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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jean H. Toal
Acting Circuit Court Judge

Appellate Case No. 2024-001997
Circuit Court Case No. 2022-CP-40-01265

Sarah J. Plant and Parker Plant, ... Plaintiffs,

v.

Avon Products, Inc.; Amaco, LLC; American Art Clay Co. Inc.;
The Bargain Barn, LLC; Beacon CMP Corporation; Belk, Inc.;
Block Drug Company, Inc.; Brenntag North America, Inc.;
Brenntag Specialties, LLC; Bristol-Myers Squibb Company;
Chattem, Inc.; Colgate-Palmolive Company; Color Techniques,
Inc.; Conopco, Inc.; Coty Inc.; Dana Classic Fragrances, Inc.;
Dillard's, Inc.; Dollar General Corporation; Elizabeth Arden, Inc.;
Estee Lauder Inc.; Estee Lauder International, Inc.; The Estee
Lauder Companies Inc.; Hamrick's Incorporated; Highwater Clays,
Inc.; Houbigant, Inc.; IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.;
IMI Fabi, LLC; Ingles Markets, Incorporated; L'Oreal USA, Inc.;
L'Oreal USA Products, Inc.; Lowcountry Grocers LLC; Martin
Himmel Inc.; May Kay Inc.; Maybelline LLC; Noxell Corporation;
Pfizer Inc.; R.T. Vanderbilt Holding Company, Inc.; Revlon
Consumer Products Corporation; Revlon, Inc.; Rite Aid of South
Carolina, Inc.; Southeastern Grocers, Inc.; Topco Associates, LLC;
Vanderbilt Minerals, LLC; Variety Wholesalers, Inc.; Variety
Wholesalers, Inc.; Vi-Jon, LLC; Walgreen Co.; Walmart, Inc.;
Whittaker, Clark & Daniels, Inc.; Winn-Dixie Stores, Inc.; Yves
Saint Laurent America, Inc. Defendants,

of which

IMI Fabi (Diana) LLC; IMI Fabi (USA) Inc.; and IMI Fabi, LLC
are the Appellants.

RECORD ON APPEAL
(VOLUME III)

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
SARAH J. PLANT and PARKER PLANT,	)	
	)	Civil Action No. 2022 CP 40 01265
Plaintiffs,	)	
	)	
v.	)	IMI FABI (DIANA) LLC’S
	)	SUPPLEMENTAL BRIEF IN SUPPORT
AVON PRODUCTS, INC., et al.,	)	OF MOTION FOR SUMMARY
	)	JUDGMENT AND MOTION TO
Defendants.	)	DISMISS FOR LACK OF PERSONAL
	)	JURISDICTION

Defendant IMI Fabi (Diana) LLC (“Defendant” or “Fabi Diana”), pursuant to Rule 56 and Rule 12 of the South Carolina Rules of Civil Procedure, respectfully submits this supplemental brief in support of its Motion for Summary Judgment and Motion to Dismiss and shows the Court as follows:

Fabi Diana has had no contacts with South Carolina related to the sale, distribution, or manufacture of cosmetic products or cosmetic talcum powder. All Fabi Diana sales of cosmetic talcum powder in the United States were sold to one customer: Cosmetic Specialties, Inc., located in New Jersey. All of those sales were done “F.O.B Fabi Diana’s dock” in Natural Bridge, New York, at which point Cosmetic Specialties, Inc., took full ownership and control, including any liability for the product after it left Fabi Diana’s loading dock. These facts distinguish Fabi Diana from other defendants whose jurisdictional arguments this Court already considered and denied. This Court lacks specific personal jurisdiction because Fabi Diana did not serve *any* market in South Carolina for cosmetic products, let alone systemically serve one, as is required under *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 141 S. Ct. 1017 (2021).

STATEMENT OF SUPPLEMENTAL FACTS

Fabi Diana adopts and re-incorporates as if set forth in full herein all facts set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those facts, Fabi Diana shows the Court as follows:

Corrado Fabi, the corporate representative of IMI Fabi Diana LLC, gave a deposition on February 15, 2023 in the instant matter and testified to the following:

- Fabi Diana has never registered to do business in the state of South Carolina. (Exhibit A, at 111: 9-12).
- Fabi Diana does not have any offices in the state of South Carolina. (*Id.*, 111: 15-17).
- Fabi Diana does not have any sales representatives that live in the state of South Carolina. (Exhibit A 111: 12-14).
- Fabi Diana does not have any plants or warehouses in the state of South Carolina. (*Id.*, 111: 15-17)
- Fabi Diana does not have any real estate holdings in the state of South Carolina. (*Id.*, 111: 18-19).
- Fabi Diana has never targeted South Carolina in its advertising. (*Id.*, 111: 20-23).
- Fabi Diana does not have any bank accounts in South Carolina. (*Id.*, 111: 24-25).
- Fabi Diana has never paid taxes in South Carolina. (*Id.*, 112: 1-2).
- Fabi Diana does not have any holdings or engage in any activity directed toward South Carolina. (*Id.*, 112: 3-6).
- Fabi Diana exclusively sold cosmetic talcum powder to Cosmetic Specialties Inc., a distributor of talc (*Id.*, 41:17-20, 43: 13-14, 106: 22-24). All cosmetic grade talc products sold by Fabi Diana were delivered F.O.B. Origin, Freight Collect, Diana. (*Id.*, 44: 1-5, 71: 1-13). In every instance, the buyer made all of the arrangements

for the shipment of the products off of Fabi Diana's premises. (*Id.*, 44: 9-12, 44: 18-45:5).

SUPPLEMENTAL ARGUMENT

Fabi Diana adopts and re-incorporates as if set forth in full herein all facts set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those facts, Fabi Diana shows the Court as follows:

In 2021, the United States Supreme Court analyzed whether Ford's contacts with the forum state were sufficiently connected with the Plaintiff's claims to support specific personal jurisdiction for product liability lawsuits. *Ford Motor Co.*, 141 S. Ct. 1017 (2021). Upon granting certiorari, the Court consolidated two cases. *Id.* at 1019. The first, involved claims brought in Montana by a citizen of Montana, following a fatal car accident that occurred while the decedent was driving a Ford Explorer in the state. *Id.* at 1022. The second involved a Plaintiff, a resident of Minnesota, seeking damages arising from a fatal accident while driving a Ford Crown Victoria in Minnesota. *Id.* Both of the vehicles at issue were purchased outside of the State where the accident occurred. *Id.* Both Plaintiffs alleged claims for product liability and negligence against Ford as the vehicle manufacturer. *Id.* at 2023.

Ford argued that since the vehicles driven by plaintiffs were designed, manufactured, and sold in states other than the forum states, the state courts (whether Montana or Minnesota) lacked jurisdiction. *Id.* at 2026. Thus, plaintiff's claims did not arise out of its contacts with the states in which the accidents occurred.

In rejecting Ford's argument, the Court focused on the nature and extent of Ford's contacts the with forum states. For many years, Ford advertised, sold, and serviced in Montana and Minnesota, the same type of vehicles that alleged to have malfunctioned and caused Plaintiffs' injuries in the forum states. *Id.* at 2028. Ford advertised in each of the States "by every means

imaginable—among them, billboards, TV and radio spots, print ads, and direct mail.” *Id.* Ford cars, including the Explorer and Crown Victoria were available for sale, whether new or used, throughout the States, at thirty-six (36) dealerships in Montana and eighty-four (84) in Minnesota. *Id.* As the Court explained, through its contacts with the forum state, Ford had “systematically served a market in Montana and Minnesota for the very vehicles that the plaintiffs allege malfunctioned and injured them in those States.” *Id.* at 1028, 1032. In turn, the Court held that because Ford itself extensively promoted, sold, and serviced the same product that Plaintiffs alleged was defective, “the relationship among the defendant, the forums and the litigation is close enough to support specific jurisdiction.” *Id.* at 1031.

The reasoning in *Ford Motor Company* is dispositive of this case. Ms. Plant alleges that she was injured by talc based cosmetic products while she was in South Carolina. To have jurisdiction over the defendant, Fabi Diana must have systematically served a market in South Carolina for the very cosmetic products that plaintiff alleged caused her harm. Unlike the *Ford* defendant, Fabi Diana has never advertised in the forum state. Nor has it sold or serviced anything in the forum state.

Further distinguishing itself from the circumstances that supported specific jurisdiction in *Ford Motor*, Fabi Diana does not have any holdings or engage in any activity directed toward South Carolina. *See* Exhibit A, 112: 3-6. Fabi Diana has never registered to do business in the state of South Carolina; it does not have any offices in the state of South Carolina; it does not have any sales representatives that live in the state of South Carolina; it does not have any offices, plants or warehouses in the state of South Carolina; it does not have any real estate holdings in the state of South Carolina; it has never targeted South Carolina in its advertising; it does not have any bank accounts. *See Id.*, 111: 9-12, 111: 12-14, 111: 15-17, 111: 18-19, 111: 20-23, 111: 24-25

Quite contrary to the facts found dispositive in *Ford Motor*, Fabi Diana exclusively sold cosmetic talcum powder to Cosmetic Specialties Inc., a New Jersey company. *See Id.*, 41:17-20, 43: 13-14, 106: 22-24. All cosmetic grade talc products sold by Fabi Diana were delivered EXW or F.O.B. Origin, Freight Collect, Diana. *See Exhibit A*, 44: 1-5, 71: 1-13. In every instance, the buyer made all of the arrangements for the shipment of the products off of Fabi Diana's premises. *See Id.*, 44: 9-12, 44: 18-45:5. Fabi Diana's contacts with South Carolina are wholly absent and well short of the 'so extensive' contacts necessary for this Court to have personal jurisdiction over Fabi Diana. Thus, under *Ford*, this Court lacks personal jurisdiction.

CONCLUSION

For these reasons discussed above, as well as in our previously filed Motion for Summary Judgment and supporting brief, and Motion to Dismiss and supporting brief, Defendant IMI Fabi (Diana) LLC respectfully requests that this Honorable Court enter an Order granting its Motion for Summary Judgment and Motion to Dismiss, and that all claims be dismissed.

Respectfully submitted this, the 17th day of February, 2023.

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STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND CASE NO. 2022-CP-40-1265

Sarah J. Plant and Parker Plant,
 Plaintiffs,

vs.

Avon Products, Inc., et al
 Defendants.

REMOTE VIDEOTAPED DEPOSITION OF IMI FABI DIANA, LLC,
IMI FABI USA, INC., AND IMI FABI, LLC,
GIVEN BY CORRADO FABI

DATE TAKEN: February 15, 2023
TIME BEGAN: 9:04 a.m.
TIME ENDED: 1:00 p.m.
REPORTED BY: Traci L. Barr

**CERTIFIED
TRANSCRIPT**

1 MS. BOLLINGER: Okay. I'm going to attach that as
2 Exhibit 5.

3 (Exhibit Number 5 marked for
4 identification.)

5 EXAMINATION RESUMED

6 BY MS. BOLLINGER:

7 Q. And for clarity, all of those cosmetic talc
8 products would have come from the Guanguang
9 province of China, correct?

10 A. Yes.

11 Q. Okay. You have mentioned Cosmetic Specialties a
12 couple of times?

13 A. Yes.

14 Q. What is Cosmetic Specialities?

15 A. To IMI Fabi is a distributor for our pharma and
16 cosmetic products.

17 Q. How long has Cosmetic Specialities been a
18 distributor for the IMI Fabi entities pharma and
19 cosmetic products?

20 A. Since the beginning, 2001.

21 Q. Between 2001 and today, has IMI Fabi ever used
22 any other distributor for its pharma and cosmetic
23 products?

24 A. No.

25 Q. I'm sorry. That was a no?

1 would appreciate it. And, ideally, we could
2 attach that as Exhibit 6.

3 (Exhibit Number 6 marked for
4 identification.)

5 EXAMINATION RESUMED

6 BY MS. BOLLINGER:

7 **Q. Do you know if IMI Fabi, LLC, still has the**
8 **contract with Cosmetic Specialities from 2004?**

9 A. The contract is valid because, I mean, we have
10 kept, over the years, the same relationship, so
11 --

12 **Q. Okay.**

13 A. -- Cosmetic Specialities is our distributor in
14 US.

15 MS. BOLLINGER: Okay. And I would just ask that the
16 IMI Fabi contract with Cosmetic Specialties be
17 produced as Exhibit 7.

18 (Exhibit Number 7 marked for
19 identification.)

20 EXAMINATION RESUMED

21 BY MS. BOLLINGER:

22 **Q. Sorry, Mr. Fabi, I'm trying to look at things to**
23 **reorganize my questions based on what you've told**
24 **me. Okay?**

25 A. Take your time.

1 Q. Between 2001 and 2004, did IMI Fabi send talc to
2 Cosmetic Specialities to distribute?

3 A. Cosmetic Specialities always organized to pick up
4 material at our facility, so our material was
5 sold FOB Diana.

6 Q. Can you just explain to me what FOB means?

7 A. Free of board. It's an inter term. It's an
8 international terminology.

9 Q. Okay. What is free on board?

10 A. That you put on the truck, and the truck is
11 organized by another party, in this case Cosmetic
12 Specialities.

13 Q. Between 2004 and today, would Cosmetic
14 Specialities -- let me strike that.
15 Between 2004 and today, did IMI Fabi, LLC, ever
16 send any talc directly to Cosmetic Specialities?

17 A. No.

18 Q. Okay. And so to understand -- my understanding
19 of Cosmetic Specialities is that it does the
20 organizing of transporting the product to the
21 customer. Correct?

22 A. No.

23 DEFENSE ATTORNEY: Object to the form.

24 THE DEPONENT: No. Absolutely, Cosmetic Specialities
25 buys the product and sells our products according

1 to its policy. We have absolutely no knowledge
2 of what Cosmetic Specialities is doing about,
3 say, strategy, pricing, and so on. On top of
4 that, Cosmetic Specialities organized the
5 freights.

6 EXAMINATION RESUMED

7 BY MS. BOLLINGER:

8 Q. Have you read the depositions in this case?

9 A. Not all, but some.

10 Q. Okay. Which deposition -- okay. Which
11 depositions did you read in this case?

12 A. I don't know. There are so many papers that I'm
13 lost.

14 Q. Okay. Did you read the deposition of Sarah
15 Plant?

16 A. No.

17 Q. Okay.

18 A. But I'm aware of what she's going through.

19 Q. Are you aware of any of the makeup products that
20 Sarah Plant used?

21 A. No.

22 Q. Are you aware that Ms. Plant testified to wearing
23 CoverGirl pressed powders?

24 A. No.

25 Q. And so you wouldn't be -- I'm sorry. Go ahead.

1 Q. Okay. And it's paragraph 23 specifically.

2 We talked a little bit about FOB earlier?

3 A. Yes.

4 Q. Can you just tell me what EXW is?

5 A. Ex Works.

6 Q. What is -- you said exports?

7 A. Ex Works.

8 Q. What exactly is that?

9 A. The same -- more or less, is the same meaning of

10 FOB. It means that the material was sold from

11 the factory.

12 Q. Okay.

13 A. And freight was organized by someone else.

14 Q. Okay. And so this paragraph 23 says --

15 references the buyer multiple times, correct?

16 A. Yes.

17 Q. Okay. And that buyer would be Cosmetic

18 Specialities?

19 A. Yes.

20 Q. Okay. Is there a reason why IMI Fabi Diana did

21 not state that the buyer was Cosmetic

22 Specialities?

23 DEFENSE ATTORNEY: Object to the form.

24 THE DEPONENT: I have no idea. I'm not Mr. Brown.

25 EXAMINATION RESUMED

1 Q. If IMI Fabi sold talc -- strike that.

2 If IMI Fabi Diana sold cosmetic talc directly to
3 Noxell, would it be a violation of your agreement
4 with Cosmetic Specialities?

5 A. Yes.

6 Q. If IMI Fabi, LLC, sold cosmetic talc directly to
7 Noxell, would it be a violation of the agreement
8 with Cosmetic Specialities?

9 A. Yes.

10 Q. Did IMI Fabi Diana ever sell cosmetic talc from
11 Alabama?

12 A. No.

13 Q. Did IMI Fabi Diana ever sell cosmetic talc from
14 Montana?

15 A. No.

16 Q. Did IMI Fabi, LLC, ever sell cosmetic talc from
17 Alabama?

18 A. No.

19 Q. Did IMI Fabi, LLC, ever sell cosmetic talc -- I'm
20 sorry -- cosmetic talc from Montana?

21 A. No.

22 Q. Was IMI Fabi Diana allowed to sell directly to
23 Procter & Gamble?

24 A. No.

25 Q. If IMI Fabi Diana had sold directly to Procter &

1 South Carolina?

2 A. No.

3 Q. Is it paid -- does it pay any taxes to the State
4 of South Carolina?

5 A. No.

6 Q. Has it ever had any of those things or done any
7 of those things in the State of South Carolina?

8 A. No.

9 Q. Was IMI Fabi Diana registered to do business in
10 the State of South Carolina?

11 A. No.

12 Q. Did it have any sales representatives in the
13 State of South Carolina?

14 A. No.

15 Q. Did it have any offices, plants, or warehouses in
16 the State of South Carolina?

17 A. No.

18 Q. Did it have any real estate in South Carolina?

19 A. No.

20 Q. Did it ever do any advertising targeted to
21 customers or potential customers in South
22 Carolina?

23 A. No.

24 Q. Did it have any bank accounts in South Carolina?

25 A. No.

1 Q. Did it pay any taxes to South Carolina?

2 A. No.

3 Q. Does it have any of those holdings or engage in
4 any of those activities towards South Carolina
5 today?

6 A. No.

7 Q. IMI Fabi USA, does it have any business that it
8 does at all today?

9 A. No.

10 Q. Has IMI Fabi USA ever done any business at all in
11 terms of buying or selling anything?

12 A. No.

13 Q. IMI Fabi -- has IMI Fabi USA ever owned any real
14 estate in South Carolina?

15 A. No.

16 Q. Does it presently own any real estate in South
17 Carolina?

18 A. No.

19 Q. Has IMI Fabi USA ever had a bank account in South
20 Carolina?

21 A. No.

22 Q. Does IMI Fabi USA presently have any bank
23 accounts in South Carolina?

24 A. No.

25 MS. O'NEILL: Those are all my questions.

CERTIFICATE

I, the undersigned, Traci L. Barr, RPR,
Notary Public in and for the State of South
Carolina, do hereby certify that the deposition
of CORRADO FABI was taken on the 15th day of
February, 2023, that the within deponent was
sworn to tell the truth, and that the foregoing
is an accurate transcription of the testimony
taken under oath; that all exhibits entered
herein are attached hereto (if requested by
counsel) and made a part of this deposition.

I further certify that I am neither counsel
nor solicitor to any of the parties in said suit,
nor interested in the event of the cause.

In witness whereof, I have hereunto set my
hand and seal this 16th day of February, 2023.



Traci L. Barr, RPR
Notary Public for South Carolina
My Commission Expires: 4/24/29

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) IN THE COURT OF COMMON PLEAS

SARAH J. PLANT and PARKER PLANT,)
)
Plaintiffs,)
)
v.)
)
AVON PRODUCTS, INC., et al.,)
)
Defendants.)
)

Civil Action No. 2022 CP 40 01265

**IMI FABI, LLC’S SUPPLEMENTAL
BRIEF IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AND
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION**

Defendant IMI Fabi, LLC (“Defendant” or “Fabi LLC”), pursuant to Rule 56 and Rule 12 of the South Carolina Rules of Civil Procedure, respectfully submits this supplemental brief in support of its Motion for Summary Judgment and Motion to Dismiss and shows the Court as follows:

Fabi LLC has had no contacts with South Carolina related to the sale, distribution, or manufacture of cosmetic products or cosmetic talcum powder. All Fabi LLC sales of cosmetic talcum powder in the United States were sold to one customer, Cosmetic Specialties, Inc., which is located in New Jersey. All of those sales were done “F.O.B Fabi LLC’s dock” in Benwood, West Virginia, at which point Cosmetic Specialties, Inc., took full ownership and control, including any liability for the product after it left Fabi LLC’s West Virginia loading dock. There is no evidence that any shipment left that dock and went to South Carolina. These facts distinguish Fabi LLC from other defendants whose jurisdictional arguments this Court has already considered and denied. This Court lacks specific personal jurisdiction because Fabi LLC did not serve *any* market in South Carolina for cosmetic products, let alone systemically serve one, as is required under *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 141 S. Ct. 1017 (2021).

SUPPLEMENTAL FACTS

Fabi LLC adopts and re-incorporates as if set forth in full herein all facts set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those facts, Fabi LLC shows the Court as follows:

Corrado Fabi, the corporate representative of Fabi LLC, gave a deposition in the current matter on February 15, 2023, and testified to the following:

- Fabi LLC has never registered to do business in the state of South Carolina. (Exhibit A, at 110: 3-6).
- Fabi LLC does not have any offices in the state of South Carolina. (*Id.*, 110: 7-9).
- Fabi LLC does not have any employees in the state of South Carolina. (*Id.*, 110: 10-12).
- Fabi LLC does not have any sales representatives that live in the state of South Carolina. (Exhibit A 110: 13-15).
- Fabi LLC does not have any plants or warehouses in the state of South Carolina. (*Id.*, 110: 16-18)
- Fabi LLC does not have any real estate holdings in the state of South Carolina. (*Id.*, 110: 19-21).
- Fabi LLC has never targeted South Carolina in its advertising. (*Id.*, 110: 22-24).
- Fabi LLC does not have any bank accounts in South Carolina. (*Id.*, 110: 25- 111:2).
- Fabi LLC has never paid taxes in South Carolina. (*Id.*, 111: 3-5)
- Fabi LLC has never sold cosmetic talc to any manufacture of cosmetic products. (*Id.*, 105: 16- 106:9).
- Fabi LLC exclusively sold cosmetic talcum powder to Cosmetic Specialties Inc, a distributor of talc. (*Id.*, 41:17-20, 43: 13-14, 106: 22-24). From 2004 to present, all cosmetic grade talc products sold by Fabi LLC were delivered EXW or F.O.B. Origin, Freight Collect, West Virginia; Fabi LLC has never sent any talc directly to

Cosmetic Specialties Inc. (Exhibit A, 44:1-17, 71: 1-13) In every instance, the buyer made all of the arrangements for the shipment of the products off of Fabi LLC's premises. (*Id.*, 44: 9-12, 44:18- 45:5).

- Fabi LLC has sold industrial talc into South Carolina. (*Id.*, 114: 17-21). From 2010 to 2022, the volume of industrial talc sold to South Carolina customers in the past twelve years accounted for between 2.4 - 4.1% of Fabi LLC's total volume of industrial talc sold in any individual year. (*Id.*, 84: 23- 85: 11).
- In 2011, Ms. Plant stopped using Covergirl powder make up products. (Exhibit B, 329:8-17).

SUPPLEMENTAL ARGUMENT

Fabi LLC adopts and re-incorporates as if set forth in full herein all arguments set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those arguments, Fabi LLC shows the Court as follows:

In 2021, the United States Supreme Court analyzed whether Ford's contacts with the forum state were sufficiently connected with the Plaintiff's claims to support specific personal jurisdiction for product liability lawsuits. *Ford Motor Co.*, 141 S. Ct. 1017 (2021). Upon granting certiorari, the Court consolidated two cases. *Id.* at 1019. The first, involved claims brought in Montana by a citizen of Montana, following a fatal car accident that occurred while the decedent was driving a Ford Explorer in the state. *Id.* at 1022. The second involved a Plaintiff, a resident of Minnesota, seeking damages arising from a fatal accident while driving a Ford Crown Victoria in Minnesota. *Id.* Both of the vehicles at issue were purchased outside of the State where the accident occurred. *Id.* Both Plaintiffs alleged claims for product liability and negligence against Ford as the vehicle manufacturer. *Id.* at 2023.

Ford argued that since the vehicles driven by plaintiffs were designed, manufactured, and sold in states other than the forum states, the state courts (whether Montana or Minnesota) lacked

jurisdiction. *Id.* at 2026. Thus, plaintiff's claims did not arise out of its contacts with the states in which the accidents occurred.

In rejecting Ford's argument, the Court focused on the nature and extent of Ford's contacts with the forum states. For many years, Ford advertised, sold, and serviced in Montana and Minnesota, the same type of vehicles that alleged to have malfunctioned and caused Plaintiffs' injuries in the forum states. *Id.* at 2028. Ford advertised in each of the States "by every means imaginable—among them, billboards, TV and radio spots, print ads, and direct mail." *Id.* Ford cars, including the Explorer and Crown Victoria were available for sale, whether new or used, throughout the States, at thirty-six (36) dealerships in Montana and eighty-four (84) in Minnesota. *Id.* As the Court explained, through its contacts with the forum state, Ford had "systematically served a market in Montana and Minnesota for the very vehicles that the plaintiffs allege malfunctioned and injured them in those States." *Id.* at 1028, 1032. In turn, the Court held that because Ford itself extensively promoted, sold, and serviced the same product that Plaintiffs alleged was defective, "the relationship among the defendant, the forums and the litigation is close enough to support specific jurisdiction." *Id.* at 1031.

The reasoning in *Ford Motor Company* is dispositive of this case. Ms. Plant alleges that she was injured by talc based cosmetic products while she was in South Carolina. To have jurisdiction over the defendant, Fabi LLC must have systematically served a market in South Carolina for the very cosmetic products that plaintiff alleged caused her harm. Unlike the *Ford* defendant, Fabi LLC has never advertised in the forum state. Nor has it sold or serviced anything in the forum state.

Furhter, Fabi LLC has never registered to do business in the state of South Carolina; Fabi LLC does not have any offices in the state of South Carolina; Fabi LLC does not have any employees in the state of South Carolina; Fabi LLC does not have any sales representatives that live in the state of South Carolina; Fabi LLC does not have any plants or warehouses in the state of South Carolina; Fabi LLC does not have any real estate holdings in the state of South Carolina; Fabi LLC has never targeted South Carolina in its advertising; Fabi LLC does not have any bank accounts in South Carolina; Fabi LLC has never paid taxes in South Carolina. *See Exhibit A*, at 110: 3-6, 110: 7-9, 110: 10-12, 110: 13-15, 110: 16-18, 110: 19-21, 110: 22-24, 111: 3-5, 105: 16-106:9.

Moreover, Fabi LLC exclusively sold cosmetic talcum powder to Cosmetic Specialties Inc.. *See Id.*, at 106: 22-24; 43: 13-14. From 2004 to present, all cosmetic grade talc products sold by Fabi LLC were delivered EXW or F.O.B. Origin, Freight Collect, West Virginia; Fabi LLC has never sent any talc directly to Cosmetic Specialties Inc. *Id.*, at 44: 1-17. In every instance, the buyer made all of the arrangements for the shipment of the products off of Fabi LLC's premises. *Id.*, at 44: 1-5.

Without additional contacts, Fabi LLC's sales of industrial talc are not sufficient to establish specific personal jurisdiction over Defendant. First, unlike the Defendants in *Ford Motor*, industrial talc is not the same product as that alleged to have caused the injury – indeed it is a totally different product, sourced from totally different mines, processed a totally different way, and sold to completely different companies than the talc Plaintiffs here claim caused their injuries. But the lack of basis to exercise jurisdiction goes even further because even with those sales of industrial talc, Fabi LLC's contacts are not 'so extensive.' In fact, those sales of industrial grade talc never account for more than 4.1% of the total volume of industrial talc sold by Fabi LLC

between 2010 and 2022. *See Id.*, 84: 23- 85: 11. Moreover, since Ms. Plant stopped using Covergirl products in 2011, the Court minimum contacts analysis is constrained to only Fabi LLC's 2010 sales of industrial talc. *See Exhibit B*, 329:8-17. Fabi LLC's sales to South Carolina represent only 3.4 % of the total volume of industrial talc sold by Fabi LLC. *See Id.*, 84: 23- 85; *Contra. Ford Motor Co.*, 141 S. Ct. at 1028. (Apart from its extensive sales of vehicles to the forum state, Ford also had company dealers who serviced Ford vehicles in the forum state, and the Ford distributed replacement parts both to its own dealers and independent body shops.) Fabi LLC's small fraction of sales to South Carolina State are not 'extensive contacts' required under the *Ford* analysis and involve a product unrelated to this litigation. Thus, this Court lacks personal jurisdiction.

CONCLUSION

For these reasons discussed above, as well as in our previously filed Motion for Summary Judgment and supporting brief, and Motion to Dismiss and supporting brief, Defendant IMI Fabi LLC respectfully requests that this Honorable Court enter an Order granting its Motion for Summary Judgment and Motion to Dismiss, and that all claims be dismissed.

Respectfully submitted this, the 17th day of February, 2023.

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Counsel for Defendant IMI Fabi, LLC

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND CASE NO. 2022-CP-40-1265

Sarah J. Plant and Parker Plant,
 Plaintiffs,

vs.

Avon Products, Inc., et al
 Defendants.

REMOTE VIDEOTAPED DEPOSITION OF IMI FABI DIANA, LLC,
IMI FABI USA, INC., AND IMI FABI, LLC,
GIVEN BY CORRADO FABI

DATE TAKEN: February 15, 2023
TIME BEGAN: 9:04 a.m.
TIME ENDED: 1:00 p.m.
REPORTED BY: Traci L. Barr

**CERTIFIED
TRANSCRIPT**



AdvancedONE
LEGAL

(866) 715-7770
advancedONE.com

EXHIBIT A

1 MS. BOLLINGER: Okay. I'm going to attach that as
2 Exhibit 5.

3 (Exhibit Number 5 marked for
4 identification.)

5 EXAMINATION RESUMED

6 BY MS. BOLLINGER:

7 Q. And for clarity, all of those cosmetic talc
8 products would have come from the Guanguang
9 province of China, correct?

10 A. Yes.

11 Q. Okay. You have mentioned Cosmetic Specialties a
12 couple of times?

13 A. Yes.

14 Q. What is Cosmetic Specialities?

15 A. To IMI Fabi is a distributor for our pharma and
16 cosmetic products.

17 Q. How long has Cosmetic Specialities been a
18 distributor for the IMI Fabi entities pharma and
19 cosmetic products?

20 A. Since the beginning, 2001.

21 Q. Between 2001 and today, has IMI Fabi ever used
22 any other distributor for its pharma and cosmetic
23 products?

24 A. No.

25 Q. I'm sorry. That was a no?

1 would appreciate it. And, ideally, we could
2 attach that as Exhibit 6.

3 (Exhibit Number 6 marked for
4 identification.)

5 EXAMINATION RESUMED

6 BY MS. BOLLINGER:

7 **Q. Do you know if IMI Fabi, LLC, still has the**
8 **contract with Cosmetic Specialities from 2004?**

9 A. The contract is valid because, I mean, we have
10 kept, over the years, the same relationship, so
11 --

12 **Q. Okay.**

13 A. -- Cosmetic Specialities is our distributor in
14 US.

15 MS. BOLLINGER: Okay. And I would just ask that the
16 IMI Fabi contract with Cosmetic Specialties be
17 produced as Exhibit 7.

18 (Exhibit Number 7 marked for
19 identification.)

20 EXAMINATION RESUMED

21 BY MS. BOLLINGER:

22 **Q. Sorry, Mr. Fabi, I'm trying to look at things to**
23 **reorganize my questions based on what you've told**
24 **me. Okay?**

25 A. Take your time.

1 Q. Between 2001 and 2004, did IMI Fabi send talc to
2 Cosmetic Specialities to distribute?

3 A. Cosmetic Specialities always organized to pick up
4 material at our facility, so our material was
5 sold FOB Diana.

6 Q. Can you just explain to me what FOB means?

7 A. Free of board. It's an inter term. It's an
8 international terminology.

9 Q. Okay. What is free on board?

10 A. That you put on the truck, and the truck is
11 organized by another party, in this case Cosmetic
12 Specialities.

13 Q. Between 2004 and today, would Cosmetic
14 Specialities -- let me strike that.

15 Between 2004 and today, did IMI Fabi, LLC, ever
16 send any talc directly to Cosmetic Specialities?

17 A. No.

18 Q. Okay. And so to understand -- my understanding
19 of Cosmetic Specialities is that it does the
20 organizing of transporting the product to the
21 customer. Correct?

22 A. No.

23 DEFENSE ATTORNEY: Object to the form.

24 THE DEPONENT: No. Absolutely, Cosmetic Specialities
25 buys the product and sells our products according

1 to its policy. We have absolutely no knowledge
2 of what Cosmetic Specialities is doing about,
3 say, strategy, pricing, and so on. On top of
4 that, Cosmetic Specialities organized the
5 freights.

6 EXAMINATION RESUMED

7 BY MS. BOLLINGER:

8 Q. Have you read the depositions in this case?

9 A. Not all, but some.

10 Q. Okay. Which deposition -- okay. Which
11 depositions did you read in this case?

12 A. I don't know. There are so many papers that I'm
13 lost.

14 Q. Okay. Did you read the deposition of Sarah
15 Plant?

16 A. No.

17 Q. Okay.

18 A. But I'm aware of what she's going through.

19 Q. Are you aware of any of the makeup products that
20 Sarah Plant used?

21 A. No.

22 Q. Are you aware that Ms. Plant testified to wearing
23 CoverGirl pressed powders?

24 A. No.

25 Q. And so you wouldn't be -- I'm sorry. Go ahead.

1 Q. Okay. And it's paragraph 23 specifically.

2 We talked a little bit about FOB earlier?

3 A. Yes.

4 Q. Can you just tell me what EXW is?

5 A. Ex Works.

6 Q. What is -- you said exports?

7 A. Ex Works.

8 Q. What exactly is that?

9 A. The same -- more or less, is the same meaning of
10 FOB. It means that the material was sold from
11 the factory.

12 Q. Okay.

13 A. And freight was organized by someone else.

14 Q. Okay. And so this paragraph 23 says --
15 references the buyer multiple times, correct?

16 A. Yes.

17 Q. Okay. And that buyer would be Cosmetic
18 Specialities?

19 A. Yes.

20 Q. Okay. Is there a reason why IMI Fabi Diana did
21 not state that the buyer was Cosmetic
22 Specialities?

23 DEFENSE ATTORNEY: Object to the form.

24 THE DEPONENT: I have no idea. I'm not Mr. Brown.

25 EXAMINATION RESUMED

1 A. That's industrial talc. Cosmetic Specialities
2 has nothing to do.

3 MS. BOLLINGER: Okay. I don't know if I said it, but
4 I'm attaching the e-mail from Ms. Alida as
5 Exhibit 14.

6 (Exhibit Number 14 marked for
7 identification.)

8 MS. O'NEILL: Got it.

9 EXAMINATION RESUMED

10 BY MS. BOLLINGER:

11 Q. Okay. I am also going to also share my screen
12 again. Okay. And this document is IMI
13 Fabi-Plant 151 to IMI Fabi-Plant 152, and this is
14 sales in South Carolina from 2010 to 2022, and
15 this -- this is for IMI Fabi, LLC, correct?

16 A. Yes.

17 Q. Okay. What is the difference between this
18 document and the previous document that we looked
19 at, the previous charts?

20 A. Previous chart was revenues in US dollar, and
21 these are the volumes sold in short tons. When I
22 say short tons, because we use metric tons.

23 Q. Okay. And so in 2010, it appears -- is it 78,646
24 metric tons sold to South Carolina?

25 A. No. It's -- those, it's -- it's that row.

1 That's in volume sold to South Carolina.

2 Q. Okay.

3 A. The volume at the bottom is the total volume sold
4 from Benwood to United States.

5 Q. Okay. So what this is saying is that in 2010,
6 sales to South Carolina made up 3.4 percent of
7 the total talc sales from Benwood, correct?

8 A. Yes.

9 Q. Understand. And that's the same for 2010 through
10 2022?

11 A. Yeah.

12 Q. Got it. Thank you.

13 MS. BOLLINGER: We'll attach this one as IMI Fabi 15.
14 (Exhibit Number 15 marked for
15 identification.)

16 MS. O'NEILL: Is it 151 and 152 is 15, or are you going
17 to do those as different exhibits?

18 MS. BOLLINGER: 151 and 152 is going to be 15.

19 MS. O'NEILL: Thank you.

20 EXAMINATION RESUMED

21 BY MS. BOLLINGER:

22 Q. And I can ask you really quickly. What is this
23 document we're looking at with 152 has -- it's --
24 it appears to me, at least, that it has the
25 similar chart that we just looked at on 151, and

1 it makes sense, I would go stand by the screen so
2 he's still looking at the camera. Does that
3 work?

4 MS. BOLLINGER: Yeah, that's fine. Just don't nod or
5 indicate to him.

6 MS. O'NEILL: Oh, I'm not going to.

7 MS. BOLLINGER: Okay.

8 MS. O'NEILL: I'm not going to do that, Jordan. If you
9 really want me to, we can arrange it --

10 THE DEPONENT: You can stay there.

11 MS. O'NEILL: I guess I could sit here.

12 THE DEPONENT: You know, Mrs. Elizabeth is very strict.
13 I tell you. She has a big stick.

14 EXAMINATION

15 BY MS. O'NEILL:

16 Q. Okay. On that note, Mr. Fabi, did IMI Fabi, LLC,
17 ever sell cosmetic talc to Noxell?

18	A.	No.

19 Q. Did IMI Fabi Diana ever sell cosmetic talc to
20 Noxell?

21 | A. No.

22 Q. Would IMI Fabi be allowed to sell cosmetic talc
23 directly to Noxell under IMI Fabi's agreement
24 with Cosmetic Specialities?

25 A. No, because we have an exclusive agreement.

1 Q. If IMI Fabi sold talc -- strike that.

2 If IMI Fabi Diana sold cosmetic talc directly to
3 Noxell, would it be a violation of your agreement
4 with Cosmetic Specialities?

5 A. Yes.

6 Q. If IMI Fabi, LLC, sold cosmetic talc directly to
7 Noxell, would it be a violation of the agreement
8 with Cosmetic Specialities?

9 A. Yes.

10 Q. Did IMI Fabi Diana ever sell cosmetic talc from
11 Alabama?

12 A. No.

13 Q. Did IMI Fabi Diana ever sell cosmetic talc from
14 Montana?

15 A. No.

16 Q. Did IMI Fabi, LLC, ever sell cosmetic talc from
17 Alabama?

18 A. No.

19 Q. Did IMI Fabi, LLC, ever sell cosmetic talc -- I'm
20 sorry -- cosmetic talc from Montana?

21 A. No.

22 Q. Was IMI Fabi Diana allowed to sell directly to
23 Procter & Gamble?

24 A. No.

25 Q. If IMI Fabi Diana had sold directly to Procter &

1 testing?

2 A. V Labs.

3 Q. Does -- quickly for the record, is IMI Fabi, LLC,
4 registered to do business in the State of South
5 Carolina?

6 A. No.

7 Q. Does it have any offices in the State of South
8 Carolina?

9 A. No.

10 Q. Does it have any employees in the State of South
11 Carolina?

12 A. No.

13 Q. Does it have any sales representatives that live
14 in the State of South Carolina?

15 A. No.

16 Q. Does it have any plants or warehouses in the
17 State of South Carolina?

18 A. No.

19 Q. Does it have any real estate holdings in the
20 State of South Carolina?

21 A. No.

22 Q. Has it done any advertising targeted to the State
23 of South Carolina?

24 A. No.

25 Q. Does it have any bank accounts in the State of

1 South Carolina?

2 A. No.

3 Q. Is it paid -- does it pay any taxes to the State
4 of South Carolina?

5 A. No.

6 Q. Has it ever had any of those things or done any
7 of those things in the State of South Carolina?

8 A. No.

9 Q. Was IMI Fabi Diana registered to do business in
10 the State of South Carolina?

11 A. No.

12 Q. Did it have any sales representatives in the
13 State of South Carolina?

14 A. No.

15 Q. Did it have any offices, plants, or warehouses in
16 the State of South Carolina?

17 A. No.

18 Q. Did it have any real estate in South Carolina?

19 A. No.

20 Q. Did it ever do any advertising targeted to
21 customers or potential customers in South
22 Carolina?

23 A. No.

24 Q. Did it have any bank accounts in South Carolina?

25 A. No.

1 & Gamble by IMI Fabi Diana that we looked at
2 earlier, those as well were in IMI Fabi -- IMI
3 Fabi Diana's position. Those were found in -- go
4 ahead.

5 THE DEPONENT: Yes.

6 MS. O'NEILL: I think we can stipulate to that.

7 MS. BOLLINGER: Okay. I'm --

8 MS. O'NEILL: He needs to do a quick check back, but I
9 believe we can stipulate to that.

10 MS. BOLLINGER: Okay. I understand.

11 EXAMINATION RESUMED

12 BY MS. BOLLINGER:

13 Q. So at least between 2001 and 2004, IMI Fabi Diana
14 was aware that Procter & Gamble was a customer of
15 Cosmetic Specialities, correct?

16 A. Yes.

17 Q. Okay. And IMI Fabi, LLC, has, in fact, sold
18 industrial talc into the State of South Carolina,
19 correct?

20 A. IMI Fabi, LLC, has sold industrial talc to South
21 Carolina.

22 MS. BOLLINGER: Okay. That's all I have.

23 MS. O'NEILL: We'll read and sign.

24 THE VIDEOGRAPHER: Can we go off the record?

25 MS. O'NEILL: Yeah.

CERTIFICATE

I, the undersigned, Traci L. Barr, RPR,
Notary Public in and for the State of South
Carolina, do hereby certify that the deposition
of CORRADO FABI was taken on the 15th day of
February, 2023, that the within deponent was
sworn to tell the truth, and that the foregoing
is an accurate transcription of the testimony
taken under oath; that all exhibits entered
herein are attached hereto (if requested by
counsel) and made a part of this deposition.

I further certify that I am neither counsel
nor solicitor to any of the parties in said suit,
nor interested in the event of the cause.

In witness whereof, I have hereunto set my
hand and seal this 16th day of February, 2023.



Traci L. Barr, RPR
Notary Public for South Carolina
My Commission Expires: 4/24/29

1 it as to my client.

2 Did you at some point -- I think -- if
3 I heard you correctly, you correct me if I'm
4 wrong, eventually -- you used the CoverGirl, but
5 the usage as you got out of high school, did it
6 start to diminish? Is that fair?

7 A. It did start to lessen.

8 Q. And about what time or about how old were
9 you when the CoverGirl started to get phased out
10 and possibly replaced by something else for
11 whatever reason?

12 A. The CoverGirl liquid foundation stayed
13 pretty consistent. I know we've been talking
14 about the pressed powder, but it started at the
15 end of my time at The Colony apartments. That's
16 when I started using more Mary Kay products
17 again.

18 Q. And with regard to -- and you're right.
19 We haven't been talking about the liquid, and I'm
20 not really going to talk about liquid CoverGirl.

21 A. Right.

22 Q. But there was a time you said where you
23 started to kind of use that more prevalently than
24 the CoverGirl pressed foundation; is that right?

25 A. I used them together. I used CoverGirl

REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF HAMILTON

I, MELISSA M. SMITH, Licensed Court
Reporter, with offices in Chattanooga, Tennessee,
hereby certify that I reported the foregoing
deposition of SARAH J. PLANT by machine shorthand
to the best of my skills and abilities, and
thereafter the same was reduced to typewritten
form by me. I am not related to any of the
parties named herein, nor their counsel, and have
no interest, financial or otherwise, in the
outcome of the proceedings.

Melissa M. Smith

MELISSA M. SMITH, RPR, CCR, LCR
LCR # 122 - Expires: 6/30/2024

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

SARAH J. PLANT and PARKER PLANT,)

Plaintiffs,)

v.)

AVON PRODUCTS, INC., et al.,)

Defendants.)

IN THE COURT OF COMMON PLEAS

FOR THE FIFTH JUDICIAL CIRCUIT

Civil Action No. 2022 CP 40 01265

**IMI FABRI (USA) INC.’S
SUPPLEMENTAL BRIEF IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT AND MOTION TO
DISMISS FOR LACK OF PERSONAL
JURISDICTION**

Defendant IMI Fabi (USA) Inc. (“Defendant” or “Fabi USA”), pursuant to Rule 56 and Rule 12 of the South Carolina Rules of Civil Procedure, respectfully submits this supplemental brief in support of its Motion for Summary Judgment and Motion to Dismiss and shows the Court as follows:

Fabi USA is a holding company that has never conducted any business or operations. It has never manufactured or sold any products. It does not have and has never had any real estate or financial holdings in South Carolina. It has no bank accounts, employees, or other contacts with South Carolina. This Court lacks specific personal jurisdiction over Fabi USA because the utter lack of contact fails to rise to the “systemic” connection required by *Ford Motor Company*. *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 141 S. Ct. 1017 (2021).

SUPPLEMENTAL FACTS

Fabi USA adopts and re-incorporates as if set forth in full herein all facts set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those facts, Fabi USA shows the Court as follows:

Corrado Fabi, the corporate representative of IMI Fabi (USA) Inc., gave a deposition on February 15, 2023, and testified to the following:

- Fabi USA has never engaged in any manufacturing, sale, distribution or other business or operations, including but not limited to business operations related to the purchase or sale of talcum powder. (Exhibit A, 79:24- 80:3, 112: 7-12).
- Fabi USA's sole business is to hold all membership interest in IMI Fabi, LLC. (*Id.*, 27: 18-19).
- Fabi USA does not now own and has never owned any real estate in South Carolina. (*Id.*, 112: 16-18).
- Fabi USA currently does not have a bank account in South Carolina and has never had a bank account in South Carolina. (*Id.*, 112: 19-24).

SUPPLEMENTAL ARGUMENT

Fabi USA adopts and re-incorporates as if set forth in full herein all arguments set forth in its 5/13/2022 Motion to Dismiss and its 1/13/2023 Motion for Summary Judgment. In addition to those arguments, Fabi USA shows the Court as follows:

In 2021, the United States Supreme Court analyzed whether Ford's contacts with the forum state were sufficiently connected with the Plaintiff's claims to support specific personal jurisdiction for product liability lawsuits. *Ford Motor Co.*, 141 S. Ct. 1017 (2021). Upon granting certiorari, the Court consolidated two cases. *Id.* at 1019. The first, involved claims brought in Montana by a citizen of Montana, following a fatal car accident that occurred while the decedent was driving a Ford Explorer in the state. *Id.* at 1022. The second involved a Plaintiff, a resident of Minnesota, seeking damages arising from a fatal accident while driving a Ford Crown Victoria in Minnesota. *Id.* Both of the vehicles at issue were purchased outside of the State where the accident occurred. *Id.* Both Plaintiffs alleged claims for product liability and negligence against Ford as the vehicle manufacturer. *Id.* at 2023.

Ford argued that since the vehicles driven by plaintiffs were designed, manufactured, and sold in states other than the forum states, the state courts (whether Montana or Minnesota) lacked jurisdiction. *Id.* at 2026. Thus, plaintiff's claims did not arise out of its contacts with the states in which the accidents occurred.

In rejecting Ford's argument, the Court focused on the nature and extent of Ford's contacts the with forum states. For many years, Ford advertised, sold, and serviced in Montana and Minnesota, the same type of vehicles that alleged to have malfunctioned and caused Plaintiffs' injuries in the forum states. *Id.* at 2028. Ford advertised in each of the States "by every means imaginable—among them, billboards, TV and radio spots, print ads, and direct mail." *Id.* Ford cars, including the Explorer and Crown Victoria were available for sale, whether new or used, throughout the States, at thirty-six (36) dealerships in Montana and eighty-four (84) in Minnesota. *Id.* As the Court explained, through its contacts with the forum state, Ford had "systematically served a market in Montana and Minnesota for the very vehicles that the plaintiffs allege malfunctioned and injured them in those States." *Id.* at 1028, 1032. In turn, the Court held that because Ford itself extensively promoted, sold, and serviced the same product that Plaintiffs alleged was defective, "the relationship among the defendant, the forums and the litigation is close enough to support specific jurisdiction." *Id.* at 1031.

The reasoning in *Ford Motor Company* is dispositive of this case. Ms. Plant alleges that she was injured by talc based cosmetic products while she was in South Carolina. To have jurisdiction over the defendant, Fabi USA must have systematically served a market in South Carolina for the very cosmetic products that plaintiff alleged caused her harm. Unlike the *Ford* defendant, Fabi USA has never advertised, sold or serviced anything in the forum state. In fact, it has never advertised, sold or serviced anything at all because it is a holding company.

Fabi USA has never had any business or operations, including business operations related to the purchase or sale of talcum powder; it does not own any real estate in South Carolina; it currently does not have a bank account in South Carolina and has never had a bank account in South Carolina. *See* Exhibit A, 79:24- 80:3, 112:7-12, 112:16-18, 112:19-24. Fabi USA's sole business is to hold all membership interest in IMI Fabi, LLC. *Id.*, 27: 18-19. Fabi USA's contacts with South Carolina are wholly absent, and well short of the 'so extensive' contacts necessary for this Court to have personal jurisdiction over Fabi USA. Thus, under *Ford*, this Court lacks personal jurisdiction.

CONCLUSION

For these reasons discussed above, as well as in Fabi USA's previously filed Motion for Summary Judgment and supporting brief, and Motion to Dismiss and supporting brief, Defendant IMI Fabi (USA) Inc. respectfully requests that this Honorable Court enter an Order granting its Motion for Summary Judgment and Motion to Dismiss, and that all claims be dismissed.

Respectfully submitted this, the 17th day of February, 2023.

WOMBLE BOND DICKINSON (US) LLP

s/ M. Elizabeth O'Neill
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STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND CASE NO. 2022-CP-40-1265

Sarah J. Plant and Parker Plant,
Plaintiffs,

vs.

Avon Products, Inc., et al
Defendants.

REMOTE VIDEOTAPED DEPOSITION OF IMI FABI DIANA, LLC,
IMI FABI USA, INC., AND IMI FABI, LLC,
GIVEN BY CORRADO FABI

DATE TAKEN: February 15, 2023
TIME BEGAN: 9:04 a.m.
TIME ENDED: 1:00 p.m.
REPORTED BY: Traci L. Barr

**CERTIFIED
TRANSCRIPT**

1 Q. Did you speak with anyone besides the lawyers to
2 prepare for your deposition today?

3 A. No.

4 Q. We talked about three IMI Fabi entities.
5 Do those entities have a parent company?

6 A. The parent company, IMI Fabi USA is owned by IMI
7 Fabi SPA.

8 Q. Who is IMI -- does IMI Fabi SPA own IMI Fabi,
9 LLC?

10 A. No. It's through IMI Fabi USA.

11 Q. Does IMI Fabi USA own IMI Fabi Diana?

12 A. No.

13 Q. Who owns IMI Fabi Diana?

14 A. LLC.

15 Q. Okay. Let me see if I have this correct. Okay.
16 IMI Fabi SPA owns IMI Fabi USA, correct?

17 A. Yes.

18 Q. IMI Fabi USA owns IMI Fabi, LLC, correct?

19 A. Yes, yes.

20 Q. And IMI Fabi, LLC, owns IMI Fabi Diana, right?

21 A. Yes, yes.

22 Q. Between 2001 and 2004, who owned IMI Fabi Diana?

23 A. LLC.

24 Q. Okay. Does IMI Fabi SPA own any talc mines?

25 A. IMI Fabi -- sorry to be precise. In Italy, you

1 legal conclusion under United States law, but if
2 he has an independent understanding, he can
3 answer.

4 MS. BOLLINGER: And really, Elizabeth, what I'm trying
5 to find out is if IMI Fabi USA is relevant at all
6 to this case, so that's why I'm asking the
7 question.

8 MS. O'NEILL: I understand. I understand.

9 MS. BOLLINGER: Okay.

10 MS. O'NEILL: You know, it's -- normally, I would just
11 object to the form of the question, calls for a
12 legal conclusion. Here I'm going to object to
13 the form of the question, calls for a legal
14 conclusion about American law.

15 MS. BOLLINGER: Okay.

16 MS. O'NEILL: Go ahead if you can, Mr. Fabi.

17 THE DEPONENT: I'm not familiar with American law, so I
18 prefer not to answer.

19 EXAMINATION RESUMED

20 BY MS. BOLLINGER:

21 Q. We talked earlier about IMI Fabi USA has never
22 sold cosmetic talc, correct?

23 A. Never, never.

24 Q. Okay. And we talked about -- in the same sense,
25 IMI Fabi -- Cosmetic Specialities has never

1 arranged for the transport of IMI Fabi USA's

2 talc, right?

3 A. IMI Fabi USA has never sold one pound of talc.

4 Q. Okay.

5 A. Regardless is cosmetic or industrial.

6 Q. Okay. And they are just a holding company?

7 A. Yes.

8 Q. That is all they have ever been?

9 A. Yeah.

10 Q. Okay.

11 A. Sorry. Yes, not yeah.

12 Q. Yeah is fine. I think yeah is fine.

13 MS. BOLLINGER: Okay. We've been going about an hour.

14 Do you want to do, like, a five-minute break?

15 MS. O'NEILL: Sure.

16 MS. BOLLINGER: Mr. Fabi, I'll represent to you I

17 actually don't have a ton more questions. If

18 it's an hour, that may be it. Okay.

19 THE DEPONENT: I'm fine. I am available all day and

20 night for you, so take your time.

21 MS. BOLLINGER: Oh, thank you. Okay. Let's go off the

22 record.

23 THE VIDEOGRAPHER: Off the record at 11:41.

24 (Recess taken.)

25 THE VIDEOGRAPHER: On the record 11:55 a.m.

1 Q. Did it pay any taxes to South Carolina?

2 A. No.

3 Q. Does it have any of those holdings or engage in
4 any of those activities towards South Carolina
5 today?

6 A. No.

7 Q. IMI Fabi USA, does it have any business that it
8 does at all today?

9 A. No.

10 Q. Has IMI Fabi USA ever done any business at all in
11 terms of buying or selling anything?

12 A. No.

13 Q. IMI Fabi -- has IMI Fabi USA ever owned any real
14 estate in South Carolina?

15 A. No.

16 Q. Does it presently own any real estate in South
17 Carolina?

18 A. No.

19 Q. Has IMI Fabi USA ever had a bank account in South
20 Carolina?

21 A. No.

22 Q. Does IMI Fabi USA presently have any bank
23 accounts in South Carolina?

24 A. No.

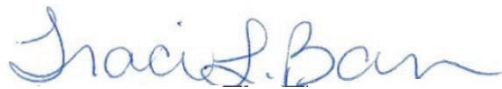
25 MS. O'NEILL: Those are all my questions.

CERTIFICATE

I, the undersigned, Traci L. Barr, RPR,
Notary Public in and for the State of South
Carolina, do hereby certify that the deposition
of CORRADO FABI was taken on the 15th day of
February, 2023, that the within deponent was
sworn to tell the truth, and that the foregoing
is an accurate transcription of the testimony
taken under oath; that all exhibits entered
herein are attached hereto (if requested by
counsel) and made a part of this deposition.

I further certify that I am neither counsel
nor solicitor to any of the parties in said suit,
nor interested in the event of the cause.

In witness whereof, I have hereunto set my
hand and seal this 16th day of February, 2023.



Traci L. Barr, RPR
Notary Public for South Carolina
My Commission Expires: 4/24/29

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
	)	
SARAH J. PLANT and PARKER	)	C/A NO. 2022-CP-40-1265
PLANT,	)	
	)	<i>In Re:</i>
Plaintiffs,	)	Asbestos Personal Injury Litigation
	)	Coordinated Docket
v.	)	
	)	
AVON PRODUCTS, INC., et al.	)	
	)	
Defendants.	)	

**PLAINTIFFS' CONSOLIDATED RESPONSES IN OPPOSITION TO
DEFENDANT IMI FABI, LLC'S AND IMI FABI (DIANA) LLC'S MOTIONS
TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

Plaintiffs Sarah J. Plant and Parker Plant, by and through the undersigned counsel, hereby oppose the Motions to Dismiss filed by Defendants IMI Fabi, LLC and IMI Fabi (Diana) LLC ("the IMI Fabi Entities"), and would respectfully show the Court that these motions should be denied.

INTRODUCTION

Sarah Plant developed a terminal cancer, pleural mesothelioma, at thirty-five years old. Her cancer was caused in part by repeated use and exposure to the IMI Fabi Entities' asbestos-containing talc. The IMI Fabi Entities have moved for dismissal of Plaintiffs' claims against them, alleging that the Court lacks personal jurisdiction over them. The IMI Fabi Entities are subject to the jurisdiction of this Court because they put their products into the stream of commerce with the understanding that they would be used in South Carolina, as in other states. Mrs. Plant was exposed to the IMI Fabi Entities' talc in South Carolina, which caused her mesothelioma. The motions to dismiss should therefore be denied.

FACTS

Sarah J. Plant was diagnosed with mesothelioma, a universally fatal disease caused by exposure to asbestos, on or about March 2021. **Ex. 1**, Amended Complaint (“Amd. Compl.”), at ¶ 25. Mrs. Plant was exposed to asbestos through her use of cosmetic talcum powder products, both body powders and talc-based makeup. *Id.* at 6, ¶ 6.

On April 11, 2022, Plaintiffs filed their Amended Complaint. *See id.* IMI Fabi, LLC is a foreign corporation organized under the laws of West Virginia. *Id.* at 22, ¶ 53. IMI Fabi (Diana), LLC is a foreign corporation organized under the laws of North Carolina. *Id.* at 21, ¶ 51. In the Amended Complaint, Plaintiffs have alleged that Sarah Plant was repeatedly exposed to asbestos-containing talc products manufactured, sold, and/or distributed by Defendants. *Id.* at 31, ¶¶ 79-81. As a result of Sarah Plant’s cumulative exposures to asbestos attributable to Defendants, she developed mesothelioma. *Id.* at 8, ¶ 16, 32, ¶ 84.

Plaintiffs have alleged discrete causes of action against Defendants, including but not limited to, strict liability, negligence, breach of warranty, fraudulent misrepresentation and conspiracy. *Id.* at 33, 38, 43, 44, 45. By failing to warn of the hazards associated with the use of their asbestos-containing talc products, among other things, Defendants breached their duty to protect end users from the hazards associated with the asbestos used in their products. *Id.* at 34, ¶ 92; 35, ¶ 95; 36-37, ¶ 100; 38, ¶ 103; 41, ¶¶ 115, 117. Plaintiffs also alleged that Defendants breached their duty to end users by failing to use a safer alternative to asbestos-containing talc. *Id.* at 34, ¶ 93.

In the Amended Complaint, Plaintiffs allege that “Plaintiffs’ claims against IMI FABI, LLC arise out of this Defendant’s business activities in the State of South Carolina, as well as Plaintiff Sarah J. Plant’s exposure to said Defendant’s products in the State of South Carolina, as

well as others.” *Id.* at 22, ¶ 53. The same allegation was made against IMI Fabi (Diana), LLC. *Id.* at 21, ¶ 51. Plaintiffs also allege that “Plaintiff Sarah J. Plant was exposed to asbestos from her personal use, and her family’s use, of asbestos-containing talc-based Powder Products, Makeup Products, and Ceramic Products throughout her life in her Tennessee, Utah and South Carolina homes beginning in the 1980s.” *Id.* at 12, ¶ 25. Plaintiffs further allege “Plaintiff Sarah J. Plant’s mesothelioma was caused by her exposure to asbestos through her personal use, and her family’s use, of asbestos-containing talc Makeup Products and Powder Products throughout her life” *Id.* at 31, ¶ 79.

Mrs. Plant used compressed foundation powder on her face, eyeshadow, pressed powders, blush, and loose powders.¹ Starting around 1998, Sarah used CoverGirl pressed powders.² She wore makeup almost every day.³ She noted that she used the same CoverGirl products in high school (2002 – 2005).⁴ She used the same products in college and thereafter.⁵

Mrs. Plant used the same makeup products in South Carolina while there on vacation.⁶ She and her family have gone on yearly beach trips to South Carolina every year.⁷ Sarah’s mother testified that she purchased Cover Girl powder makeup at Winn Dixie during their beach vacations in South Carolina.⁸ Ms. Johnson testified to doing so because all her daughters would do photoshoots and go through her makeup bag to use her products.⁹

¹ **Ex. 2** Deposition of Sarah Plant, 08/23 – 08/25/2022 at 25:23-26:7.

² *Id.* at 34:3-9.

³ *Id.* at 34:10-12.

⁴ *Id.* at 77:1-13.

⁵ *Id.* at 94:14-22.

⁶ *Id.* at 52:3-14.

⁷ **Ex. 3** Deposition of Patrice Johnson, 10/25/22, 15:2 – 15:9.

⁸ *Id.* at 295:17 - 25

⁹ *Id.* at 296: 1-11

Mrs. Plant believes she also used CoverGirl pressed powder products while she was living South Carolina between 2013 and 2017.¹⁰ She recalled shopping for powder products at stores in South Carolina.¹¹

1) IMI Fabi LLC

IMI Fabi USA owns IMI Fabi LLC.¹² IMI Fabi LLC has sold cosmetic talc since 2004 to the present.¹³ It has also sold industrial talc since 2001.¹⁴

In its affidavit to this court, IMI Fabi, LLC acknowledged it has sold industrial-grade talc in South Carolina since 2016, Woods Aff., ¶¶ 17-18, which overlaps with Ms. Plant's years of use. LLC has regularly transacted business in South Carolina for over a decade.

Documents produced in discovery by IMI Fabi show that between 2015 and 2021 IMI Fabi LLC has revenues of \$1.3 million and \$1.63 million dollars a year from its industrial talc sales in South Carolina.¹⁵ Their total revenues in South Carolina for six years amount to over \$11 million.

IMI Fabi did not produce revenue figures for every year they have supplied talc to South Carolina companies. However it did produce even more evidence of talc sales prior to 2016.

From 2010 to the present it has sold between 2,654 and 3,617 short tons of industrial talc to companies in South Carolina every year.¹⁶ (The equivalent of 5,308,000 to 7,234,000 pounds of talc).

¹⁰ See Ex. 3 at 336:12 – 23.

¹¹ *Id.* at 54:12 - 16

¹² Ex. 4, Deposition of IMI Fabi Entities, 2/15/22, 27:18 – 19

¹³ *Id.* 19:17 – 23

¹⁴ *Id.* 19:24 – 20:8

¹⁵ Ex. 5, IMIFABI-PLANT- 0000087 – 000093

¹⁶ Ex. 6, IMIFABI-PLANT 000151 – 000152

2) IMI Fabi Diana

IMI Fabi LLC owns IMI Fabi Diana (hereinafter “Diana”).¹⁷ Diana sold cosmetic talc between 2001 and 2004.¹⁸ During this time, all the CoverGirl pressed powder products contained talc as an ingredient.¹⁹

Diana sold Talc 141.²⁰ Between 1964 and 2022 Noxell primarily used Talc 141 in its CoverGirl line.²¹ As an example, it specified Talc 141 in pressed powder products in 2001.²² It continued specifying Talc 141 into the 2010s.²³

Talc 141 is a trade name of talc products specific to a grade of talc manufactured at the Diana facility.²⁴ Whittaker, Clark and Daniels, the previous owner of the facility, had to rename their own 141 product after it the facility was sold to IMI Fabi.²⁵ Diana never changed the name of the product or product range.²⁶

Talc 141 was supplied to Noxell’s owner, Proctor & Gamble, between 2001 and 2005.²⁷ Noxell has also identified IMI Fabi as a supplier to CoverGirl talc powder products.²⁸ IMI Fabi continues to be the main supplier of talc used in CoverGirl products today despite the sale of Noxell/CoverGirl line to Coty in 2016.²⁹

¹⁷ See Ex. 4 at 27:20 – 21

¹⁸ *Id.* 18:12 – 23, *Id.* 18:12 – 23, No other IMI Fabi entity was selling cosmetic talc at the same time as Diana. *Id.* at 19:4 – 19:10.

¹⁹ *Id.* at 81:10 – 15.

²⁰ *Id.* 33:17 – 37:10

²¹ **Ex. 7**, Defendant Noxell Corporation’s Answers to Plaintiff Gary Chapman’s Special Interrogatories (Set One), at Response to Interrogatory 1, p. 2.

²² **Ex. 8**, Noxell-CG-014665

²³ **Ex. 9**, Noxell – CG – 013925 – 13929.

²⁴ **Ex. 10** IMERYS 338156 (Through a series of complex transactions the Suzorite facility referenced became the Diana facility.)

²⁵ *Id.*

²⁶ See Ex. 4, 37:4 - 15

²⁷ **Ex. 11**, Various sales documents and certificates of analyses from IMI Fabi to Proctor & Gamble. Proctor and Gamble owned Noxell until 2016.

²⁸ **Ex. 12** Deposition of Richard Sutton in *Shelby Payne v. Avon Products, et al*, 11/4/22, 209:20 – 210:8

²⁹ *Id.* see also **Ex. 13** Deposition of Richard Sutton in *Rita Chapman v. Avon Products, et al*, 8/18/22, 82:16 – 24. **Ex. 14** Deposition of William Ward., 8/8/22, at pp. 33:1-20, 35:6-36:13.

Diana sent letters directly to P&G certifying their talc.³⁰ Diana was writing to Duane Cephus with P&G. Mr. Cephus received raw materials at Noxell.³¹ Duane Cephus' address is in Beaver Court, Maryland. This is the same facility where CoverGirl has manufactured CoverGirl pressed and loose powders since 1986.³²

Further Diana's own documents show vast quantities of talc being shipped to P&G, purchase order numbers, customer numbers, and the price of the talc sold to P&G.³³

IMI Fabi was aware that P&G was a big company and it sold cosmetic talc products.³⁴ Noxell has testified that it has always been an industry leader in cosmetics products in the United States since the 1960s.³⁵ Noxell began to sell CoverGirl pressed powders nationally in 1961.³⁶ During the 1980s CoverGirl was the leading mass-marketed cosmetics line in the United States.³⁷ As discussed above, Mrs. Johnson and Mrs. Plant also testified to purchasing CoverGirl Products in South Carolina since the late 90's into the 2010s.

3) IMI FABI used Cosmetic Specialties as a distributor.

IMI Fabi attempts to hide behind its business relationship with Cosmetic Specialties to avoid this court conferring jurisdiction. Mr. Fabi testified that Cosmetic Specialties always arranged the transport of cosmetic talc from the IMI Fabi facilities.³⁸ He testified that cosmetic brands are not his expertise because IMI Fabi has "no information of Cosmetic Specialties' customer."³⁹

³⁰ See Ex. 11.

³¹ See Ex. 13 at 112:14–19.

³² *Id.* at 46:7 – 23.

³³ See Ex 11.

³⁴ See Ex. 4, at 51:2 – 7

³⁵ See Ex. 13 at 72:11 – 73:2

³⁶ *Id.* at 51:2 – 14.

³⁷ See Ex. 13, 47:4 – 22 and *Exhibit 7*

³⁸ See Ex. 4 at 44:1 – 12.

³⁹ *Id.* 46:1 – 6

IMI Fabi had similar arrangements where someone else would arrange for the transport of its industrial talc to South Carolina.⁴⁰ IMI Fabi's revenue documents make no distinction between the methods of distribution of the products.⁴¹

Mr. Fabi stated that he didn't know any details about what Cosmetic Specialties customers were doing with IMI Fabi talc. Contrary to Mr. Fabi's testimony, Diana knew that P&G sold cosmetic talc. Diana knew P&G was obtaining IMI Fabi cosmetic talc. Diana identified P&G by customer code and dealt with the receiver of raw products for Noxell. Diana had purchase orders that showed the amount P&G was paying for IMI Fabi cosmetic talc.⁴²

ARGUMENT

The Court should reject the IMI Fabi Entities' challenge to the Court's jurisdiction. It is premised on the incorrect assertion that Plaintiffs lack evidence of Sarah Plant's exposure to asbestos from IMI Fabi-supplied talc in South Carolina. As Ms. Plant was exposed to IMI Fabi talc when she purchased and used talc products in South Carolina, this Court may properly exercise personal jurisdiction in this case.

The determination of whether a court may exercise personal jurisdiction over a nonresident defendant involves a two-step analysis. *Hammond v. Butler, Means, Evins & Brown*, 300 S.C. 458, 462, 388 S.E.2d 796, 798 (1990). The nonresident defendant's conduct must meet the requirements of South Carolina's long-arm statute and the exercise of jurisdiction must comport with the requirements of the Due Process Clause. *Id.*; *Moosally*, 358 S.C. at 328, 594 S.E.2d at 882. The South Carolina long-arm "affords broad power to exercise personal jurisdiction over causes of

⁴⁰ See Ex. 4 – 86:4 – 11.

⁴¹ See Ex. 5, and Ex. 6

⁴² See Ex. 11

action arising from tortious injuries in South Carolina, has been construed to extend to the outer limits of the due process clause.” *Moosally*, 358 S.C. at 329, 594 S.E.2d at 883.

Section 36-2-803(A) of the South Carolina Code, which provides for specific jurisdiction over a person based on specific conduct relating to the underlying legal claims, provides in pertinent part as follows:

A court may exercise personal jurisdiction over a person who acts directly or by an agent as to a cause of action arising from the person’s:

- (1) transacting any business in this State;
- (2) contracting to supply services or things in the State;

[...]

- (7) entry into a contract to be performed in whole or in part by either party in this State;
- (8) production, manufacture, or distribution of goods with the reasonable expectation that those goods are to be used or consumed in this State and are so used or consumed.

South Carolina’s long-arm statute has been construed to extend to the full limits of due process. *S. Plastics Co. v. S. Commerce Bank*, 310 S.C. 256, 260, 423 S.E.2d 128,130-31 (1992). Therefore, the statutory requirements for personal jurisdiction merge with the constitutional inquiry. *See Consulting Engineers Corp. v. Geometric Ltd.*, 561 F.3d 273, 277 (4th Cir. 2009); *ALS Scan, Inc. v. Digital Serv. Consultants, Inc.*, 293 F.3d 707, 710 (4th Cir. 2002).

Jurisdiction may properly be exercised under the Due Process Clause when a defendant has “minimum contacts” with the forum state. *See Asahi Metal Industry Co. v. Superior Court of California*, 480 U.S. 102, 108-09 (1987); *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 474 (1985); *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 291 (1980). Specific jurisdiction may be exercised when the defendant purposefully directs his activities at residents of the forum and the litigation results from alleged injuries that ““arise out of or relate to”” those

activities. *Burger King*, 471 U.S. at 472 (quoting *Helicopteros Nacionales de Columbia S.A. v. Hall*, 466 U.S. 408, 414 (1984)). The requirement that a defendant purposely direct conduct at the forum state ensures that the defendant's connection with the forum state is sufficient to cause the defendant to "reasonably anticipate being haled into court there." *World-Wide Volkswagen*, 444 U.S. at 297.

Specific jurisdiction requires "that the relevant conduct have such a connection with the forum state that it is fair for the defendant to defend itself in that state." *CFA Inst. v. Inst. of Chartered Fin. Analysts of India*, 551 F.3d 285, 292 at n.15 (4th Cir. 2009). A court may exercise specific jurisdiction when the cause of action "arises out of the defendant's contacts with the forum." *Saudi v. Northrop Grumman Corp.*, 427 F.3d 271, 276 (4th Cir. 2005). The determination of whether jurisdiction is appropriate depends on the facts and circumstances of each case. *See Walden v. Fiore*, 134 S. Ct. 1115, 1121 (2014) (holding that the specific jurisdiction inquiry necessitates a study of the interconnection between the defendant, the forum, and the litigation); *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 485–86 (1985). Extension of specific jurisdiction requires consideration of three factors: "(1) the extent to which the defendant purposefully availed itself of the privilege of conducting activities in the forum state; (2) whether the plaintiff's claims arise out of those activities; and (3) whether the exercise of personal jurisdiction is constitutionally reasonable." *Tire Eng'g & Distribution*, 682 F.3d at 301–02; *see also Universal Leather*, 773 F.3d at 559.

The "purposeful availment" requirement ensures that "a defendant will not be haled into a jurisdiction solely as a result of random, fortuitous, or attenuated contacts." *Burger King*, 471 U.S. at 475 (internal quotation marks omitted). Rather, a defendant's conduct and connection to the forum must be "such that [it] should reasonably anticipate being haled into court there." *Universal Leather*, 773 F.3d at 559 (quoting *Fed. Ins. Co. v. Lake Shore Inc.*, 886 F.2d

654, 658 (4th Cir. 1989)). If a defendant has created a “substantial connection” to the forum, then it has purposefully availed itself of the privilege of conducting business there. *See Diamond Healthcare of Ohio, Inc. v. Humility of Mary Health Partners*, 229 F.3d 448, 450 (4th Cir. 2000); *ESAB Grp., Inc. v. Centricut, Inc.*, 126 F.3d 617, 625 (4th Cir. 1997) (holding that “contacts related to the cause of action must create a ‘substantial connection’ with the forum state, although this connection need not be as extensive as is necessary for general jurisdiction” (citation omitted)). The connection to the forum “must arise out of contacts that the defendant *himself* creates with the forum State.” *Walden*, 134 S. Ct. at 1122 (quoting *Burger King*, 471 U.S. at 475) (internal quotation marks omitted).

This case involves the stream-of-commerce theory of specific personal jurisdiction. Sufficient minimum contacts exist and a “forum State does not exceed its powers under the Due Process Clause if it asserts personal jurisdiction over a corporation that delivers its products into the stream of commerce with the expectation that they will be purchased by consumers in the forum State.” *World-Wide Volkswagen*, 444 U.S. at 291-98. “[I]f the sale of a product of a manufacturer . . . is not an isolated occurrence, but arises from the efforts of the manufacturer or distributor to serve directly or indirectly, the market for its product in other States, it is not unreasonable to subject it to suit in one of those States if its allegedly defective merchandise” causes injury there. *Id.* at 297. Under the stream of commerce theory, a defendant has minimum contacts with the forum when it purposefully ships a product into the forum state through an “established distribution channel.” *Akeva L.L.C. v. Mizuno Corp.*, 199 F. Supp. 2d 336, 339 (M.D.N.C. 2002) (quoting *Beverly Hills Fan Co. v. Royal Sovereign Corp.*, 21 F.3d 1558, 1565 (Fed.Cir. 1994)).

In this Circuit, sales of asbestos products in the forum state have been found sufficient to confer personal jurisdiction over the defendant manufacturer. *See, e.g., Lineberger v. CBS Corp.*, No. 1:16CV390, 2017 WL 3883712, at *1 (W.D.N.C. Aug. 14, 2017), *report and recommendation adopted*, No. 1:16-CV-00390-MR-DLH, 2017 WL 3879092 (W.D.N.C. Sept. 5, 2017) (allegations that the defendant sold asbestos products in North Carolina and the plaintiff was exposed to those products while working in North Carolina were sufficient to state a prima facie case of specific personal jurisdiction).

Recently, in *Ford Motor Co. v. Montana Eighth Judicial District Court*, ---U.S.---, 141 S. Ct. 1017 (2021), the Supreme Court held that a plaintiff need not show a strict causal connection between his claims and the defendant’s forum-state product sales as long as there is a relationship between the defendant, the forum, and the litigation. *Ford Motor Co.* involved two separate cases against Ford brought by plaintiffs who were injured in their home states in car accidents involving Ford vehicles. 141 S. Ct. at 1022. In both cases, the plaintiffs had purchased used Ford cars that were manufactured outside the forum and originally sold outside the forum. *Id.* at 1022-23.⁴³ The Supreme Court succinctly summarized the facts: “The accident happened in the State where suit was brought. The victim was one of the State’s residents. And Ford did substantial business in the State—among other things, advertising, selling, and servicing the model of vehicle the suit claims is defective.” *Id.* at 1022.

Ford resisted personal jurisdiction on the grounds that in each case the car had not been originally sold in the forum state. *Id.* at 1023. It argued that there must be a causal link between its activity in the forum state and the suit, which would only exist “if the company had designed,

⁴³ A Montana resident was killed in Montana when the tread separated on the tire of her Ford Explorer and her vehicle spun out and rolled into a ditch. *Id.* at 1023. Her family brought suit against Ford in Montana. A Minnesota resident was a passenger in his friend’s Ford Crown Victoria and suffered serious brain injuries in an accident in rural Minnesota when the air bag failed to deploy. *Id.* He brought suit against Ford in Minnesota.

manufactured, or—most likely—sold in the State the particular vehicle involved in the accident.” *Id.* The plaintiffs could not make that showing. Not only were the cars designed and manufactured out of state, they had originally been sold in other states and brought into the forum states as used vehicles. *Id.*

Nevertheless, the high courts of Montana and Minnesota rebuffed Ford’s motions to dismiss for lack of personal jurisdiction. *Id.* They both found that because Ford had purposefully sought to serve the market in their states, selling the exact models of cars involved in the accidents, Ford’s relationship with the plaintiffs’ respective claims was sufficient to confer jurisdiction. *Id.* at 1023-24.

The United States Supreme Court agreed. It held that “[w]hen a company like Ford serves a market for a product in a State and that product causes injury in the State to one of its residents, the State’s courts may entertain the resulting suit.” *Id.* at 1022. Even though the exact vehicles involved in the accidents were not sold in the forum states, “the connection between the plaintiffs’ claims and Ford’s activities in those States—or otherwise said, the ‘relationship among the defendant, the forum[s], and the litigation’—is close enough to support specific jurisdiction.” *Id.* at 1032 (quoting *Walden v. Fiore*, 571 U.S. 277, 284 (2014)). There was no dispute that Ford conducts substantial business activity in Montana and Minnesota and actively serves the car market in those states. *Id.* at 1026. “Ford agrees that it has ‘purposefully avail[ed] itself of the privilege of conducting activities’ in both places.” *Id.* (quoting *Hanson*, 357 U.S. at 253). The Court also found that the plaintiffs’ suits had the requisite connection to Ford’s business activities in the forum States, rejecting Ford’s contention that there must be a direct causal link between its business activities and the suit. *Id.* It did not matter that the specific vehicles involved in the accidents were not sold in the forum States given that there was an undeniable relationship between Ford’s activity

in serving the car market in those states, even selling the same models involved in the accidents, and the plaintiffs' lawsuits. *Id.*

Because "Ford had systematically served a market in Montana and Minnesota for the very vehicles that the plaintiffs allege malfunctioned and injured them in those States . . . there is a strong 'relationship among the defendant, the forum, and the litigation'—the 'essential foundation' of specific jurisdiction." *Id.* at 1028 (quoting *Helicopteros Nacionales de Colombia, S.A. v. Hall*, 466 U.S. 408, 414 (1984)).

The Court noted that its holding is in keeping with a long line of precedent that has recognized specific personal jurisdiction in precisely such factual circumstances. *Id.* at 1027-28. Most notably, in *World-Wide Volkswagen* the Court held that Oklahoma did not have jurisdiction over a New York car dealer that sold the car causing injury in Oklahoma, but that it *did* have jurisdiction over the car's manufacturer (Audi) and the car's nationwide importer (Volkswagen). *Id.* at 1027 (citing *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 297 (1980)). "Or said another way, if Audi and Volkswagen's business deliberately extended into Oklahoma (among other States), then Oklahoma's courts could hold the companies accountable for a car's catching fire there—even though the vehicle had been designed and made overseas and sold in New York." *Id.* This holding has been cited by the Court numerous times, including in *Daimler AG v. Bauman*, 571 U.S. 117, 127 n.5 (2014), where the Court "used the Audi/Volkswagen scenario as a paradigm case of specific jurisdiction." *Id.* at 1027-28.

Jurisdiction over the IMI Fabi Entities is proper under *Ford Motor Co.* and longstanding specific jurisdiction principles. As the plaintiffs in *Ford Motor Co.*, Ms. Plant was injured in South Carolina when she was exposed to asbestos in IMI Fabi-supplied talc in South Carolina.

Plaintiffs' claims against the IMI Fabi Entities arise from their substantial sales activity of talc in South Carolina. There can be no question that the IMI Fabi Entities were serving the market for talc in South Carolina. Like Ford, they "'purposefully avail[ed] [themselves] of the privilege of conducting activities within the forum State.'" *Ford Motor Co.*, 141 S. Ct. at 1024 (quoting *Hanson*, 357 U.S. at 253). Moreover, as in *Ford Motor Co.*, Plaintiffs' tort claims against the IMI Fabi Entities have a relationship to their product sales in South Carolina. The IMI Fabi Entities marketed and sold their talc in this State, and/or used distributors that they knew were selling IMI Fabi talc in this State, and Ms. Plant was exposed here. Under *Ford Motor Co.*, personal jurisdiction is proper against the IMI Fabi Entities, which engaged in regular product sales in South Carolina, profited from talc sales in South Carolina, and must answer for injuries caused in South Carolina by defects in those products. The IMI Fabi Entities' sales into South Carolina certainly satisfy the long-arm statute, as well as due process. South Carolina may exercise specific personal jurisdiction over them in this case.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that this Court deny the IMI Fabi Entities' motions to dismiss as Plaintiffs have shown that this Court may exercise specific jurisdiction over them for their activities directed to South Carolina that injured Sarah Plant.

Respectfully submitted,

DEAN OMAR BRANHAM SHIRLEY, LLP

s/ David C. Humen

David C. Humen (SC Bar No. 104536)

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ATTORNEYS FOR PLAINTIFF

February 18, 2023
Dallas, Texas

EXHIBIT 2

MR. VEDOVA: Harvie Ann.

THE WITNESS: Harvie Ann, Harvie
H-A-R-V-I-E.

BY MS. BOLLINGER:

Q. What do you recall about them using talc
powder?

A. Just that they did. I remember it being
in her vanity area.

Q. Starting from the time you began using
talc powder to the time you stopped, how often
would you use it?

A. Off and on. It depended on the time of
year.

Q. Can you explain that for us?

A. Just that in the south it's hot. And so
the more humidity or the more I was outside
hiking or playing sports or being at the beach,
the more I would chafe. It went hand in hand
with how often I chafed.

Q. So you used it probably more in the summer
months?

A. Yes.

Q. Okay. Let's move on to some general
information about makeup powders. Have you ever
used powder on your face?

1 A. Yes.

2 Q. Tell us how you used that.

3 A. I used compressed foundation powders the
4 most and eyeshadow, again, the pressed powders.
5 I used blush, and I used -- when I was older,
6 I used loose powders for foundation, blush, and
7 eyeshadow.

8 Q. Okay. Growing up did anyone in your home
9 use face powders?

10 A. Yes.

11 Q. Who was that?

12 A. My mom and my sisters.

13 Q. What kind of face powders did they use?

14 A. Compressed foundation powders, blush,
15 eyeshadows, bronzer.

16 Q. Would you have been around them while
17 you -- while they were using that?

18 A. Yes.

19 Q. What about anyone in your extended family?
20 Did anyone in your extended family use face
21 powders?

22 A. Yes.

23 Q. And who is that?

24 A. My aunts, my cousins.

25 Q. Okay. What is your first memory of using

1 A. I would say, sixth or seventh grade,
2 I would have been more like 12.

3 Q. How often did you use face powders in
4 middle school?

5 A. I would use CoverGirl pressed foundation
6 powder -- that would be the first thing -- and
7 then blush and eyeshadow. I wasn't allowed to
8 wear all types of makeup, just kind of what my
9 mom deemed the beginner makeup.

10 Q. Okay. So how often would you use them?
11 Would you wear makeup every day?

12 A. Yeah. Most days.

13 (Reporter requests clarification.)

14 THE WITNESS: Starter makeup.

15 BY MS. BOLLINGER:

16 Q. Okay. Going on that, what do you mean by
17 "starter makeup"?

18 A. They were colors that were light pinks, so
19 blush -- light pink eye shadows. Blush,
20 foundation powder. Stuff that wasn't quite as
21 obvious or dramatic for a young girl.

22 There was a lipstick in the compact as
23 well. It was a square compact.

24 Q. We're going to get to all that in a
25 minute.

1 Q. Can you show us where you are?

2 A. (Indicating.)

3 Q. When you guys would go to South Carolina
4 during the summer, would you do your makeup
5 there?

6 A. Yes.

7 Q. And where would you get your makeup from?

8 A. It's whatever I had. We would bring it
9 with us in our suitcases.

10 Q. If you were doing your makeup, if you were
11 using makeup products in Tennessee, you would
12 also have been using them in South Carolina; is
13 that correct?

14 A. Yes.

15 Q. And you would do your makeup the same way?

16 I think we already covered this, but you
17 would do your makeup the same way in
18 South Carolina as you did it at home?

19 A. Yes. Slightly heavier because we liked
20 feeling tan.

21 Q. By "slightly heavier," do you mean using
22 more product?

23 A. Just more powder, more eyeshadow when we
24 went out to dinner.

25 Q. You talked about living in South Carolina.

1 me?

2 A. The first one that we rented?

3 Q. Yes.

4 A. It was a small house from the '50s or
5 '60s. It had one bathroom, two bedrooms, a very
6 small kitchen, and a living room.

7 Q. Where would you do your makeup in that
8 house?

9 A. For -- on Sundays when we'd go to church,
10 I would do it in the bathroom, in the bathroom or
11 in my car. That habit is still there sometimes.

12 Q. Do you recall any of the stores that you
13 would have bought makeup powders from in
14 South Carolina?

15 A. I would have shopped at Walgreens,
16 Wal-Mart, Bi-Lo, Dollar General.

17 Q. Can you tell us what Walgreens you shopped
18 at?

19 A. The one opposite our street. We lived
20 behind the Bi-Lo, and on the street across the
21 street from that Bi-Lo is the Walgreens, on that
22 corner.

23 Q. Do you know what street that is?

24 A. Highway 9 and McMillin Boulevard.

25 Q. What about the Wal-Mart? Do you recall

Sarah Plant
August 23, 2022

Page 77

1 Q. Let's talk about CoverGirl. I think we
2 clarified you used the same CoverGirl products
3 that you used in middle school --

4 A. Uh-huh.

5 Q. -- during high school, correct?

6 A. Yes.

7 Q. Did you use any new powder products in
8 high school?

9 A. I used -- I started using bronzer
10 sometimes.

11 Q. And that's CoverGirl, right?

12 A. I think I used CoverGirl and Maybelline
13 bronzers because I was new to the bronzer world.

14 Q. Where would you have bought CoverGirl
15 from?

16 A. Wal-Mart or Walgreens.

17 Q. Same Wal-Mart?

18 A. Uh-huh.

19 Q. Same Walgreens?

20 A. Yeah.

21 Q. Did anyone else you know use CoverGirl
22 products?

23 A. My mom and my sisters.

24 Q. What products did they use?

25 A. The foundation powder, the liquid

1 Q. Would you ever buy yourself Almay
2 products?

3 A. Not often. I usually relied on my mom.
4 I wouldn't run out from my holiday stocking
5 versus what I already bought of Clinique and the
6 Mary Kay products I had because I used so many
7 different products regularly.

8 Q. Where would you have bought the Almay
9 powder products from?

10 A. When I bought all my makeup, Wal-Mart and
11 Walgreens, depending on where I was.

12 Q. Same locations we already talked about?

13 A. Yes.

14 Q. Between Clinique, Bare Minerals, L'Oréal,
15 Almay, and Mary Kay, what were you go-to products
16 during college?

17 A. So my go-to liquid foundation would have
18 still been CoverGirl. I would have used --
19 I would have used the CoverGirl pressed powder
20 foundation for the earlier years of college, and
21 then I would have switched to the Mary Kay or
22 Bare Minerals loose powders.

23 I still would have used Maybelline
24 eyeshadows for the early college years, and then
25 I started using that favorite Clinique one.

REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF HAMILTON

I, MELISSA M. SMITH, Licensed Court
Reporter, with offices in Chattanooga, Tennessee,
hereby certify that I reported the foregoing
deposition of SARAH PLANT by machine shorthand to
the best of my skills and abilities, and
thereafter the same was reduced to typewritten
form by me.

I am not related to any of the parties
named herein, nor their counsel, and have no
interest, financial or otherwise, in the outcome
of the proceedings.

Melissa M. Smith

MELISSA M. SMITH, RPR, CCR, LCR
LCR # 122 - Expires: 6/30/2024

In the Matter Of:
SARAH J. PLANT and PARKER PLANT
VS
AVON PRODUCTS

Sarah Plant
August 24, 2022



1 THE WITNESS: I kept -- so do I
2 answer? I don't --

3 MS. BOLLINGER: Yes. Go ahead.

4 THE WITNESS: I'm sorry.

5 I am frugal and I -- I don't throw
6 makeup away. Typically, I didn't throw makeup
7 away, and so I moved all of makeup that I had
8 that I potentially used with me from Utah to
9 South Carolina. That's why I'm hesitant to say
10 I stopped in Utah.

11 BY MR. DEMPSEY:

12 Q. Would you agree with me that you
13 perhaps buying it -- that perhaps you obtained it
14 or buying in Utah, even though you may have used
15 it in Spartanburg, does that sound like a fair
16 statement?

17 MS. BOLLINGER: Objection to form.

18 THE WITNESS: I don't know, because
19 I used loose powders in South Carolina and in
20 Utah, but I also used pressed powder. And the
21 pressed powder brand that was my go-to for all
22 these years was CoverGirl, so I don't remember
23 using a different pressed powder.

24 BY MR. DEMPSEY:

25 Q. Have you talked to anyone -- let's just

REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF HAMILTON

I, MELISSA M. SMITH, Licensed Court
Reporter, with offices in Chattanooga, Tennessee,
hereby certify that I reported the foregoing
deposition of SARAH J. PLANT by machine shorthand
to the best of my skills and abilities, and
thereafter the same was reduced to typewritten
form by me. I am not related to any of the
parties named herein, nor their counsel, and have
no interest, financial or otherwise, in the
outcome of the proceedings.

Melissa M. Smith

MELISSA M. SMITH, RPR, CCR, LCR
LCR # 122 - Expires: 6/30/2024

EXHIBIT 3

1 away. But they all lived there.

2 Q Would you guys ever go visit South
3 Carolina when Sarah was a kid?

4 A Yeah. We went absolutely every
5 Thanksgiving, we'd go to Harvey Ann's house. She has a big farm
6 house. Do hay rides and the whole 'shebang. And then we would
7 always go -- we started going to the beach when my son was, I
8 think, about a year old. So '96. We went to the beach at
9 Litchfield, South Carolina, yearly.

10 Q Was there a certain route that you would
11 take from Cosby to South Carolina?

12 A Yes. We'd just go the interstate to
13 Spartanburg, South Carolina -- well, she lives in Inman, which
14 is north of Spartanburg. And then we'd go to the beach, we'd go
15 down -- I think it's 26, and we'd get off on Garners Ferry Road,
16 I think, and go -- head over towards Columbia and down
17 through -- to south of Myrtle Beach.

18 Q Would you ever have to make stops on that
19 trip?

20 A We often -- like, on the way to the beach,
21 since it was a seven-hour trip, we would always -- usually
22 always stop in Spartanburg to say hello to family and have
23 lunch. We have a favorite restaurant over there in Spartanburg.
24 And if -- if we got a late start we would sometimes stay in
25 Columbia for the night before heading on to the beach.

1 Georgetown, Polly's Island. It's a newer one.

2 Q And for Winn-Dixie, would it be safe to
3 say that any product you bought there would you have been
4 filled?

5 A Yes.

6 Q I'm sorry. I hit the button. Can you
7 hear me now?

8 A I can.

9 Q Do you have any specific recollection of
10 buying any of the makeup products we've talked about at
11 Winn-Dixie Litchfield?

12 A I cannot for sure say I did. But I
13 couldn't -- I don't know. I was there for years, and a week or
14 two at a time. I very likely bought makeup. Because I did not
15 go to Walmart for many years when we first got there because I
16 had the grocery stores closer.

17 Q Is there any specific makeup that you have
18 a memory of buying at Winn-Dixie specifically at Litchfield?

19 A Cover Girl and Maybelline.

20 Q Okay. And what were those products that
21 you bought at Winn-Dixie?

22 A Blush and eyeshadows.

23 Q And how many times would you say you
24 bought blush or eyeshadow at Winn-Dixie in Litchfield?

25 A I would say four times.

1 Q Do you have any recollection of why you
2 would have been on vacation and needed to buy blush or eyeshadow
3 on vacation?

4 MS. BOLLINGER: Objection to form.

5 THE WITNESS: Because I probably needed
6 more than I had brought because all my girls like to
7 do photo shoots when they're at the beach and all
8 nice and tan. And they go through what I had and
9 often they just brought hodgepodge of stuff and
10 they'd say, mom, I need more blush or I want some
11 green eyeshadow to go with this outfit.

12 BY MS. SHOFNER:

13 Q And I don't know if you said this, do you
14 know if the time period in Litchfield that you would have been
15 shopping at Winn-Dixie, do you know if you were using credit
16 cards during that time period or the envelope cash that you
17 talked about?

18 A At Winn-Dixie, most likely cash still.
19 And my husband would always just give me cash for buying the
20 vacation groceries when we get there. So I would pay with cash.

21 Q Was anyone with you when you purchased the
22 baby powder at Winn-Dixie?

23 A Possibly my little kids. But I have no
24 set memory of that. I often run to the store while they're all
25 at the house playing or sleeping or -- I either go grocery

C E R T I F I C A T E

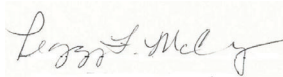
STATE OF TENNESSEE:

COUNTY OF SEVIER:

I, Peggy F. McCrory, Registered
Professional Reporter and Notary Public, do hereby certify that
I reported in machine shorthand the foregoing proceedings; that
the foregoing pages, numbered from 1 through 316, were typed by
me using computer-aided transcription and constitute a true and
accurate record of said proceedings.

I further certify that I am not an
attorney or counsel of any attorney or counsel connected with
the action, nor financially interested in the action.

Witness my hand and official seal this the
4th day of November, 2022.



Peggy F. McCrory, LCR #532
Registered Professional Reporter
And Notary Public at Large.

My Commission Expires: 8-29-26

EXHIBIT 4

STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND CASE NO. 2022-CP-40-1265

Sarah J. Plant and Parker Plant,
 Plaintiffs,

vs.

Avon Products, Inc., et al
 Defendants.

REMOTE VIDEOTAPED DEPOSITION OF IMI FABI DIANA, LLC,
IMI FABI USA, INC., AND IMI FABI, LLC,
GIVEN BY CORRADO FABI

DATE TAKEN: February 15, 2023
TIME BEGAN: 9:04 a.m.
TIME ENDED: 1:00 p.m.
REPORTED BY: Traci L. Barr

**CERTIFIED
TRANSCRIPT**

1 much with the questions because --

2 MS. O'NEILL: No, I'm not going to. I meant to ask you
3 that off the record. I forgot.

4 MS. BOLLINGER: Thank you. Okay.

5 EXAMINATION RESUMED

6 BY MS. BOLLINGER:

7 Q. Mr. Fabi, do you understand that the plaintiffs
8 have named three IMI Fabi entities in this case?

9 A. Yes.

10 Q. Correct?

11 A. Yes.

12 Q. Okay. What is IMI Fabi Diana?

13 A. Diana is a company in the State of New York that
14 ceased operations, talc operation, in 2004.

15 Q. It ceased talc operations. Is that what you
16 said?

17 A. Talc operation, yeah.

18 Q. When did IMI Fabi Diana start its talc
19 operations?

20 A. 2001.

21 Q. What type of talc did IMI Fabi Diana sell during
22 -- between 2001 and 2004?

23 A. Cosmetic and pharma products to Cosmetic
24 Specialties.

25 Q. After 2004, did IMI Fabi Diana cease to exist?

1 A. No. It is still in existence.

2 Q. Does it operate any type of business today?

3 A. No.

4 Q. Was there any other IMI Fabi entity selling
5 cosmetic talc at the same time as IMI Fabi Diana?

6 A. No.

7 Q. So between 2001 and 2004, IMI Fabi Diana was the
8 only IMI Fabi entity selling cosmetic talc,
9 correct?

10 A. Yes, yes.

11 Q. What is IMI Fabi, LLC?

12 A. It is a talc operation in West Virginia.

13 Q. Did IMI Fabi, LLC, sell cosmetic talc at any
14 point in time?

15 A. IMI Fabi, LLC, started in 2004 after Diana
16 stopped operation, to make it clear.

17 Q. And so IMI Fabi, LLC, started selling cosmetic
18 talc when IMI Fabi Diana ceased its talc
19 operations, correct?

20 A. Yes.

21 Q. How long did IMI Fabi, LLC, sell cosmetic talc
22 after 2004?

23 A. Until today.

24 Q. Did IMI -- does IMI Fabi, LLC, sell any other
25 types of talc besides cosmetic talc?

1 Q. Did you speak with anyone besides the lawyers to
2 prepare for your deposition today?

3 A. No.

4 Q. We talked about three IMI Fabi entities.
5 Do those entities have a parent company?

6 A. The parent company, IMI Fabi USA is owned by IMI
7 Fabi SPA.

8 Q. Who is IMI -- does IMI Fabi SPA own IMI Fabi,
9 LLC?

10 A. No. It's through IMI Fabi USA.

11 Q. Does IMI Fabi USA own IMI Fabi Diana?

12 A. No.

13 Q. Who owns IMI Fabi Diana?

14 A. LLC.

15 Q. Okay. Let me see if I have this correct. Okay.
16 IMI Fabi SPA owns IMI Fabi USA, correct?

17 A. Yes.

18 Q. IMI Fabi USA owns IMI Fabi, LLC, correct?

19 A. Yes, yes.

20 Q. And IMI Fabi, LLC, owns IMI Fabi Diana, right?

21 A. Yes, yes.

22 Q. Between 2001 and 2004, who owned IMI Fabi Diana?

23 A. LLC.

24 Q. Okay. Does IMI Fabi SPA own any talc mines?

25 A. IMI Fabi -- sorry to be precise. In Italy, you

1 DEFENSE ATTORNEY: Object to the form.

2 THE DEPONENT: Brazil.

3 EXAMINATION RESUMED

4 BY MS. BOLLINGER:

5 Q. Would that be true starting in 2021?

6 A. No. Brazil, we started in 2016.

7 Q. Right. Between 2001 and 2016, where did IMI Fabi
8 mine cosmetic talc from?

9 DEFENSE ATTORNEY: Object to the form.

10 THE DEPONENT: IMI Fabi never mined cosmetic talc.

11 EXAMINATION RESUMED

12 BY MS. BOLLINGER:

13 Q. And that's until 2016?

14 A. Right.

15 Q. Okay. Between 2001 and 2016, where did IMI Fabi
16 source its cosmetic talc from?

17 A. Benwood, West Virginia. Sorry. Just to be
18 precise, between 2001 and 2004, was Diana. From
19 2004 to today, Benwood.

20 Q. So help me understand. Between 2001 and 2004,
21 when Diana was selling cosmetic talc, where did
22 Diana's cosmetic talc come from?

23 A. China.

24 Q. Was there a specific province in China where it
25 came from?

1 A. Guanguang.

2 Q. Did someone sell that talc from China to Diana?

3 A. Minchen, M-I-N-C-H-E-N.

4 Q. Between 2001 and 2004, did Diana source its talc
5 from anywhere besides China?

6 DEFENSE ATTORNEY: Object to the form.

7 THE DEPONENT: Diana bought talc from China.

8 EXAMINATION RESUMED

9 BY MS. BOLLINGER:

10 Q. Did Diana buy cosmetic talc from anywhere else?

11 A. No.

12 Q. And to be clear, Diana only sold cosmetic talc?

13 A. Yes.

14 Q. Between 2004 and 2016, where did the cosmetic
15 talc at IMI Fabi, LLC come from?

16 A. Guanguang.

17 Q. And that was sold to IMI Fabi LLC by -- is it
18 Minchen?

19 A. Minchen, M-I-N-C-H-E-N. Now it was sold until
20 2010 or 2011. Then LLC bought the talc directly
21 from China. Minchen is a company based in Texas.

22 Q. Okay. So before -- between 2004 and 2010 or
23 2011, IMI Fabi, LLC, purchased talc from Minchen
24 in Texas, correct?

25 A. Yes, yes.

1 Q. And I'm specifically talking about cosmetic talc.
2 Correct?

3 A. Yes.

4 Q. Between 2004 and 2010 or '11, did İMI Fabi, LLC,
5 purchase cosmetic talc from anyone else besides
6 Minchen?

7 A. From Australia, but not for cosmetic talc, and
8 then around those years, also from Pakistan for
9 industrial talc, not for cosmetic.

10 Q. Okay. So between -- let me start over.
11 From 2004 to the present day, has İMI Fabi sold
12 talc from anywhere besides -- okay. Let me back
13 up.

14 Between 2004 and present, has İMI Fabi sold
15 cosmetic talc from any other country than China?

16 A. No. The cosmetic -- the raw material used to
17 make pharma and cosmetic products have always
18 come from China.

19 Q. Okay. Has any İMI Fabi entity, at any point in
20 time, had any business relationship with
21 Whittaker, Clark, and Daniels?

22 A. No.

23 Q. Okay. I am going to try to share my screen with
24 you. Can you see my screen, Mr. Fabi?

25 A. Let me wear my glasses. Yeah.

1 Q. Okay. Have you seen this document before?

2 A. Yes, I presume so. I mean, it's a purchase
3 order. I don't know if I have seen this specific
4 document, but, you know --

5 MS. O'NEILL: Can you tell me the Bates stamp number?

6 MS. BOLLINGER: The Bates stamp number is going to be
7 -- well, I was about to until this thing popped
8 up. Let me try to do it this way. Hold on one
9 second. Okay.

10 EXAMINATION RESUMED

11 BY MS. BOLLINGER:

12 Q. Can you still see my screen okay?

13 A. Yes.

14 Q. All right. The Bates stamp number is IMI
15 Fabi-Plant 000878. Do you see that, Mr. Fabi?

16 A. Yes.

17 Q. Okay. And this is a document dated August 31,
18 2001, correct?

19 A. Yes.

20 Q. And the vendor here is IMI Fabi Diana, correct?

21 A. Yes.

22 Q. And it is being shipped to Procter & Gamble care
23 of Sterigenics, correct?

24 A. Yes.

25 Q. IMI Fabi sold talc 141, correct?

1 A. To Cosmetic Specialties.

2 Q. Okay. We'll get into that.

3 A. Okay.

4 Q. Right here it says WCD 141 BC. Do you know what
5 WCD stands for?

6 A. It's the brand name of the product when we bought
7 the company. We didn't change the product range.

8 Q. Okay. Where does talc 141 -- at this point in
9 time in 2001, where did talc 141 come from?

10 A. China, Guanguang, and to Minchen.

11 Q. Do you have any reason to believe that WCD stands
12 for Whittaker, Clark, and Daniels?

13 DEFENSE ATTORNEY: Object to the form.

14 THE DEPONENT: I can guess so, but we never had any
15 relation with Whittaker, Clark, and Daniels.

16 EXAMINATION RESUMED

17 BY MS. BOLLINGER:

18 Q. Okay. And so -- I'm sorry. Go ahead.

19 A. As I said before, our contact and our distributor
20 has always been Cosmetic Specialties.

21 Q. Okay. And so has -- is the better question, has
22 IMI Fabi Diana ever sold Whittaker, Clark, and
23 Daniels talc?

24 A. To my knowledge, at least since 2001, our
25 products were sold to Cosmetic Specialties.

1 Q. Between 2001 and 2004, did IMI Fabi send talc to
2 Cosmetic Specialities to distribute?

3 A. Cosmetic Specialities always organized to pick up
4 material at our facility, so our material was
5 sold FOB Diana.

6 Q. Can you just explain to me what FOB means?

7 A. Free of board. It's an inter term. It's an
8 international terminology.

9 Q. Okay. What is free on board?

10 A. That you put on the truck, and the truck is
11 organized by another party, in this case Cosmetic
12 Specialities.

13 Q. Between 2004 and today, would Cosmetic
14 Specialities -- let me strike that.
15 Between 2004 and today, did IMI Fabi, LLC, ever
16 send any talc directly to Cosmetic Specialities?

17 A. No.

18 Q. Okay. And so to understand -- my understanding
19 of Cosmetic Specialities is that it does the
20 organizing of transporting the product to the
21 customer. Correct?

22 A. No.

23 DEFENSE ATTORNEY: Object to the form.

24 THE DEPONENT: No. Absolutely, Cosmetic Specialities
25 buys the product and sells our products according

1 A. In that I'm not aware about brands, cosmetic
2 brands, because it's not my expertise.

3 **Q. What do you mean by it's not your expertise?**

4 A. Because we have our contact is Cosmetic
5 Specialities, so we have no information of
6 Cosmetic Specialties' customer.

7 **Q. Okay. So you are -- you would not be aware that**
8 **Mrs. Plant testified to wearing CoverGirl pressed**
9 **powders every day starting around 1998, correct?**

10 DEFENSE ATTORNEY: Object to the form.

11 THE DEPONENT: I am not aware.

12 EXAMINATION RESUMED

13 BY MS. BOLLINGER:

14 **Q. Okay. I am going to show you a document.**

15 MS. BOLLINGER: And, Elizabeth, I'm not sure if that's
16 one of those exhibits. I haven't had the chance
17 to go back and check. I think it is. So just
18 let me know.

19 MS. O'NEILL: What's the Bates number? Do you know?

20 MS. BOLLINGER: The document is titled NOX-057. I'll
21 show it to you, and we can see --

22 MS. O'NEILL: Perfect.

23 MS. BOLLINGER: Sorry?

24 MS. O'NEILL: I said sure.

25 MS. BOLLINGER: Okay.

1 BY MS. BOLLINGER:

2 Q. It's -- let's see. I'm going to show you my
3 screen again. Can you see my screen okay?

4 A. Yes.

5 Q. Okay. I'm going to tell you that this is a
6 deposition, much like what you are giving today.
7 Okay?

8 A. Okay.

9 Q. And that interrogatory response, we acknowledge
10 that was in the Chapman case. Correct?

11 MS. O'NEILL: I'll stipulate to that, Jordan.

12 MS. BOLLINGER: Okay.

13 MS. O'NEILL: This is the deposition of whom? I can't
14 see.

15 MS. BOLLINGER: I'm going to scroll down and let you
16 see.

17 EXAMINATION RESUMED

18 BY MS. BOLLINGER:

19 Q. This is the videotaped videoconference deposition
20 of Richard Sutton.
21 Do you know who that is?

22 A. No.

23 Q. Okay. And he is testifying -- much like
24 yourself, he's testifying as the representative
25 of the Noxell Corporation, correct?

1 EXAMINATION RESUMED

2 BY MS. BOLLINGER:

3 Q. Okay. Mr. Fabi, did you talk to anyone about
4 your testimony while we were on the break?

5 A. No.

6 Q. Okay. All right. Do you see the document on my
7 screen right now?

8 A. Yes.

9 Q. These are Bates number 87, let's see, to 94, IMI
10 Fabi-Plant 87 to 94, right?

11 MS. O'NEILL: I've got them. Do you want me to hand
12 them to him?

13 MS. BOLLINGER: Yeah, if he wants to see them, that's
14 fine. Maybe it will help him to have all the
15 documents in front of him at once.

16 THE DEPONENT: I can see.

17 EXAMINATION RESUMED

18 BY MS. BOLLINGER:

19 Q. Okay. And so can you just tell me what these
20 documents are?

21 A. These are our revenues for industrial talc sold
22 to South Carolina in 2015.

23 Q. Okay. And this is IMI Fabi, LLC, correct?

24 A. Yes.

25 Q. Okay. Do you know how long IMI Fabi, LLC, has

1 then there is two other charts added to it.

2 Right?

3 A. Yes.

4 Q. Okay. Are those in addition to -- are those any
5 different than what we looked at on 151?

6 A. Yes. For your information, when you see CPT, it
7 means that we have organized the transport.

8 Q. Okay.

9 A. When you see Ex Works as the same meaning that we
10 discussed for Diana, so the carrier was organized
11 by the customer.

12 Q. Understand. Okay. So the second chart on 152 is
13 products sold directly to the customer, right?

14 A. And freight organized by IMI Fabi.

15 Q. Okay. Freight is organized by IMI Fabi.

16 And then the third chart on 152, that is where
17 the freight is organized by a different company,
18 right?

19 A. By the customer.

20 Q. Okay. By the customer. Understand. Okay.

21 MS. BOLLINGER: So that is going to be Exhibit 15.

22 MS. O'NEILL: I'm sorry. Jordan, Exhibit 15 is 151 and
23 152, correct?

24 MS. BOLLINGER: Correct. And then Exhibit 14, if I
25 wasn't clear on that one --

CERTIFICATE

I, the undersigned, Traci L. Barr, RPR,
Notary Public in and for the State of South
Carolina, do hereby certify that the deposition
of CORRADO FABI was taken on the 15th day of
February, 2023, that the within deponent was
sworn to tell the truth, and that the foregoing
is an accurate transcription of the testimony
taken under oath; that all exhibits entered
herein are attached hereto (if requested by
counsel) and made a part of this deposition.

I further certify that I am neither counsel
nor solicitor to any of the parties in said suit,
nor interested in the event of the cause.

In witness whereof, I have hereunto set my
hand and seal this 16th day of February, 2023.



Traci L. Barr, RPR
Notary Public for South Carolina
My Commission Expires: 4/24/29

EXHIBIT 5

Product Revenue in South Carolina - 2015

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		52,076.42			Isola Ridgeway, USA
		1,200,559.15			Michelin North America, Inc.
		135,402.72			PRET Advanced(Toyobo)Materials,LLC
		1,388,038.29			

Product Revenue in South Carolina - 2016

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		128,475.29			D&W Fine Pack
		91,744.45			Isola Ridgeway, USA
		1,191,324.15			Michelin North America, Inc.
		18,470.14			Michelin- Commerce Warehouse
		274,953.00			PRET Advanced(Toyobo)Materials,LLC
		956.50			Sukano Polymers Corporation
		1,705,923.53			

Product Revenue in South Carolina - 2017

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		102,303.89			D&W Fine Pack
		1,453.65			D&W Fine Pack SC
		91,660.05			Isola Ridgeway, USA
		1,090,997.74			Michelin North America, Inc.
		359,352.00			PRET Advanced(Toyobo)Materials,LLC
		1,645,767.33			

Product Revenue in South Carolina - 2018

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		79,428.98			Isola Ridgeway, USA
		1,071,268.25			Michelin North America, Inc.
		418,740.00			PRET Advanced(Toyobo)Materials,LLC
		1,569,437.23			

Product Revenue in South Carolina - 2019

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		78,528.70			Isola Ridgeway, USA
		1,249,253.31			Michelin North America, Inc.
		316,533.00			PRET Advanced(Toyobo)Materials,LLC
		1,644,315.01			

Product Revenue in South Carolina - 2020

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		17,820.00			Altera Polymers LLC
		91,954.74			Isola Ridgeway, USA
		1,077,271.36			Michelin North America, Inc.
		31,225.00			PRET Advanced Materials, LLC
		281,106.84			PRET Advanced(Toyobo)Materials,LLC
		1,499,377.94			

Product Revenue in South Carolina - 2021

VBELN	ERDAT	NETWR	KUNAG_ANA	KUNWE_ANA	NAME1
		78,961.00			Altera Polymers LLC
		107,884.92			Isola Ridgeway, USA
		1,202,406.75			Michelin North America, Inc.
		37,034.80			PRET Advanced Materials, LLC
		198,534.00			PRET Advanced(Toyobo)Materials,LLC
		1,624,821.47			

EXHIBIT 6

Sales to South Carolina from 2010 to 2022

Customer	Location	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
AalChem Corporation	Gaffney Warehouse, SC													
PRET	Johnsonville, SC				10							21	42	41
Toyobo	Johnsonville, SC	172	377	735	462		399	211	441	567	672	504	329	252
Altera Polymers	Easley/Jefferson, SC		1										66	301
DW Fine Pack	Fountain Inn, SC								216	216				100
Isola	Ridgeway, SC	61	51	57	69		55	65	112	111	99	97	102	121
Michelin	Anderson/Pendleton, SC	2420	2865	2824	2577	2680	2597	2680	2680	2432	2433	2721	2330	2494
Total in Short Tons	South Carolina	2654	3295	3617	3118	3052	3052	2956	3449	3326	3204	3322	2848	2484
		3.4%	4.1%	3.9%	3.2%	2.9%	2.8%	2.8%	3.2%	3.0%	3.1%	3.1%	3.0%	3.1%
		78646	81311	93871	98541	106426	105520	106727	112608	106669	105502	94306	103261	102925

Sales to South Carolina from 2010 to 2022

Customer	Incoterms	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
Aalchem Corporation	EXW					10							21	42	41
PRET	CPT														
Toyobo	CPT	172	377	735	462	399	211	441	567	672	504	329	252	47	
Altera Polymers	EXW		1									66	301	100	
DW Fine Pack	CPT							216	216						
Isola	EXW	61	51	57	69	55	65	112	111	99	97	102	102	121	112
Michelin	EXW	2420	2865	2824	2577	2597	2680	2680	2432	2433	2721	2330	2494	2184	2184
Total In Short Tons - South Carolina		2654	3295	3617	3118	3052	2956	3449	3326	3204	3322	2848	3210	2484	2484
		3.4%	4.1%	3.9%	3.2%	2.9%	2.8%	3.2%	3.0%	3.0%	3.1%	3.0%	3.1%	2.4%	2.4%
Total Sales		78646	81311	93871	98541	106426	105520	106727	112608	106669	105502	94306	103261	102925	

Customer	Incoterms	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
PRET	CPT					10							21	42	
Toyobo	CPT	172	377	735	462	399	211	441	567	672	504	329	252	47	
DW Fine Pack	CPT							216	216						
Total In Short Tons - South Carolina		172	377	735	472	399	211	657	783	672	504	350	294	47	
		0.2%	0.5%	0.8%	0.5%	0.4%	0.2%	0.6%	0.7%	0.6%	0.5%	0.4%	0.3%	0.0%	
Total Sales		78646	81311	93871	98541	106426	105520	106727	112608	106669	105502	94306	103261	102925	

Customer	Incoterms	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	
Aalchem Corporation	EXW												66	301	41
Altera Polymers	EXW														
Isola	EXW	61	51	57	69	55	65	112	111	99	97	102	102	121	112
Michelin	EXW	2420	2865	2824	2577	2597	2680	2680	2432	2433	2721	2330	2494	2184	2184
Total In Short Tons - South Carolina		2482	2918	2882	2646	2653	2745	2792	2543	2532	2818	2498	2916	2437	2437
		3.2%	3.6%	3.1%	2.7%	2.5%	2.6%	2.6%	2.3%	2.4%	2.7%	2.6%	2.8%	2.4%	2.4%
Total Sales		78646	81311	93871	98541	106426	105520	106727	112608	106669	105502	94306	103261	102925	

EXHIBIT 7



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2 **VANTHARA MEAK, ESQ. SBN 227441**
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9 Attorneys for Defendant
10 **NOXELL CORPORATION**

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**
13 **COMPLEX ASBESTOS LITIGATION**

14 **RITA-ANN CHAPMAN and**
15 **GARY CHAPMAN**

16 Plaintiff,

17 vs.

18 **AVON PRODUCTS, INC. *et al.***

19 Defendants.

Coordinated Case No. JCCP4674
Case No. 22STCV05968
Honorable Stuart M. Rice, Dept. 15

**DEFENDANT NOXELL
CORPORATION'S ANSWERS TO
PLAINTIFF GARY CHAPMAN'S
SPECIAL INTERROGATORIES (SET
ONE)**

20 PROPOUNDING PARTY: Plaintiff Gary Chapman

21 RESPONDING PARTY: Defendant Noxell Corporation

22 SET: One

23 **PRELIMINARY STATEMENT**

24 Defendant Noxell Corporation is not, nor has it ever been, a miner or miller of asbestos
25 fiber or a manufacturer of thermal asbestos insulation products that have typically been the focus
26 of asbestos personal injury litigation. Defendant manufactured consumer goods and has never been
27
28

1 a member of or has any affiliation with the “asbestos industry” as that term is commonly used.
2 Noxell has made a good-faith effort to respond to these Interrogatories based upon information that
3 is presently known and available to Noxell after a diligent and reasonable investigation. Noxell
4 believes that these responses (hereinafter “responses”) are accurate as of the date made. Many of
5 the matters inquired about in the Interrogatories, however, took place decades ago and, therefore,
6 responsive information may be incomplete or no longer available due to the passage of time.
7 Furthermore, many, if not all, of the persons who may have had knowledge of the particular facts,
8 events, or subject matters inquired into in the Interrogatories are now deceased or cannot be located.
9 Discovery remains ongoing and Noxell discovery reserves the right to supplement its responses in
10 the event additional relevant information is located.
11

12 **SPECIAL INTERROGATORIES**

13
14 **INTERROGATORY NO. 1:** Where did the talc used in CoverGirl products come from
15 between 1964 and 2022 (for example, Val Chisone, Italy; Willow Creek, Montana; Madoc, Canada,
16 etc.)?

17 **ANSWER:** Noxell objects to this interrogatory as ambiguous and overbroad. Noxell further
18 objects as this interrogatory is unduly burdensome and not reasonably calculated to lead to the
19 discovery of admissible evidence, as it is not limited to the relevant product at issue. Noxell objects
20 to this interrogatory to the extent it seeks information regarding an entity other than Defendant.
21 Subject to and without waiving its objections, upon best information and belief, a number of the
22 CoverGirl products which plaintiff claims to have used did not contain talc as an ingredient and
23 thus this Interrogatory is irrelevant as to some of the CoverGirl products. Further answering, upon
24 best information and belief, Noxell primarily used Talc 141 in the pressed powder products at issue
25 during the relevant time period. While Noxell cannot independently confirm the precise source of
26 Talc 141 during any particular time frame, Noxell believes that Talc 141 was sourced from mines
27
28

1 in Alabama and Montana at various times. To the extent Noxell has additional responsive
2 information regarding sources/suppliers of talc, relevant to the specific products at issue, please see
3 Noxell's document production produced in accordance with Noxell's discovery responses in this
4 litigation.

5
6 **INTERROGATORY NO. 2:** What are the names of the mines where the talc used in
7 CoverGirl products come from between 1964 and 2022 (for example, Beaverhead Mine, Fontana
8 Mine, Argonaut Mine, Hammondville Mine, etc.)?

9 **ANSWER:** Noxell objects to this interrogatory as ambiguous and overbroad. Noxell further
10 objects as this interrogatory is unduly burdensome and not reasonably calculated to lead to the
11 discovery of admissible evidence, as it is not limited to the relevant product at issue. Noxell objects
12 to this interrogatory to the extent it seeks information regarding an entity other than Defendant.
13 Subject to and without waiving its objections, see Answer to Interrogatory No. 1.
14

15 **INTERROGATORY NO. 3:** Who supplied the talc used in CoverGirl products between
16 1964 to 2022 (for example, Whittaker, Clark & Daniels, Luzenac, Imery's, etc.)?

17 **ANSWER:** Noxell objects to this interrogatory as ambiguous and overbroad. Noxell further
18 objects as this interrogatory is unduly burdensome and not reasonably calculated to lead to the
19 discovery of admissible evidence, as it is not limited to the relevant product at issue. Noxell objects
20 to this interrogatory to the extent it seeks information regarding an entity other than Defendant.
21 Subject to and without waiving its objections, upon best information and belief, Noxell believes
22 that talc supplied by Whittaker, Clark and Daniels; Cyprus; Imafabi and potentially other suppliers
23 was used in certain CoverGirl products at issue at various times during the relevant time period.
24 To the extent Noxell has additional responsive information regarding sources/suppliers of talc,
25 relevant to the specific product at issue, please see Noxell's document production produced in
26 accordance with Noxell's discovery responses in this litigation.
27
28

1 **INTERROGATORY NO. 4:** Please IDENTIFY the employees involved with the talc in
2 CoverGirl products between 1964 and 2022.

3 [As used herein, the term “IDENTIFY” means to provide the full name, last known address, and
4 last known phone number.]

5 **ANSWER:** Noxell objects to this interrogatory as it is vague, ambiguous, overbroad and
6 unduly burdensome. Noxell objects that the phrase “employees involved with the talc in Cover
7 Girl products” is vague and ambiguous. Noxell also objects to the overbreadth of this interrogatory
8 as it goes beyond the scope of allowable discovery under the California Rules of Civil Procedure.
9 Noxell also objects to the production of the personal information of its current and/or former
10 employees.
11

12 **INTERROGATORY NO. 5:** Has Noxell ever tested talc for asbestos?

13 **ANSWER:** Noxell objects as this interrogatory is vague and overbroad. Further, Noxell
14 objects to this interrogatory as it assumes facts not in evidence; particularly, to the extent it assumes
15 any nexus between any Noxell products and Plaintiff’s alleged exposure to asbestos. Noxell further
16 objects to this interrogatory to the extent it prematurely seeks expert opinion. Subject to and
17 without waiving its objections, Noxell never included asbestos as an ingredient in its products.
18 Further answering, Noxell never mined, milled nor distributed talc. Subject to and without waiving
19 these objections, Noxell is aware that since the 1970s, the CTFA required suppliers of talc to
20 provide Certificates of Analysis (COA) indicating that its talc had been tested and that no asbestos
21 had been found in the lots supplied. Noxell also required receipt of an acceptable Certificate of
22 Analysis before any talc received from a supplier was used in its manufacturing operation. Noxell
23 has located some documents in that regard for the time period at issue and is also aware through
24 documents and testimony provided in litigation that Noxell’s suppliers tested its talc before
25 shipping it to its customers and any lot wherein asbestos was detected was not to be shipped. To
26
27
28

1 the extent Noxell has additional information regarding the testing of the talc used in the specific
2 product at issue in this litigation, see Noxell's document production produced in accordance with
3 its discovery responses in this matter.

4 **INTERROGATORY NO. 6:** When did Noxell first test talc for asbestos?

5 **ANSWER:** Noxell objects as this interrogatory is vague and overbroad. Further, Noxell
6 objects to this interrogatory as it assumes facts not in evidence; particularly, to the extent it assumes
7 any nexus between any Noxell products and Plaintiff's alleged exposure to asbestos. Noxell further
8 objects to this interrogatory to the extent it prematurely seeks expert opinion. Subject to and
9 without waiving its objections, see Noxell's Response to Interrogatory No. 5.
10

11 **INTERROGATORY NO. 7:** How many times has Noxell tested talc for asbestos?

12 **ANSWER:** Noxell objects as this interrogatory is vague and overbroad. Further, Noxell
13 objects to this interrogatory as it assumes facts not in evidence; particularly, to the extent it assumes
14 any nexus between any Noxell products and Plaintiff's alleged exposure to asbestos. Noxell further
15 objects to this interrogatory to the extent it prematurely seeks expert opinion and information.
16 Subject to and without waiving its objections, see Noxell's Response to Interrogatory No. 5.
17

18 **INTERROGATORY NO. 8:** Why did Noxell test talc for asbestos?

19 **ANSWER:** Noxell objects as this interrogatory is vague and overbroad. Further, Noxell
20 objects to this interrogatory as it assumes facts not in evidence; particularly, to the extent it assumes
21 any nexus between any Noxell products and Plaintiff's alleged exposure to asbestos. Noxell further
22 objects to this interrogatory to the extent it prematurely seeks expert opinion and/or information.
23 Subject to and without waiving its objections, see Noxell's Response to Interrogatory No. 5.
24

25 **INTERROGATORY NO. 9:** Did Noxell ever tell its customers that it was testing talc for
26 asbestos?
27
28

1 **ANSWER:** Noxell objects as this interrogatory is vague and overbroad. Further, Noxell
2 objects to this interrogatory as it assumes facts not in evidence; particularly, to the extent it assumes
3 any nexus between any Noxell products and Plaintiff's alleged exposure to asbestos. Noxell further
4 objects to this interrogatory to the extent it prematurely seeks expert opinion and/or information.
5 Subject to and without waiving its objections, Noxell is not currently aware of any public
6 notification process regarding the various safety, purity and quality control tests that are conducted
7 on all of Noxell's raw materials and finished products. To the extent additional, responsive
8 information is known, please see Noxell's document production produced in accordance with its
9 discovery responses in this matter.
10

11 **INTERROGATORY NO. 10:** Which fashion magazines did CoverGirl advertise in
12 between 1964 and 2022 (for example, Vogue, Cosmopolitan, Seventeen, Elle, Vanity Fair, Bazaar,
13 W, Marie Claire, etc.)?
14

15 **ANSWER:** Noxell objects to this interrogatory as it is vague, ambiguous, overbroad and
16 unduly burdensome. Noxell further objects as the term "fashion magazine" is vague, undefined
17 and ambiguous. Noxell further objects as this interrogatory seeks information which is neither
18 relevant nor reasonably calculated to lead to the discovery of admissible evidence, as it is not
19 limited to the relevant product at issue. Furthermore, this interrogatory seeks information so remote
20 from the subject matter of the action that the burden imposed upon Noxell from responding to this
21 interrogatory as phrased far outweighs the little practical benefit Plaintiffs might derive therefrom.
22 Noxell also objects to this interrogatory to the extent it seeks publicly available information. To the
23

24 ///

25 ///

26 ///

27 ///

1 extent Noxell has any responsive information regarding the product at issue, see Noxell's
2 document production produced in accordance with Noxell's discovery responses in this matter.
3

4 DATED: June 23, 2022
5

6 **RIDLEY♦MASTER**
7

8 By: /s/ Vanthara Meak

9 **SHAWN M. RIDLEY SBN 144311**

10 **VANTHARA MEAK SBN 227441**

11 **RIDLEY♦MASTER**

12 1900 O'Farrell Street, Suite 280

13 San Mateo, CA 94403 Telephone: (650) 365-7715
14

15 Attorneys for Defendant

16 **NOXELL CORPORATION**
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1 *Rita-Ann and Gary Chapman v. Avon Products, Inc., et al./LASC Case No. 22STCV05968*

2 **PROOF OF SERVICE BY ELECTRONIC TRANSMISSION**

3
4 I, the undersigned, declare: that I am, and was at the time of service of the documents
5 herein referred to, over the age of 18 years, and not a party to the action; and I am employed in
6 the County of San Mateo, State of California. My business address is 1900 O'Farrell Street, Suite
7 280, San Mateo, California 94403.

8 On the date executed below, I electronically served the document(s) via File &
9 ServeXpress described as:

- 10
11 **▪ DEFENDANT NOXELL CORPORATION'S ANSWERS TO PLAINTIFF
12 GARY CHAPMAN'S SPECIAL INTERROGATORIES (SET ONE)**

13 on the recipients designated on the Transaction Receipt located on the File & ServeXpress
14 website. I declare under penalty of perjury pursuant to the laws of the State of California that the
15 foregoing is true and correct and was executed on **June 23, 2022**, at San Mateo, California.

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28



Faith Kelly

EXHIBIT 8

CONFIDENTIAL

Procter & Gamble C&F North America
Formula CardAPPROVED
Page 2 of 2

Description: CG CLEAN FRAGRANCE FREE PRESSED POWDER
 Formula Code: HVS247-43
 Shade Name: SOFT HONEY
 Making Instruction: PRESSED POWDER - PROCEDURE A (60073038)
 Reason For Change: CORRECT DOC GCAS CODE

Date Typed: 08/09/01
 Previous Date Typed: 07/31/00
 Date Expiry: UNTIL SUPERSEDED
 Doc GCAS Number: 64017768
 GCAS Number: 15138358
 Part Number: 2986360

Batch Size: 650 KG

Vessel Size: 75 CU FT

Batch No.: _____

Active Ingredients: NA

Act	Ingredients In Sequence	GCAS No.	Part No.	MF % by Weight	Target Weight	Approved Alternate Material		Adjusted Target Weight	Actual Wt. (Kg) (BC Only)	Add By	Check By**
						GCAS #	Part #				
Phase: A											
	TALC (141 TYPE) BAG	10200017	1802980	47.928	311.53 kg	10200015	1802981				
	TALC MICRO-ACE P-4 TYPE	11081302	1808640	20.000	130.00 kg						
	ZINC STEARATE 695, USP	11082925	1802990	5.000	32.50 kg						
	OAT FLOUR (STERILIZED)	11081155	1804050	5.000	32.50 kg						
	POLYETHYLENE B-6	11081131	1808170	5.000	32.50 kg						
	PEARL, MICA SVA	11081240	1808180	5.000	32.50 kg						
	CALCIUM SILICATE	11081161	1805080	2.000	13.00 kg						
	METHYL PARABEN, NF1800560	11500000	1800550	0.200	1.3000 kg						
	PROPYL PARABEN, NF	11500015	1800560	0.100	0.6500 kg						
	SODIUM DEHYDROACETATE MONOHYDRATE	11081137	1802700	0.100	0.6500 kg						
	BHT	11109954	1808330	0.050	0.3250 kg						
	DOWICIL 200	11081138	1802770	0.020	0.1300 kg						
	RED A-6205 OR TYPE	11081069	1801500	1.328	8.63 kg						
	YELLOW 34-3170 OR TYPE	11081078	1805140	1.482	9.63 kg						
	BLACK 34-3068 OR TYPE	11081127	1802540	1.102	7.16 kg						
Phase: B											
	OCTYL DODECYL STEAROYL STEARATE	11081139	1806800	4.880	31.72 kg						
	SILICONE (SF-96-350 TYPE)	11800330	1802380	0.810	5.26 kg						
Totals:				100	650						

** To be used only when CCATS system is shut down or unavailable.

The above ingredients shall be measured to within 1% of the indicated target or volume. Target weights of colorants may be adjusted to achieve shade.

If an approved alternate material exists, the material numbers will show in the approved alternate material columns which means that this material can be substituted for the original material. This is the only time that a material can be substituted.

This Batch Card is an Accurate Reproduction of the Master Batch Card

PS Authorization

Date

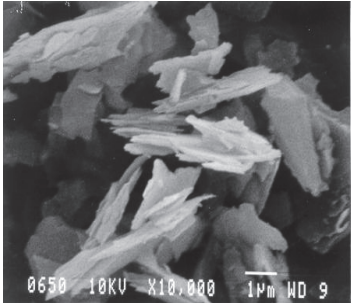
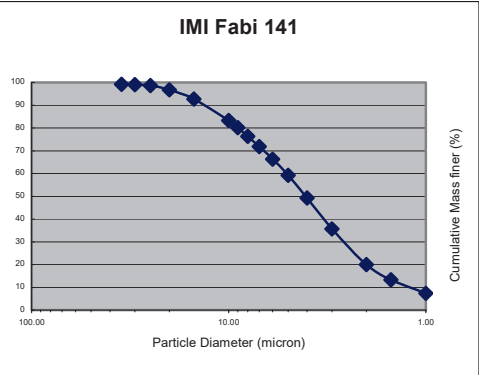
ELECTRONICALLY FILED - 2023 Feb 18 11:08 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001265

EXHIBIT 9

#	RM #	Raw Material Name	Wet %	WetWt	Units
		New Phase	100.00%	1000.00	g
1	10200017	TALC 141	69.096%	690.96	g
2	11081127	IRON OXIDES BLACK 34-3068-EQ	0.043%	0.43	g
3	11081069	Red Iron Oxide	0.095%	0.95	g
4	11081078	SunCroma Yellow Iron Oxide C33-8073	0.146%	1.46	g
5	11081136	325 Titanium Dioxide (HOMBITAN FF-PHARMA)	1.50%	15.00	g
6	11081155	Tech-O 11-070	5.00%	50.00	g
7	99619708	FC COVG 103-068 I44C	2.07%	20.70	g
8	11081143	Kaolin	7.00%	70.00	g
9	11800330	Xiameter PMX-200 Silicone Fluid 350CS	0.50%	5.00	g
10	11109954	BHT	0.05%	0.50	g
11	97275837	Perfume Oil 1868-AF 2014C 5493347	0.75%	7.50	g
12	11081137	TRISTAT SDHAFCC/NF	0.30%	3.00	g
13	11082925	Zinc Stearate	10.00%	100.00	g
14	10200040	Carnation White Mineral Oil	3.00%	30.00	g
15	11500000	Methylparaben	0.35%	3.50	g
16	11500015	PROPYLPARABEN	0.10%	1.00	g
		TOTALS:	100.00%	1000.00	g



IMI Fabi Talc 141

Mineralogy		Thermogravimetric and X-ray Diffraction	
Laminar	Talc	98	%
	Water Solubles	< 0.1	%
	Acid Solubles	< 6.0	%
	Arsenic	< 3	PPM
	Lead	< 20	PPM
Brightness		95	CIE L *
MICROBIOLOGICAL ANALYSIS .Total aerobic plate count including yeast and mold <100 per gram. .Gram negative plate count not detected .IMI Fabi 141 is certified to meet the latest Cosmetic, Toiletry and Fragrance Association specifications.			
			
		99.8	Thru 325 Mesh
Specific Gravity		2.73	g/cm ³
Loose density		17	pounds/ft ³
Tapped Density		41	pounds/ft ³
Chemical Analysis			
SiO ₂		61.5	%
MgO		31.4	%
CaO		0.5	%
Fe ₂ O ₃		0.6	%
Al ₂ O ₃		0.5	%
Hardness		1.0	Mohs
Moisture		0.5	%
Loss on Ignition		< 6.0	%

The statements in this bulletin are based on data, which is believed to be reliable. This data is offered in good faith and typical of normal production. IMI Fabi USA, LLC makes no warranty or representation, expressed or implied, regarding the accuracy of this data or the use of this product. The user is solely responsible for the use of this product. IMI Fabi USA, LLC disclaims any liability based on any claim of patent infringement.

04/2001 - Regulatory Approvals: IMI Fabi LLC talc products meet the FDA requirements of Title 21 CFR 73.1550 Color Additives Certification, Title 21 CFR 182.70 and 182.90 Food Contact Surface Component and Title 21 CFR 75.300(B)(3) Resinous and Polymeric Coatings. The IMI Fabi LLC talc products are on the US TSCA List and the Canadian DSL. See the MSDS for safety and additional regulatory information.

IMIFABI LLC
 Second & Marshall Street, Benwood, West Virginia 26031, USA
 ☎ (304) 233 0050 fax : (304) 232 0793



March 18, 2011

Dear Customer,

This letter states that all the products commercialized under the brand IMI Fabi are free of asbestos.

IMI Fabi developed controls, starting from the ore selection to the final product, to guarantee the absence of asbestos from its products.

The absence of asbestos is checked by standard techniques to confirm the absence of asbestiform minerals (CTFA Method J 4-1 10.07.76: Asbestiform Amphibole Minerals in cosmetic talc), by:

- *X-ray diffraction (XRD)*: detection limit 0.5%wt
- *Contrast Phase Optical Microscopy (CPOM)*: detection limit is the presence of few fibers per sample; the outcome of this analysis is "asbestos free" or "containing asbestos".
- *SEM-EDS electronic microscopy*: when necessary, to confirm the results of previous analyses.

Additional controls are periodically carried out by independent Institutes for the Occupational Health (in EU and in USA, accredited by National Authorities) that issue official certifications on the absence of asbestos.

IMI Fabi is member of the Industrial Minerals Association: this association periodically promotes workgroups and round-robins exercises among different labs on issues relating the occupational health.

For the reasons mentioned above, IMI Fabi declares as follows:

1. Asbestos has never been detected in IMI Fabi talc products.
2. All cosmetic grade Talc is free of asbestos.

We are at your disposal for any further requests.

Faithfully,
Marco Leusciatti
(IMI Fabi S.p.a.)



Postalesio, 19.10.2012

Customer: **Cosmetic Specialties**

Subject: **Free of asbestos and free silica content – IMI Fabi Cosmetic and Pharmaceutical Talc Products**

This letter states that IMI Fabi checks to guarantee the absence of asbestos from its products at different steps of the production process, from the extraction and selection of the ore material to the final manufactured product.

The analyses on the final products are carried out by an independent Laboratory, recognized by the Italian Department of Health.

It is possible also to highlight that in many years of control by the external labs, asbestiform minerals have been never found in IMI Fabi talc products.

In reference to the level of quartz into the IMI Fabi products, more specifically our “pharma/cosmetic grade” products, have a level of quartz (crystalline free silica) below the instrumental detection limit when the sample is analysed by XRD (IMI Fabi constantly checks the absence of quartz in its products by XRD).

Furthermore we would like to inform you that IMI Fabi participates to international programs of monitoring the quartz level in the airborne dusts in its plant and to international Industrial Hygiene projects.

For the reasons mentioned above, IMI Fabi declares that:

- It has been never detected asbestiform minerals in IMI Fabi talc products.
- IMI Fabi Cosmetic/Pharmaceutical talc is free of asbestos.
- IMI Fabi Cosmetic/Pharmaceutical talc is free of quartz

At your disposal for any further requests.
Kind regards

Marco Leusciatti
(IMI Fabi S.p.a. – Quality Assurance)

A handwritten signature in black ink, appearing to read 'Marco Leusciatti'.



Material Safety Data Sheet

Issue date: February 2008

1 – IDENTIFICATION OF THE MATERIAL AND SUPPLIER

Substance: Talc
 Chemical formula: $\text{Mg}_3(\text{OH})_2\text{Si}_4\text{O}_{10}$
 Molecular formula: $3\text{MgO} \cdot 4\text{SiO}_2 \cdot \text{H}_2\text{O}$
 Mineralogical class: silicates

Trade names: Talc Series HTP, Series BT, Series HC, Series HM, Series CH, Series GT, 140, 141, 1626, 1656, 1625, 3355, 5258, 5259, 1629, 3351, 3351 Dense, 3351 Lustre, 3355 Dense, 114, 643, LO-MICRON #5

Company Name: IMI Fabi L.L.C.

Address: Second and Marshall Street – Benwood
 West Virginia 26031 U.S.A.

Telephone number: +1-304-2330050 (available into the office hours)

2 – HAZARDS IDENTIFICATION

2.1 Inhalation: Symptoms of acute accidental exposure are non specific and similar to the inhalation of any dust.; such symptoms may include paroxysmal coughing, wheezing, difficult breathing and upper respiratory tract irritation. The repeated overexposure can develop a benign pneumoconiosis, known as talcosis, which can cause respiratory problems and lung complications. Smoking and concomitant diseases might impose an additional pulmonary burden which may alter the course of the pneumoconiosis.

2.2 Eye contact: As with most dusts or particulate materials, talc can cause temporary discomfort and irritation if accidentally introduced into the eye

2.3 Skin contact: No adverse effects are known as a consequence of application to unbroken skin

3 – COMPOSITION

3.1 Chemical (mineralogical) composition

Main constituents:			
Name	CAS No	EINECS No	Conc. Range (%wt/wt)
Talc	14807-96-6	238-877-9	70-98
Chlorite	1318-59-8	215-285-9	0.5-30
Dolomite	16389-88-1	240-440-2	0-1
Magnesite	83897-85-2	281-193-0	0-1

3.2 Components presenting a health hazard

Not present. Free of quartz and asbestos.



4 – FIRST AID MEASURES

- 4.1 Eye contact:** flush the affected eye(s) with clean water while holding the eyelids open; if irritation or redness develops, seek medical attention.
- 4.2 Ingestion:** no treatment necessary.
- 4.3 Inhalation:** if irritation of nose or throat develops, move away from source of exposure and into fresh air; if irritation persists or breathing difficulties develop seek immediate medical attention.
- 4.4 Skin contact:** usually of no general concern; broken skin can be cleansed with mild soap and water; if irritation or redness develops and persists, seek medical attention.

5 – FIRE FIGHTING MEASURES

- Fire and explosion hazards: NO.
- Extinguishing media: NONE REQUIRED.
- Fire fighting procedures: NONE REQUIRED.

6 – ACCIDENTAL RELEASE MEASURES

- 6.1 Personal precautions:** wear protective clothes and mask as protection from the dust
- 6.2 Environmental precaution:** the product is environmental safe
- 6.3 Method for cleaning up:** If the products is clean an dry, shovel, vacuum or sweep up and return to container for use.
Otherwise sweep or vacuum up for disposal.
CAUTION : the use of water washdown is not recommended unless the spilled material is already wet.
Wet material on a walking surface will be extremely slippery.
Wet spills should be thoroughly flushed with water until non-slippery.

7 – HANDLING AND STOCKING

- 7.1 Safe Handling Advice:** Talc, like all fine powders, can create dust when handled; Keep all floors, workstation, stairs and handrails clean and dry.
- 7.2 Stocking:** Keep in a clean and dry place; all traditional packing methods can be used.
- 7.3 Specific use:** description not required since it is no end-product.

8 – EXPOSURE CONTROL/PERSONAL PROTECTION

- 8.1 Ventilation:** If current ventilation practices are non adequate in maintaining airborne concentrations of talc below the TLV (see also point 15 of the present document), additional ventilation or local exhaust systems may be required



8.2 Respiratory Protection:

Avoid prolonged or intensive dust exposure; approved dust respirators should be worn in locations where exposure limits may be exceeded.

8.3 Eye Protection:

If necessary, safety glasses or goggles should be worn in areas of potentially high dust concentrations.

8.4 Hand Protection:

Protective gloves generally are not required, but recommended for workers who suffers from dermatitis or are susceptible to irritation and dry skin.

8.5 Environmental exposure control:

it is not provided because the substance, not classified as toxic, exists as natural mineral and it is widespread in the soil.

9 – CHEMICAL AND PHYSICAL PROPERTIES

9.1 General information

Physical state:	powder
Odour:	none
Colour:	white or near white to light gray

9.2 Important health, safety and environmental informations

Density:	2,7 g/cm ³
pH:	approx. 9
Melting point:	1250-1350°C
Decomposition temperature:	starting around 550°C,
Solubility in water:	approx. 0,2% at 20°C
Solubility in hydrofluoric acid:	soluble

10 – STABILITY AND REACTIVITY

10.1 Decomposition Products: No hazardous products (CO₂ and H₂O >550°C).

10.2 Incompatibility: None.

11 – TOXICOLOGICAL INFORMATION

Toxicology: Talc is neither orally nor cutaneously toxic. The IARC (International Agency for Research on Cancer) working group stated that there is no evidence of cancerogenity genotoxicity both on animals and on man.
No teratogenic effects were found on animals after oral ingestion of talc (Food and Drugs Research Laboratories, 1973).
Talc is not listed as a carcinogen by NTP (US National Toxicological Program) and not regulated as a carcinogen by OSHA (US Occupational Safety and Health Agency).

12 – ECOLOGICAL INFORMATION

Ecotoxicity: No known dangerous effects on the environment.

13 – DISPOSAL CONSIDERATIONS



Disposal consideration:

Talc is not a hazardous waste; dispose of in accordance with local, state and federal regulations.

Dry material can be landfilled, wet material sewered, if diluted enough that high viscosity or will not cause a blockage and respecting the local Laws.

14 – TRANSPORT INFORMATION

U.S. Dept. of transportation	:	NOT REGULATED
Canadian Transportation of dangerous goods	:	NOT REGULATED
Air transport – IATA/ICAO	:	NOT REGULATED
RID/ADR (Int. Regulation for Transport of dangerous Products)	:	NOT LISTED
DOT (Department of Transportation classification)	:	NOT HAZARDOUS
DOT proper shipping name	:	NOT REGULATED
BC Code (Code of Safe Practice for Solid Bulk Cargoes)	:	NOT HAZARDOUS
IMGD (Intern. Code for Dangerous Products)	:	NOT HAZARDOUS
UN Classification for dangerous Products	:	NOT LISTED

15 – REGULATORY INFORMATION

Talc is not classified as a toxic or dangerous substance.

Respirable dust levels are monitored on a regularly scheduled basis in some EEC or Extra-EEC countries.

Particularly:

- in the USA	:	2mg/m ³ ;
- In Italy, Germany and Belgium	:	2mg/m ³ ;
- in the U.K. and Holland	:	1mg/m ³ ,
- in Finland and Austria	:	5mg/m ³ .

EPA TSCA status	:	listed (CAS #14807-96-6)
EPA TSCA 12(B) Export notification	:	not listed
CEPA Domestic substances list – DSL status	:	listed
CEPA Non-Domestic substances list – NDSL status	:	not listed
Canadian WHMIS classification	:	D2b – Chronic inhalation hazard

California Proposition 65 Status	:	talc not listed
State Right-to-know	:	talc listed - Florida; Illinois; Massachusetts; New Jersey; Pennsylvania.

Clean Air Act – ODC's	:	none

Other Inventories	:	AICS (Australian)
	:	ECL (Korean No: KE 1-686)
	:	KECI (Korean No: KE 32773)
	:	SWISS (ID No: G-6939)
	:	PICCS (Philippines)
	:	MITI (Japan) – Not Listed (not required for natural minerals)
	:	ISHL (Japan) – Not listed
	:	DSL (listed)
	:	NDSL (not listed)
	:	IECSC (China – listed)
	:	NZIoC (New Zealand – listed)

16 – ADDITIONAL INFORMATION

Sources used in preparation of this Safety Data Sheet include:

the American Industrial Hygiene Association; Hygienic Guide Series on Talc.

the American Conference of Governmental Industrial Hygienists TLV and Biological Exposure Indices.

The various national regulations for airborne dusts.

IARC Monographs on the evaluation of the carcinogenic risk of chemicals to humans.



Liability: The data contained herein is based on data available to us and is believed to be correct and accurate. However, the information makes no warranty, expressed or implied, regarding the accuracy or completeness of this information or the result to be obtained from the use thereof.

Issued by: Mario Mondonico - IMI FABI S.p.A.



Revision, 7/3/06

MATERIAL SAFETY DATA SHEET

- ◆ 2001/58/EC EEC directive 27/07/2001
- ◆ OSHA 29 CFR 1910.1200

1. Identification

1.1 Trade name : HTPultra 5, HTPultra 5c, HTPultra 10, HTPultra 10c, HTP05, HTP05c, HTP1, HTP1c, HTP2, HTP2c, HTP3, HTP4, BT-2201, BT-2202, BT-2203, BT-2204, BT-2207, BT-2209, BT-2210, BT-2213, BT-2202C, BT-2203C, BT-2204C, HTPultra 10c-SFX, GT-4410, HM2, HM3, HM3c, HM4, HM05, 140, 141, 1626, 1656, 1625, 3355, 3355 Dense, 5258, 1629, 3351, 3351 Dense, 643, 114, Lo-Micron #5, 3351 Lustre

1.2 Supplier IMI FABI, LLC – Second and Marshall Street, Benwood, V. 26031
phone (304) 233-0050 fax (304) 232-0793 E-mail: sales@imifabi.com

2. Composition

Magnesium Silicate Hydrate; $Mg_3((OH)_2Si_4O_{10})$

	CAS N	EINECS
Talc	14807-96-6	238-877-9
Chlorite	1318-59-8	215-285-9
Asbestos	77536-68-6	not registered (never detected)
Quartz	14808-60-7	238-874-4 (never detected)

3. Hazards Identification

3.1 Inhalation: Symptoms of acute accidental exposure are non-specific and similar to the inhalation of any dust.; such symptoms may include paroxysmal coughing, wheezing, difficult breathing and upper respiratory tract irritation. The repeated overexposure can develop a benign pneumoconiosis, known as talcosis, which can cause respiratory problems and lung complications. Smoking and concomitant diseases might impose an additional pulmonary burden which may alter the course of the pneumoconiosis.

3.2 Eye contact: As with most dusts or particulate materials, talc can cause temporary discomfort and irritation if accidentally introduced into the eye

3.3 Skin contact: No adverse effects are known as a consequence of application to unbroken skin

4. First Aid Measures

4.1 Inhalation: If irritation of nose or throat develops, move away from source of exposure and into fresh air; if irritation persists or breathing difficulties develop seek immediate medical attention.

4.2 Eye contact: Flush the affected eye(s) with clean water while holding the eyelids open; if irritation or redness develops, seek medical attention.

4.3 Skin contact: Usually of no general concern; broken skin can be cleansed with mild soap and water; if irritation or redness develops and persists, seek medical attention.

4.4 Ingestion: No treatment necessary.

5. Fire Fighting Measures

Fire and explosion hazards	:	NO.
Extinguishing media	:	NONE REQUIRED.
Fire fighting procedures	:	NONE REQUIRED.



6. Accidental Release Measures

If the product is clean and dry, shovel, vacuum or sweep up and return to container for use. Otherwise sweep or vacuum up for disposal.

CAUTION : the use of water wash-down is not recommended unless the spilled material is already wet. Wet material on a walking surface will be extremely slippery. Wet spills should be thoroughly flushed with water until non-slippery.

7. Handling and Stocking

7.1 Handling: Talc, like all fine powders, can create dust when handled. Keep all floors, workstation, stairs and handrails clean and dry.

7.2 Storage: Keep in a clean and dry place; all traditional packing methods can be used.

8. Exposure Control/Personal Protection

OSHA PEL

Table Z-3

20 mppcf (2 mg/cu. meter)

ACGIH TLV

RESPIRABLE DUST (TWA-8 Hours Period)

2 mg/cu. meter

The exposure limits of TALC are shown in Table Z-3-Mineral Dust, published by OSHA (29 CFR 1910.1000) USA

8.1 Ventilation: If current ventilation practices are non-adequate in maintaining airborne concentrations of talc below the TLV, additional ventilation or local exhaust systems may be required

8.2 Respiratory Protection: Avoid prolonged or intensive dust exposure; approved dust respirators should be worn in locations where exposure limits may be exceeded.

8.3 Eye Protection: If necessary, safety glasses or goggles should be worn in areas of potentially high dust concentrations.

8.4 Hand Protection: Protective gloves generally are not required, but recommended for workers who suffers from dermatitis or are susceptible to irritation and dry skin.

9. Chemical and physical characteristics

9.1 Appearance: powder

9.2 Odour: none

9.3 Colour

: white or near white

9.4 Density: 2,7 g/cm³

9.5 pH: approx. 9

9.6 Melting point

: 1250-1350°C

9.7 Solubility in water: approx. 0,2% at 20°C

10. Stability and Reactivity

10.1 Decomposition Products : NO HAZARDOUS PRODUCTS (WATER AND CO₂>400°C).

10.2 Incompatibility : NONE.

11. Toxicological Information

Talc is neither orally nor cutaneously toxic. The IARC (International Agency for Research on Cancer) working group stated that there is no evidence of carcinogen status or genotoxicity both on animals and on man.



No teratogenic effects were found in animals after oral ingestion of talc (Food and Drugs Research Laboratories, 1973).

Talc is not listed as a carcinogen by NTP (US National Toxicological Program) and not regulated as a carcinogen by OSHA (US Occupational Safety and Health Agency).

12. Ecological Information

No known dangerous effects on the environment.

13. Disposal Considerations

Talc is not a hazardous waste; dispose of in accordance with local, state and federal regulations.

Dry material can be landfilled, wet material sewered, if diluted enough that high viscosity or will not cause a blockage.

14. Transport Information

RID/ADR (Int. Regulation for Transport of dangerous Products)	:	NOT LISTED
DOT (Department of Transportation classification)	:	NOT HAZARDOUS
DOT proper shipping name	:	NOT REGULATED
BC Code (Code of Safe Practice for Solid Bulk Cargoes)	:	NOT HAZARDOUS
IMGD (Intern. Code for Dangerous Products)	:	NOT HAZARDOUS
UN Classification for dangerous Products	:	NOT LISTED

15. Regulatory Information

Talc is not classified as a toxic or dangerous substance (EEC Directive 79/831).

Respirable dust levels should be monitored on a regularly scheduled basis following the local or national regulations.

Canadian WHIMIS: Class D, Division 2, Sub-division A

Canadian DSL: As a naturally occurring substance, talc is considered to be on the Canadian DSL

CERCLA: 40 CFR Part 302, Table 302.4/Talc is not listed, notification of spill is not required.

EPA-TCLP: 40 CFR Part 261-24, Appendix II-Table 1. No noticeable amount of toxic substance leaches out.

RCRA: Talc is not classified as a hazardous waste under Section 3001 of RCR and under regulation 40 CFR Part 261.4 (b)(7)

SARA TITLE III: This product is not subject to SARA Title III

TSCA CHEMICAL SUBSTANCE INVENTORY: Talc is listed, CAS# 14807-96-6

16. Additional Information

Sources used in preparation of this Safety Data Sheet include:

The American Industrial Hygiene Association; Hygienic Guide Series on Talc.

The American Conference of Governmental Industrial Hygienists TLV and Biological Exposure Indices.

The various national regulations for airborne dusts.

IARC Monographs on the evaluation of the carcinogenic risk of chemicals to humans.

The data contained herein is based on data available to us and is believed to be correct and accurate. However, the information makes no warranty, expressed or implied, regarding the accuracy or completeness of this information or the result to be obtained from the use thereof.

MSDS issued by Mario Russo
Revision by Martin Hayes
Revision by Martin Hayes
Revision by Martin Hayes
Revision by Brian Lewis
Revision by Matteo Crottogini

Postalesio, 2001-06-01
revision, 2004-09-01
revision, 2005-01-03
revision, 2005-03-30
revision, 2006-04-12
revision, 2006-07-03

For more instructions/examples of data requested, view 'comment' data by hovering over the red triangle. To print: File/Page Setup/Sheet/Comment-at end of sheet. Then File/Print form.

P&G Internal Tracking Info (to be filled out by the R&D Requestor prior to sending questionnaire):

P&G Raw Material #:	10200015 & 10200017	RM SMART RQ #:	n/a	Chemical Category:	Select	Date (DD-MMM-YY):	9-Mar-11
R&D Requester Name:	n/a	Phone/FAX:	n/a	e-mail:	n/a		
Product Safety & Regulatory Affairs (PS&RA) Contact Name:	Julie Whitten	Phone/FAX:	513-622-3972	e-mail:	whitten.jj@pg.com		

RAW MATERIAL DATA (please fill out electronically)

This questionnaire is intended to provide technical understanding of your raw material & company. These data are essential for accurate safety & regulatory assessments. As such, the prompt & accurate completion of all sections in ENGLISH facilitates this process. If the information being requested is not available or not applicable, please indicate. Refer to an attached document if the data is available there.

Completion certifies all your lots will comply with data provided until further notice. Any changes require your submission of a new questionnaire to P&G before use.

Complete this Basics Worksheet (BW) for the final material provided to P&G. If your material includes other 'mixtures' (e.g., preservatives, botanicals or other tradename materials) include the Tradename/Supplier in this sheet and EITHER complete a new Basics worksheet for mixture if you manufacture it or know the composition OR we will contact the supplier for their complete compositional disclosure.

See row 25 comment for instructions to copy the Basics worksheet.

E-mail this form (in this Excel format) with the MSDS, SDS, COA, Technical specification & other certifications (BSE/TSE, SRM, Kosher, Halal, GMO, etc.) to the Requestor & PS&RA Contacts.

Is this data covered by an existing 'PS&RA Only Confidential Disclosure Agreement'?	No	If yes, send the completed questionnaire directly to the PS&RA Contact bypassing the R&D Requester. Send related public documents (i.e. MSDS, Spec) to the Requester & PS&RA Contacts.	
MANUFACTURER NAME:	IMI Fabi LLC	Manufacturing full address(es) for this material:	2nd and Marshall Sts., Benwood, WV 26031
If multiple manufacturing sites, is the composition (& all CAS #) the same at each site? (Yes/No) If no, explain differences:		N/A	
MATERIAL-PRODUCT NAME:	Talc 141	Product Code/Inventory #:	Talc 141
SUPPLIER/Distributor Name:	Cosmetic Specialties, Inc.	SUPPLIER/Distributor Full Address:	308 White Horse Pike, Haddon Heights, NJ 08035
TECHNICAL Contact Name:	Sean Grexa	Title:	VP
PHONE:	856-547-9298 X12	FAX:	856-547-5002
DATE OF COMPLETION (DD-MMM-YY):		17-03-2011	

COMPOSITION Details (2 Parts - Intentionally Added Constituents & Unintentional Constituents) SECTION

Part 1 - Intentionally Added Constituents Still Present in the final material. Each must have low, target & high. Total of all target values must equal **100%**.

If total is over **100%** please indicate reason - i.e. substitute materials used & clearly mark the appropriate and/or relationships in the Constituent Relationship field.

Duplicate this worksheet if more rows are needed in Part 1 or Part 2. **DO NOT try to insert rows.** See comment.

Constituent Types:

Key - Chemicals intended to demonstrate functionality in finished formula. Provide low, target & high values.

Additive - Any chemicals intentionally added to maintain its quality, stability or for another purpose. They don't function in the finished product formula.

Examples are preservatives, colorants, anti-oxidants, UV filters, dilution or extract solvents (including water), processing aids, etc.

IF ANY CONSTITUENT(S) USED ARE MADE BY ANOTHER MANUFACTURER, ENSURE YOU ADD TRADE NAME & SUPPLIER DETAILS & SEND US THE MSDS/SDS & TECHNICAL SPECIFICATION.

Trade Name and Supplier Company Name, Contact Name & e-mail Address	Chemical Name (mandatory) and INCI Name (if applicable)	CAS # or PMN #	Low (wt %)	Target (wt %)	High (wt %)	Function (Select from list)	Feedstock animal * plant ** (Select)	Constituent Relationship (And/Or)
TN: Talc 141	Chem: Talc	14807-96-6	97.50000000	98.00000000	99.00000000	Additive-processing aid	Mineral	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							

TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
TN:	Chem:					Select	Select	Select
Supp:	INCI:							
		Total:	97.50000000	98.00000000	99.00000000			
If 'Other' selected for Function or Feedstock, list specific detail(s):		Function:				Feedstock:		
Part 2 - Unintentional Constituents (Impurities, Residues, Catalysts, Monomers, By-Products) These must have a maximum Level value. See comment example.								
Include everything tested for and/or you know may be present at any level including contaminants, residual monomer, residual reactants, residual solvents, heavy metals, other metals, specifically lead, phthalates, Bisphenol A, proteins, methanol, pesticides, formaldehyde, etc. List even if no CAS # exists. If more rows are needed duplicate the Basics worksheet. See row 25 comment for duplication instructions.								
Chemical Name	CAS # (if exists)	Maximum Level (number only)	Unit of measure (ppm, wt % or ppb)	Frequency of Testing for presence?	Unintentional Constituent Type (Select from list)	Unintentional Constituent Type Details if 'Other'	Test Method Type	
chlorite	1318-59-8	2.00000000	wt %	qly	Other Impurity (add detail in next column)	natural impurity	XRD	
dolomite	16389-88-1	1.00000000	wt %	qly	Other Impurity (add detail in next column)	natural impurity	XRD	
magnesite	83897-85-2	1.00000000	wt %	qly	Other Impurity (add detail in next column)	natural impurity	XRD	
			Select		Select			
			Select		Select			
			Select		Select			

			Select		Select		
			Select		Select		
			Select		Select		
			Select		Select		
			Select		Select		
			Select		Select		
			Select		Select		

You must disclose ALL residual solvents/monomers.

ANIMAL FEEDSTOCK SECTION

* Animal feedstocks must be described further. Answer the questions below for each intentional constituent from animal feedstock.

List country where source animal was:	Born:		Bred:		Slaughtered:	
Does the feedstock exclude "Downer Stock" and "Fallen Stock":	Select	Is the slaughtered animal theoretically fit for human consumption and in compliance with the EU animal by-products regulation as a Category 3 material:	Select			
Are Prions and Pathogens inactivated/removed using internationally accepted conditions:			Select			
If bovine-sourced, attach processing information describing the animal parts used / excluded as well as methods how residual proteins are denatured & how prion & pathogens are inactivated. Provide a TSE-free (Transmissible spongiform encephalopathy) and SRM-free (Specified Risk Materials) certificate.						
If the above information & TSE-free & SRM-free certificates will not be provided, please explain why not:						

PLANT FEEDSTOCK SECTION

In addition, use the calculated Target Wt % when adding Botanical-Natural constituents into Part 1. See comment for calculation details.

List plant genus & species:		List specific country & State/Region of origin:	
Farm Grown or Wild Crafted:		Plant part(s) used, if applicable. (i.e. flowers, roots, ripe or unripe fruit, leaves, etc.):	
Plant maturity when harvested (i.e. young, mature, withered on vine):		Concentration factor (for oils):	
Is the constituent a Genetically Modified Organism (GMO), a derivative of a GMO or is a GMO derivative contained in this constituent:	Select	If GMO question answered 'Yes', provide details or an attachment with details:	
Has the material or any constituent been irradiated:	Select	If irradiation question answered 'Yes', provide details including radiation level:	
Has the material been tested for residual pesticides:	Select	If yes, list the test method(s), frequency of testing and names of the pesticides tested for:	
PLEASE DESCRIBE THE EXTRACTION PROCESS/ESSENTIAL OIL production process. Include name/amount of solvent(s) used; plant:solvent ratio(s); concentration levels, etc. If easier attach separate document with details. See comment			
Protein Content of final botanical material. If requested when you receive this questionnaire, please submit a sample to identified lab for protein analysis using the Kjeldahl Nitrogen analysis. (See protein analysis form & details supplied w/ questionnaire to submit sample. If form/details not supplied contact the P&G Requester or PS&RA Contact identified at the top of this questionnaire.)			

SPECIFIC CHEMICALS LIST SECTION

For all chemicals below indicate if they are, or possibly could be, present in this material. This includes whether intentionally added or due to chemical reaction during the manufacture of this raw material. If yes, they must be described in Part I or 2 above. See comment.

Acrylamide:	No - Theoretically not possible based on product knowledge	Asbestos:	No - Testing confirmed not detectable (indicate detection limit below)	Benzene:	No - Theoretically not possible based on product knowledge	BisPhenol A:	No - Theoretically not possible based on product knowledge
Cyanuric Acid:	No - Theoretically not possible based on product knowledge	1, 4 Dioxane:	No - Theoretically not possible based on product knowledge	Epichlorohydrin:	No - Theoretically not possible based on product knowledge	Ethoxylates:	No - Theoretically not possible based on product knowledge
Ethylene Oxide:	No - Theoretically not possible based on product knowledge	Fluorescent Whitening Agents (Optical Brighteners)	No - Theoretically not possible based on product knowledge	Formaldehyde	No - Theoretically not possible based on product knowledge	Green 7 (CAS 1328-53-6)	No - Theoretically not possible based on product knowledge
Green 36 (CAS 14302-13-7)	No - Theoretically not possible based on product knowledge	Heavy Metals:	Yes - Details are in Part I or 2	Hexachlorobenzene:	No - Theoretically not possible based on product knowledge	Melamine:	No - Theoretically not possible based on product knowledge
Nitrosamines:	No - Theoretically not possible based on product knowledge	Phthalates:	No - Theoretically not possible based on product knowledge	Polyvinylidene chloride (PVC & PVDC):	No - Theoretically not possible based on product knowledge	Red 104 (CAS 12656-85-8):	No - Theoretically not possible based on product knowledge

Styrene:	No - Theoretically not possible based on product knowledge	Yellow 34 (CAS 1344-37-2):	No - Theoretically not possible based on product knowledge	Yellow 138 (CAS 30125-47-4):	No - Theoretically not possible based on product knowledge
When it's possible for the above materials to be present, is testing being performed to report level(s):					Yes
When testing is performed, indicate chemical name and detection limit:					asbestos and heavy metals- MDL varies but meets applicable standards

REGULATORY & CLASSIFICATION SECTION

Is your material food grade? (Yes/No)		No			
If it is food grade, list for which countries & FDA/FCC or other country food citation/part number(s):					
Is material compliant with guidelines for material in contact with food stuff? (Yes/No)				Select	
If yes, indicate compliance for which country(ies)/guidelines below.					
US FDA guideline for package materials in contact with food stuff:		Select		European Framework Regulation (EC) 1935/2004 on materials and articles intended to come in contact with food stuff:	
European Framework Reg (EC) 2002/72/EC Monomer Additives and amendments:		Select			
Is your material compliant with US CONEG (Yes/No):		Select			
Is your material acceptable for use in cosmetics/drugs? (Yes/No)		Select		If yes, please explain:	
Is your material compendial grade? (Yes/No)		Select		If yes, please describe USP, BP, EP, JP, JSQI, Chinese MOH Hygienic Standard, EU Cosmetic Directive, Korean Specifications, etc.:	
If yes & there is more than 1 intentional constituent, please list the compendial name & grade(s) used for each:					
If your material is intended as a food, dietary supplement, active pharmaceutical ingredient or for use in a Medical Device, is your manufacturing site registered with the FDA?				Select	
If yes, please provide the registration number:					
Is your material sourced from P.R.China & used in toothpaste? (Yes/No):				Select	
If yes, please provide the standard code. If enterprise standard, provide notification code.					
Is a Drug Master File being Used? (Yes/No):		Select		If yes, attach details (i.e. country/agency, age, format, etc.):	
List country(ies) where your material is registered for use:					
Is your material certified kosher? (Yes/No):		Select		Is your material certified kosher for passover? (Yes/No):	
Is your material certified halal? (Yes/No):		Select			
If colorants are used in this material, please indicate if listed in the regulations below.					
European Cosmetic Directive 76/768 as amended:		Select		China MOH Hygienic standard:	
US Code of Federal Regulations (CFR) Title 21 (Yes/No):		Select		Japan MHLW Standard:	
				Korea MOH:	
				Select	
List any R phrases that apply to this material: (see/print comment for list) (To Print: File/Page Setup/Sheet/Comment-at end of sheet)					
List any S phrases that apply to this material: (see/print comment for list) (To Print: File/Page Setup/Sheet/Comment-at end of sheet)					
Is any constituent listed on CITES (Convention on International Trade in Endangered Species) Appendix I, II or III? (Yes/No):				Select	
Reference http://www.cites.org for details on the regulations & these appendix lists of animal (& feathers), plant/fauna.					
If yes, is it in Appendix I, II or III?:				Select	
If yes, do you have a CITES Permit? (Yes/No):				Select	
If yes, list constituent chemical name(s):					

EUROPEAN UNION REACH SECTION - NON ARTICLE

IF THE MATERIAL IS NOT AN ARTICLE & IS NOT CLASSIFIED IN EU AS MEDICINE/PHARMACEUTICAL, FOOD OR FOOD ADDITIVE/STUFF, please complete the REACH questions below.

Compliant with REACH?	Yes	If no, partial or unknown, describe why:	
If you have not signed a REACH Commitment Document, please complete & sign the REACH Commitment Document worksheet. Scan & return the signed document with this questionnaire.			
Does the material contain any Substances of Very High Concern (SVHC) from ECHA Candidate List as an intentional or unintentional (impurity) constituent at $\geq 0.1\%$? (http://echa.europa.eu/chem_data/authorisation_process/candidate_list_en.asp)		No	If yes, please specify SVHC & level (%) and ensure it is in above composition:

Additional Comments:	

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The Procter & Gamble Company - All Information View

MASTER RAW MATERIAL SPECIFICATION (MRMS)

Originator:Cherise Montague

Is ATS: No

GCAS: 60020736.006

Status: Approved

SAP Description: TALC

Page 1 of 4

Effective Date: 7Feb2006

Expiration Date: 7Feb2006

Approval Date: 7Feb2006

Issue Date: 7Feb2006

GENERAL

Description: TALC

Local Description: 141 Type-Tank Bulk
Other Names:

Is this Standard a Template: NO

Supersedes Code	SAP Description	Supersedes On Date
60020736.005	Talc 141 Type-Tank Bulk	7Feb2006

Reason For Change: Change testing characteristics to only include tests that are necessary to ensure efficacy of material; change name to INCI name; add option to use Certificate of Irradiation for Micro

Shipping Hazard Classification:

Shipping/Receiving/Storage Information: Label each container with P&G GAS#, Material name, Supplier name, Supplier lot#

Comments:

Related Data:

Has Authorized Temporary Standard of:
Material Group: TALC

Archive Date:
Archive Reason:
Archive Comment:

Life Cycle Status: PRODUCTION
Preferred Material: No
Superseded by Code:
Superseded by SAP Description:
Superseded on Date:
Unarchive Date:
Unarchive Reason:

PERFORMANCE SPECIFICATIONS

Check appropriate Individual Specification for additional requirements.

Chg	Characteristic (Ch) Characteristic Specifics (CS) Common Performance Specification Code(CPS)	Test Method (GCAS) Origin (Orgn) Test Method Number(TM#) Reference Document (Ref) Test Method Specifics (Sp)	Sampling (SM) Subgroup (SG)	Plant Testing	Lower Spec Limit (LSL) Lower Target (LTGT) Target (TGT) Upper Target (UTGT) Upper Spec Limit (USL)	Unit of Measure(UoM) Report to Nearest (RTN) Report Type (RT) Action (AC)	Release Criteria	Criticality (CR) Basis (BA)	Test Group (TG) Application (AP)
Ch: Appearance CS:		GCAS: 60047645 Orgn: PG TM#: Ref: Sp:	SM: each lot SG:	PR 12 M	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: ATTRIBUTE RT: ATTRIBUTE AC: CONTROL	Compares to standard	CR: Ensure correct BA: Material is received	TG: AP:

RESTRICTED

The Procter & Gamble Company - All Information View
MASTER RAW MATERIAL SPECIFICATION (MRMS)

Page 2 of 4
Effective Date: 7Feb2006

GCAS: 60020736.006

SAP Description: TALC

Chg	Characteristic (Ch) Characteristic Specifics (CS) Common Performance Specification Code(CPS)	Test Method (GCAS) Origin (Orgn) Test Method Number(TM#) Reference Document (Ref) Test Method Specifics (Sp)	Sampling (SM) Subgroup (SG)	Plant Testing	Lower Spec Limit (LSL) Lower Target (LTGT) Upper Target (TGT) Upper Spec Limit (USL)	Unit of Measure(UoM) Report to Nearest (RTN) Report Type (RT) Action (AC)	Release Criteria	Criticality (CR) Basis (BA)	Test Group (TG) Application (AP)
	Ch: Color CS:	GCAS: 60047645 Orgn: PG TM#: Ref: Sp:	SM: each lot SG:	FR 12 M	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: RT: ATTRIBUTE AC: CONTROL	Compares to standard	CR: BA: Ensure correct material is received	TG: AP:
	Ch: Odor CS:	GCAS: 60061885 Orgn: PG TM#: Ref: Sp:	SM: each lot SG:	FR 12 M	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: RT: ATTRIBUTE AC: CONTROL	Compares to standard	CR: BA: Ensure correct material is received	TG: AP:
	Ch: Infrared spectrum CS:	GCAS: 64018298 Orgn: USP TM#: Ref: Sp: <197K>	SM: each lot SG:	FR 12 M	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: RT: ATTRIBUTE AC: CONTROL	Matches master	CR: BA: Ensure correct material is received	TG: AP:
	Ch: Texture CS:	GCAS: 60057623 Orgn: PG TM#: Ref: Sp:	SM: each lot SG:	FR	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: RT: ATTRIBUTE AC: CONTROL	Passes test and free of foreign matter	CR: BA: Ensure purity	TG: AP:
	Ch: Lead CS:	GCAS: 64018298 Orgn: USP TM#: Ref: Sp: monograph for Talc	SM: each lot SG:	F	LSL: LTGT: TGT: UTGT: USL: 20	UoM: Parts per mil- lion RTN: 1 RT: ATTRIBUTE AC: REPORT	20 ppm maximum	CR: BA: Ensure purity	TG: AP:
	Ch: Arsenic CS:	GCAS: 64018298 Orgn: USP TM#: Ref: Sp: <211>	SM: each lot SG:	F	LSL: LTGT: TGT: UTGT: USL: 3	UoM: Parts per mil- lion RTN: 1 RT: ATTRIBUTE AC: CONTROL	3 ppm maximum	CR: BA: Ensure purity	TG: AP:
C+	Ch: Infrared spectrum CS:	GCAS: 64018298 Orgn: USP TM#: Ref: Sp: for absence of as- bestos Part A	SM: each lot SG:	F	LSL: LTGT: TGT: UTGT: USL:	UoM: RTN: RT: ATTRIBUTE AC: REPORT	Passes test in Part A of USP monograph for Talc	CR: BA: Ensure purity	TG: AP:
C+	Ch: Microbial content CS:	GCAS: 64022360 Orgn: PG TM#: Ref: Sp: n = # of bags, drums, etc.	SM: 1 sample from 1 container lots, oth- erwise square root of n + 1, where n = # of bags, drums, etc. SG:	FR 12 M	LSL: LTGT: TGT: UTGT: USL: 50	UoM: Colony Forming Units per gram RTN: 20 RT: ATTRIBUTE AC: CONTROL	</= 50 cfu/g for Yeast and Mold	CR: BA: Ensure micro quality	TG: AP:
	Ch: Microbial content CS:	GCAS: 64022360 Orgn: PG TM#: Ref: Sp: Option to use Cer- tificate of Irradiation from Steris-Isomedix	SM: 1 sample from 1 container lots, oth- erwise square root of n + 1, where n = # of bags, drums, etc. SG:	FR 12 M	LSL: LTGT: TGT: UTGT: USL: 100	UoM: Colony Forming Units per gram RTN: 20 RT: ATTRIBUTE AC: CONTROL	</= 100 cfu/g, no Staph aureus, no Gram negative bacteria, no Candida albicans; OR if using Certificate of Irradiation: Minimum dose=5.0kGy, Maximum dose=30kGy	CR: BA: Ensure micro quality	TG: AP:

CSS View created: 16-Sep-2016 02:36:20 PM EDT

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RESTRICTED

GCAS: 60020736.006 SAP Description: TALC

Chg	Characteristic (Ch) Common Performance Specification Code(CPS)	Test Method (GCAS) Origin (Orgn) Test Method Number(TM#) Reference Document (Ref) Test Method Specifics (Sp)	Sampling (SM) Subgroup (SG)	Plant Testing	Lower Spec Limit (LSL) Lower Target (LTGT) Target (TGT) Upper Target (UTGT) Upper Spec Limit (USL)	Unit of Measure(UoM) Report to Nearest (RTN) Report Type (RT) Action (AC)	Release Criteria	Criticality (CR) Basis (BA)	Test Group (TG) Application (AP)
	Ch: Density - bulk CS:	GCAS: 60076026 Orgn: ASTM TM#: Ref: Sp: B329-95	SM: each lot SG:	F	LSL: 14 LTGT: TGT: UTGT: USL: 19	UoM: Pound per cubic Feet RTN: 1 RT: VARIABLE AC: REPORT	14-19 lbs/ cu ft	CR: BA: Ensure purity	TG: AP:

REFERENCES

Approved Supplier List	
GCAS Code	SAP Description
95128042	Talc (141 Type) (Bag/Bulk)

Related Data:

Reference Files

Translations:
Electronic Distribution List:
Other Distribution List:

REGULATORY & SAFETY DATA

Related Data:

Chemical Abstracts Service (CAS) Number:
Color Index Number:
Material Function:
Chemical Group:
Valence:
Chemical Reactivity:
Material Origin:
Ingredient Class:
Molecular Formula:
R-Phrase:
S-Phrase:
Safety Symbol:

GCAS: 60020736.006 SAP Description: TALC

Danger Category:
Einecs/Elincs Number:

Constituent Breakdown:
NOTE: Designation of suppliers below does not necessarily indicate that these suppliers are approved. See the Approved Supplier List (ASL) for the list of all Approved suppliers for this material. Constituent breakdowns do not show materials disclosed under CDAs.

INDIVIDUALS

Related Data:

GCAS Code	SAP Description	Type
10200017	TALC (141 TYPE) TANK	IRMS
10200015	TALC (141 TYPE) BULK	IRMS
10200015	TALC (141 TYPE) BULK	IRMS
10200017	TALC (141 TYPE) TANK	IRMS
10200017	TALC (141 TYPE) TANK	IRMS

OWNERSHIP

Related Data:

Originator ID: tj1244

Owning Organization: NORTHERN AMERICA~BEAUTY CARE~COLOR COSMETICS

Segment:

Owning Standards Office: NA - BEAUTYCARE - HV

Project Security Group:

Co-Creators:

Approvers: Cherise Montague, Francisco Pichardo, John Mayer, Karen Beanland, Maureen Lee, Michele Foss, Steve Schultz, Syndy Zhang

Sharing Organizations:

Locked By:

Locked Date:

Last Update Date: 25May2016

Last Update User: Maureen Lee - tv0040

EXHIBIT 10

LUZENAC AMERICA CALL REPORT

Date: August 7, 1997
Date of Call: August 7, 1997
Call by: G.E. Gauntt
Accompanied by: R.J. Buettner

Contact: Michael Argyelan-President
Theodore Hubbard-Executive Vice President

Customer: Whittaker, Clark, & Daniels
1000 Coolidge Street
South Plainfield, NJ 07080
Application: Distributor

Telephone: 908-561-6100
Facsimile: 908-757-3488

Objective: Begin detailed discussion on products, customers, and other issues impacting WCD's and Luzenac's plans for the personnel care market.

Summary: Mike and Ted began the meeting by showing Jack and I a letter from their lawyer which is attached. Essentially this letter states that the trade names used by WCD with the products from Diana, NY now belong to Suzorite. Therefore, the conversion of customers will be more challenging than anticipated. Ted indicated based upon this legal opinion they are probably better just selling Luzenac grades and not have private label talcs as they have done in the past. After much discussion we agreed that if we can use a "Mistron" trade-name with the same numbers that WCD used (e.g. Mistron 141 USP versus WCD 141 USP), this will help with conversions. Further, since we will tell customers this is a new product, produced at a different mill, and with different crude there should be no problem with product names and what Suzorite bought from WCD. Mike and Ted asked Luzenac to have our lawyers review this plan to make certain there are no legal problems with this approach. Although this situation means WCD will short term likely lose some volume when they separate from Suzorite, because of approvals, they have no reservations about working with Luzenac. WCD has ended its relationship with Suzorite and wants a stable long term supply arrangement with Luzenac.

Jack discussed the products GI can produce with Chinese crude and the current samples of Haichen and Guangshi material that are being sent to WCD. He also showed them a sample of the crude and the variability we have seen with the Haichen material. Both Mike and Ted agreed that if WCD's technical team feels the Guangshi material is acceptable, it is in all of our interests to use this crude to control costs and standardize products. We also reviewed the products available from Alpine, GI, and West Windsor. GEG emphasized that Luzenac desires to move some of WCD's volume to Alpine, particularly if this will help speed along the approval process.

Reviewed current Luzenac distributor arrangements and future plans. Contracts with CSI and McCullough & Benton will essentially need to be terminated to develop our business relationship with WCD. Luzenac will retain contracts with ET Horn in CA and LV Lomas for Eastern Canada. WCD agreed to this plan. For WCD, they have extended the Suzorite contract to 9/30/97 and will meet with them in September. They therefore envision a final termination date of 3/31/98 with Suzorite. GEG indicated this will work since CSI has a 6 month termination clause so we can time both contracts to end at the same-time.

Discussed the small volume of MTI volume WCD sells into body powder. Again Mike and Ted agreed that it is best if they buy this from Luzenac and just do industrial products with MTI and all personnel care items with Luzenac. WCD also buys a small amount of MTI material that they repackage for pharmaceutical applications. Although WCD will need to review this with MTI, Ted felt this is a modification that all can live with. Further, it will make a clean distinction of what they do with both of our organizations.

Reviewed volumes sold through CSI's warehouse in NJ. Ted and GEG agreed that what we both need to do is develop a list of all buying accounts and current products. We can then compare this and WCD can determine where current Alpine and other standard products fit. GEG indicated Luzenac will keep certain house accounts like J&J, Lander (NY), and Procter & Gamble. However, we will review every personnel care account and decide on a specific plan for each customer. Agreed to develop this list for exchange during the next three weeks. Further, made tentative plans to meet again in NJ on Monday October 13th to begin an account by account review and plan development.

GEG asked Mike and Ted what they think Suzorite will do when they realize WCD will no longer sell the Diana product? They believe Suzorite will try to continue to sell, but they have no sales force or history with the business. Also they have no information on pricing since they bill WCD for all volume. Also WCD has never given Suzorite any information on their LTL accounts. They feel Suzorite will have major problems servicing existing customers. Further, Mike indicated that from his knowledge of Suzorite, the loss of income from Diana will put the entire Zemex Corp. in a negative profit situation. Mike confirmed the rumor we have heard that F&S Trading is looking at buying Suzorite's talc business. Mike said F&S has contacted him and they will visit WCD in September. Suzorite will also visit WCD in September. WCD did give notice to Suzorite in late June that they will terminate the current contract, but Mike indicated he believes they have not yet realized this is a total separation and not just minor changes to their agreement.

Over lunch met with Carl and Frank from WCD's technical group. Carl is in charge of analytical functions and Frank all environmental and safety issues. Carl will analyze the samples we have sent to WCD. GEG asked Carl how they check for fragrance retention with talc? He indicated they have a test which checks for sulfur content. It takes about ten minutes to run and is a good measure of how the talc will hold fragrance. Frank also indicated iron is the other key player in fragrance with talc. Jack asked if they also have a

WCD807.DOC

8/3/97

test or limit for this, and Frank indicated they do not have an iron test and the sulfur one discussed by Carl is all they use. WCD's lab can run full USP testing including heavy metals.

Mike and Ted also indicated Pioneer Talc's volume is now down to less than 30,000 TPY since Suzorite has operated this plant. Most of the volume has been lost to Milwhite. Bird & Company, which had been the original Pioneer customer in 1959, dropped them last year. Mike indicated this was a truck per day customer and reflects the poor job Suzorite has done in running their talc business.

Actions Required:

- 1) Luzenac to check on trade-name issues with legal counsel on product names for future sales.
- 2) WCD to check Luzenac samples with the goal of just selling Guangshi products if at all possible.
- 3) WCD and Luzenac to develop customers lists with products used to develop specific plan for each account. Next meeting planned for October 13, 1997.
- 4) Luzenac to terminate contracts with CSI and McCullough & Benton by September 30, 1997.
- 5) WCD to terminate contract with Suzorite by September 30, 1997.
- 6) WCD to discuss and modify agreement with MTI to purchase all personnel care products from Luzenac.

IMERYS338156**Metadata**

BegAttach	IMERYS 338156	ORIGINAL
Confidentiality	Yes	ORIGINAL
Custodian	Non-Custodial;	ORIGINAL
DocumentType	Physicals	ORIGINAL
EndAttach	IMERYS 338158	ORIGINAL
ProdVol	IMERYS018;	ORIGINAL

EXHIBIT 11



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8677

23-Jul-2004

Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#24T15,
Code #10200015 will meet specifications on the attached data sheet.

Shipped on ^{Aug 2}~~July~~ 2004, against your Purchase Order No. 5600309120.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
9/24/2001	101915-16

Vendor
IMIFABI (DIANA) LLC 2ND & MARSHALL STREET BENWOOD, WV 26031 ATTN: PATTI TACOSIK CC: NY PLANT

SHIP TO
PROCTER & GAMBLE C/O STERIGENICS 75 TILBURY RD. SALEM, NJ 08079-1507

DUE DATE	FOB
9/26/2001	DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
00001625B	1625 TALC B.C. BULK - 1000 LB. SPAY BAG. MARK BAGS WITH PART #1-801781, P.O.#, LOT #, NT. WT.	16,000	606.00 0.303	4,848.00
0000141B	141 B.C. TALC - 1600 LB. SEMI-BULK BAGS MARK BAGS WITH PART #1-802981, P.O.#, LOT #, NT. WT.	9,600	446.00 0.223	2,140.80
ONE LOT ONLY. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: <u>Michael Brown</u>				
BILL TO COSMETIC SPECIALTIES.				Total \$6,988.80

Samples
 4 Fr 141
 6 Fr 1625
 Class 05
 Collect

Charges
 Pallets Fr Both 22 @ 2.00 Fr
 Prod Fr 3.00/Ton
 R. p. 1138



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

24-Sep-2001

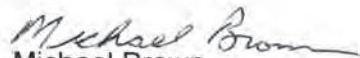
Dear Sir/Madam:

We certify that 16 Bulk Bags @ 1,000# Ea. of Product No. 1625 Lot#21H30,
Code #1-801781 and 6 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21J18,
Code #1-802981, will meet specifications on the attached data sheets.

Shipped on September 24, 2001, against your Purchase Order No. 101915-16.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager

Aug 31 01 11:11a

COS-SPEC / SOL-IN-PKG

8566637322

p.1

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO
8/31/2001	101915-15

Vendor

IMIFAB (DIANA) LLC
P.O. BOX 65842
CHARLOTTE, NC 28265-0842
ATTN: MARY
FAX: 704-765-8988

SHIP TO

PROCTOR & GAMBLE
C/O STERIGENICS
75 TILBURY ROAD
SALEM, NJ 08079-1507
PHONE: 856-935-0542

DUE DATE

9/21/2001

FOB

DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
0000141	WCD 141 B.C. TALL - 50 LB. BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART # 1-802980, P.O.#, LOT #, NT. WT. ONE LOT ONLY EACH ITEM. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 PLEASE TAKE RANDOM SAMPLES THAT EQUAL THE SQUARE ROOT OF N (NUMBER OF INDIVIDUAL BAGS OR BULK BAGS) PLUS ONE AND SEND TO KELLY RUBY IN HUNT VALLEY, MD. MARK WITH P&G P.O.#, PRODUCT NAME, ITEM CODE, AND PALLET #. NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: _____ BILL TO COSMETIC SPECIALTIES.	35,200	0.1975 355.00	6,952.00
Total				\$6,952.00

Charges

Trans 22 @ 150 Ea

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE

8/27/2001

P.O. NO.

101915-14

Vendor

IMFABI (DIANA) LLC
P.O. BOX 65842
CHARLOTTE, NC 28265-0842
ATTN: MARY
CC: NY PLANT

SHIP TO

PROCTOR & GAMBLE
C/O STERIGENICS
75 TILBURY RD.
SALEM, NJ 08079-1507
PHONE: 856-935-0542

Revised Do Not Duplicate
1623 Talc Cancelled

DUE DATE

9/5/2001

FOB

DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
0000141B	WCD 141 B.C. TALC - 1600 LB. SEMI-BULK BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART# 1-802981, P.O.#, LOT#	64,000	0.223	14,272.00
000002	PALLETS	20	2.00	40.00
0000141	WCD 141 B.C. TALC - 50 LB. BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART #802980, P.O.#, LOT#	35,200	0.1975	6,952.00
ONE LOT ONLY EACH ITEM. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 PLEASE TAKE RANDOM SAMPLES THAT EQUAL THE SQUARE ROOT OF N (NUMBER OF INDIVIDUAL BAGS OR BULK BAGS) PLUS ONE AND SEND TO KELLY RUBY IN HUNT VALLEY, MD. MARK WITH P&G P.O.#, PRODUCT NAME, ITEM CODE, AND PALLET #. NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: <i>[Signature]</i>				

FAXED
8/31/01

BILL TO COSMETIC SPECIALTIES.

Total

\$21,264.00



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

29-Aug-2001

Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21H15,
Code #1-802981, will meet specifications on the attached data sheet.

Shipped on August 29, 2001, against your Purchase Order No. 101915-14.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

4-Sep-2001

Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21H16
Code No.1-802980, will meet specifications on the attached data sheet.

Shipped on Sept. 5, 2001 against your Purchase Order No. 101915-14.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
10/18/2001	101915-17

Vendor
IMIFABI (DIANA) LLC 2ND & MARSHALL STREET BENWOOD, WV 26031 ATTN: PATTI TACOSIK CC: NY PLANT

SHIP TO
PROCTER & GAMBLE C/O STERIGENICS 75 TILBURY RD. SALEM, NJ 08079-1507

DUE DATE	FOB
10/31/2001	DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
00001625B	1625 TALC B.C. BULK - 1000 LB. SPAY BAG. MARK BAGS WITH PART #1-801781, P.O.#, LOT #, NT. WT.	5 Tm 10,000	606.00 0.303	3,030.00
0000141B	141 B.C. TALC - 1600 LB. SEMI-BULK BAGS MARK BAGS WITH PART #1-802981, P.O.#, LOT #, NT. WT.	16 Tm 32,000	446.00 0.223	7,136.00
0000141	141 B.C. TALC - 50 LB. BAGS MARK BAGS WITH PART #1-802980, P.O.#, LOT #, NT. WT.	17.6 Tm 35,200	395.00 0.1975	6,952.00
	ONE LOT ONLY.			
	PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED			
	SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT.			
	FAX C OF A TO DUANE CEPHUS: 410-785-8663			
	FAX B/L TO CSI 856-663-7322			
	NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX:			
	ACCEPTED BY: <u>Michael Bron</u>			
BILL TO COSMETIC SPECIALTIES.			Total	\$17,118.00

(1625 - 5 Bales 2.00 Ea.
Pack Fee - 1.00 Per Tm)

141 - 1600#

141 50#



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

29-Oct-2001

Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21K24
Code No.1-802980, will meet specifications on the attached data sheet.

Shipped on October 3 / 2001 against your Purchase Order No. 101915-17.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

29-Oct-2001

Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21K25,
Code #1-802981, will meet specifications on the attached data sheet.

Shipped on October 2001, against your Purchase Order No. 101915-17.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
11/26/2001	101915-18

Vendor
IMIFABI (DIANA) LLC 2ND & MARSHALL STREET BENWOOD, WV 26031 ATTN: PATTI TACOSIK CC: NY PLANT

SHIP TO
PROCTOR & GAMBLE C/O STERIGENICS 75 TILBURY RD. SALEM, NJ 08079-1507 PHONE: 856-935-0542

DUE DATE	FOB
12/7/2001	DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
0000141	141 B.C. TALC - 50 LB. BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART#1-802980, P.O.#, LOT#, NT. WT.	35,200	0.1975 ~~446~~ 395	6,952.00
0000141B	141 B.C. TALC - 1600 LB. SEMI-BULK BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART # 1-802981, P.O.#, LOT #, NT. WT.	32,000	446 0.223	7,136.00
000002	PALLETS ONE LOT ONLY EACH ITEM. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8677 FAX B/L TO CSI 856-663-7322 NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: <i>Michael Brown</i>	20	2.00	40.00
BILL TO COSMETIC SPECIALTIES.			Total	\$14,128.00

ELECTRONICALLY FILED - 2023 Feb 18 11:08 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001265



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

5-Dec-2001

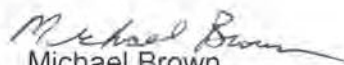
Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21K24
Code No.1-802980, will meet specifications on the attached data sheet.
Truck Seal #148538

Shipped on December 5, 2001 against your Purchase Order No. 101915-18.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

5-Dec-2001

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

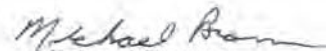
Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21K25,
Code #1-802981, will meet specifications on the attached data sheet.
Truck Seal #148539

Shipped on December 6, 2001, against your Purchase Order No. 101915-18.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager

Mar 08 01 03:15p

COS-SPEC / SOL-IN-PKG

8566637322

P.1

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
3/8/2001	101915-2

Vendor

ZEMEX INDUSTRIAL MINERALS
P.O. BOX 65360
CHARLOTTE, NC 28265-0360
ATTN: MARY
FAX: 704-765-8988

SHIP TO

PROCTOR & GAMMEL
C/O STRIGENICS
75 TILBURY ROAD
SALEM, NJ 08079-1507
PHONE: 856-935-0542

ITEM	DESCRIPTION	QTY	RATE	AMOUNT	DUE DATE	FOB
0000141	WCD 141 B.C. TALL - 50 LB. BAGS NEW 48 X 40 PALLETES NO MORE THAN 4' HIGH MARK BAGS WITH PART # 1-802980, P.O.#, LOT #, NT. WT. ONE LOT ONLY EACH ITEM. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 PLEASE TAKE RANDOM SAMPLES THAT EQUAL THE SQUARE ROOT OF N (NUMBER OF INDIVIDUAL BAGS OR BUL BAGS) PLUS ONE AND SEND TO KELLY RUBY IN HUNT VALLEY, MD. MARK WITH P&G P.O.#, PRODUCT NAME, ITEM CODE AND PALLET #. NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: <i>Chang</i> <i>20 Tons @ 1.50 EA.</i>	17.4	35,200	395.00	0.1975	6,952.00
28 Samples Sent 3/19/01 1A, 1B, (2 of) 1C, 5, 7, 13, 15, 25, (2 of) 27, (2 of) 29, (2 of) 32, 33, 34, 35, 36, (2 of) 44, 45, 46, (2 of) 47, 48, 49, 50					Total \$6,952.00	

BILL TO COSMETIC SPECIALTIES.

Total

\$6,952.00

Mar.30 01 01:53p

COS-SPEC / SOL-IN-PKG

8566637322

p.1

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
3/30/2001	101915-3

Vendor
ZEMEX INDUSTRIAL MINERALS P.O. BOX 65360 CHARLOTTE, NC 28265-0360 ATTN: MARY FAX: 704-765-8988

SHIP TO
PROCTOR & GAMBLE C/O STERIGENICS 75 TILBURY ROAD SALEM, NJ 08079-1507 PHONE: 856-935-0542

ITEM	DESCRIPTION	QTY	DUE DATE		RATE	FOB	
			4/17/2001			DIANA, NY	
0000141	WCD 141 B.C. TALC - 50 LB. BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART # 1-802980, P.O.#, LOT #, NT. WT. ONE LOT ONLY EACH ITEM. <u>USE LOT 21C16.</u> <i>Please Note</i> PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 PLEASE TAKE RANDOM SAMPLES THAT EQUAL THE SQUARE ROOT OF N (NUMBER OF INDIVIDUAL BAGS OR BUL BAGS) PLUS ONE AND SEND TO KELLY RUBY IN HUNT VALLEY, MD. MARK WITH P&G P.O.#, PRODUCT NAME, ITEM CODE AND PALLET #. NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: <i>Chas</i> <i>Do Trip @ 1.50 EA</i> <i>SA 2259</i>	35,200	17.6	0.1975	6,952.00		
BILL TO COSMETIC SPECIALTIES.						Total	\$6,952.00



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

ELECTRONICALLY FILED - 2023 Feb 18 11:08 AM - RICHLAND - COMMON PLEAS - CASE#2022CP4001265

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

14-May-2001

Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21E11,
Code #1-802981, will meet specifications on the attached data sheet.

Shipped on May 14, 2001, against your Purchase Order No. 101915-7.

Thank You for this opportunity to be of service.

Regards,
Suzorite Mineral Products, Inc.


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

14-May-2001

Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21D27
Code No.1-802980, will meet specifications on the attached data sheet.

Shipped on May 16, 2001 against your Purchase Order No. 101915-6.

Thank You for this opportunity to be of service.

Regards,
Suzorite Mineral Products, Inc.


Michael Brown
Plant Manager

Jul 05 01 02:37p

COS-SPEC / SOL-IN-PKG

8566637322

p.2

COSMETIC SPECIALTIES, INC.

103 Greenleigh Court
Merchantville, NJ 08109

Purchase Order

DATE	P.O. NO.
7/5/2001	101915-10

Vendor

ZEMEX INDUSTRIAL MINERALS
P.O. BOX 65360
CHARLOTTE, NC 28265-0360
ATTN: MARY
FAX: 704-765-8988

SHIP TO

PROCTOR & GAMBLE
C/O STERIGENICS
75 TILBURY ROAD
SALEM, NJ 08079-1507
PHONE: 856-935-0542*This order is ASAP*

DUE DATE

7/10/2001

FOB

DIANA, NY

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
0000141	WCD 141 B.C. TALC - 50 LB. BAGS NEW 48 X 40 PALLETS NO MORE THAN 4' HIGH MARK BAGS WITH PART # 1-802980, P.O.#, LOT #, NT. WT. ONE LOT ONLY EACH ITEM. PACKING LIST AND C OF A TO BE ENCLOSED IN ENVELOPE AND GIVEN TO DRIVER TO BE HAND DELIVERED SHIP VIA AMSTAM TRUCKER TO BILL P&G FOR FREIGHT. FAX C OF A TO DUANE CEPHUS: 410-785-8663 FAX B/L TO CSI 856-663-7322 PLEASE TAKE RANDOM SAMPLES THAT EQUAL THE SQUARE ROOT OF N (NUMBER OF INDIVIDUAL BAGS OR BUL BAGS) PLUS ONE AND SEND TO KELLY RUBY IN HUNT VALLEY, MD. MARK WITH P&G P.O.#, PRODUCT NAME, ITEM CODE AND PALLET #. NY PLANT: PLEASE SIGN BELOW AND CONFIRM VIA FAX: ACCEPTED BY: _____	70,400	0.1975	13,904.00
BILL TO COSMETIC SPECIALTIES.				Total \$13,904.00

SA 2339

SA 2340

Charge Add 20 Tons EA. load



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

9-Jul-2001

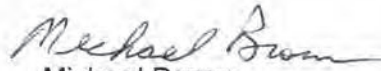
Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21E17
Code No.1-802980, will meet specifications on the attached data sheet.

Shipped on July 9, 2001 against your Purchase Order No. 101915-10.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

9-Jul-2001

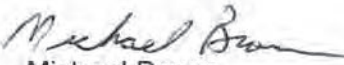
Dear Sir/Madam:

We certify that 704 Bags @ 50# ea. of Product No. 141 Talc BC from Lot No.21E17
Code No.1-802980, will meet specifications on the attached data sheet.

Shipped on July 10, 2001 against your Purchase Order No. 101915-10.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)


Michael Brown
Plant Manager



IMIFABI (DIANA) LLC
PO Box 398
Natural Bridge, NY 13665

Procter & Gamble
Attn: Duane Cephus
93 Beaver Court
Hunt Valley, MD 21030
Fax#(410)785-8663

9-Jul-2001

Dear Sir/Madam:

We certify that 20 Bulk Bags @ 1,600# Ea. of Product No. 141 Lot#21E11,
Code #1-802981, will meet specifications on the attached data sheet.

Shipped on July 12, 2001, against your Purchase Order No. 101915-11.

Thank You for this opportunity to be of service.

Regards,
IMIFABI (DIANA)

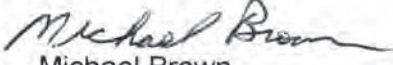

Michael Brown
Plant Manager

EXHIBIT 12

In the Matter Of:
Kelly Payne Clark, et al.
vs
3M Company, et al.

Noxell Corp. (Richard Sutton)
November 04, 2022



STATE OF SOUTH CAROLINA : IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND : FOR THE FIFTH JUDICIAL CIRCUIT
SHELBY PAYNE, :
Plaintiffs, :
v. : C/A NO. 2022-CP-40-01281
3M COMPANY, et al., :
Defendants. : **CERTIFIED
ORIGINAL**

- - - - -

Video-recorded Deposition of
NOXELL CORP.,
through its corporate representative
RICHARD SUTTON

Via Zoom Videoconferencing

Friday, November 4, 2022

10:07 a.m.

Reported by:

Adam D. Miller, Registered Professional Reporter

1 APPEARANCES:

2 On Behalf of Plaintiff:

3 JONATHAN M. HOLDER, ESQUIRE

4 jholder@dobslegal.com

5 DEAN OMAR BRANHAM SHIRLEY, LLP

6 302 North Market Street, Suite 300

7 Dallas, Texas 75202

8 214.722.5990

9 On Behalf of Coty, Inc.; Noxell Corporation; The
10 Procter & Gamble Company; and Wyeth Holdings, LLC:

11 JOHN D. COSMICH, ESQUIRE

12 cos@cs-law.com

13 COSMICH SIMMONS & BROWN, PLLC

14 One Eastover Center

15 100 Vision Drive, Suite 200

16 Jackson, Mississippi 39211

17 601.863.2100

18 -and-

19 CLINT HAGAMAN, ESQUIRE

20 clint@cs-law.com

21 COSMICH SIMMONS & BROWN, PLLC

22 100 East River Center Boulevard, Suite 480

23 Covington, Kentucky 41011

24 859.878.2502

On Behalf of Armstrong International, Inc. and
Whittaker, Clark & Daniels, Inc.:

TIM PECK, ESQUIRE

TPeck@foxrothschild.com

FOX ROTHSCHILD LLP

300 North Greene Street, Suite 1400

Greensboro, North Carolina 27401

336.378.5200

-and-

WILLIAM A. NEINAST, ESQUIRE

WNeinast@foxrothschild.com

FOX ROTHSCHILD LLP

2 West Washington Street, Suite 1100

Greenville, South Carolina 29601-2784

704.343.2000

On Behalf of Colgate-Palmolive Company:

DEIRDRE S. MCCOOL, ESQUIRE

deirdre.mccool@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP

Liberty Center, Suite 600

151 Meeting Street

Charleston, South Carolina 29401-2239

843.853.5200

On Behalf of RFP:

STEPHEN B. WILLIAMSON, ESQUIRE

swilliamson@vwlawfirm.com

THE VAN WINKLE LAW FIRM

11 North Market Street

Asheville, North Carolina 28801

828.258.2991

On Behalf of Harris Teeter, LLC; and The Kroger Company:

TRAVIS R. SMITH, ESQUIRE

Travis.Smith@dinsmore.com

DINSMORE & SHOHL, LLC

211 N. Pennsylvania Street

One Indiana Square, Suite 1800

Indianapolis, Indiana 46204

317.639.6151

On Behalf of International Paper Company:

CATHERINE L. PETTIS, ESQUIRE

Catherine.Pettis@formanwatkins.com

FORMAN WATKINS & KRUTZ LLP

210 East Capitol Street, Suite 2200

Jackson, Mississippi 39201-2375

601.960.8600

On Behalf of Chanel, Inc. and 3M Company:

MORGAN Y. DRAPEAU, ESQUIRE

morgan.drapeau@bowmanandbrooke.com

BOWMAN AND BROOKE LLP

1441 Main Street, Suite 1200

Columbia, South Carolina 29201

803.726.7420

On Behalf of Dillard's, Inc.:

KATIE L. MILLER, ESQUIRE

katiemiller@piercesloan.com

PIERCE SLOAN KENNEDY & EARLY LLC

The Blake-Grimké House

321 East Bay Street (29401)

P.O. Box 22437

Charleston, SC 29413-2437

843.722.7733

On Behalf of Avon Products, Inc. and Variety
Wholesalers:

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- - - - -

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 through its corporate representative
 RICHARD SUTTON

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1 we knew of an example where it didn't have talc;
2 correct?

3 A. Yes. So one, one variant of the
4 brand was developed without talc; yes.

5 Q. When did Noxell create the internal
6 specification that the level of asbestos
7 should be non-detect?

8 A. We discussed this earlier. I think
9 the 1976 was the first, first document that I
10 saw that stated that. I've -- and, you know, I
11 doubt that is the first document that was
12 created. So I can't give you an exact time.

13 Q. That's fair. I think we have
14 mentioned suppliers of talc to Noxell for
15 CoverGirl. We've mentioned Whittaker, Clark &
16 Daniels. We've mentioned Cyprus. We've
17 mentioned Nippon Talc Company of Japan. We've
18 mentioned -- what's the current? Who is the
19 current talc supplier?

20 A. IMI Fabi.

21 Q. Fabi, that's it. Can you spell that,
22 just for the record.

23 A. I-M-I F-A-B-I. And I'm just --

24 Q. Go ahead.

25 A. I don't have the, the knowledge here

1 to say otherwise, but I don't know if the Nippon
2 talc was, was used for product that was made --
3 that was distributed in the United States.

4 So I -- as I said, my focus was
5 really on the US, and it's mostly 141. I'm not
6 sure for the international -- you know, what
7 suppliers were used to supply our international
8 product range.

9 Q. Okay. Other than Whittaker, Clark &
10 Daniels, Cyprus, and IMI Fabi, what other
11 suppliers of talc were there to Noxell in the
12 US?

13 A. I mean, there may have been some
14 smaller suppliers. But the bulk of the talc
15 really was the -- for use for the products that,
16 that were described in this case would have
17 been, likely have been 141.

18 Q. And that's Whittaker, Clark &
19 Daniels; correct?

20 A. Yes.

21 Q. Do you know a specific talc grade or
22 talc type that when you see it, you know, oh,
23 that was from Cyprus?

24 A. I need to, I need to refresh myself
25 on the numbering then. I don't know if they --

EXHIBIT 13

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
COMPLEX ASBESTOS LITIGATION

LAOSD ASBESTOS CASES	)	JCCP 4674
_____	)	
	)	
RITA-ANN CHAPMAN and	)	Case No. 22STCV05968
GARY CHAPMAN,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
AVON PRODUCTS, et al.,	)	
	)	
Defendants.	)	
_____	)	

CERTIFIED COPY

VIDEOTAPED VIDEO CONFERENCE DEPOSITION OF
RICHARD SUTTON
AS REPRESENTATIVE OF
NOXELL CORPORATION
THURSDAY, AUGUST 18, 2022

Reported By: Shirley Koch, RPR
California CSR No. 10849

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
COMPLEX ASBESTOS LITIGATION

RITA-ANN CHAPMAN and) Case No. 22STCV05968
GARY CHAPMAN,)
)
Plaintiffs,)
)
vs.)
)
AVON PRODUCTS, et al.,)
)
Defendants.)
_____)

VIDEOTAPED VIDEO CONFERENCE DEPOSITION OF
RICHARD SUTTON, AS REPRESENTATIVE OF NOXELL
CORPORATION, commencing from 10:02 a.m. to
1:34 p.m., Thursday, the 18th of August, 2022, was
taken on behalf of the Plaintiffs and reported
stenographically by Shirley Koch, CSR 10849, RPR.

The witness's physical location for the
taking of the deposition was Morristown, New Jersey.

The reporter's physical location for the
taking of the deposition was Lake Forest,
California.

The videographer's physical location for
the taking of the deposition was Rockwell, Texas.

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INFORMATION REQUESTED
(NONE)

QUESTIONS MARKED
(NONE)

1 A. It -- sorry. The 19- --

2 Q. '50s.

3 A. So I'm not sure what year they started
4 diversification, but they certainly had a number of
5 product -- project -- products by the '60s, yes.

6 Q. Okay. And you mentioned shaving -- shaving
7 cream, suntan lotion. What other products did they
8 diversify in, to your knowledge?

9 A. So in the mid '50s, they did some --
10 started research on cosmetic products. By 1960,
11 they added test-market for CoverGirl, and in 1961,
12 they launched the CoverGirl range of products.

13 Q. Okay. Noxzema originated the CoverGirl
14 line of cosmetics; true?

15 A. I believe that was Noxell in nine -- oh,
16 yes. Noxzema, yes.

17 Q. Right.

18 A. Yep.

19 Q. Okay. The Noxzema Chemical Company changed
20 its name to Noxell Corporation in 1966; true?

21 A. Yes, I believe that's it. Moving to Hunt
22 -- the Hunt Valley site.

23 Q. Okay. All right. In 1989, Proctor &
24 Gamble purchased the Noxell Company, and Noxell
25 continued to operate as a subsidiary; true?

1 Q. Okay. Is that the only location, to your
2 knowledge, where CoverGirl products are currently
3 manufactured?

4 A. I believe that some CoverGirl products
5 could be made by third parties, but I -- I can't
6 confirm it.

7 Q. Where are CoverGirl pressed powder products
8 manufactured today?

9 A. In the Beaver Court facility, close to the
10 Hunt Valley site.

11 Q. Okay. Where are CoverGirl loose face
12 powder products currently manufactured?

13 A. I believe they're manufactured in the same
14 facility.

15 Q. Okay. How long has that been the case?

16 A. Since 1986 or slightly before then, even.

17 Q. Before 1986, do you know where CoverGirl
18 pressed powder and loose face powder products were
19 manufactured?

20 A. So in a short period, maybe several years,
21 there was joint manufacture between the Beaver Court
22 facility and the third-party manufacturer. At least
23 one third-party manufacturer.

24 Q. Okay. Sir, what I'd like to do is move on
25 and kind of focus on the history of CoverGirl

1 products. And what I'd like to do now is show you
2 what we'll mark as -- gosh, I think I'm at Exhibit
3 7.

4 (Exhibit No. 7 was marked for
5 identification and will be
6 provided by Mr. Gamble.)

7 MR. GAMBLE: Yeah, let me make a note.

8 So --

9 BY MR. GAMBLE:

10 Q. And this may be a document that both you
11 and I have looked at. Let me see.

12 Okay. Sir, have you seen this document
13 before? And I'll kind of scroll through it.

14 A. I believe so, yes.

15 Q. Okay. And I'll represent to you that this
16 is just a -- a nifty document I pulled off the
17 Internet that kind of goes through the history of
18 CoverGirl products. And what I'd like to do is kind
19 of walk through this with you and see if it comports
20 with Noxell's understanding of the evolution of
21 CoverGirl products. Okay?

22 A. Yes.

23 Q. All right. And if there's anything on this
24 document that's inaccurate or inconsistent with
25 Noxell's understanding, please let me know. Okay?

1 the -- to the face.

2 Q. Okay. All right. Continuing on with the
3 exhibit, it goes on to say:

4 "First sold nationally in January,
5 1961, they were introduced with an
6 extensive magazine and television
7 advertising campaign targeting
8 teenagers and young women."

9 Did I read that correctly?

10 A. Yes.

11 Q. Okay. One of the things that was mentioned
12 was that the compressed powder was sold nationally
13 in January of '61; correct?

14 A. Yes.

15 Q. Do you know prior to that time whether or
16 not CoverGirl pressed powder products were sold more
17 locally or regionally?

18 A. I believe there was a test-market in 1960
19 that went -- was very successful, and they decided
20 to go ahead with the national launch in 1961.

21 Q. Okay. All right. Moving on, it mentions
22 in the article "extensive magazine and television
23 advertising campaigns."

24 Do you know what magazines CoverGirl
25 advertised in?

1 particularly television, and it is
2 estimated that Noxell was spending
3 U.S. \$20 million on Cover Girl
4 advertising or about 20 percent of
5 its sales earnings by 1980."

6 Did I read that correctly?

7 A. Yes.

8 Q. And does that comport with your
9 understanding?

10 A. It -- yeah, seems about right. Yeah.

11 Q. Okay. Would you agree with me that Noxell
12 was one of the leading manufacturers and
13 distributors of beauty products?

14 A. In the United States.

15 Q. Okay. Would you agree with me that Noxell
16 held itself out as an industry leader in cosmetic
17 products in the United States?

18 MR. COSMICH: Object to the form. Vague.

19 THE WITNESS: Which time frame are you
20 talking about? Right here; 1980?

21 BY MR. GAMBLE:

22 Q. The whole time frame. From -- from '60 --
23 well, from its inception up until the present. So
24 let me strike that.

25 With that understanding, the whole time

1 frame, would you agree that Noxell held itself out
2 as an industry leader in cosmetic products?

3 MR. COSMICH: Same objections.

4 THE WITNESS: Yes.

5 BY MR. GAMBLE:

6 Q. Okay. Would you agree that Noxell was a
7 sophisticated company when it came to cosmetic
8 products?

9 MR. COSMICH: Object to the form. Vague.
10 Calls for a legal conclusion.

11 THE WITNESS: Yes.

12 BY MR. GAMBLE:

13 Q. Would you agree that Noxell was a
14 profitable company?

15 A. Yes.

16 Q. Okay. All right. Sir, and then going down
17 further, there's a -- there's a time line that's
18 highlighted, and it gives different years and
19 information. And I think we've gone over most of
20 that. But at the bottom here, it says that this
21 document was last updated 11th August, 2021, and
22 then it has several sources that are cited. One of
23 those is -- looks like an article by Jones, G.,
24 2010, "Beauty Imagined: A History of the Global
25 Beauty Industry."

1 pressed powder products that's available for
2 purchase that does not contain talc?

3 A. I -- I think the CoverGirl Clean might not
4 contain talc, but I'm not sure. I don't know.
5 Can't confirm it a hundred percent.

6 Q. Sure. Why did Noxell use talc as an
7 ingredient in its CoverGirl products, if you know?

8 A. Because it's a -- a fantastic natural
9 ingredient.

10 Q. Who -- to your knowledge, who supplies the
11 talc that is currently used in CoverGirl products
12 today?

13 MR. COSMICH: Object to the form. Outside
14 the scope. Calls for speculation.

15 But you can answer.

16 THE WITNESS: Today it -- it would -- that
17 would be IMI Fabi.

18 BY MR. GAMBLE:

19 Q. Okay. And is that the only supplier of
20 talc -- strike that.

21 Is IMI Fabi the only supplier of talc used
22 in CoverGirl products today?

23 A. I can't confirm that, but I believe they're
24 the main supplier.

25 Q. Do you know the geographic location or the

1 this as Exhibit -- gosh -- 7.

2 THE REPORTER: Excuse me. I think we're on
3 8.

4 MR. GAMBLE: Or 8 -- 8. You're right. I
5 just caught that. Exhibit 8.

6 (Exhibit No. 8 was marked for
7 identification and will be
8 provided by Mr. Gamble.)

9 BY MR. GAMBLE:

10 Q. All right. So for example, on this one --
11 and this is a -- a certificate from IMI Fabi; is
12 that correct?

13 A. Correct, yes.

14 Q. All right. And it's to Proctor & Gamble,
15 Attention: Duane Cephus at 93 Beaver Court, Hunt
16 Valley, Maryland. Who -- who's Duane Cephus?

17 A. He was somebody receiving raw materials at
18 Noxell. He was either a Noxell employee or a
19 contract employee.

20 Q. Do you know if Duane Cephus still works for
21 Noxell?

22 A. I don't.

23 Q. Okay. Do you know what Duane Cephus's
24 title or job duties were?

25 A. No, I don't.

EXHIBIT 14

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT
COMPLEX ASBESTOS LITIGATION

RITA-ANN CHAPMAN and GARY
CHAPMAN,

Plaintiffs,

vs.

AVON PRODUCTS, INC., et al.,

Defendants.

**CERTIFIED
ORIGINAL**

JCCP No. 4674

Case No.
22STCV05968

REMOTE VIDEOTAPED DEPOSITION OF:
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BY AND THROUGH WILLIAM WARD, PMQ

DATE: Monday, August 8, 2022

TIME: 8:10 a.m. to 9:07 a.m. PST

PAGES: 1 - 41

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A decorative graphic consisting of a 5x3 grid of slanted parallel lines. Each row contains three identical slanted lines, and there are five such rows stacked vertically. The lines are dark gray and slanted at approximately 45 degrees.

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R. p. 1192

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GPS Reporting

--oOo--

1 So in 2015 Procter & Gamble sold the CoverGirl
2 cosmetic product line to Coty, true?

3 A. Yes, along with many other beauty brands, over
4 three-dozen, I think.

5 Q. Sure.

6 To prepare for this deposition today, did you
7 attempt to find or speak with any former Noxzema
8 employees?

9 A. I did not because as part of this transaction,
10 all of the employees, facilities, and products were
11 transitioned to Coty, so I didn't really have access to
12 who they might be.

13 Q. Okay. Did you attempt to look for any
14 documents from Noxzema regarding their CoverGirl talcum
15 powder products?

16 A. The only documents -- since all of the
17 documents were forwarded to Coty, the only documents I
18 had were actually the transaction agreement regarding
19 the sale, and that did not have detail that I recall
20 regarding talc products specifically.

21 Q. Okay.

22 A. It was more commercial terms of the
23 transaction.

24 Q. During your employment with Procter & Gamble,
25 did you ever have a chance to visit any Noxzema plant

1 And to prepare for your deposition today, did
2 you attempt to contact anyone at Coty to discuss
3 CoverGirl cosmetic talcum powder products?

4 A. I'm sorry. You were breaking up. I did not
5 hear the question.

6 Q. My apologies. To prepare for your deposition
7 today, did you attempt to contact anyone at Coty to
8 discuss CoverGirl cosmetic talcum powder products?

9 A. I did not.

10 Q. Okay.

11 A. Again, all of our records and information were
12 transitioned to Coty along with the people, all of the
13 employees, and Coty assumed all of the liability prior
14 to the transition, during and after the transition for
15 these products.

16 Q. That was my next question about the liability.
17 So let me ask you this: What's the basis for your
18 testimony that Coty assumed the liability?

19 A. It's the transaction agreements that occurred
20 in 2015 when the beauty brands were transitioned from
21 Procter & Gamble to Coty, including CoverGirl.

22 Q. Okay.

23 A. And I don't have the document in front of me,
24 but the -- it's probably a 150-page or more document,
25 but the relevant sections I do remember, which were --

1 again, I don't have a Bates number -- but the relevant
2 sections in that agreement were Sections 103, which I
3 believe were entitled "The Assumption of Liabilities,"
4 and then there were further definitions as to what the
5 liabilities were in Section 106. And I seem to recall
6 that among the many clarifications of the liabilities,
7 there was one that was numbered a Roman Numeral XI,
8 number 11, and that one, as I recall, specifically
9 called out that the liabilities included any liabilities
10 before the transaction date, during, or after.

11 So in net, Coty assumed the liabilities for
12 all of the beauty brands, including CoverGirl, for all
13 time periods in that transaction.

14 Q. Great. Mr. Ward, I promised you I'd keep it
15 short, and I think I've done that today.

16 MR. GAMBLE: Those are all the questions I
17 have.

18 John, do you got anything you want to follow
19 up on?

20 MR. COSMICH: I do not. Thank you, Tyson.
21 Anyone else?

22 Hearing none, going once, going twice, I'll
23 make it as quick as I can.

24 Thank you, court reporter and videographer. I
25 sent Exhibit 1 to you, so I think we're good.

DECLARATION UNDER PENALTY OF PERJURY

I, WILLIAM WARD, PMQ, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on AUGUST 8, 2022; that I have made such corrections as appear noted on the Deposition Errata Page(s), attached hereto, signed by me; that my testimony as contained herein, as corrected, is true and correct.

This Declaration is executed this _____ day of _____, 20____, at _____, California.

WILLIAM WARD, PMQ

PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND						
PLAINTIFF EXHIBIT NO		DATE	DESCRIPTION	ADMITTED	DENIED	LIMITED
1			Medical Records			
2			Billing Records			
3			Social Security Records			
4			Family Photographs			
5			Marriage Records			
6			Sarah Plant's Mary Kay Consultant Bag and Brush			
7		8/23/2022	Deposition of Sarah Plant dated August 23, 2022, Volume 1, and all exhibits thereto			
8		8/24/2022	Deposition of Sarah Plant dated August 24, 2022, Volume 2, and all exhibits thereto			
9		8/25/2022	Deposition of Sarah Plant dated August 25, 2022, Volume 3, and all exhibits thereto			
10		2/9/2023	Deposition of Eric Johnson dated February 9, 2023			
11		1/16/2023	Deposition of Melanie Villabiscencio dated January 16, 2023			
12		12/12/2022	Deposition of Parker Plant dated December 12, 2022			
13		10/25/2022	Deposition of Patrice Johnson dated October 25, 2022			
14		1/27/2023	Deposition of Dr. Robert Taylor Ripley dated January 27, 2023 and all exhibits thereto			
15		6/21/2021	Deposition of Dr. Robert Taylor Ripley dated June 21, 2021 and all exhibits thereto			
16		8/23/2020	Deposition of Dr. Robert Taylor Ripley dated August 23, 2020 and all exhibits thereto			
17		11/15/2021	Deposition of Dr. Robert Taylor Ripley dated November 15, 2021 and all exhibits thereto			
18		1/23/2023	Deposition of Steven Haber dated January 23, 2023 and all exhibits thereto			
19		1/6/2023	Deposition of William Longo dated January 6, 2023, Volume 1, and all exhibits thereto			
20		1/25/2023	Deposition of William Longo dated January 25, 2023, Volume 2, and all exhibits thereto			
21		1/5/2023	Deposition of John Maddox dated January 5, 2023 and all exhibits thereto			
22		2/9/2023	Deposition of Oliver Wood dated February 9, 2023			
23			Deposition of Mark Bailey			
24			Deposition of Sarah Lustig			
25			Curriculum Vitae of Dr. Robert Ripley			
26			Curriculum Vitae of Dr. Steven Haber			
27			Curriculum Vitae of William Longo			
28			Curriculum Vitae of DR. John Maddox			
29			Expert Report of Dr. Steven Haber			
30			Expert Report of Sarah Lustig			
31			Expert Report of Dr. JohnMaddox			
32			Expert Report of Oliver G. Wood, Ph.D.			
33			Demonstrative Powerpoints and/or Slides Used by Plaintiff Experts In This Case			
34			All Exhibits Marked at Expert's Deposition(s)			
35			Any and All Documents, Materials, and Studies Relied Upon By Plaintiffs' Experts in this Case.			
36			Any and All Discovery Responses Filed by Defendants In This Case or In Past Cases			
37			All Documents/ Exhibits Produced By Defendants In This Case or Previously Marked Documents Bearing Defendant's Bates Label/Stamp			

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38			Any Documents/Exhibits or Deposition Used to Authenticate Exhibits			
39			Any and All Documents/Exhibits Identified in Any Deposition Taken In This Case			
40			Any and All Documents/ Exhibits Used In Any Deposition In This Case			
41			Any and All Documents/Exhibits Attached to a MSJ, Response or Pleading In This Case			
42			Defendant Company Logos			
43			Photographs of Defendant-Company Headquarters, Facilities, Plants, Job-sites			
44			Longo's notes related to the Payne and Plant cases			
45			Summary compilation on Mary Kay codes			
46			Summary compilation on WC&D sales to Gold Bond entities			
47			Summary compilation on WC&D sales to Procter & Gamble			
48			Exhibit 4 to the deposition of Presperse 11/18/2022 (flow chart)			
49			Exhibit 5 to the deposition of Presperse 11/18/2022 (table on sources)			
50			Exhibit 6 to the deposition of Presperse 11/18/2022 (MSDS)			
51			Exhibit 9 to the deposition of Presperse 11/18/2022 (Presperse to mfgs.)			
52			Deposition of Perperse 11/18/2022, including all exhibits			
53			RESERVED			
54			RESERVED			
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85			RESERVED			
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89			RESERVED			
90			RESERVED			
91			RESERVED			
92			RESERVED			
93			RESERVED			
94			RESERVED			
95			RESERVED			
96			RESERVED			
97			RESERVED			
98			RESERVED			
99			RESERVED			
100			RESERVED			
101		6/27/2022	About Us, Color Techniques, 6/27/22.			
102		8/13/1990	Memo to EF McCarthy, from MA Nordhauser; Re: Cosmetics and Pharmaceuticals: One and Five Year Plan, 8/13/90; IMERYS095823-825.			
103		4/27/1999	Luzenac America to B Beck, et al, from J Gauntt; Re: Cosmetic Accounts, 4/27/99; IMERYS056132-141.			
104		1/20/1998	Luzenac America Memo to T Hubbard, et al, from J Gauntt; Re: Private Label Products and Customer Mailing, 1/20/98; IMERYS 231188-231212.			
105		3/24/1997	Talc Usage by Industry from 1997 Competition Database, 3/24/97; IMERYS231100-231106.			
106		9/8/1991	Revlon Memo to Distribution, from M Shortal-Mulkearns; Re: Supplier Update, 9/8/91; Rev-NJ-000792.			
107		5/28/1986	Letter to S Price, from J Bonina, Revlon; Re: Specifications for Timato (111089-00) 1004CX Talc, 5/28/86; Rev-NJ-000821.			
108		3/24/2004	Revlon Email to J Ackerman, from A Osborn; Re: Certificate of Analysis for Talc Received from Our Suppliers, 3/24/04; Color Techniques Data Sheet for RCT 1004CX Cosmetic Talc, Timato (111089-00); REV-NJ-000788-790.			
109		3/13/1981	Kolmar Laboratory Report; Re: Talc, 3/27/81; Canadian 1004 CX Talc vs Italian 1615 Talc, 3/13/81; CTI 589-593.			
110		8/30/2022	Color Techniques, Inc's Responses to Plaintiff's Product Identification Interrogatories, Williams v Avon products, Inc, et al, 8/30/22; Verified.			
111		1983-1990	Revlon Correspondence with Color Techniques, 1983-1990; Color T 563-579.			
112		6/29/2021	Sales Report to Avon, 1/1/1997 to 12/31/2010, 6/29/21; Color T 616-623.			
113		10/3/2005	Sales Report to L'Oreal, 10/3/05, Color T 651.			
114		5/21/1998	Sales Report to Coty, Inc, 5/21/98, Color T000596.			
115		10/18/2021	Sales Report to Revlon Consumer Products Corp, 1/1/1996 to 10/18/2021; Color T000597-606.			
116		2/10/2003	Correspondence to Estee Lauder, Product Data and MSDS for Number 10708 Lo Micron Italian Talc, 2/10/03; Color T 000029-74.			
117		9/12/2002	Letter to G Padulo, Estee Lauder R&D, from C Edridge; Re: Coding package requirements for 10746 Italian talc, 9/12/02; Color T000075.			
118		7/29/2003	Certification Regarding Source of Raw Material, C Edridge, 7/29/03; Color T000095-103.			

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119		9/14/2001	Letter to E Schack, from S Cherpelis, Estee Lauder; Re: D-10295 Dimethicone Treated Talc, 9/14/01; Color T 000104-109.			
120		2/10/2003	Correspondence to Estee Lauder, Product Data and MSDS for Number 10746 Italian Talc, 10/28/03; Color T 000111-123.			
121		9/10/2010	Correspondence to Estee Lauder, Product Data and MSDS for Number 10746 Italian Talc, 9/10/10; Color T 000124-131.			
122		9/12/2002	Correspondence to Estee Lauder, Product Data and MSDS for Number 10746 Italian Talc, 9/12/02; Color T 000133-142.			
123		9/14/2001	Fax to I Schlenoff, Estee Lauder, from C Edridge; Re: D-10295 Dimethicone Treated Talc, 9/22/09; Color T 000164-233.			
124		1/6/2003	Luzenac America Email to J Tracey, et al, from M Radies; Re: Color Techniques, 1/6/03; Color T 000234-235.			
125		7/12/2001	Whittaker, Clark & Daniels Analytical Report for Product 195, Talc Superiore M10 DEC, 7/12/01; Color T000230-231.			
126		2/9/2002	Luzenac Val Chisone Certificate of Analysis for Talc EXTRA 5/0 DEC, 2/9/02; Color T 000232-233.			
127		6/2/2005	Luzenac Pharma M Data Sheet, 6/2/05; Color T 000439-456.			
128		6/1/2003	Luzenac Imperial 250 Data Sheet, 6/1/03; Color T 000457-461.			
129		4/1/2001	Whittaker, Clark & Daniels/Brenntag Material Safety Data Sheet (MSDS) for 195 Talc Superiore M10 DEC, April 2001; Color T000462-465.			
130		2/20/2019	Color Techniques Technical Data Sheet for 10708 Lo Micron Italian Talc, Issued 4/8/05, Revised 2/20/19; Color T000466.			
131		4/20/2017	Imerys Talc America Safety Data Sheet for Imercare Talc, 4/20/17; Color T000471-477.			
132		2/28/2013	Imi Fabi Safety Data Sheet for Talc in Powdered Form, Version 2, 2/28/13; Color T000478-484.			
133		12/1/2017	Brenntag Specialties Product Data Sheet for Talc - Pharmaceutical Grade, WCD 2755 USP BC - Lo Micron, Issued February 2004, Revised December 2017; Color T000485.			
134		1999-2001	Sales Report to Whittaker, Clark & Daniels, 1999-2001; Color T000607-610.			
135		1/7/2005	Luzenac Email to D Miller and M McKeever, from D Miller; Re: Talc Information - Urgent Request, 1/7/05; Moore EL 00000890.			
136		1/11/2022	Letter to J Bolitsky, from S Mathers, Ironshore, A Liberty Mutual Company; Re: Insurance coverage, 1/11/22.			
137		8/20/2020	Sales Report to Estee Lauder, 1/1/2000 to 12/31/2010, 8/20/20; CTI 000002-26.			
138		8/1/1983	Letter to H Saunders, Revlon, from LB Rodino; Re: RCT1004, 8/1/83; Color T000575-578.			
139		12/31/1984	Cyprus Industrial Minerals Sales Analysis, 12/31/84; IMERYS233284-233292.			
140		12/1/1994	Luzenac America Sales Report, Cosmetics/ Pharmaceuticals, Industry Sales by Customer by Product, December 1994; IMERYS213926-213965.			
141		1/1/1999	Luzenac Alpine Sales By Product, 1999; IMERYS054017-28.			
142		5/26/1993	Cosmetics, Pharmaceuticals and Food Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			

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143		8/18/2022	Defendant Color Techniques, Inc's Responses to Plaintiffs Rita-Ann Chapman and Gary Chapman's Supplemental Request for Production, Chapman v Avon Products, Inc, et al, 8/18/22; Verified; w Sales Report to Avon, 1997-2010; CTI000208-216.			
144		7/6/2022	Defendant Color Techniques, Inc's Response to Plaintiff Rita-Ann Chapman's Request for Production, Set One, Chapman v Avon Products, Inc, et al, 7/6/22.			
145		10/13/1983	Letter to H Saunders, Revlon, from RM Loncar; Re: RCT1004 and RCT1004CX, 10/13/83; Color T000567.			
146		7/11/1983	Letter to D Kelner, Revlon, from RM Loncar; Re: RCT 1004 and RCT 1004CX Cosmetic Talcs, 7/11/83; Color T 568-572.			
147		Undated	Talco Val Chisone SPA Data Sheet for Extra 5/0 Dec Talc, Undated; Color T 000233.			
148		11/25/2003	Fax to Veronique, Luzenac Europe, from C Edridge; Re: Talc 5/0, 11/25/03; Luzenac Certificate of Analysis to Charles B Chrystal, 7/15/02; Color T 000248-249.			
149		5/27/2005	Email to C Edridge, from J Tracy, Luzenac America; Re: Name Changes for Luzenac Products made in Houston, TX, 5/27/05; Color T 000456-485.			
150		1/1/2009	Luzenac America Talc Sales Report, A Perkinson, January 2009; IMERY5295889.			
151		3/4/1981	Request for New Raw Material Approval, Talc 1004CX, Beacon Chemical, D Horton, 3/4/81; CTI 593.			
152		3/27/1981	Comparison Report between Italian 1615 Talc and Canadian 1004CX Talc, 3/27/81; CTI 592.			
153		4/26/2022	Letter to J Bolitsky, from KE Sharperson, Weber Gallagher; Re: Insured: Color Techniques, Policy Period: December 7, 2020 to December 7, 2021, 4/26/22; Color T 669-680.			
154		4/4/2022	Letter to J Bolitsky, from S Mathers, Ironshore; Re: Policy 001228400 (12/7/11-12/7/12), 4/4/22; Color T 663-668.			
155		11/9/2022	Letter to TW Branham, DOBS Legal, from WH Kleindienst, Gordon Rees Scully Mansukhani; Re: Clark, et al v 3M Company, et al, Topic 52 in Second Amended Notice of Deposition, 11/9/22.			
156		7/9/1979	Certificate of Incorporation of Color Techniques, 7/9/79; Color T 000414.			
157		7/11/1983	Letter to D Kelner, Revlon, from RM Loncar; Re: RCT 1004 and RCT 1004CX Cosmetic Talcs, 7/11/83; Color T 568.			
158		5/28/1986	Letter to S Price, from J Bonina, Revlon; Re: Specifications for Timato (111089-00) 1004CX Talc, 5/28/86; Revlon Raw Material Specification for Timato, Code No 111089-00, 11/20/84; Color T 580-583.			
159		1/18/2021	Scientech Invoice No 34196 to Color Techniques, R-7008 and R-7046 Lo Micron Italian Talc, 1/18/21; Color T 652-657.			
160		2/20/2020	Manufacturing Personnel Responsibilities, 2/20/20; Color T 000331-393.			
161		Undated	Organization Chart, Color Techniques, Undated.			
162		Undated	Our Products, Search for Talc, Color Techniques Website, Undated.			
163		Undated	Our Products, Product Filter showing no results for Talc, Color Techniques Website, Undated.			
164		Undated	Our Products, Search for Titanium Dioxide, Color Techniques Website, Undated.			
165		Undated	Our Products, Product Filter: All Products, Color Techniques Website, Undated.			

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166		6/6/1978	Letter to F Donnelly, Arkwright-Boston Insurance, from R Rubin, Johns-Manville; Re: Timmins, Ontario, Canada, Steetley Talc Ltd, 6/6/78; CRMC-Talc-Micro-000887; Affidavit.			
167		Undated	Inorganic Colors, Fillers & Surface Treatments: Enhancing the Performance of Your Products, Color Techniques			
168		Undated	Surface Treated Pigments & Mineral Products Technologies, Color Techniques			
169		4/2/2013	Minerals Technologies/ Barretts Minerals Sales Report as of March 13, 2013, 4/2/13; BMI_00073522-73640. CONFIDENTIAL			
170		Undated	Color Techniques Product Data for RCT 1004CX Cosmetic Talc #10-240, CTFA/USP BC, Timato, Undated; Revlon-Moore-000010.			
171		9/7/2017	Color Techniques Certificate of Analysis for D-10230 Hydrophobic Talc, Improved, 9/7/17; Revlon-Moore-000041.			
172			All Documents Showing Color Techniques Membership in Trade Organizations			
173			All Documents Produced by Color Techniques in this Case			
174			All Documents Produced by Color Techniques in any Case			
175			All Documents Discussed or Attached to any Color Techniques Corporate Representative Deposition			
176			All Documents Discussed, Cited or Attached to any Expert Report			
177			All Documents Discussed, Cited or Attached to any Expert Deposition			
178			All Documents Attached In Response to Any Motions Filed in this Case			
179			Color Techniques 10-K, 10-Q and Annual Reports			
180		4/4/2022	Responses to Plaintiffs' Liability Interrogatories to Noxell Corporation, Incorrectly Sued as Coty, Inc, for Its Covergirl Line of Products, Peltz v Avon Products, Inc, et al, In Re: NYCAL, 4/4/22.			
181		11/12/1979	Noxzema Price List, 11/12/79; CG-EGGERS-000591-594.			
182		8/1/1970	Noxell Product Price Schedule, 8/1/70; CG-EGGERS-000670-673.			
183		1/1/1969	Noxell Product Price Schedule, 1/1/69; CG-EGGERS-000676-677.			
184		8/19/1968	Noxell Product Price Schedule, 8/19/68; CG-EGGERS-000678-679.			
185		6/1/1968	Noxell Wholesaler Price List, 6/1/68; CG-EGGERS-000682-683.			
186		1/1/1964	Noxzema Trade List Prices, 1/1/64; CG-EGGERS-000700-701.			
187		1/15/1962	Noxzema Retail Fair Trade Minimum Price Schedule G-27, 1/15/62; Extra Bonus on Cover Girl Cosmetics; CG-EGGERS-000718-721.			
188		10/17/1983	Noxzema Cover Girl Products Price List, 10/17/83; CG-EGGERS-000756-757.			
189		1977-1978	Noxell Laboratory Notebook, N Taylor, 7/27/77 to 12/9/78; CG-EGGERS-000764-772.			
190		1/1/2013	Classic Campaigns - Cover Girl Cosmetics, 1960-1990, LM Scott, Advertising & Society Review, 2013.			
191		9/1/1992	Prince Matchabelli Information Memorandum, Lesser & Roffe Co, September 1992; CONOPCO-FRIEDMAN000462-514.			

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192		1/1/1969	Cosmetics and Skin: Your Winning Look by Cover Girl, 1969.			
193		1/1/2019	Covergirl: About Us, Coty, Inc, 2019.			
194		9/8/2020	Is Talc in Make-Up Safe? A Keller, 9/8/20. www.drugwatch.com			
195		1/1/1970	Advertisement - Noxell Corporation Introduces New Cover Girl Eyes, 1970.			
196		1/1/1976	The Cover Girl Beauty Book, Noxel Corp, 1976.			
197		12/1/1961	Advertisement - At last! A Cover Girl complexion... so natural you can't believe it's make-up! Cosmopolitan, December 1961.			
198		1/1/1997	Product Photo - Cover Girl Pressed Powder, Creamy Beige, 1997.			
199		10/1/1978	Advertisement - I Won! Now I'm a Cover Girl! Co-Ed, October 1978; CG-PELTZ-001085.			
200		5/1/1978	Advertisement - The look that's good to your skin, May 1978; CG-PELTZ-001086-1087.			
201		1/1/1960	Noxzema Annual Report, 1960; CG-PELTZ-000001-22.			
202		1/1/1961	Noxzema Annual Report, 1961; CG-PELTZ-000023-45.			
203		1/1/1962	Noxzema Annual Report, 1962; CG-PELTZ-000046-72.			
204		1/1/1963	Noxzema Annual Report, 1963; CG-PELTZ-000073-100.			
205		1/1/1964	Noxzema Annual Report, 1964; CG-PELTZ-000101-124.			
206		1/1/1965	Noxzema Annual Report, 1965; CG-PELTZ-000125-152.			
207		1/1/1966	Noxzema Annual Report, 1966; CG-PELTZ-000153-172.			
208		1/1/1968	Noxzema Annual Report, 1968; CG-PELTZ-000173-196.			
209		1/1/1969	Noxzema Annual Report, 1969; CG-PELTZ-000197-220.			
210		1/1/1970	Noxzema Annual Report, 1970; CG-PELTZ-000221-244.			
211		1/1/1971	Noxzema Annual Report, 1971; CG-PELTZ-000245-264.			
212		1/1/1972	Noxzema Annual Report, 1972; CG-PELTZ-000265-288.			
213		1/1/1973	Noxzema Annual Report, 1973; CG-PELTZ-000289-312.			
214		1/1/1974	Noxzema Annual Report, 1974; CG-PELTZ-000313-332.			
215		1/1/1975	Noxzema Annual Report, 1975; CG-PELTZ-000333-356.			
216		1/1/1976	Noxzema Annual Report, 1976; CG-PELTZ-000357-380.			
217		1/1/1977	Noxzema Annual Report, 1977; CG-PELTZ-000381-407.			
218		1/1/1978	Noxzema Annual Report, 1978; CG-PELTZ-000408-434.			
219		1/1/1979	Noxzema Annual Report, 1979; CG-PELTZ-000435-457.			
220		1/1/1982	Call Cyprus before it's too late, 1982; CG-PELTZ-000458.			
221		1/24/1979	Request for Raw Material Approval No 71 to RJ Gutowski, from RH Ashley; Re: Olympic Talc (Cyprus Industrial Minerals), 1/24/79; CG-PELTZ-000463-465..			
222		8/10/1977	Noxell Raw Material Specifications & Procedures, 1615 AGI Talc (BC), Supplier: WCD, 8/10/77; CG-PELTZ-000476.			
223		11/26/1970	Raw Material Evaluation No 113 to RH Gutowski, from RH Ashley; Re: Mistron Spray Talc, Cyprus, 11/26/70; CG-PELTZ-000478.			
224		9/7/1977	Noxell Raw Material Specifications & Procedures, 141 Talc USP (BC), Supplier: WCD, No 77718, 9/7/77; CG-PELTZ-000487.			
225		9/6/1979	Noxell Memo to RH Ashley, from RJ Gutowski; Re: Request for Raw Material Approval No 70, 9/6/79; CG-PELTZ-000497.			
226		1976-1978	Noxell Formulas for Cover Girl International Pressed Powder, Compact Powder, 6/22/76 to 1/18/78; CG-PELTZ-000510-527.			
227		12/16/1976	Noxell Formula for Cover Girl International Pressed Powder, Formula No CGI-5-809-31 Misty Peach, 12/16/76; CG-PELTZ-000515.			

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228		6/22/1976	Noxell Formulas for Cover Girl International Pressed Powder, 6/22/76; CG-PELTZ-000516-521.			
229		6/22/1976	Noxell Microbiological Guidelines and Specifications for Cover Girl International Pressed Powder, 6/22/76; CG-PELTZ-000536-547.			
230		12/15/1982	Noxell Master Formulas for Compact Powder, Laboratory Formula No CG1WP 12260-01, Honey Beige, Shade No 2, 12/15/82; CG-PELTZ-000780-783.			
231		8/28/1975	Formula No 707-51, Moisturewear Powder Tawny Beige, 8/28/75; CG-PELTZ-000798.			
232		Undated	Formula CG-1225-4 for Cover Girl Oil Control Pressed Powder, Undated; CG-PELTZ-000800.			
233		12/30/1961	Marketing Brochure/Advertisement - Cover Girl Face Powder by Noxzema, 12/30/61; CG-PELTZ-000839.			
234		6/1/1967	Advertisement - "Glow lightly" by Cover Girl, 3 new brush-on blushers irresistibly merged with frost! Seventeen, June 1967; CG PELTZ-000887.			
235		1/24/1979	Request for Raw Material Approval No 70 to RJ Gutowski, from RH Ashley; Re: Mistron Monomix Talc (Cyprus Industrial Minerals), 1/24/79; CG-PELTZ-000492.			
236		6/23/2022	Defendant Noxell Corporation's Answers to Plaintiff Gary Chapman's Special Interrogatories (Set One), Chapman vs. Avon Products, Inc., et al., Superior Court of the State of California, County of Los Angeles, Central District, 6/23/22; Verified.			
237		10/31/1994	CTFA Memorandum to Talc Interested Party Task Force, from P Dennis; Re: Faxed Items - 94-TA-48, 10/31/94; WCD-McBride(IN)-002785-2787.			
238		11/3/1985	CTFA Scientific Conference, Final Registration, November 3-6, 1985.			
239		10/16/1989	Cyprus Industrial Minerals Sales Records for Second Half of 1988, 10/16/89; IMERY5105785-830.			
240		1/1/2022	Curriculum Vitae of Richard Sutton, 2022.			
241		7/21/2022	Meeting 7/21/22 - Martin Roddy, Clint Hagaman, Richard Sutton			
242		Undated	Noxell Corporation - Covergirl Document Production			
243		5/24/2004	Letter to D Cephus, Proctor & Gamble, from M Brown, ImiFabi; Re: Certification and attached data sheets, 5/24/04; NOXELL-CG-002189-2195.			
244		11/23/1982	Letter to T Griffith, from RR Krammes, Whittaker, Clark & Daniel; Re: Typical General Statement Concerning a Shipment of No 141 Talc BC, 11/23/82; NOXELL-CG-000738-739.			
245		12/16/1980	Noxell Raw Material Specification 802980, Talc (WHT 141) CI No 77718, 12/16/80; NOXELL-CG-000839-842.			
246		9/7/2022	Analysis Report, Rita Chapman's Cover Girl Sample, MAS Project #M71575, WE Longo, MAS, 9/7/22.			
247		7/31/1995	Confidential Product Formula No 3073-196 for Cover Girl Non-Stop Eyecolor Shadow Plus Base, Burnished Copper, 7/31/95; NOXELL-CG-004973.			
248		1/6/1995	Proctor & Gamble Confidential Master Formula 3073-199 for Cover Girl Non-Stop Eyecolor Shadow Plus Base, Burgundy Splash, 1/6/95; NOXELL-CG-004967.			
249		11/1/1982	Noxell Memo to RN Lenham, from EM Jackson; Re: Talc, 11/1/82; w Attachments; NOXELL-CG-000697-709.			
250		8/18/1982	Noxell Memo to JL Dudley and G Porres, from RJ Gutowski; Re: Talc from Cyprus and Whittaker, Clark & Daniel, 8/18/82; NOXELL-CG-000710-713.			

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251		1/8/1981	Talc and the OSHA, Asbestos Standard 29CFR 1910.1001, Cyprus Industrial Minerals, 1/8/81; NOXELL-CG-000715.			
252		7/1/1982	Cyprus/ Amoco Material Safety Data Sheet (MSDS) for Altalc 400 USP, July 1982; NOXELL-CG-000716.			
253		Undated	Beacon CMP Technical Data, Specifications for Cosmetic Talc, CTFA BC, Undated; NOXELL-CG-000717-719.			
254		3/12/1982	Letter to D Willis, from Whittaker, Clark & Daniels; Re: Sample of RCT 1004 as replacement for Italian talc, 3/12/82; NOXELL-CG-000721.			
255		9/28/1981	Letter to R Gutowski, from CR Moebus, Cyprus Industrial Minerals; Re: MSDS for Orean Talc, 9/28/81; NOXELL-CG-000728.			
256		3/3/1983	New Raw Material Specification Request, Raw Material #804990, 1623 Lo Micron Talc and Suprafino Talc, Cyprus/ WCD, 3/3/83; NOXELL-CG-000730-732.			
257		3/4/1983	Noxell Memo to J Dudley, from T Griffiths; Re: Talc, 3/4/83; NOXELL-CG-000733-734.			
258		11/23/1982	Letter to T Griffiths, from RR Krammes, WCD; Re: Typical General Statement Concerning a Shipment of No 141 Talc BC, 11/23/82; NOXELL-CG-000738.			
259		8/10/1977	Noxell Raw Material Specifications & Procedures, RM No 8017BO, 1615 AGI Talc (BC), 8/10/77; Cyprus Product List-Montana and California Talcs; NOXELL-CG-000769-770.			
260		6/20/1980	Noxell Memo to RH Ashley, from RJ Gutowski; Re: Raw Material Request #113, 6/20/80; NOXELL-CG-000771.			
261		3/20/1980	Letter to D Ashley, from LS Beviz, Cyprus; Re: Cosmetic talcs Altalc 400 and Supra, 3/20/80; NOXELL-CG-000772.			
262		7/1/1985	Letter to R Ashley, from F McGonigle, WCD; Re: 2755 Lo Micron Talc USP BC, 7/1/85; NOXELL-CG-000791-797.			
263		4/2/1991	Noxell Laboratory Formula 3094-43 for Navy Dusting Powder, Project 1630, 4/2/91; NOXELL-CG-000799.			
264		1/19/1990	Presperse to Talc Micro Ace P-2-030, 1/19/90; NOXELL-CG-000800.			
265		6/10/1991	Noxell Memo to SR Delaney, from MG Madsen; Re: Talc (141 Type) - Part #802980 and 802981, 6/10/91; NOXELL-CG-000824.			
266		10/27/1986	Vermont Talc to Noxell Corporation; Re: Certificate of Assurance, Vertal USP 700 Talc, 10/27/86; NOXELL-CG-000825-826.			
267		7/25/1994	Raw Material Specification RM# 1851590, Talc 2611 (Montana Type), 7/25/94; NOXELL-CG-000837-838.			
268		12/16/1980	Raw Material Specification RM# 802980, Talc (WHT 141) CI No 77718, 12/16/80; NOXELL-CG-000839-840.			
269		11/9/1984	Color Techniques Material Safety Data Sheet (MSDS) for RCT 1004 CX 10-240, 11/9/84; NOXELL-CG-000847.			
270		Undated	Color Techniques Technical Data for D10220 Hydrophobic Talc, Undated; NOXELL-CG-000853.			
271		7/9/1985	Noxell Beaver Court Raw Material Specification RM#802980, 141 Talc, 7/9/85; NOXELL-CG-000859.			
272		Undated	Cover Girl Product List and Manufacturing Locations; NOXELL-CG-000917-919.			
273		3/20/1990	Beaver Court Raw Materials, Part Number 1805080, Calcium Silicate (Type E), Manville, 3/20/90; NOXELL-CG-000952.			
274		9/17/1982	Noxell Memo to J Dudley, from T Griffiths; Re: Talc, 9/17/82; NOXELL-CG-001074.			
275		1980-1983	Noxell Raw Material specification RM #804990, 1623 Talc, 9/9/80 and 8/5/83; NOXELL-CG-001365-1368.			

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276		7/1/1994	Proctor & Gamble Cosmetics and Fragrances Division, CTFA Nomenclature/ Raw Materials, 7/1/94; NOXELL-CG-001469-1728.			
277		5/26/1993	Cosmetics, Food and Pharmaceutical Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			
278		10/14/1989	Beaver Court Raw Materials, Part No 1806280, Hydrophobic Talc 9441, Color Techniques, 10/14/89; Color Techniques Material Safety Data Sheet, 10/2/89; NOXELL-CG-000966-998.			
279		5/2/1988	Memo to VE Gemma, from TR Griffiths; Re: Alternate Raw Material Request 311, Talc (141 Type), Supplied by G&G Specialty Products Co, Part No 802980, 5/2/88; NOXELL-CG-000999-			
280		9/6/1979	Noxell Memo to RH Ashley, from RJ Gutowski; Re: Mistron Monomix approved as substitute for Talc #399, 9/6/79; NOXELL-CG-001047-1048.			
281		10/28/1982	Letter to R Gutowski, from RR Krammes, Whittaker, Clark & Daniels; Re: Comparison between #141 Talc USP BC and New #141 Talc BC, 10/28/82; NOXELL-CG-001055-1057.			
282		2/2/1983	Letter to R Butler, from JT Suchan, Whittaker, Clark & Daniels; Re: Price quotation for Nos 140 Talc USP BC and 141 Talc BC, 2/2/83; NOXELL-CG-001058-1060.			
283		10/7/1982	Memo to T Griffiths, from J Dudley; Re: Talc, 10/7/82; NOXELL-CG-001070.			
284		9/2/1982	Memo to G Porus, from T Griffiths; Re: Talc, 9/2/82; NOXELL-CG-001084.			
285		7/1/1991	Raw Material Specification 804830, Talc 2755, Whittaker, Clark & Daniels, 7/1/91; NOXELL-CG-001096.			
286		4/10/1978	Raw Material Specifications & Procedures for Master Formula for Ochre (C1624), RM No 801490, Cosmetic Ochre 1624, 4/10/78; NOXELL-CG-001120-1121.			
287		1984-1985	Raw Material Specification 801530 for Talc (WHT 399), 9/17/84 to 6/27/85; NOXELL-CG-001323-1324.			
288		12/22/1980	Raw Material Specification 801530 for Talc (WHT 399) or (PLT MP 12-50) or (CPR Monomix), 12/22/80; NOXELL-CG-001325-1326.			
289		8/10/1977	Raw Material Specification 801530 for Talc 399 8/10/77; NOXELL-CG-001327.			
290		11/29/1976	Raw Material Specification 801530 for Talc (WHT 399) or (PLT MP 12-50), 11/29/76; NOXELL-CG-001328.			
291		1983-1989	Raw Material Specification 801780 for Talc (1625 Type), 8/8/83 to 3/30/89; NOXELL-CG-001329-1334.			
292		8/8/1988	Production Formulas for Cover Girl Pro-Colors One-Kit Eye Shadows, 8/8/88; NOXELL-CG-005872-5907.			
293		3/20/1989	Production Formula for Cover Girl Pro-Colors One-Kit Eye Shadows - Fall '89, 3/20/89; NOXELL-CG-005908.			
294		4/25/1989	Production Formulas for Cover Girl Pro-Colors One-Kit Eye Shadows, 4/25/89; NOXELL-CG-005909-5919.			
295		6/9/1986	Production Formulas for Cover Girl Pro-Colors One-Kit Eye Shadows, 6/9/86; NOXELL-CG-005936-5951.			
296		10/3/1985	Production Formulas for Cover Girl Pro-Colors One-Kit Eye Shadows, 10/3/85; NOXELL-CG-005985-6000.			
297		4/4/1985	Production Formulas for Cover Girl Pro-Colors One-Kit Eye Shadows, 4/4/85; NOXELL-CG-006033-6048.			
298		2/9/1976	Microbiological Guidelines, Cover Girl Eyes - Cake Eye Shadow, 2/9/76; NOXELL-CG-006268-6277.			

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299		6/26/1997	Proctor & Gamble Master Formula 3396-1 for CG Fresh Complexion Oil Control Loose Powder, 6/26/97; NOXELL-CG-006527.			
300		5/1/1992	Noxell Master Formula 3396-2 for CG Fresh Complexion Oil Control Loose Powder, 5/1/92; NOXELL-CG-006528.			
301		4/16/1997	Proctor & Gamble Master Formula 34183-171 for CG Replenishing Ultra Finish Cream Make-Up, 4/16/97; NOXELL-CG-006534.			
302		4/8/1996	Replenishing Translucent Pressed Powder Master Formulas, Formula No 2282, 4/8/96; NOXELL-CG-006555-6560.			
303		5/20/1991	Replenishing Loose Powder Master Formulas, Formula No 3058, 5/20/91; NOXELL-CG-006561-6566.			
304		7/8/1994	Replenishing Concealer Master Formulas, Formula No 3792, 7/8/94; NOXELL-CG-006576-6583.			
305		7/10/1992	Extremely Gentle Hypo-Allergenic Pressed Powder Master Formulas, Formula No 2580, 7/10/92; NOXELL-CG-006596-6600.			
306		12/15/1982	Compact Powder Master Formula, Formula No CG1WP 12260-01, 12/15/82; NOXELL-CG-015147.			
307		9/12/1982	Compact Powder Master Formula, Formula No CG1WP 12257-01, 9/12/82; NOXELL-CG-015148.			
308		6/15/1984	Loose Face Powder Master Formula, Formula No CG1WP 01203-02, 6/15/84; NOXELL-CG-015181.			
309		Undated	New Faces Pale Mu Pearly Powder Formula, Formula No 1119-32, Project No 9728, Undated; NOXELL-CG-015179.			
310		12/16/1980	Raw Material Specification #801780, Talc (WHT 1615) CI No 77718, 12/16/80; NOXELL-CG-001335-1336.			
311		8/26/1988	Raw Material Specification #807190, Talc (Brilliant), 8/26/88; NOXELL-CG-001338.			
312		1977-1989	Raw Material Specification #802981, Talc (141 Type) Bulk, 9/7/77 to 3/30/89; NOXELL-CG-001339-1351.			
313		1982-1987	Raw Material Specification #804830, Talc 2755, 8/27/82 to 10/27/87; NOXELL-CG-001352-1360.			
314		1980-1989	Raw Material Specification #804990, Talc (1623 Type), 9/9/80 to 3/30/89; NOXELL-CG-001361-1368.			
315		1986-1989	Raw Material Specification #806280, Talc Hydrophobic 9441, 6/20/86 to 11/7/89; NOXELL-CG-001369-1372.			
316		2/22/1989	Raw Material Specification #807310, Talc, Micro-Ace P-2, 2/22/89; NOXELL-CG-001373.			
317		1992-1994	Proctor & Gamble Cosmetics and Fragrances Division, Current Raw Materials, 11/17/92 to 7/1/94; NOXELL-CG-001472-1728.			
318		5/1/1992	Noxell Raw Materials, R Schwartz, 5/1/92; NOXELL-CG-001729-1743.			
319		10/1/1993	Proctor & Gamble Domestic Master Formula, Formula No 1852, The Invisible Concealer, 10/1/93 to 10/21/93; NOXELL-CG-006680-6690.			
320		7/2/1992	CG Professional Finishing Loose Powder Master Formula, Formula No 2283, 7/2/92; NOXELL-CG-006691-6698.			
321		6/17/1992	Classic Color Believable Blush Master Formula, Formula No 2289, 6/17/92; NOXELL-CG-006765-6774.			
322		7/8/1992	Cheekers Fashion Blush Master Formulas, Formula No 2229, 7/8/92; NOXELL-CG-006775-6796.			
323		7/8/1992	Professional Color Match Blush Duet Master Formula, Formula No 2229, 7/8/92; NOXELL-CG-006797-6814.			
324		7/15/1992	Instant Cheekbones Contouring Blush Master Formula, Formula No 2367, 7/15/92; NOXELL-CG-006815-6833.			

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325		6/17/1992	Continuous Color Moisture Enriched Blush Master Formula, Formula No 1675, 6/17/92; NOXELL-CG-006834-6843.			
326		1991-1994	CG Eye Shadows - Matte Master Formulas, Formula No 2322, 5/21/91 to 10/26/94; NOXELL-CG-007118-7130.			
327		1991-1996	CG Eye Shadows - Spun Satin Master Formulas, Formula No 2511, 5/22/91 to 8/30/96; NOXELL-CG-007131-7147.			
328		1991-1992	Clarion Captive Color Eye Shadow Plus Base Master Formulas, Formula No 3073, 11/22/91 to 6/1/92; NOXELL-CG-007155-7178.			
329		1/6/1995	CG Non-Stop Eyecolor or Shadow Plus Base Master Formulas, Formula No 3073, 1/6/95 to 9/19/95; NOXELL-CG-008701-8724.			
330		8/14/1992	Noxell Pressure-Sensitive Label Specification for Various CG Pressed Powders & Finishing Powders, 8/14/92; NOXELL-CG-009051-9065.			
331		1991-1992	Replenishing Translucent Pressed Powder Master Formulas, Formula No 2282, 5/24/91 to 3/31/92 ; NOXELL-CG-009209-9228.			
332		12/10/2012	Presperse Certificate of Analysis for Talc Micro-Ace P-4, Nippon Talc Co, Japan, 12/10/12; NOXELL-CG-015621.			
333		9/14/2015	Presperse Certificate of Analysis for Talc Micro-Ace P-4, Nippon Talc Co, Japan, 9/14/15; NOXELL-CG-015726.			
334		6/21/2004	SIMPL Milestone Document, TruBlend Pressed Powder, 6/21/04; NOXELL-CG-016109-16113.			
335		1978-2003	Whittaker, Clark & Daniels Sales Report to Noxell Corp, Cover Girl, 1978-2003; WCD_Chamberlain(PA)_000316-340. 1003.			
336		9/30/2022	Supplement Report, M71575 Talcum Powder Analysis, Rita Chapman Cover Girl Powder Container, WE Longo, MAS, 9/30/22.			
337		9/30/2022	MAS Project M71583 Talcum Powder Analysis, Cover Girl Make-Up Compact Powder Containers, WE Longo, MAS, 9/30/22.			
338		12/14/1982	Noxell Master Formula No CG1WP 12258-01, Compact Powder, Cool Tan, 12/14/82; NOXELL-CG-015149.			
339		12/15/1982	Noxell Master Formula No CG1WP 12259-01, Compact Powder, Translucent, 12/15/82; NOXELL-CG-015150.			
340		Undated	Noxell Formula 1119-26, Project 9728, Loose Face Powder, Undated; NOXELL-CG-015180.			
341		6/1/1989	Cyprus Industrial Minerals Active Customers, Ranked by Tonnage, Figures YTD as of June 1989; IMERY5106488-106511.			
342		4/22/2022	Meeting 4/22/22 - Noxell Former Employee, Taras Wojtowycz			
343		4/28/2022	Meeting 4/28/22 - Noxell Former Employee, Mike Waltz			
344		7/21/2022	Meeting 7/21/22 - Noxell Former Employee, Martin Roddy			
345		3/29/1976	CG Loose Powder Shadow, SPI- International, Formulas, 3/29/76 to 5/3/76; NOXELL-CG-004922-4940.			
346		7/2/1992	Cover Girl Professional Finishing Powder Formula, 7/2/92; NOXELL-CG-006691-6698.			
347		1982-1992	Cover Girl Powder Formulas, Specifications and Product Safety Summaries, 1982-1992; NOXELL-CG-015140-15346.			
348		11/7/1996	Cover Girl Master Formulas for Simply Powder Foundation, 11/7/96; NOXELL-CG-006732-6745.			

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349		1991-1996	Cover Girl Clean Pressed Powder, Clean Fragrance Free Make-Up, and Clean Pressed Powder Formulas, 1991-1996; NOXELL-CG-006628-6679.			
350		2012-2013	Raw Material Sample Testing Sheet, GCAS# 11081302, 6/17/13; Presperse Certificate of Analysis for Talc Micro-Ace P-4, 12/10/12; NOXELL-CG-015617-15656.			
351		11/26/1970	Request for Raw Material Approval, Request #113, Mistrion Spray Talc - Cyprus Industrial Minerals, RH Ashley, 11/26/70; NOXELL-CG-001032.			
352		8/12/1982	Inside News from CTFA, Study Claims Talc Possible Carcinogen, 8/12/82; NOXELL-CG-000708-709.			
353		9/8/2021	Presperse Product Names, 9/8/21. www.presperse.com			
354		12/29/2021	Cosmetics and Skin: Cover Girl, 12/29/21. www.cosmeticsandskin.com			
355		1/18/1991	Newspaper Article - P&G, Noxell: A good business Marriage, M Mallory, Baltimore Sun, 1/18/91.			
356		9/28/2022	PG, Our Company of the Year, Beauty Packaging, 9/28/22. www.beautypackaging.com			
357		1/1/1968	Advertisement - Clean Make-Up, It looks and feels like no make-up at all, 1968.			
358		1/1/1970	Advertisement - Clean Make-Up, It's a beautiful way to feel, Susan Blakely, 1970.			
359		1/1/1972	Advertisement - All Eyes. Not all eye make-up. Natural. That's the look of new Cover Girl Eyes, Cybil Shepherd, 1972.			
360		6/1/2007	Advertisement - Take off that mask! And let your skin breathe with clean makeup, Keri Russell, Seventeen Magazine, June 2007.			
361		8/1/2022	Chart - 26 times Pfizer identified asbestos fibers by TEM/SAED in Talc 141 in 1976 to 1988; Exhibit to the deposition of Pfizer in Payne, August 2022.			
362		Undated	Chart - 115 times Pfizer identified asbestos fibers by TEM/SAED in Talc 1615 and/or Supra in 1976-1992; Exhibit 14 to the notice of deposition of Pfizer, Chapman v Pfizer, Inc.			
363		8/11/2022	Deposition of Mary Leech, Vol 3, Payne v 3M Company, et al, 8/11/22.			
364		12/12/1997	Luzenac America Memo to S Abarca, et al, from K Aillslienger; Re: Table of Cosmetic/Pharmaceutical/Food products (by location), 12/12/97; IMERYS426200-426201.			
365		1975-1989	WCD Sales Report to Noxell, 1975-1989; WCD-EGLI (CA)-04366-4383.			
366			Documents Produced in the Plant Matter and Bates Labeled NOXELL-CG-000001 to NOXELL-CG-020669.			
367			All Documents Showing Covergirl, Coty or Noxell Membership in Trade Organizations			
368			All Documents Produced by Covergirl, Coty or Noxell in this Case			
369			All Documents Produced by Covergirl, Coty or Noxell in any Case			
370			All Documents Discussed or Attached to any Covergirl, Coty or Noxell Corporate Representative Deposition			
371			All Documents Discussed, Cited or Attached to any Expert Report			
372			All Documents Discussed, Cited or Attached to any Expert Deposition			
373			All Documents Attached In Response to Any Motions Filed in this Case			

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374			Covergirl, Coty or Noxell 10-K, 10-Q and Annual Reports			
375		1/1/1994	Zemex Corporation Annual Report, Form 10-K, 1994.			
376		1/9/1995	Letter to P Goodwin, Suzorite Mineral Products, from R Zazenski, Luzenac America; Re: Organization of North American Talc Association (NATA), 1/9/95; IMERY5052296-52298.			
377		3/4/2003	Newspaper Article - Zemex zooms on \$100M takeover bid, The Ottawa Citizen, Ontario, Canada, 3/4/03.			
378		12/16/1950	Newspaper Article - Siscoe Plans Feb Output from Vermiculite Deposit, National Post, Ontario, Canada, 12/16/50.			
379		12/4/2012	Whittaker, Clark & Daniels Answers to Supplemental Interrogatories, Kaenzig and Argento v Charles B Chrystal Company, et al, Superior Court of New Jersey, 12/4/12.			
380		2/28/2013	IMI Fabi Safety Data Sheet for Talc in Powder Form, 2/28/13; Color T000478-484.			
381		9/22/2008	The structure of the talc supply market, M O'Driscoll, Industrial Minerals, Presented at the China Liaoning International Magnesia Materials Exposition, September 22-24, 2008.			
382		8/7/1997	Luzenac America Call Report to Whittaker, Clark & Daniels, GE Gauntt, 8/7/97; IMERY5338156-338158.			
383		9/30/2000	Evaluation of the market for Talc in Cosmetic Applications, Market Research Project for Luzenac America, Chemical Contract Marketing, Inc, 9/30/00; IMERY5147287-147306.			
384		1/1/2004	Talc and Pyrophyllite, RL Virta, 2004.			
385		1/1/2010	Talc, EF McCarthy, NA Genco and EH Reade, Jr, Industrial Minerals and Rocks, 2010; IMERY5072882-72897.			
386		1/1/2006	Rio Tinto Powerpoint - Territory Review - Southeast United States, MJ Keener, 2006; IMERY5125188.			
387		4/1/2001	Imi Fabi (Diana) Material Safety Data Sheet (MSDS) for Talc, 4/1/01; Moore_EL_00000789-790. CONFIDENTIAL			
388		3/7/2008	Estee Lauder Raw Material Specification, Code #9999-69-0064, Imi Fabi 643 Talc, 3/7/08; Moore_EL_00000894-895. CONFIDENTIAL			
389		7/3/2007	Imi Fabi Certificate of Analysis for 643 Talc BC, 7/3/07; Moore_EL_00000903-904. CONFIDENTIAL			
390		11/19/2001	Imi Fabi Certificate of Analysis for 3355 Talc USP BC, 11/19/01; Moore_EL_00000823. CONFIDENTIAL			
391		2/23/1998	Suzorite Certificate of Analysis for 141 Cosmetic Talc BC, 2/23/98; Revlon_Moore-000034.			
392		2/23/1998	Suzorite Certificate of Analysis for 1626 Cosmetic Talc BC, 2/23/98; Revlon_Moore-000035.			
393		5/31/2017	Imi Fabi Certificate of Analysis for 141 Talc BC, 5/31/17; Revlon_Moore-000042-43.			
394		4/14/2015	Imi Fabi Certificate of Analysis for 3351 Lustre, Cosmetic Specialties, 4/14/15; Revlon_Moore-000044-46.			
395		1/1/2002	Industrial Minerals & Rocks, Commodities, Markets and Uses, 7th Edition, JE Kogel, NC Trivedi, Eds, 2002.			
396		5/11/1993	Newspaper Article - Carolinas - Announcement of Zemex Agreement to Buy Suzorite, The Charlotte Observer, 5/11/93.			
397		3/21/2001	Newspaper Article - Zemex sells New York talc plant, National Post, Ontario, Canada, 3/21/01.			
398		1/22/2001	Articles of Incorporation of Zemex Fabi Benwood (ZFB-1), 1/22/01; IMI FABI-PLANT-000001-13.			
399		1/26/1999	Certificate of Incorporation of Imi Fabi (USA) Inc, 1/26/99; IMI FABI-PLANT-000075-86.			

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400		10/1/2018	Imi Fabi Ethic Code, October 2018; IMI FABI-PLANT-000100-110.			
401		11/11/2011	IMI Fabi Bag Label, 11/11/11; IMI FABI-PLANT-000153.			
402		1920-2021	History of Imi Fabi, 1920-2021; IMI FABI-PLANT-000156.			
403			Documents Produced in the Plant Matter and Bates Labeled IMI FABI-PLANT-000001 to IMI FABI-PLANT-000013.			
404			All Documents Showing Imi Fabi, Suzorite or Zemex Membership in Trade Organizations			
405			All Documents Produced by Imi Fabi, Suzorite or Zemex in this Case			
406			All Documents Produced by Imi Fabi, Suzorite or Zemex in any Case			
407			All Documents Discussed or Attached to any Imi Fabi, Suzorite or Zemex Corporate Representative Deposition			
408			All Documents Discussed, Cited or Attached to any Expert Report			
409			All Documents Discussed, Cited or Attached to any Expert Deposition			
410			All Documents Attached In Response to Any Motions Filed in this Case			
411			Imi Fabi, Suzorite or Zemex 10-K, 10-Q and Annual Reports			
412		Undated	The Mary Kay Marketing Plan.			
413		6/1/1997	Cosmetics, Food and Pharmaceutical Market Analysis, Luzenac America, June 1997; Talc Usage by Industry from 1997 Competition Database; IMERYS231083-231106.			
414		7/6/1998	Luzenac America Domestic Talc Usage in TX, OK, AR, MS, LA from 1998 Competition Database, 7/6/98; IMERYS219749-219801.			
415		2/20/1998	1997 Domestic Specialty Customers Ranked by Total Exworks Revenue Grouped by Corporate Name, Luzenac America, 2/20/98; IMERYS053954-53974.			
416		9/30/2000	Evaluation of the Market for Talc in Cosmetic Applications, Chemical Contract Marketing, Market Research Project for Luzenac America, 9/30/00; IMERYS147287-147306.			
417		1/20/1998	Letter to T Hubbard, et al, Whittaker, Clark & Daniels, from J Gauntt, Luzenac America; Re: Private Label Products and Customer Mailing, 1/20/98; IMERYS231188-231212.			
418		5/6/1992	Luzenac America Customer Sales by Shipping Location, West Windsor, Vermont Talc Mill, 5/6/92; IMERYS052354-52359.			
419		6/25/2004	Email from L Loretz, CTFA; Re: Talc Conference Call Minutes, 6/25/04; JNJ000002302.			
420		4/27/1999	Luzenac America Memo to B Beck, et al, from J Gauntt; Re: Cosmetic Accounts, 4/27/99; IMERYS056132-56141.			
421		9/12/2001	Luzenac North America Email to E McCarthy, from R Beck; Re: Mary Kay Cosmetics Wax Problem, 9/12/01; IMERYS132894-132895.			
422		2/3/1999	Alpine and Grand Island Plant Shutdown Cosmetics Sales Plan, 2/3/99; IMERYS090787-90800.			
423		10/1/1999	Luzenac America United States and Canada Cosmetics Sales, October 1999; IMERYS342919-342926.			
424		2/4/1983	Cyprus Customer Specification Sheet No 54051A for Mark Kay, Dallas, TX, and Mary Kay c/o Kolmar Labs, 2/4/83; LEHMAN 01591.			
425		12/31/1981	Cyprus Industrial Minerals Sales Analysis by State, 12/31/81; IMERYS234031-234177.			
426		5/26/1993	Cosmetics, Food and Pharmaceutical Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			

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427		10/22/1992	Luzenac America 1993 Forecast by Prodloc by Customer by Prodship, 10/22/92; IMERYS096938-096944.			
428		9/8/2004	Luzenac America Memo to J Yordan, from E McCarthy; Re: Mary Kay, Dallas, 9/8/04; IMERYS049266-267.			
429		1/10/1994	Luzenac America Sales to Mary Kay, Dallas, 1/10/94; IMERYS096945-96947.			
430		12/29/1992	Whittaker, Clark & Daniels Memo to G Dippold, et al, from S Stephens; Re: WC&D Meeting - Chicago Paint Convention, October 1992, 12/29/92; WCD-McBride(IN)-004342-4343.			
431		5/2/1979	Formula for Facets Dusting Powder, Part No 70-0661-9-001, 5/2/79 to 7/5/79; MARY KAY 000284-288.			
432		1/15/1979	Formula for Mary Kay Eyeshadow (Fr Rose) MS-1-29 Great Fashion Plum #1, Part No 70-0787-8-001, 1/15/79; MARY KAY 000289-293.			
433		2/13/1979	Formula for Mary Kay Eyeshadow Great Fashion Blue #1, Part No 70-0790-9-001, 2/13/79; MARY KAY 000294-298.			
434		2/13/1979	Formula for Mary Kay Eyeshadow Great Fashion Brown #2 DC-6-52, Part No 70-0797-9-001, 2/13/79; MARY KAY_000299-303.			
435		2/13/1979	Formula for Mary Kay Eyeshadow Great Fashion Green #1 DC-6-49, Part No 70-0793-9-001, 2/13/79; MARY KAY_000304-308.			
436		6/17/1988	Notice of Part No/Specification Change for Loose Face Powder - Medium, Part No 70-014400-02, 6/17/88; Master Formula, Revision Copy, 8/17/88; MARY KAY 000434-436.			
437		7/9/1989	Notice of Part No/Specification Change for '90 Eyeshadows, 7/9/89; Master Formula, Revision Copy, 8/24/89; MARY KAY 000469-470.			
438		4/17/1990	Mary Kay Cosmetics Analytical Services Request for Analysis, Report #90041704, Montana Talc Co, Part No 50-027500-01, 4/17/90; MARY KAY 000495.			
439		Undated	Mary Kay Request for Vendor Sample Evaluation for No 2258 Talc BC, Sierra Supreme Talc, WCD, Mary Kay Part No 50-0275, Blusher, Eyeshadow and DR White, Undated; MARY KAY 000496.			
440		2015-2018	Mary Kay Certificate of Material Origin and Imerys Talc America Certificate for Suprafino H USP, Part No 50001177, 2015-2018; MARY KAY 000499-500.			
441		1/2/2003	Charles B Chrystal Material Safety Data Sheet (MSDS), MK Part #50-061400, 1/2/03; MARY KAY 000526-528.			
442		Undated	Raw Material Review, Part No 50-0614, Charles B Chrystal Talc, Undated; MARY KAY 000529.			
443		6/30/1988	Charles B Chrystal Material Safety Data Sheet (MSDS), MK Part #50-061400, 6/30/88; MARY KAY 000530-531.			
444		12/16/2014	Raw Material Specification 11000516-1, Talc and Titanium Dioxide, Intercos Global Cosmetic Manufacturer, 12/16/14; MARY KAY 000540.			
445		1982-1983	The Glamour Collection, Director's Guide, Vol 3, July 1982 to May 1983; MARY KAY 000541-558.			
446		8/1/2010	Kobo Product Specifications, Talc A-CL3, Talc (And) Lecithin, August 2010; MARY KAY 000561.			
447		3/7/1994	CTFA Memorandum to Task Force/ Committee Members, from P Dennis; Re: Updating Mailing Information for Rosters, 3/7/94; MARY KAY 000572.			
448		1/11/1994	CTFA Memorandum from P Dennis; Re: Meeting and Agenda of the Talc Interested Party Task Force, 1/11/94; MARY KAY 000573-577.			
449		12/1/1989	Mary Kay Catalog, December 1989; MARY KAY 000562-569.			

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450		1/7/1994	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Presentation/Manuscript, 1/7/94; Draft Copy of "Talc: Occurrence, Characterization, and Consumer Applications." R Zazenski. et al: MARY KAY_000573-577.			
451		4/3/2018	Mary Kay Standard Operating Procedure EHS07, Respiratory Protection Program, Rev 8.0, 4/3/18; MARY KAY_002681-2691.			
452		3/14/1988	Letter to C Curry, from F McGonigle, Whittaker, Clark & Daniels; Re: Certification of No 2258 Talc BC, Mary Kay Code 50-0275, 3/14/88; MARY KAY_002693.			
453		10/29/1988	Quality Assurance Specification, Part No 50-027500-01, Sierra Supreme Talc, 10/29/88; MARY KAY_002694.			
454		5/24/1991	Initial Safety Review, Acapella Body Talc HLE '92, 803-82B, 5/24/91; MARY KAY_002695-2704. CONFIDENTIAL			
455		5/28/1991	Request for Safety/ Claims Evaluation, Angelfire Body Talc, HLE '92, 5/28/91; MARY KAY_002705-2706.			
456		1/1/1988	Master Formulas, SP '89, 1988; MARY KAY_002711-2728; CONFIDENTIAL			
457		2/25/1992	Master Formulas, Translucent Pressed Powder Medium, Part No 70-487800-03, 2/25/92; Revision Copy, 5/22/92; MARY KAY_002738-2739; CONFIDENTIAL			
458		11/8/1989	Master Formula, Loose Face Powder Dark, Part No 70-01400-04, 11/8/89; MARY KAY_002822; CONFIDENTIAL			
459		5/24/1991	Initial Safety Review, Exquisite Body Talc HLE '92, 303-75B, 5/24/91; MARY KAY_002867-2887. CONFIDENTIAL			
460		6/12/1995	Fax to G LaCrone, from R Zazenski, Luzenac America; Re: Asbestos in Cosmetic Talc, 6/12/95; IMERY337802-803.			
461		1/1/1971	The Mary Kay Success Story, January 1971; MARY KAY_000003-4.			
462		1/1/1973	Mary Kay Company Brochure, 1973; MARY KAY_000208-219.			
463		1/1/1978	Exclusive Gifts and Limited Editions from Mary Kay, 1978.			
464		Undated	The Complete Collection, Undated; MARY KAY_000315-316.			
465		1/1/1981	The Beauty of Christmas is in the Giving, 1981; MARY KAY_000318-325.			
466		1/1/1982	Mary Kay Wraps up the Spirit and Sparkle of Christmas, 1982; MARY KAY000330-337.			
467		1/1/1983	That's the Beauty of Mary Kay, 1983; MARY KAY000348-353.			
468		1/1/1983	That's the Beauty of Mary Kay, 1983; MARY KAY000354-357.			
469		1/1/1984	That's the Beauty of Mary Kay, 1984; MARY KAY000358-362.			
470		1/1/1985	That's the Beauty of Mary Kay, 1985; MARY KAY000370-375.			
471		1/1/1986	Mary Kay Cosmetics, 1986; MARY KAY_000384-387.			
472		3/18/1976	Articles of Merger of Cosmetic Creations into Mary Kay, 3/18/76; MARY KAY_002888.			
473		1/1/1968	Mary Kay Annual Report, 1968; MARY KAY_002889-2907.			
474		1/1/1969	Mary Kay Annual Report, 1969; MARY KAY_002908-2926.			
475		1/1/1970	Mary Kay Annual Report, 1970; MARY KAY_002927-2949.			
476		2/19/1969	Goodier Inc Unanimous Consent of Directors, 2/19/69; MARY KAY_003186-3187.			
477		1/1/1974	Mary Kay Annual Report, 1974; MARY KAY_002998-3018.			
478		6/22/2017	Imerys Talc America Certificate of Analysis, Suprafino H USP, Shipped to LV Lomas, Ontario, 6/22/17; MARY KAY_000538.			
479		1/1/1987	Mary Kay Catalog, 1987; MARY KAY_000388-391.			

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480		1/1/1987	Mary Kay Color Awareness, 1987; MARY KAY_000396-397.			
481		1/1/1987	Mary Kay Spotlights Glamour, 1987; MARY KAY_000398-409.			
482		1/1/1988	Mary Kay Catalog, 1988; MARY KAY_000414-417.			
483		1/1/1989	Mary Kay Catalog, 1989; MARY KAY_000465-468.			
484		1/1/1990	Mary Kay Catalog, 1990; MARY KAY_000471-475.			
485		1/1/1990	Mary Kay Catalog, Products for Total Beauty, 1990; MARY KAY_000475-478.			
486		1/1/1990	Holiday Presence: The Essence of Giving, 1990; MRY KAY_000483-490.			
487		1/1/1990	Return to Romance: A Collection of Gifts from the Heart, 1990; MARY KAY_000497-498.			
488		1/25/1991	Letter to N Berlin, Johnson & Johnson, from LD Murino, Cyprus Industrial Minerals; Re: Castle 65 Talc, 1/25/91; JNITALC000088193.			
489		7/15/1992	CTFA Talc Interested Party Task Force Meeting Attendance List, 7/15/92; CPC_NYCALTRSCPT00004482.			
490		9/10/2001	Luzenac Email to E McCarthy and R Beck, from M Clark; Re: Mary Kay Cosmetics Wax problem, 9/10/01; IMERYS045214.			
491		2/1/1991	Cyprus Industrial Minerals Call Report at Mary Kay, 2/1/91; IMERYS135310.			
492		1/1/2001	Luzenac Email Chain re Mary Kay, 2001; IMERYS135297-135307.			
493		5/25/2000	Luzenac America Memo to F Panion, from J Gauntt; Re: Grand Island Customer Conversion Update, 5/25/00; IMERYS140178-140221.			
494		10/18/2000	Luzenac Email to R Bernstein, et al, from R Zazenski; Re: CTFA Conference Call Minutes, 10/18/00; IMERYS240345.			
495		1/29/2010	Minutes and Attendance List of the European Chamber Asbestos Seminar hosted by CAFFCI, 1/29/10; IMERYS271554-271556.			
496		4/15/2009	Rio Tinto Email to A Russell, from J Poston; Re: Talc Documents, 4/15/09; IMERYS310817.			
497		2/2/1998	CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Visit to A Culver, UCI University of California, Ovarian Cancer Issue, 2/2/98; IMERYS331408-331410.			
498		4/16/1999	LV Lomas Sales Call and Product Report, Kolmar, 4/16/99; IMERYS337650.			
499		5/4/2000	Luzenac Call Report at Kolmar Labs, 5/4/00; IMERYS337652-337653.			
500		6/15/2000	Luzenac/ Crozier Nelson Joint Call Report at Mary Kay Manufacturing Division, 6/15/00; IMERYS337796-337797.			
501		6/12/1997	Letter to JA Sherman, from R Beck, Luzenac America; Re: Direct sales contact for your talc purchases, 6/12/97; IMERYS337798-337799.			
502		2/8/1994	Letter to Suppliers, from MG Rozen; Re: BSE disease, 2/8/94; IMERYS337806.			
503		10/17/2000	Email to R Zazenski, Luzenac America, et al, from L Loretz, CTFA; Re: Conference Call Minutes, NTP draft, 10/17/00; IMERYS303907.			
504		5/21/1997	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Attached memo from C Sinnex; Re: Talc, 5/21/97; Ovarian Cancer and Talc Powder: A Sixty-Year Scandal of Informed Neglect; AV_RODRIGUEZN-0001078-1080.			
505		Undated	VIDEO - Our Product Promise, Mary Kay. https://www.youtube.com/watch?v=eFggLyKotJs			

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506		1/1/1978	Mary Kay Annual Report, 1978; MARY KAY_003065-3078.			
507		11/2/2022	Plaintiffs' Fourth Amended Notice of 30(b)(6) Deposition of Defendant Mary Kay, Inc, and Subpeona Duces Tecum, Payne v 3M Company, et al, County of Richland, State of South Carolina, 11/2/22.			
508		Undated	Collection of Handwritten Notes/Lists provided by LA Gildea, PHD, Undated.			
509		Undated	Color photo of cosmetic products and Discount Price and Order Sheet, Undated, MARY KAY_000195-196.			
510		7/1/1967	Excerpts - Show Product Procedure, July 1967.			
511		6/3/1996	Collection of documents: Angelfire Lux Body Powder ingredient list, 6/3/96; Memo to B Walke, from A Burrowws, Re: Safety Testing for HLE '95 Body Powders, 7/8/94; Memo from S Rojas, Re: P44B Body Powder New PPP - Product/Packaging Profile, 6/9/93; Request for Safety/Claims Evaluation, Undated; Angelfire Lux Body Powder Ingredient list, 6/16/94; Premonition Lux Body Powder Ingredient List, 6/16/94; Acapella Lux Body Powder Ingredient List, 6/16/94; Genji Lux Body Powder Ingredient List, 6/16/94; Intrigue Lux Body Powder Ingredient List, 6/16/94; Acapella Lux Body Powder HLE 95' Ingredient Statement; Undated; Angel Lux Body Powder Ingredient List, 6/3/96; MARY KAY_003457-3472. *Label as confidential.			
512		1966-1990	Index, Mary Kay Depo Prep Materials Product Catalogs, Payne v 3M Company, et al, County of Richland, State of South Carolina, 1966-1990.			
513		1978-1990	Mary Kay Powder History from 1978-1990.			
514		1966-1990	Updated Index, Mary Kay Depo Prep Materials Product Catalogs, Payne v 3M Company, et al, County of Richland, State of South Carolina, 1966-1990.			
515		1/1/2015	"Safety Assesment of Talc as Used in Cosmetics," M M Fiume, et al., International Journal of Toxicology, Vol. 34 (Supplement 1), 2015.			
516		Undated	Color photo of Mary Kay Show Ribbon			
517		11/28/1975	Color photo of back of Mary Kay Show Ribbon issued to Shelby Payne, amount \$104.50, 11/28/75.			
518		7/1/1958	Occupational Health Regulations, Maximum Permissible Concentrations of Atmospheric Contaminants in Places of Employment, Texas Department of Health, Division of Occupational Health. No 3. 7/1/58.			
519		6/7/1972	Title 29-Labor, Chapter XVII- Occupational Safety and Health Adminsitration, Department of Labor, Part 1910--Occupational Safety and Health Standards, Standard for Exposure to Asbestos Dust, Rules and Regulatons, Federal Register, Vol 37, No 110, 6/7/72			
520		11/30/1978-12/1/1978	Distribution List and Related Information, Annual Scientific Meeting, The Waldorf-Astoria, New York, NY, Advance Resitration as of 11/20/78, 11/30/78-12/1/78.			
521		11/3/1985-11/6/1985	Distribution List and Related Information, CTFA Scientific Conference, Fairmont Hotel, New Orleans, LA, Final Registration, 11/3/85-11/6/85.			

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522		1/11/1994	CTFA invitation for N Teetsel re meeting of Talc Interested Party Task Force with Agenda and draft Meeting Minutes, 1/11/94; CTFA invitation for N Teetsel re meeting of Talc Interested Party Task Force, 1/18/95; CTFA invitation for N Teetsel re meeting of Talc Interested Party Task Force, 1/30/94; CTFA invitation for N Teetsel re meeting of Talc Interested Party Task Force with draft Agenda, 4/12/94; MARY KAY_000573-581.			
523		7/25/1994	CTFA Invitation for N Teetsel re meeting of Talc Interested Party Task Force with draft Agenda and Agenda with handwritten notes, 7/25/94; MARY KAY_000589-592.			
524		1/7/1994	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Presentation/Manuscript, 1/7/94; Draft Copy with proposed handwritten revisions of "Talc: Occurrence, Characterization, and Consumer Applications," R Zazenski, et al; MARY KAY_000616-638			
525		1/26/1994	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Presentation/Manuscript, 1/7/94; Final Draft Copy of "Talc: Occurrence, Characterization, and Consumer Applications." R Zazenski, et al; MARY KAY_000650-680.			
526		1/26/1994	Fax to Talc Interested Party Task Force, from SD Gettings; Re: Talc: Occurrence, Characterization, and Consumer Applications presentation, with attached related slide presentation printout, 1/26/94; MARY KAY_000683-721.			
527		10/31/1994	CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Faxed Items(s) - 94-TA-48; 10/31/94; CTFA Memo to Talc Interested Party Task Force, from SD Getting; Re: Publication of Zazenski et al manuscript, 10/28/94; MARY KAY_001590-1592.			
528		12/12/1997	Luzenac America Memo to S Abarca, et al, from K Ailsliager; Re: Table of Cosmetic/Pharmaceutical/Food Products (by location), 12/12/97; IMERY5426200-426201.			
529		6/1/1997	Cosmetics, Food and Pharmaceutical Market Analysis, GE Gauntt, Luzenac, June 1997; Talc Usage by Industry from 1997 Competition Database, 3/24/97; IMERY5231083-1106.			
530		1/2/2003	Charles B Chrystal Material Safety Data Sheet (MSDS) for Talc, MK Part No #50-061400, 1/2/03; MARY KAY_000526-528.			
531		1/1/2007	Rio Tinto Inquiries Received - 31 and Growing, 2007; IMERY5241213.			
532		1/1/1984	Case 26: Mary Kay Cosmetics, Cases in Marketing Management: Issues for the 1980s, CL Hinkle and EF Steinman, 1984.			
533		1/3/2023	MAS Project #M71574, Rita Chapman's Mary Kay Sample Analysis Report, WE Longo, MAS, 1/3/23.			
534		11/12/1987	Letter to DM Greaney, from RJ Zazenski, Cyprus Industrial Minerals; Re: Cyprus Talc Products and Propsiition 65, 11/12/87; ITA-Moore-007488-7489.			
535		Undated	50 Years and Still driven: Mary Kay Celebrates Milestone Anniversary of Its Iconic Pink Cadillac at US Seminar			
536		12/1/1994	Luzenac America Industry Sales Report by Customer By Product, December 1994; IMERY5213786-214112.			
537		5/7/2009	Email Chain between John Bailey, PCPC, and Linda Katz, FDA Re: Meeting May 8 on Talc - Attendees and Agenda, 4/29/09 to 5/7/09; IMERY5281928-281933.			

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538		3/26/2000	Luzenac America Memo to RS Bernstein, from RJ Zazenski; Re: NTP Nomination of Talc, 3/26/00; IMERYS288763-288765.			
539		4/26/2000	Email to L Loretz, CTFA, RJ Zazenski, Luzenac America, L Pan, Mary Kay, et al, from J Hopkins, Innova UK; Re: Conference Call Minutes, 4/26/00; IMERYS303926-303928.			
540		1/1/1980	The Five Steps to Beauty, Mary Kay Cosmetics, 1980; MARY KAY 000309-313.			
541		3/31/1995	Memo to M Barker, et al, from R Bogardus; Re: Replacement - Talc as a Cosmetic Ingredient, 3/31/95; MARY KAY_001881-1882.			
542		2/25/1992	Mary Kay Master Formula for Translucent Pressed Powder Medium, Part # 70-487800-03, 2/25/92; MARY KAY_002738.			
543		5/22/1992	Mary Kay Master Formula for Translucent Pressed Powder - Japn Shade 1-1026, Part # 70-524103-02, 5/22/92; MARY KAY_002739.			
544		11/1/2016	Mary Kay Employee Handbook, November 2016; MARY KAY_000119-131.			
545		5/1/1980	Mary Kay is equal to the ambitions of American Women, 1977, Revised May 1980; MARY KAY_000079-88.			
546		9/17/2019	Letter to Simon Greenstone Panatier, from AM Chohlis, Berkes Crane Robinson & Seal; Re: Metwally v Avon products, et al, WCD Document Production bates numbered WCD-Metwally(CA)000001-6707, 9/17/19; MARY KAY_000132-193.			
547		10/16/1989	Cyprus Industrial Mineral Industry Z Sales, Sales Second Half 1988, 10/16/89; IMERYS105785-105830.			
548		1/17/1994	Letter from AM Burrows; Re: MSDS system at Mar Kay Cosmetics, 1/17/94; IMERYS337805.			
549		12/31/1984	Cyprus Industrial Minerals Sales Analysis by Industry, 12/31/84; IMERYS233284-233292.			
550		Undated	CTFA Brochure, Undated; CAMC-Herford-000056-82.			
551		11/1/2010	Cosmetic Chemicals, M Hackett, SRI Consulting, November 2010; IMERYS308463-308730.			
552		12/1/1989	Holiday Catalog, 1989.			
553		8/1/1994	Fax to Dr. S Gettings, from N Teetsel; Re: Questions from Donald Havery, FDA, 8/1/94; CTFA Draft Memo to D Havery, FDA, from SD Gettings; Re: Revisions to manuscript entitled, "Talc: Occurrence, Characterization and Consumer Applications" (Zazenski, et al, 1994), 7/22/94; MARY_KAY_001400-1405.			
554		10/7/1976	Cosmetic Talc, CTFA Talc Specification J 4-1, 6/1/42, Revised 10/7/76; MARY_KAY_001675.			
555		12/19/1994	Memo to N Teetsel, et al, from C Fisher; Re: Talc- 1983 Citizen's Petition for Talc Warning & 86 FDA Denial, 12/19/94; MARY_KAY_001859.			
556		4/17/2020	Our Product Promise, Mary Kay, 4/17/20.			
557		11/15/2022	Handwritten Notes on Talc Codes and Suppliers			
558		12/1/1994	Luzenac America Sales Report, Cosmetics/ Pharmaceuticals, Industry Sales by Customer by Product, December 1994; IMERYS213926-213965.			
559		1/1/1985	Mary Kay Consumer Guide to Cosmetic Ingredients, 1985; MARY_KAY_003893-3904.			
560		1986-1987	Mary Kay Consumer Guide to Cosmetic Ingredients, 1986-1987; MARY_KAY_003905-3922.			
561		1/1/1989	Mary Kay Consumer Guide to Cosmetic Ingredients, 1989; MARY_KAY_003923-3941.			

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562		1989-1990	Mary Kay Consumer Guide to Cosmetic Ingredients, 1989-1990; MARY_KAY_003942-3961.			
563		1/1/1983	Create Golden Holiday Memories with Mary Kay, 1983; MARY_KAY_003475-3482.			
564		1/1/1984	Mary Kay Cosmetics Presents Calais and Other Fine Gifts for the Holidays, 1984; MARY_KAY_003483-3490.			
565		12/9/1991	Cyprus/ Luzenac Cosmetic Industry Sales by Ship-Location by Industry by Customer by Product, 12/9/91; IMERYS140810.			
566		1980-1994	Cyprus Industrial Minerals Sales to Mary Kay, Supreme and Supra talcs, 1980-1994; IMERYS233774 and various bates.			
567		Undated	Summary Chart of Talc in Mary Kay Products			
568		5/6/1992	Cyprus/Luzenac Customer Sales by Shipping Location, 5/6/92; IMERYS052357.			
569		1/12/1990	Cyprus Industrial Minerals Memo to EP Tiritas, from EH Reade; Re: Geologic Mapping - Alabama Talc, 1/12/90; IMERYS096935-947.			
570		Undated	Cyprus Typical Data Sheet for Supreme USP, Undated; THAN010639.			
571		4/1/1980	Cyprus Memo to All Agents & Representatives, from CR Moebus; Re: Product Application, 4/1/80; CBC_Hansen and O'Neil 00287.			
572		5/8/1995	Luzenac America Call Report to Mary Kay, F Hanson, 5/8/95; IMERYS337803.			
573		Undated	List of Searched Items/ Terms; MARY_KAY_004635.			
574		Undated	System History Information; MARY_KAY_004636.			
575		Undated	Handwritten Note by Dr Gildea - Interviews with Current and Former Employees of Mary Kay; MARY_KAY_004637-4646.			
576		Undated	CTFA Name Inquiry; MARY_KAY_004631-4634.			
577		1980-1994	Cyprus Industrial Minerals Sales Report, 12/31/80 to 12/1/94; IMERYS233774 and various bates.			
578		5/5/1989	Master Formula, Part # 70-014000-01, Loose Face Powder Dark, 5/5/89; MARY_KAY_004618. CONFIDENTIAL			
579		3/15/1990	Master Formula, Part # 70-013900-01, Loose Face Powder Light, 3/15/90; MARY_KAY_004620. CONFIDENTIAL			
580		5/23/1991	Initial Safety Review, Angelfire Body Talc HLE '92, 303-83B, 5/23/91; MARY_KAY_002701-2706. CONFIDENTIAL			
581		2/20/1992	Master Formula, Part # 70-384600-03, Acapella Dusting Powder, 2/20/92; MARY_KAY_004621.			
582		11/26/1997	Analytical Services Request for Analysis, Report No 971209004, Cheek Color Tablets, Project N1085, 11/26/97; MARY_MAY_004596-4597.			
583		10/27/1989	Master Formulas for Eye Shadows, History Copy, 10/27/89; MARY_KAY_004622-4630. CONFIDENTIAL			
584		11/13/1985	Master Formula, Active Copy, CP Blush Col Blend Raspberry, 11/13/85; MARY_KAY_002712-2714. CONFIDENTIAL			
585		Undated	Mary Kay Consultants Guide, A Reference Manual for Independent Mary Kay Beauty Consultants; MARY_KAY_000085-301.			
586		1/1/1992	"A Comparative Study of the Rates of in Vitro Percutaneous Absorption of Eight Chemicals Using Rat and Human Skin," ED Barber, NM Teetsel, et al, Fundamental and Applied Toxicology, 1992.			

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587		1/1/1997	"Percutaneous Penetration of Octyl Salicylate from Representative Sunscreen Formulations through Human Skin In Vitro," KA Walters, NM Teetsel, SD Gettings, et al, 1997.			
588		1/1/1995	"Talc: Occurrence, Characterization, and Consumer Applications," R Zazenski, NM Teetsel, SD Gettings, et al, Regulatory Toxicology & Pharmacology, 1995; FDA00000856-67.			
589		7/13/2000	Certificate of Analysis, Powder Perfect Eye Color - Fig, 7/13/00; MARY_KAY_004612-4616. CONFIDENTIAL			
590		10/11/1999	Certificate of Analysis, Powder Perfect Cheek Color, 10/11/99; MARY_KAY_004598-4601. CONFIDENTIAL			
591		7/13/2000	Certificate of Analysis, Powder Perfect Eye Color - Smokey Plum, 7/13/00; MARY_KAY_004602-4606. CONFIDENTIAL			
592		7/13/2000	Certificate of Analysis, Powder Perfect Eye Color - Sugar Plum, 7/13/00; MARY_KAY_004607-4611. CONFIDENTIAL			
593		5/26/2020	Imerys Regulatory Statement, 5/26/20; MARY_KAY_001441. CONFIDENTIAL			
594		8/30/2022	Imerys Product Stewardship, Performance Minerals EMEA; Re: Detection of asbestos fibres in Imerys Talc Italy Products, 8/30/22; MARY_KAY_001442. CONFIDENTIAL			
595		1/1/2022	Mary Kay Year-End Highlights, 2022.			
596		4/7/2009	110442 Certificate, 4/7/09; MARY_KAY_000713.			
597		1/25/2017	Imerys Letter to Customers; Re: Renaming of Imerys cosmetic talc range under ImerCare brand, 1/25/17; MARY_KAY_001438. CONFIDENTIAL			
598		1/31/2012	Letter to D Ammirato, IMCD Italia SPA, from S Sharma, Imerys; Re: Inquiry about Superiore M10 DEC, 1/31/12; MARY_KAY_000712.			
599		3/16/2015	Letter to M Corti, IMCD Italia SpA, from S Sharma, Imerys; Inquiry about talc products, 3/16/15; MARY_KAY_000711.			
600		8/8/2016	Intercos Raw Material Specification, Codice 110442-5, Talc, 8/8/16; MARY_KAY_000714.			
601		9/29/2013	Intercos Raw Material Specification, Codice 110444-5, Talc, 9/29/13; MARY_KAY_000716.			
602		12/16/2014	Intercos Raw Material Specification, Codice 11000516-1, Talc and Titanium Dioxide (CI 77891) and H, 12/16/14; MARY_KAY_000717.			
603		12/3/2020	Imerys Certificate of Analysis 0383/20 to Intercos Europe SpA for Talco Imercare 4T, 3/12/20; MARY_KAY_001439. CONFIDENTIAL			
604		3/18/2020	Imerys Certificate of Analysis 0407/20 to Intercos Europe SpA for Talco Imercare 11T, 3/18/20; MARY_KAY_001440. CONFIDENTIAL			
605		10/14/2022	Imerys Certificate of Analysis 1208/22 to Intercos Europe SpA for Talco Imercare 11T, 10/14/22; MARY_KAY_001444. CONFIDENTIAL			
606		8/31/2022	Imerys Certificate of Analysis 1005 B/22 to Intercos Europe SpA for Talco Imercare 4T, 8/31/22; MARY_KAY_001443. CONFIDENTIAL			
607		3/7/2007	Letter to M McCown, from LA Tredici, Intercos; Re: Certification for new Mary Kay Mineral Powder (129MP28/2), 3/7/07; MARY_KAY_000718.			
608		1/1/2012	Start earning right away, Ask me, your Independent Beauty Consultant, how to get started today, 2012; MARY_KAY_000656.			
609		7/16/2012	Mary Kay Independent Beauty Consultant Agreement, SE Johnson, 7/16/12; MARY_KAY_000719.			

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610		Undated	Independent Beauty Consultant Report for Ellen Jenkins; MARY KAY 001958-1962.			
611		Undated	Independent Beauty Consultant Report for Sarah Johnson; MARY KAY 001963.			
612		5/21/2014	Personal Care Products Council Appoints Beth Lange, PhD as its New Chief Scientist-Industry Expert to Direct Cosmetic Industry's Scientific Programs and Advance Safety Mission, 5/21/14.			
613		1999-2001	Independent Beauty Consultant Agreement, Ellen R Jenkins, JM0067/J511, 11/30/99 to 10/1/01; MARY KAY 001964.			
614		Undated	Color Photograph of Mary Kay Compact, Front			
615		Undated	Color Photograph of Mary Kay Compact, Back			
616		Undated	Color Photograph of Mary Kay Compact, Side			
617		Undated	Color Photograph of Mary Kay Eyeshadow Compact, Interior View			
618		Undated	Color Photograph of Mary Kay Eyeshadow Compact, Brushes			
619		Undated	Color Photograph of Mary Kay Lip Gloss			
620		Undated	Color Photograph of Mary Kay Lip Gloss, bottom			
621		Undated	Color Photograph of Mary Kay Eye Shadow Palette 0425, Great Fashion Forecast			
622		Undated	Color Photograph of Mary Kay South Sea Eye Shadow and Brush			
623		Undated	Mary Kay Gift Set for Men, Mr K Talc and Cologne			
624		Undated	Color Photographs of Intrigue Perfumed Dusting Powder, 3 oz (purple)			
625		Undated	Color Photographs of Intrigue Perfumed Dusting Powder, 3 oz (black)			
626		Undated	Color Photographs of Intrigue Perfumed Dusting Powder, 3 oz (iridescent purple)			
627		Undated	Color Photographs of Facets Perfumed Dusting Powder Gift Set, 3 oz (brown/yellow and white box)			
628		Undated	Color Photographs of Angelfire Perfumed Dusting Powder, 3 oz (red)			
629		Undated	Color Photographs of Angelfire Perfumed Dusting Powder, 3 oz (yellow)			
630		Undated	Color Photographs of Angelfire Perfumed Powder-Mitt, 2.5 oz (yellow)			
631		Undated	Color Photographs of Exquisite Perfumed Dusting Powder, 3 oz (pale yellow)			
632		Undated	Color Photographs of Exquisite Perfumed Dusting Powder, 3 oz (pink)			
633		Undated	Color Photographs of Exquisite Perfumed Dusting Powder, 3 oz (shaker)			
634		Undated	For the Mary Kay Hostess, Undated; MARY KAY_000213-219.			
635		12/1/1973	Mary Kay Christmas Catalog, A Special Way to Wrap Up the Holidays, 1973; MARY KAY 000211-212.			
636		12/1/1975	Mary Kay Christmas Catalog, Holiday Gift Ideas from Mary Kay, 1975; MARY KAY 000040-43.			
637		1/1/1980	Mary Kay Catalog, The Five Steps to Beauty, 1980; MARY KAY 000309-313.			
638		1/1/1986	Mary Kay Cosmetics Catalog, 1986; MARYKAY 000384-395.			
639		1/1/1987	Mary Kay spotlights Glamour, 1987; MARYKAY_000398-409.			
640		1/1/2006	Mary Kay Fact Sheet, 2006.			
641		1963-2011	Mary Kay Accomplishments by Timeline, 1963-2011.			
642		Undated	Mary Kay Marketing Plan			

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643		2020-2021	Mary Kay Sustainability and Social Impact Strategic Summary Report, 2020-2021.			
644		11/11/1998	1998 LTL Accounts That Should Be Buying from WCD, Luzenac America, 11/11/98; IMERYS338117-123.			
645		11/30/1978	CTFA Annual Scientific Meeting, November 30-December 1, 1978.			
646		11/3/1985	CTFA Annual Scientific Meeting, November 3-6, 1985.			
647		1972-1992	WCD Talc Analysis (Asbestos) of 1625 Talc, SZ Lewin, NYU, 5/14/72 to 6/16/92; WCD (CA) DAVIS 0004739-4912.			
648		1/1/1975	Johnson & Johnson Worldwide 1975 Talc Monitoring Program; JNJ14T5 000006148-6163.			
649		1/1/1976	Johnson & Johnson Worldwide 1976 Talc Monitoring Program; JNJAZ55 000018909-18922.			
650		8/31/1976	Johnson & Johnson Memo to G Lee, from WH Ashton; Re: Johnson & Johnson Worldwide Talc Monitoring Program, 1976 Talcs, 8/31/76; JNJ000567551-567573.			
651		3/1/1977	Johnson & Johnson Worldwide Talc Sources, March 1977; JNJAZ55 000020446-20448.			
652		3/2/1978	Johnson & Johnson Memo to Dr JR Marshall, from AM Marks; Re: Johnson's Baby Powder Worldwide Survey Status as of February 28, 1978, Project No 2500.01, 3/2/78; JNJ000244013-244017.			
653		9/17/1980	WCD Talc Analysis (Asbestos), 1625 Talc, South Korea, ES Laboratories, 9/17/80; WCD (CA) Moore 0002317-2320.			
654		6/1/1983	List of Products Produced at Clark Minerals Corporation, 6/1/83.			
655		1982-1992	WCD File for 5251 Talc, 1982-1992; WCD (CA) Moore0003661-3728.			
656		1/1/1985	Johnson & Johnson World Talc Survey, 1985; JNJ000370429-370435.			
657		10/9/1987	WCD Talc Analysis (Asbestos), 5251 Talc, Korea II, ES Labs Report 219X, 10/9/87; WCD (CA) Moore0003710.			
658		10/9/1987	WCD Talc Analysis (Asbestos) for 5251, Korea II, ES Laboratories, 10/9/87; WCD Lashley Disoc Docs 005981.			
659		1/1/1988	"The Origin and Mineralogy of the Dongyang Talc Deposit," H Moon, ST Kim, 1988.			
660		1/1/1995	"Talc Mineralization in the Middle Ogcheon Metamorphic Belt (I): with Emphasis of the Stable Isotopes of the Dongyang Talc Deposit," H Park, I Lee, and S Hur, Econ Environ Geology, 1995.			
661		12/1/2004	"Mineral Chemistry of Talc from Different Origins in the Dongyang Talc Deposit," D Shin, I Lee, S Koh, J Min Soc Korea, December 2004.			
662		1/16/1978	Whittaker, Clark & Daniels Marketing Guide for Cosmetic-Pharmaceutical Industries, 1/16/78; WCD (IL) Garcia 1147-1157.			
663		1/1/1992	Cyprus Industrial Minerals Domestic Producing Locations, Key Product Specifications, January 1992; ITA-Alfaro-000393-398.			
664		3/25/1992	Luzenac Memo to Distribution, from RC Munro; Re: Cyprus Ore Reserves - Arsenic and Tremolite, 3/25/92; IMERYS219720-219722.			
665		11/1/1983	Talc Product Specifications (Final), Revision #4, November 1983; CAMC-Booker-001563-1564.			
666		8/23/1982	WCD Talc Analysis (Asbestos), 141 Talc, ES Laboratories, 8/23/82 to 12/10/82.			
667		2/23/1998	Suzorite Certificate of Analysis, 141 Cosmetic Talc BC, 2/23/98; Revlon-Moore-000034.			

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668		8/1/2022	Chart - 26 times Pfizer identified asbestos fibers by TEM/SAED in Talc 141 in 1976 to 1988; Exhibit to the deposition of Pfizer in Payne, August 2022.			
669		8/1/2022	Chart and Images - 26 times Pfizer identified asbestos fibers by TEM/SAED in Talc 141 in 1976 to 1988; Exhibit to the deposition of Pfizer in Payne, August 2022.			
670		5/17/1976	Johnson & Johnson Memo to Dr WC Wagoner, from WH Ashton; Re: Report of Talc 141 USP Lot No 11-16-17, 5/17/76; JNJ000064758.			
671		9/13/2016	Defendant Whittaker, Clark & Daniels, Inc's Answers to Plaintiffs' First Set of Interrogatories, Smith v Alcatel-Lucent, et al, Madison County, IL, 9/13/16; Verified.			
672		Undated	Excerpt of WCD Reference Book, Talc Product Codes, Undated; JNJ000308215-8217.			
673		3/2/2016	Excerpt of Deposition of Theodore Hubbard Re Talc Codes, 3/2/16. (14 pp)			
674		1976-1992	Chart and Images - 115 times Pfizer identified asbestos fibers by TEM/SAED in Talc 1615 and/or Supra in 1976-1992; Exhibit 14 to the notice of deposition of Pfizer.			
675			Documents Produced by Mary Kay in the Plant Matter and Bates Labeled MARY KAY 000001 to MARY KAY 001963.			
676			All Documents Showing Mary Kay Membership in Trade Organizations			
677			All Documents Produced by Mary Kay in this Case			
678			All Documents Produced by Mary Kay in any Case			
679			All Documents Discussed or Attached to any Mary Kay Corporate Representative Deposition			
680			All Documents Discussed, Cited or Attached to any Expert Report			
681			All Documents Discussed, Cited or Attached to any Expert Deposition			
682			All Documents Attached In Response to Any Motions Filed in this Case			
683			Mary Kay 10-K, 10-Q and Annual Reports			
684		9/1/2017	Rite-Aid Records Management Policies & Procedures Manual, September 2017; RITE AID 26-68.			
685		Undated	Rite-Aid Store Locations, South Carolina; RITE AID 80-87.			
686		8/24/2016	Email to PC Mueller, from DJ Avery; Re: Rite Aid Baby Powder, 8/24/16; RITE AID 209-210.			
687		1/1/2018	Rite Aid Chemical Policy, 2018; RITE AID 211-212.			
688		1/29/2015	Newspaper Article - Rite Aid to build new distribution center in Spartanburg County, The Times and Democrat, 1/29/15.			
689		10/15/1996	Newspaper Article - Rite Aid to buy West Coast chain, The State, 10/15/96.			
690		7/22/1997	Newspaper Article - Rite Aid to buy K&B, Harco Drug, D Ratigan, Anderson Independent-Mail, 7/22/97.			
691		6/10/2007	Newspaper Article - Rite Aid coming to Sumter, The Item, 6/10/07.			
692		8/27/2006	Newspaper Article - Rite Aid to buy Eckerd and Brooks stores, The Item, 8/27/06.			
693		10/15/1996	Newspaper Article - Rite Aid makes bid for competitor, Sun-News, 10/15/96.			
694		10/15/1996	Newspaper Article - Rite Aid buys West Coast chain, will sell stores in SC, NC, The Times and Democrat, 10/15/96.			
695		8/10/2018	Newspaper Article - Rite Aid calls off Albertsons merger, The State, 8/10/18.			

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696		1/18/2007	Newspaper Article - Rite Aid expansion depends on vote, The Greenville News, 1/18/07.			
697		12/1/1995	Newspaper Article - Rite Aid announces buyout of Revco, The State, 12/1/95.			
698		6/28/1982	Newspaper Advertisement - 1000 Stores, 1000 Prizes! Help us Celebrate the Grand Opening of our 1000th Store, Rite Aid Discount Pharmacy, Anderson Independent-Mail, 6/28/82.			
699		1/19/2007	Newspaper Article - Rite Aid gets bigger, Anderson Independent-Mail, 1/19/07.			
700		8/10/2008	Newspaper Advertisement - National Brand Quality, We Will Prove it to You - For Free! Rite Aid Pharmacy, The Greenville News, 8/10/08.			
701		10/15/1996	Newspaper Article - Rite Aid selling Carolina stores to smooth merger, The Island Packet, 10/15/96.			
702		6/22/2002	Newspaper Article - 4 Rite Aid execs indicted, The Item, 6/22/02.			
703		1/12/1987	Newspaper Advertisement - Rite Aid Sale, The Greenville News, 1/12/87.			
704		6/8/1987	Newspaper Advertisement - Rite Aid Sale, The Greenville News, 6/8/87.			
705		10/22/1984	Newspaper Advertisement - Rite Aid Sale, The Greenville News, 10/22/84.			
706		4/29/1991	Newspaper Advertisement - Rite Aid Sale, The State, 4/29/91.			
707		3/16/1966	Newspaper Advertisement - Rite Aid Health Center Grand Opening, Baby Supplies, The Ithaca Journal, 3/16/66.			
708		4/27/1980	Newspaper Advertisement - Shop, Compare and Save... Our Buying Powder Saves You More! Democrat and Chronicle, Rochester, New York, 4/27/80.			
709		8/6/1970	Newspaper Advertisement - Daw's Rite Aid, Over 15,000 Items Reduced, The Post-Star, Glenn Falls, New York, 8/6/70.			
710		10/17/2022	Email to DL Barthel, from C Gamboa; Re: Rite Aid Private Label asbestos testing? - Teigland, 10/17/22; RITE AID 213-216.			
711		2015-2022	Rite Aid Insurance Policies, 2015-2022; RITE AID 1-101.			
712		2020-2021	Rite Aid Insurance Policies, Chubb, 2020-2021; RITE AID 102-208.			
713		2002-2016	Vi-Jon Sales to Rite-Aid, August 2002-2016; VIJONCHAMBERLAIN0018888-11892.			
714			All Documents Showing Rite-Aid Membership in Trade Organizations			
715			All Documents Produced by Rite-Aid in this Case			
716			All Documents Produced by Rite-Aid in any Case			
717			All Documents Discussed or Attached to any Rite-Aid Corporate Representative Deposition			
718			All Documents Discussed, Cited or Attached to any Expert Report			
719			All Documents Discussed, Cited or Attached to any Expert Deposition			
720			All Documents Attached In Response to Any Motions Filed in this Case			
721			Rite-Aid 10-K, 10-Q and Annual Reports			
722		8/28/1979	Letter to Charles Mathieu and Metropolitan Talc, from FF Roesch; Re: Agreements with WCD dated November 11, 1977, 8/28/79; WCD-Ratcliff(NC) 002683-84.			

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723		11/11/1977	Distributor Agreement between Metropolitan Talc and WCD, 11/11/77; WCD-Ratcliff(NC) 002685-91.			
724		4/14/1962	Memo of Agreement on Sales of Metropolitan Talc, 4/14/62; WCD-Ratcliff(NC) 002692.			
725		10/20/1977	Agreement Between WCD and Pfizer, 10/20/77; PFI ABE 00005912-5920.			
726		1/1/1990	A Century of Growth Based on Unvarying Commitment to Its Original Business, Our First 100 Years, 1990.			
727		5/21/1970	Memo to B Smith; Re: Sales to cosmetic companies, 5/21/70; Memo to B Smith, from C Driscoll; Re: Sales Report - Month of November 1969 Metropolitan Talc Co, 12/10/69; , FM-WCD-MOR-KAN 0002325-2328.			
728		1/1/1997	Material Safety Data Sheet (MSDS) for Talc, 1/1/97.			
729		9/30/1972	Letter to GJ Dippold, from SZ Lewin, NYU; Re: Analysis of four recent talc samples, 9/30/72.			
730		9/30/1972	Talc Analysis (Asbestos), Product 1615 Italy, SZ Lewin, NYU, 9/30/72; WCD002473-2475.			
731		1/1/1966	Threshold Limit Values for 1966, ACGIH.			
732		6/24/2015	Certification of Leah C Kagan, Fishbain v Colgate-Palmolive, et al, Middlesex County, New Jersey, 6/24/15; With attachments.			
733		12/31/2015	Letter to L Kagan, Levy Phillips Konigsberg, from DR Kuszmerski, Hoagland Longo; Re: Supplemental Interrogatory Response, Dalis v WCD, 12/31/15.			
734		1/1/1979	Cyprus Mines Corp Acquisition of Assets of Charles Mathieu, Inc and Subsidiaries, 1979; ITA 101-18.			
735		8/1/1957	Excerpt of WCD Bulletin No 54-1, 643 Talc, North Carolina, Revised August 1957. (2 pp)			
736		12/2/1977	Letter to AM Langer, Mt Sinai, from M Roark; Re: Old talc samples from Helena Rubinstein archives and recent talc samples, 12/2/77.			
737		12/1/2014	Letter to L Kagan, Levy Phillips Konigsberg, from JA Soltesz, Hoagland Longo; Re: Documents produced in Gilvin in Response to Notice of Deposition. 12/1/14.			
738		3/30/2015	Letter to L Kagan, Levy Phillips Konigsberg, from NJ Grimbergen, Hoagland Longo; Re: Workers Compensation Records produced in Gilvin Pursuant to Court Order on March 25, 2015, 3/30/15.			
739		4/5/2016	Deposition of Donald R Ferry, Alfaro v American Talc Co, 4/5/16.			
740		11/2/2017	Defendant, Whittaker, Clark & Daniels, Inc's Responses to Plaintiff's Request for Production of Documents, Goodhue v 3M Co. et al, Commonwealth of Massachusetts, 11/2/17.			
741		10/9/1987	WCD Responses to Standard Asbestos Interrogatories, Macauley v Celotex Corp, et al, 10/9/87.			
742		Undated	Charles B Chrystal Co Material Safety Data Sheet (MSDS) for Talc, Undated; MEN-00003304.			
743		3/16/2001	Analytical Report, Product 190, Talc Extra 5/0 Dec, Lot S327/01, Talc de Luzenac, 3/16/01; COT-HUG00000211.			
744		3/3/1972	Johnson & Johnson Memo to RL Sundberg, from RS Russell; Re: Domestic Talc Sources (101) North Carolina, 3/3/72; IMERYS117967-969.			
745		6/13/1960	Asbestos Product Data Sheet and Price List, 6/13/60.			
746		1/1/1960	WCD Brochure, Early 1960s.			
747		5/21/2013	Deposition of Donald R Ferry, Goldsmith v ACandS, Inc, et al, 5/21/13.			
748		12/31/1994	Annual Report, Form 10-K, Zemex Corporation, 12/31/94.			

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749		7/7/1970	Review of Talc Meeting Held at South Kearny, 7/7/70; WCD002843-44.			
750		10/11/1972	Letter to CU Driscoll, from M Berdick, Chesebrough-Ponds; Re: Two samples of WCD Talc, Micron and 1615, 10/11/72; Letter to W Berdick, Chesebrough-Ponds, from GR Grieger, McCrone; Re: Two talc samples. 9/29/71			
751		11/28/1977	Letter to R Krammes, from JP Schelz, Johnson & Johnson, CTFA Task Force on Round Robin Testing; Re: Task Force Meeting on December 6, 1977, 11/28/77; Attachments; Goodhue WCD000238-46.			
752		3/21/1972	Letter to CE Clark, from DR Ferry, Metropolitan Talc; Re: 1615 Italian Talc, 3/21/72; WCD002845-60.			
753		6/12/1972	ES Laboratories Chemical Analyses of 3 WCD Talc Samples, 6/12/72; WCD002478-82.			
754		6/12/1972	ES Laboratories, Talc Analysis of 1621. Origin: Italy, 6/12/72; WCD(CA) Moore 0001913.			
755		3/22/1976	Letter to N Estrin, CTFA, from R Suffis, The Mennen Company; Re: WCD sole supplier to Mennen, 3/22/76; WCD000074-75.			
756		12/10/1973	Letter to F Roesch and Members of the CTFA Talc Subcommittee, from GW Sandland; Re: Report of the CTFA Talc Subcommittee to the FDA, 12/10/73; WCD Depoin 000878-885.			
757		8/12/1988	Deposition of Henry Mulryan, Blue v Fibreboard Corp, et al, 8/12/88.			
758		12/8/1972	Pfizer Memo to JE Clements, from HD Stanley; Re: Asbestos in Talc, 12/8/72; PFE-Hug00007104-23.			
759		1/23/1973	Letter to FF Roesch, from S Berasi, RT Vanderbilt; Re: Correction of Definition of Cosmetic Talc, 1/23/73; Pfizer File No 2692-11 Evaluation of MPM Talcs, 3/9/70; .			
760		2/8/1973	Letter to RS Smith, from J Gossip, Quebec Asbestos Mining Association (QAMA); Re: Copy of Asbestos and Your Health, 2/8/73.			
761		3/21/1973	Meeting of Talc Group, 3/21/73; WCD000178-82.			
762		3/22/1976	Memorandum of Meeting at Mt Sinai Between AM Langer and AN Rohl, Mt Sinai and CH Wilson and RL Yates, FDA; Re: Analytical Methodology for the Detection and Determination of Asbestos Minerals in Talc, 3/22/76; HHS00000018-21.			
763		4/18/1973	Letter to J Callaghan, Pfizer, from GJ Dippold; Re: Notes from Recent Talc Group meeting on March 21, 1973, 4/18/73; PFZ01162 015933-938.			
764		5/23/1973	Letter to R Hurdman, Mobil Chemical Company, from GJ Dippold; Re: Asbestos in #1313 and #1767 talc, 5/23/73; MOBILPRODUCTS 01250.			
765		1/1/1965	Whittaker Ceramic Materials, 1965.			
766		8/15/1973	Colgate-Palmolive Company Research Report 2675 (Analytical Method), Determination of Chrysotile Asbestos in Talc by X-Ray Diffraction, P Briscese, 8/15/73; QE-CPC00005063-80.			
767		12/5/1974	Johnson & Johnson Memo to Dr Hildick-Smith, from WH Ashton; Re: Italian Talc Study, Professor G Rubino, 12/5/74; JNJNL61 000032331.			
768		9/28/1973	Letter to GJ Dippold, from WK Hill, Markel Hill & Byerley; Re: FDA publication concerning asbestos in food and drugs, 9/28/73; WCD000039-40.			

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769		10/10/1973	Memo to All Whittaker Salesmen, et al, from J Woodruff; Re: Talc and FDA Regulations, 10/10/73; LoGiudice/WCD/0156.			
770		11/20/1973	Determination of Asbestos in Talc by Light- Optical Microscopy for Whittaker, Clark & Daniels, Report No 1621, Ernest F Fullam Inc, 11/20/73; JNJ000267972-974.			
771		10/16/1973	Letter to RR Krammes, from EF Fullam; Re: Request for Quotation for analyzing talc, 10/16/73.			
772		10/19/1973	Letter to F Roesch, from GW Sandland, Bristol Myers/CTFA; Re: Six samples of talc, 10/19/73; LoGiudice/WCD/0171.			
773		6/12/1972	ES Laboratories Talc Analysis (Asbestos) of 399 and 1745 Montana Talc, WCD Sample #2755, 6/12/72; Booker WCD 001038-1040; WCD Alderice Disc Docs 005471-5473.			
774		9/11/2015	Trial Testimony of Theodore Hubbard, Fishbain v Colgate-Palmolive Company, et al, 9/11/15.			
775		1/28/1966	Agreement between WCD and Pfizer, 1/28/66; PFI SEL 00010344-10349.			
776		1/28/1974	Letter to I Stewart, McCrone, from JP Simko, Colgate; Re: Three samples of talc under PO 614953, 1/28/74; MCCRONE0168-79.			
777		2/3/1999	Alpine and Grand Island Plant Shutdown, Cosmetic Sales Plan, 2/3/99; IMERYS090787-800.			
778		7/18/1972	Letter to PH Bixby, Metropolitan Talc, from SZ Lewin, NYU; Re: XRD analysis results for 4601 talc, 7/18/72.			
779		12/5/1974	Memo from F Roesch; Re: CTFA Subcommittee Meeting on Asbestos in Talc, 12/5/74; LoGiudice/WCD/0282-83.			
780		11/2/1971	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, SZ Lewin, 11/2/71; WCD0242.			
781		9/16/1975	Letter to GW Sandland, CTFA Talc Subcommittee, from FF Roesch; Re:Asbestos testing program, 9/16/75; CK-HAPPY-23.			
782		10/22/1975	Letter to CU Driscoll, from AS Johnson, Asbestos Corporation Ltd; Re: Termination of Representative's Agreement, 10/22/75.			
783		3/8/1976	Pfizer Request for Physical Chemical Testing, Two Talcs from Coty (John Clements), 75-4066-2, 3/5/76, 3/8/76; PFE-Hug00007094-101.			
784		5/14/1972	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, SZ Lewin, 5/14/72; WCD0243.			
785		3/11/1976	Letter to N Estrin, CTFA, from FF Roesch; Re: Test program for asbestos started in August 1971, 3/11/76; WCD000012.			
786		6/12/1972	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, WCD 6/72-1, 6/12/72; WCD0244.			
787		7/20/1972	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, SZ Lewin, 7/20/72; WCD0245.			
788		7/20/1972	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, SZ Lewin, 7/20/72; WCD0246.			
789		12/18/1972	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, Gordon Brown, Princeton University, 12/18/72; WCD0247.			
790		3/24/1976	Letter to HJ Eierman, FDA, from NF Estrin, CTFA; Re: Two letters to supplement our March 15th submission to you on Talc, 3/24/76; Attachments: Letter to NF Estrin, CTFA, from HY Mulyran, Cyprus Industrial Minerals; Re: Program to test Montana grades, 3/12/76; Letter to N Estrin, CTFA, from R Suffis, The Mennen Company; Re: WCD sole supplier to Mennen, 3/22/76; WCD000104.7			
791		3/22/1976	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, 3/22/76; WCD0265.			

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792		4/13/1976	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, McCrone, 4/13/76; WCD0266.			
793		4/13/1976	McCrone Talc Analysis (Asbestos), 141 Talc, Major Montana, Minor Canada, Lab Report 3591, Code 319L41, Lot No 2-5-6, 4/13/76.			
794		1/1/1990	At Whittaker, Clark & Daniels... A Century of Growth Based on Unvarying Commitment to Its Original Business, 1990.			
795		1/1/1990	WCD 100th Anniversary Brochure - The Unique Supplier, 1990; WCD (IL) Garcia 1679-1683.			
796		1/27/1964	Bulletin No 966, Carson Frailey's Washington Letter, DCAT, 1/27/64; WCD000880-89.			
797		Undated	WCD Customer List, Undated; WCD001657-58.			
798		10/13/1977	Talc Analysis Report No ES 1681 for Three Talc Samples - 562M09, 562M50, 562M73, ES Laboratories, 10/13/77.			
799		11/9/1977	McCrone Report for Colgate-Palmolive Sample Talc 1615, Lab #4811, 11/3, MA Project 5500, 11/9/77; MCCRONE0077.			
800		9/30/2016	Whittaker, Clark & Daniels Balance Sheet, 9/30/16.			
801		12/12/1978	Letter to MW Glenn, from A Greife; Re: Preliminary evaluation of environmental data as part of industry-wide study of talc miners and millers, 12/12/78; 11/30/78; WCD 000850-75.			
802		12/13/1978	Letter to VE Rose, Director of Division of Criteria Documents, from FF Roesch; Re: First draft of a study on "Talc" prepared by SRI International, 12/13/78; WCD 001014-15.			
803		Undated	Sales Report to Houbigant, Inc, Undated; WCD Caine 000001-5..			
804		11/2/1976	Letter to R Krammes, from LB McCrone; Re: Analysis of Talc Sample No 705 L 15, 11/2/76; WHIT-MA03591-0157-0158; WCD-NYCAL-012451-012452.			
805		12/14/1979	Memo to PR Saueracker, from DG Brant; Re: Montana Talc at Victorville, 12/14/79.			
806		2/19/1983	Company News; Cyanamid to Close Facility in New Jersey, The New York Times, 2/19/83.			
807		10/9/1987	Letter to DC Bendush, Zucker, Facher & Zucker, from GJ Dippold; Re: Draft Answers to Standard Interrogatories, Macaulay v Celotex, et al, 10/9/87.			
808		10/9/1987	Talc Analysis (Asbestos), Korea & Montana, Lab Report 219X, Product Lot 7H30, ES Laboratories, 10/9/87.			
809		1/1/1941	Excerpts from The Chemistry and Manufacture of Cosmetics, MG DeNavarre, D Van Nostrand Company, Inc, 1941.			
810		2/1/1977	Letter to R Krammes, from RJ Hinch, Jr, McCrone; Re: Analysis of talc sample 911 L 13, 2/1/77; WHIT-MA03591-0140-0141; WCD-NYCAL-012455-012456.			
811		8/1/1957	Talcs: Magnesium Silicate, Pyrophyllite, Soapstone, Steatite, Bulletin No 54-1, Whittaker, Clark & Daniels, Inc, New York, August 1957. (237 pp)			
812		7/13/1977	Letter to R Krammes, from RJ Hinch, Jr, McCrone; Re: Analysis of talc sample 329 M 15, 7/13/77; WHIT-MA03591-0180-0181; WCD-NYCAL-012457-012458.			
813		6/27/1977	McCrone Project MA3591, Analysis of talc sample 299 M 06, 6/27/77; WHIT-MA03591-0188; WCD-NYCAL-012470.			
814		1/1/1968	National Inventory of Sources and Emissions: Asbestos, WE Davis & Associates, Prepared for Environmental Protection Agency, 1968.			

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815		1/22/2009	Minerals and Pigment Solutions Sales Report to CE Minerals, 1/22/09.			
816		6/27/1977	McCrone Project MA3591, Analysis of talc sample 313 M 5, 6/30/77; WHIT-MA03591-0187; WCD-NYCAL-012471.			
817		10/30/2015	Colgate Palmolive Sales to The Mennen Company, Produced October 30, 2015 by Whittaker, Clark & Daniels, Inc in Response to RFP#4 of Plaintiff's First Supp Rogs and Doc Request, Dalis v WCD, 10/30/15.			
818		1/1/1976	CTFA Correspondence, 1976; FISHBAINWCD-00000001-9.			
819		1/1/1993	Diagrams and Charts, Clark Minerals Sales by Industry, 1993.			
820		3/2/2016	Handwritten notes re WCD Product Numbers and Sources, T Hubbard, 3/2/16.			
821		4/7/1946	Proceedings of the Eighth Annual Meeting of the American Conference of Governmental Industrial Hygienists, Chicago, IL, April 7-13, 1946; MT-007028-30.			
822		4/16/1979	ES Laboratories Talc Analysis, Sample #743N50, 4/16/79.			
823		2/27/1976	ES Laboratories Talc Analysis of #1 Talc, North Carolina, Code 276L50, 2/27/76.			
824		3/17/1976	Letter to GJ Dippold, from WK Hill, Markel, Hill & Byerley; Re: Lehn & Fink demand for data on products, 3/17/76.			
825		Undated	Industrial Hygiene Walk-Through Report at Pioneer Talc, Allamore, TX, NIOSH, Undated.			
826		3/21/1990	ES Laboratories Lab Reports for Analysis of 2655 Talc, 3/21/90, 9/17/90 and 11/15/90; WCD (MO) Strunk 0010-18.			
827		1983-1996	WCD Sales to US Gypsum, 1983-1996; WCD (MO) Strunk 0001-8.			
828		1/27/1964	WCD Carson Frailey's Washington Letter - Bulletin No 966, 1/27/64; WCD000880-84.			
829		1983-1992	ES Laboratories Lab Analysis (Asbestos) for 2882 Texas Talc, 7/11/83 to 2/21/92; WCD (MO) Strunk 0127-202.			
830		1/1/2003	Material Safety Data Sheet (MSDS) for Pioneer Talc, 1/1/03.			
831		3/16/1970	Memo to Bob, from Larry; Re: Metropolitan Talc Company, 3/16/70; WCD002853-54.			
832		4/14/1970	Letter to D Ferry, Metropolitan Talc Company, from R Roff; Re: Last of Lot D-912-4 of #1615 AGI Talc, 4/14/70; WCD 002855.			
833		1/1/1984	Product Data Sheet for 618 Talc BC, E85, January 1984.			
834		3/1/1984	Product Data Sheet for 1623 Lo Micron Talc BC, March 1984.			
835		2/22/1976	Product Data Sheet for 1615 AGI Talc BC, D44, 2/22/76.			
836		6/1/1991	Product Data Sheet for 1615 Italian Talc, June 1991.			
837		Undated	Product Data Sheet for 4475 Talc, Undated.			
838		3/2/1972	Memo to H Schwartz, from JR Rodgers; Re: Talc, 3/2/72; Mennen 00003096-3101.			
839		4/12/1972	Letter to B Keller, from D Ferry, Metropolitan Talc; Re: Price of #1615 AGI Italian Talc increase, 4/12/72; WCD 002847.			
840		6/12/1972	ES Laboratories, Talc Analysis of 2755. Origin: Montana, 6/12/72; WCD004011-4013.			
841		6/12/1972	ES Laboratories Talc Analysis of 128 Talc, Montana, Lab Report No. WCD 6/72-1, 6/12/72; WCD Caine 001514-1517.			
842		6/12/1972	Talc Analysis (Asbestos) Product Number 1615, Product Origin Italy, 6/12/72; WCD 002478-2482.			
843		7/14/1972	ES Laboratories, Talc Analysis of 156. Origin: Vermont, 7/14/72; WCD Greco 000094.			
844		12/1/1971	WCD Report of X-Ray Diffraction Analysis, SZ Lewin, 12/1/71.			

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845		5/26/1978	ES Laboratories Talc Analysis of Sample 72N43, Report No 1826, 5/26/78.			
846		9/26/2013	Letter to L Kagan, Levy Phillips, from ML Lazarus; Re: Samples of talc, 9/26/13; Certification of Robert Patrick Nolan, Kaenzig v Charles B Chrystal Company, et al, 9/26/13.			
847		8/16/1972	Memo from F Roesch; Re: Talc - Asbestos Content Evaluation, 8/16/72; WCD 001555-57.			
848		3/10/1970	Letter to P Bixby, Metropolitan Talc, from CE Clark, Clark Minerals; Re: Monthly Operating Expenses, 3/10/70; FM-WCD-MOR-KAN 0002322-2324.			
849		8/16/1972	Memo from F Roesch; Re: Talc - Asbestos Content Evaluation, 8/16/72; WCD-Von Salzen (CA)-000909-911.			
850		Undated	Talco e Grafite Material Safety Data Sheet (MSDS) for Talc 5/0, Undated; RATCLIFF EL-CL000067.			
851		9/1/1999	Material Safety Data Sheet (MSDS) for Talc, Luzenac America, 9/1/99; WCD Analytical Report on Altalc 300V USP BC, 8/31/99; RATCLIFF EL-CL000017-21.			
852		5/24/2000	Material Safety Data Sheet (MSDS) for ST1937 Dimethicone Surface Treated Talc, 5/24/00; Product Data Sheet for ST1937, December 1999; Product Data Sheet for 195 Talc Superiore M1G DEC, June 1999; Fax to D Cohon, from C Edridge; Re: ST 1937 Dimethicone Treated Talc, Estee Lauder R&D, 5/3/00; RATCLIFF EL-CL000009-15.			
853		5/24/1973	Letter from D Ferry, Metropolitan Talc; Re: #1615 AGI talc price increase, 5/24/73; WCD 002849.			
854		2/22/2000	Letter to S Sung, Estee Lauder, from F McGonigle; Re: PO for Altalc 300V USP BC, 2/22/00; RATCLIFF EL-CL000016.			
855		7/19/1979	Cyprus Mines Letter to C Oliver, Oliver & Company, from JW Paul; Re: Westfall lawsuit, 7/19/79; CAMC_Alfaro_001713-15.			
856		10/11/1973	Letter to EF Fullam Associates, from R Krammes; Re: Proposed method for the optical microscope determination of asbestos in talc. 10/11/73.			
857		11/28/1973	Handwritten notes about Talc Suggested Cost, D Ferry, P Bixby, 11/28/73; WCD 002852.			
858		12/19/1973	Mennen Government Relations Committee, 12/19/73; CP-MENNEN-00000842-47.			
859		2/1/1974	Memo to L Driscoll, from Clarence; Re: Crude Italian Talc Cost, 2/1/74; WCD 002851.			
860		1/1/2008	Brenntag Application Data, Cosmetic Talc Application Guide, April 2004, Revised January 2008.			
861		10/1/1977	Health Info Mailing List, Union Carbide, October 1977; UCASB01409821-34.			
862		9/7/1983	David Howard Westfall v Whittaker Clark & Daniels, et al, CA No 79-0269B, US Dist Ct, Rhode Island, 9/7/83.			
863		10/1/1977	Insurance Certification for WCD from Pfizer MPM Division, 10/1/77; PFZ01162 012499.			
864		6/21/1984	Letter to JF Craffey, Pfizer, from KP Valeri; Re: Letter from WT Rawleigh Co regarding warning labels, 6/21/84; PFZ01162 011945-47.			
865		8/29/1975	Memorandum for the Record of a Telephone Conversation between RR Krammes and Dr RE Shapiro, 8/29/75; HHS00000004-5.			
866		1/30/1976	Product Safety: Nine Baby Powders Found To Have Asbestos Fibers, Hospitals Report, Bureau of National Affairs, 1/30/76; WCD000155-57.			

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867		3/31/1976	Letter to F Roesch, from WK Hill; Markel Hill & Byerley; Re: FDC Reports regarding Mt Sinai talc statement, 3/31/76; LoGiudice/WCD/0400-1.			
868		12/30/1974	Letter to RR Krammes, from D Greene, DeBell & Richardson; Re: Analysis of Seven Samples of Coded Talc by Thermogram, 12/30/74; LoGiudice/WCD/0291-304.			
869		7/30/1975	Health Study of Italian Talcs, Whittaker Clark & Daniels, 7/30/75; Attachment: "Mortality Study of Talc Miners and Millers," GF Rubino, G Scansetti, G Piolatto, C Romano, Presented at American Industrial Health Conference, April 14, 1975; LoGiudice/WCD/0322-35.			
870		3/9/1976	Newspaper Article - FDA urged to study baby powders, J Walcott, The Record, 3/9/76 WCD000153-54.			
871		7/16/1975	Letter to GJ Dippold, from WK Hill, Markel Hill & Byerley; Re: FDC Reports relating to a recommendation for use of talc in antiperspirants, 7/16/75; LoGiudice/WCD/0319-21.			
872		8/29/1974	Samples from WCD to Dr M Ezrin, DeBell and Richardson, 8/29/74; LoGiudice/WCD/0260-64.			
873		8/28/1974	Letter to R Krammes, from M Ezrin, DeBell & Richardson; Re: Differential Thermal Analysis of Talc, 8/28/74; LoGiudice/WCD/0258-59.			
874		10/31/1977	ES Laboratories Talc Analysis for Whittaker, Clark & Daniels, Report No ES 1681, GA Brown, 10/31/77.			
875		1972-1975	Faberge Talc Investigations, 1972-1975; WCD 000008.			
876		1/1/1975	Washington Digest Article #4 - Hypoallergenic Cosmetics, 1975, Received by FF Roesch; WCD 001635-36.			
877		4/16/1973	Letter to L Driscoll and F Roesch, from RC Bacon, RT Vanderbilt; Re: Coordination of strategies for US Bureau of Mine Symposium Presentations, 4/16/73; WCD 001634.			
878		12/10/1976	Letter to Dr Letterman, Bristol-Myers, from LB McCrone; Re: Analysis of Talc samples 934 and 976, 12/10/76.			
879		3/4/2019	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiffs' Master Request for Production to Defendant Manufacturers/Distributors, In Re: Mass Tort Litigation, Marion County, 3/4/19.			
880		8/23/2019	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiffs' First Requests for Admissions, Interrogatories, and Requests for Production of Documents, In Re: Mass Tort Litigation, Marion County, 8/23/19: Verified.			
881		10/13/1977	ES Laboratories, Talc Analysis of 156, Origin: Vermont, 10/13/77; WCD Greco 000008-11.			
882		11/16/1977	Letter to JP Simko, Colgate, from LB McCrone; Re: Analysis of Two Talc Samples - French Talc Lot 5854 and Talc 1615, Lab #4811, 11/16/77; McCrone 0075-77.			
883		1/24/1978	Talc Analysis of 156, Vermont, McCrone, 1/24/78; WCD Greco 000118-123.			
884		1/24/1978	McCrone X-Ray Diffraction Data results on Project No 3591 (Material 746 M5 Talc) for Whittaker, Clark & Daniels, 1/24/78.			
885		5/26/1978	Talc Analysis of 156, Vermont, ES Laboratories, 5/26/78; WCD Greco 000124-127.			
886		8/17/1978	Letter to KR Hancock, OSHA, from A Cohen; Re: Your Letter 8/21/78 Magnesium Silicate, 8/17/78; WCD000813.			
887		8/25/1978	Talc Analysis of 156, Vermont, McCrone, 8/25/78; WCD Greco 000128-132.			
888		11/14/1978	Talc Analysis of 156, Vermont, ES Laboratories, 11/14/78; WCD Greco 000012-15.			

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889		2/13/1979	Talc Analysis of 156, Vermont, McCrone, 2/13/79; WCD Greco 000133-137.			
890		3/5/1979	Talc Analysis of 156, Vermont, McCrone, 3/5/79; WCD Greco 000048-52.			
891		10/12/1972	Memo to F Roesch, from D Loncar; Re: CTFA Voluntary Regulation Seminar on Product Ingredient Disclosure Compliance FDA, 10/12/72; LoGiudice/WCD/0100-01.			
892		5/1/1981	Letter to CU Driscoll, from RH Thomas; Re: Products selected for analysis as part of the CTFA, 5/1/81; WCD 001452-57.			
893		Undated	Product Description and Uses, 141 Talc, 643 Talc North Carolina, 1615 Talc AGI BC, 2450 Talc North Carolina, Undated.			
894		6/17/2018	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiffs' Interrogatories and Requests for Production of Documents, Pipes v American Honda Motor Co, et al, 6/17/18; Verified.			
895		6/30/1980	Talc Analysis ES#5210, ES Laboratories, 6/30/80; WCD 002181.			
896		9/17/1980	Talc Analysis of 156, Vermont, ES Laboratories, 9/17/80; WCD Greco 000158-161.			
897		1975-1987	WCD Sales Report to Avon, 1975-1987; WCD-Pipes (OK)-4011-4060.			
898		11/18/1983	ES Laboratories Talc Analysis ES#6544, 11/18/83; WCD 001756.			
899		3/13/1984	ES Laboratories Talc Analysis, 3/13/84; WCD 001762.			
900		4/26/1984	Letter to GJ Dippold, from WJ Campbell, US Dept. of the Interior Bureau of Mines; Re: 18 Talc Samples, 4/26/84; WCD000928.			
901		5/3/1984	ES Laboratories Talc Analysis ES#6790, 5/3/84; WCD 002794.			
902		11/3/1984	ES Laboratories Talc Analysis ES#7966, 11/3/84; WCD 002748.			
903		11/6/1984	ES Laboratories - Talc Analysis ES#7090, 11/6/84; WCD 001773.			
904		11/6/1984	ES Laboratories Talc Analysis ES#7090, 11/6/84; WCD 002799.			
905		4/5/1985	ES Laboratories Talc Analysis ES#7255, 4/5/85; WCD 002733.			
906		7/11/1985	ES Laboratories Talc Analysis ES#7361, 7/11/85; WCD 002736.			
907		1/27/1986	ES Laboratories Talc Analysis ES#7590, 1/27/86; WCD 002739.			
908		5/15/1990	Photos, Dumping #8522 Talc from Warner Siding, 5/15/90 and 5/16/90; WCD-Pipes (OK)-3866-3868.			
909		7/16/1986	ES Laboratories Talc Analysis ES#7823, 7/16/86; WCD 002745.			
910		Undated	Fax to Lehman from B Anderson; Re: Tremolite Test, Lehman 01696-1839.			
911		8/27/2019	Defendant Whittaker, Clark & Daniels, Inc's Answers to Plaintiffs' Master Interrogatories to Defendant Manufacturers/Distributors, In Re: Mass Tort Litigation, Marion County. 8/27/19.			
912		9/28/1987	Defendant, Whittaker, Clark & Daniels, Inc.'s Answers to the Standard Set of Defendant Interrogatories in the Matter of Macaulay v. Celotex, et al. 9/28/87.			
913		11/6/1959	Letter to GW Achenbach, Johnson & Johnson; Re: North Carolina Talc, 11/6/59; JNJALC001282659-61.			

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914		5/17/1976	Johnson & Johnson Memo to Dr WC Wagoner, from WH Ashton; Re: Report of Talc 141 USP Lot No 11-16-17, 5/17/76; JNJ000064758.			
915		6/5/1975	Letter to R Schroeder, Personal Products Co, from GW Sandland, Bristol Myers; Re: Procedure for Determining Acid Soluble Substances in Talc, 6/5/75; JNJ000308219.			
916		6/12/1972	ES Laboratories Talc Analysis (Asbestos), 399 Montana, Invoice No 1428, 6/12/72; Booker WCD 001038-1040.			
917		1976-1991	Product Data Sheet for 1615, Brenntag Specialties, 1976-June 1991; WCD (IL) Garcia 0669-0679.			
918		1/16/1978	Marketing Guide for Cosmetic-Pharmaceutical Industries, Revised 1/16/78; WCD (IL) Garcia 1147-1157.			
919		4/9/1976	McCrone Talc Analysis for WCD Talc Sample 4608, Code 319L28, Lot No 11-13-14, Montana, Lab Report 3591, 4/9/76.			
920		8/28/1979	Talc Supply Agreement between Cyprus Georesearch and WCD, 8/28/79; ITA 294- ITA 301.			
921		4/13/1976	McCrone Talc Analysis for WCD Talc Sample 319L15B, 1615 Italian Talc, 4/13/76; Letter to RR Krammes, from McCrone; Re: XRD results on talc samples 319L15B, et al, 4/27/76.			
922		2/9/1977	Letter to L Driscoll, from JP Bartels, Pfizer; Re: OSHA Standards, 2/9/77.			
923		1/1/2017	Response to Subpoena Duces Tecum Served Upon Whittaker, Clark & Daniels, Inc, Tucker v Chanel, Inc, et al, 2017; Sales Report to Chanel, 1975-1990.			
924		4/18/1975	Letter to WCD, from JH Merritt, CTFA; Re: Request to update membership records, 4/18/75; CTFA 1975 Associate Membership Information Questionnaire, 1975.			
925		10/12/1972	Letter to Hearing Clerk, FDA, from WK Hill; Re: Comments on proposed food additive regulation, 10/12/72.			
926		8/27/1971	Letter to Sr Mountsier, from WK Hill, Markel, Hill & Byerley; Re: Washington Post article, 8/27/71; Newspaper article - Contaminated Baby Powder, Washington Post, 8/27/71.			
927		11/1/1971	Letter to SR Mountsier, from SZ Lewin, NYU; Re: Two unresolved questions from Sept 11, 1971 report, 11/1/71.			
928		2/17/1977	Memo to All Whittaker Salesmen and Agents, from JC Woodruff; Re: Vanderbilt letter of 1/25/77 and Pfizer letter of 2/9/77, 2/17/77.			
929		2/13/1987	Letter to RM Kirkwood, Clark Minerals, from ME Marszalkowski, Hodgson Russ Andrews Woods & Goodyear; Re: Clark Minerals advertisement, 2/13/87.			
930		12/15/1964	Minutes of Special Meeting of Board of Directors of Whittaker, Clark & Daniels, 12/15/64.			
931		Undated	WCD Product Data for 399 Magnesium Silicate SF, Undated.			
932		Undated	WCD Product Data for Magnesium Silicate Talc, Undated.			
933		1/1/1959	WCD Brochure - Call on Whittaker for Minerals, Colors, Pigments, 1959.			
934		Undated	WCD Brochure - Call on Whittaker for Minerals, Colors, Pigments, Undated.			
935		4/1/1992	Schedule for Retention of Business Records, 4/1/92.			
936		1/1/1955	Advertisement - 399 Magnesium Silicate SF, Quality control starts at the mill, 1955.			

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937		6/10/1964	Memo to WD Jordan, from AD Dickson; Re: Proposed Agreement Between a New Company to be Formed Imperial Products Company Inc and Whittaker, Clark & Daniels, and Canada Talc Industries Limited, 6/10/64; Memo of Agreement on Sales of Metropolitan Talc, 4/14/62; Letter to D Ferry, Metropolitan Talc, from FF Roesch; Re: Agreement between Charles Mathieu and WCD, 1/26/76.			
938		1/19/1977	Letter from DR Ferry, Imperial Products; Re: New price list for talcs, 1/19/77.			
939		1/21/1974	Letter to F Roesch, from DR Ferry, Imperial Products; Re: Talc sold to you by Metropolitan Talc and American Talc, 1/21/74.			
940		5/9/2014	Certification of Dennis St George, Argento v Charles B Chrystal, et al New Jersey Middlesex County, 5/9/14.			
941		1975-1995	Chart of Manufacturers, Years, Talc Suppliers, Mine Sources and Mills, 1975-95.			
942		1975-1990	Chart of Manufacturers, Years, Talc Suppliers, Mine Sources and Mills, 1975-90.			
943		7/26/2012	Sales Report for Shulton, 7/26/12.			
944		Undated	Sales Report for Faberge, Inc, Undated; WCD001058-1060.			
945		1975-2004	Sales Report for Colgate, 1975-2004; WCD000002-19.			
946		Undated	Sales Report for American Cyanamid, Undated.			
947		1975-2004	Sales Report to Proctor & Gamble, 1975-2004.			
948		Undated	Sales Report for Helene Curtis, 1975-2000.			
949		Undated	Sales Report for American International, 1980-2004; WCD Depoian 00001-7.			
950		Undated	Sales Report for Nestle Le Mur Company, 1977-1986; WCD Depoian 00008-13.			
951		10/2/1973	Letter to RR Krammes, from RJ Hinch; Re: Examination of 12 Talc Samples, 10/2/73; WHIT-MA03591-0340-65.			
952		2/2/1978	Letter to RR Krammes, from RJ Hinch; Re: Examination of Talc Samples 746M50, 746M15 and 745M5, 2/2/78; WHIT-MA03591-0328-35.			
953		5/15/1978	Letter to RR Krammes, from RJ Hinch; Re: Examination of Talc Samples 951M73, 951M67 and 951M32, 5/15/78; WHIT-MA03591-0320-27.			
954		3/1/1979	Letter to RR Krammes, from RJ Hinch; Re: Examination of Talc Samples 604N13, 600N67 and 600N09, 3/1/79; WHIT-MA03591-0293-304.			
955		8/31/1977	Letter to RR Krammes, from RJ Hinch; Re: Examination of Talc Samples, 8/31/77; WHIT-MA03591-0270-80.			
956		4/27/1976	Letter to RR Krammes, from LB McCrone and RJ Shimps; Re: Examination of Talc Samples, 4/27/76; WHIT-MA03591-0259-69.			
957		3/22/1976	Letter to LB McCrone, from RR Krammes; Re: 5 samples of talc, 3/22/76; WHIT-MA03591-0253-58.			
958		10/13/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of samples 563M13 and 563M15, 10/13/77; WHIT-MA03591-0246-51.			
959		2/23/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of samples 956L67 and 956L11, 2/23/77; WHIT-MA03591-0228-33.			
960		5/10/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of samples 182 M15 and 183 M67, 5/10/77; WHIT-MA03591-0211-15.			
961		5/23/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of samples 182 M50 and 183 M50, 5/23/77; WHIT-MA03591-0204-10.			

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962		6/15/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of sample 238M08, 6/15/77; WHIT-MA03591-0199-202.			
963		7/6/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc analysis of samples 299 M 06, 313 M 5, 313 M 28, and 313 M 15, 7/6/77; WHIT-MA03591-0184-94.			
964		7/13/1977	Letter to RR Krammes, from RJ Hinch, McCrone; Re: Talc sample 329 M 15, 7/13/77; WHIT-MA03591-0180-83.			
965		10/18/1976	McCrone Sample Analysis, MA3591, Sample Talc 705 L15, 10/18/76; WHIT-MA03591-0158-62.			
966		3/26/1976	McCrone Sample Analysis, MA3591, Samples 15A, 15B, L50, L41, and L73, 3/26/76; Letter to McCrone, 1/3/77; WHIT-MA03591-0155.			
967		6/24/1976	McCrone Talc Analysis for WCD, Sample 485 LY Talc, MA Project 3591, 6/24/76; WHIT-MA03591-0108-24.			
968		4/13/1976	McCrone Talc Analysis for WCD Talc Sample 319L15B, 319L28, MA Project 3591, 4/13/76; WHIT-MA03591-0262-63.			
969		6/10/1974	Letter to LB McCrone, from RR Krammes; Re: Sample of Talc #480 CW440621, 6/10/74; Letter to RR Krammes, from LB McCrone; Re: Talc Sample 480, 6/27/74; Analysis of Talc For Asbestos Content, Talc #480 CW 440621, WCD, MA3591, 6/26/74; WHIT-MA03591-0075-78.			
970		10/23/1973	Purchase Order to McCrone for Optical Microscope Examination of 12 Samples of Talc, 10/23/73; WHIT-MA03591-0342-43.			
971		1/30/1978	Letter from NIOSH; Re: Product Ingredient Information, OMB 68-R-1337, 1/30/78; Goodhue WCD000750-77.			
972		1947-1948	List of Officers, American Ceramic Society, 1947-48.			
973		10/1/1954	American Ceramic Society Bulletin, October 1954.			
974		10/1/1956	American Ceramic Society Bulletin, October 1956.			
975		Undated	Sales Report to Coty Products, 1980-2004; WCD1015-57.			
976		1/1/1963	American Ceramic Society Bulletin, Vol 42, 1963.			
977		1985-2002	WCD Sales Report to Dexter Plastics and Dexter Automotive Materials, 1985-2002.			
978		4/8/1993	State of Montana Letter from RA Miller; Re: Environmental Assessment, Regal Mine, Barretts Minerals fka Pfizer, 4/8/93.			
979		2/1/2001	Final Environmental Impact Statement Amending and Adopting the Draft Environmental Impact Statement, Barretts Minerals, Regal, Life-of-Mine Expansion Plan, Montana Dept of Environmental Quality, February 2001.			
980		12/17/2010	Barretts Minerals Material Safety Data Sheet (MSDS) for USP Talc and Microtalc, 12/17/10.			
981		4/11/1988	Mennen Memo to C Alvarado, from WS Henderson; Re: Asbestos Testing - Talc, 4/11/88; Mennen-00003315.			
982		2/8/1991	Thorp, Reed & Armstrong Memorandum to Montana Talc File, from BV Hicks; Re: Summary of Tremolite Testing of Montana Talc, 2/8/91; PFZ001162_05753-55.			
983		6/22/2017	Defendant, Whittaker, Clark & Daniels, Inc.'s Amended Response to Plaintiffs' Special Interrogatories to Defendant WCD, Booker v BASF Catalysts LLC, et al, Alameda County, California, 6/22/17.			
984		7/12/2001	Analytical Report, Product 190, Talc Extra 5/0 Dec, Lot S327/01, Talc de Luzenac, 7/12/01; COT-HUG00000207.			
985		11/22/1993	Luzenac Competitive Cross Reference, 11/22/93; IMERYS221073-82.			

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986		9/13/1973	Letter to FDA and CU Driscoll, from NF Estrin, CTFA; Re: Optical Microscopy Method, 9/13/73.			
987		7/18/1975	Memo from F Roesch; Re: FDC Report - Talc, 7/18/75; WCD0300-0302.			
988		Undated	Whittaker, Clark & Daniels, Inc's Affidavit In Support of Motion for Summary Judgment, In Re: Mass Tort Litigation, Marion County, Undated.			
989		4/20/2016	Defendant, Whittaker, Clark & Daniels, Inc.'s Answers to Plaintiffs Mary Wade and Wesley Wade's Supplemental Interrogatories and Document Request Regarding Coty, Wade v Brenntag North America, Inc, et al, Middlesex County, NJ, 4/20/16			
990		1979-1980	Talc Analysis (Asbestos) for 1615 Talc, Italy & Montana, ES 5259, ES Laboratories, 9/10/79 to 8/15/80.			
991		Undated	Marketing Guide for WC&D Materials, Undated.			
992		9/14/1972	Letter to SZ Lewin, NYU, from GJ Dippold; Re: Four samples of talc for XRD analysis, 9/14/72; Letter to GJ Dippold, from Lewin; Re: Analysis of Four Samples, 9/30/72.			
993		10/9/1987	Talc Analysis (Asbestos) for 5251, Korea II, ES Laboratories, 10/9/87; WCD Lashley Disoc Docs 005981.			
994		5/20/1948	WCD Brochure - Sample, 5/20/48.			
995		1/27/2010	Letter to WCD, from LM Katz, FDA; Re: Asbestos contamination in foreign market talc-containing products, 1/27/10.			
996		7/23/2010	Letter to WCD, from LM Katz, FDA; Re: Request for response to January 27 Letter, 7/23/10.			
997		7/3/2013	Letter to L Kagan, Levy Phillips Konigsberg, from ML Lazarus, Hoagland Longo; Re: Documents produced in Kaenzig vs WCD, 7/3/13.			
998		10/19/1973	Letter to F Roesch, from LB McCrone; Re: Twelve samples of talc labeled A-L, 10/19/73; Sample ID attached.			
999		2/16/1970	Letter to RG Smith, from DR Ferry, Chas Mathieu/ Metropolitan Talc; Re: Metropolitan talc situation and price of Canadian Talc, 2/16/70.			
1000		Undated	Product Description - 141 Talc Alpine, 643 Talc North Carolina, 2450 Talc North Carolina, 1615 AGI BC, Undated.			
1001		Undated	Marketing Guide for Cosmetic-Pharmaceutical Industries, Undated.			
1002		1980-1986	Documents Regarding Carbola/ Clark Minerals, 1980-1986.			
1003		11/20/1978	Annual Scientific Meeting, November 30 - December 1, 1978, Advance Registration as of 11/20/78.			
1004		2/14/1977	CTFA Memo to Dr Roesch, from S Finlay; Re: Attached Letter dated 1/31/77 to Dr MA Mehlman, JOETH/NIH, from G Hildick-Smith, Johnson & Johnson; Re: Rohl/ Langer Article published in November 1976. 2/14/77.			
1005		2/3/1977	Newspaper Article - Labor Agency Cancels Its Safety Exemption on Industrial Talcs, Wall Street Journal, 2/3/77.			
1006		7/16/1969	Letter from NF Ritchey, Gamma Process Co; Re: Sterilex Talc, 7/16/69; Sterilex Talc Product List.			
1007		11/30/1980	Tonnage Analysis, YTD, 11/30/80.			
1008		1951-1974	US Patent & Trademark Documents, Whittaker, Clark & Daniels, 1951-1974.			
1009		Undated	Photo - #50 WCD 399 Magnesium Silicate SF, Brenntag Specialties			
1010		2/10/1979	Pfizer Material Safety Data Sheet (MSDS) - Form 10, Montana-Barretts, 2/10/79; PFZ01162 00681-683.			
1011		7/12/1978	Memo to G Dippold, from T Laasko; Re: US Dept of Labor, 7/12/78; Booker WCD 000814-815.			

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1012		4/25/1979	ES Laboratories Talc Analysis ES#2083 for Whittaker, Clark & Daniels, Samples #756N33 and 756N32, 4/25/79; WCD003061.			
1013		9/19/1997	Luzenac America Memo to D Baker, from J Gauntt; Re: Termination of Cosmetics Specialties Inc and McCulloch & Benton, 9/19/97; IMERY5426209-210.			
1014		Undated	Luzenac Cosmetic, Pharmaceutical and Food Group "Market and Potential," Undated; IMERY5204565-601.			
1015		6/1/1997	Cosmetics, Food and Pharmaceutical Market Analysis, GE Gauntt, Luzenac, June 1997; Talc Usage by Industry from 1997 Competition Database, 3/24/97; IMERY5231083-1106.			
1016		2/11/2000	Luzenac Memo to J Longeaux and R Meli, from J Gauntt; Re: Italian Replacement Products, 2/11/00; IMERY5061748-749.			
1017		1/1/1988	Strategic Developments in North American Talc: A Multiclient Report, Kline & Company, 1988; IMERY5416547-761.			
1018		7/24/1990	Luzenac Memo to DW Gorman, from JH McCausland; Re: Luzenac Inc, 7/24/90; ING001965.			
1019		6/22/2001	Luzenac Call Report to Maybelline, Joint Call with Whittaker, Clark & Daniels, 6/22/01; IMERY5337824-825.			
1020		4/20/2000	Luzenac Call Report to Whittaker, Clark & Daniels, 4/20/00; IMERY5338101-104.			
1021		1/22/2002	Confidential Memorandum to MJ Lorang for Circulation, from M Hayes; Re: Finished Product Specifications, 1/22/02; IMERY5052305.			
1022		9/30/1972	ES Laboratories, Talc Analysis of 1621. Origin: Italy, 9/30/72; WCD(CA) Moore 0001918-1924.			
1023		1982-1993	ES Laboratories, Talc Analysis of 1623, 1982-1993-; WCD(CA) Moore 0002191-2265.			
1024		1/13/2017	Excerpt of Defendant Pfizer Inc's Responses to Plaintiff's First Supplemental Interrogatories and Document Requests, Schoeniger v Brenntag North America, Inc, et al, Middlesex County, New Jersey, 1/13/17.			
1025		1985-2004	WCD Sales Report to Estee Lauder, 1985-2004; WCD(CA) Moore 0000143-168.			
1026		11/1/1967	Johnson & Johnson Memo from W Ashton; Re: Metropolitan Talc, Lot G 716, Preliminary Evaluation, 11/1/67; JNJITLC000588519-526.			
1027		2/12/1976	Cyprus Industrial Minerals Call Report at Colgate Palmolive, IN, 2/12/76; CYPRUS(2015) 000731-732.			
1028		1975-1989	WCD Sales Report to Chanel, 1975-1989; WCD (CA) Moore 0000137-142.			
1029		5/24/1976	ES Laboratory Talc Analysis (Asbestos) - 4615 Canada, 5/24/76; WCD0267.			
1030		1975-2004	WCD Sales Report to Coty, 1975-2004; WCD (CA) Moore 0000111-136.			
1031		1975-1982	WCD Sales to Avon, 1975-2004; WCD(CA)-Moore 000001-110.			
1032		11/21/1975	Amoco Memo to G Hauer, from J Zechinati; Re: Talc grades used at New Castle polypropylene plant, 11/21/75; WCD0292.			
1033		4/19/1973	Letter to FF Roesch, Whittaker, Clark & Daniels, from A Weissler, FDA; Re: Sample of industrial talc containing chrysotile, 4/19/73; WCD-Pipes (OK)-1173-1175.			

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1034		4/2/1975	Pfizer Bulletin 75-3, Listing of Whittaker, Clark & Daniels' Product Codes for Pfizer Products, 4/2/75; PFZ01162_012295-12296.			
1035		8/3/1972	Amoco Memo to RF Miller, Polymer Plant, from WD Inskeep; Re: Asbestos Contents of Talcs, 8/3/72; WCD0293.			
1036		9/17/1980	Talc Analysis (Asbestos) for 1625 Talc, S Korea, ES Laboratories, ES 5279, Code 802P73, 9/17/80; WCD(CA) Moore 0002317-2320.			
1037		1971-1982	WCD File for 1621 Talc, 1971-1982; WCD (CA) Moore0001899-2190.			
1038		3/26/1976	McCrone Project MA-3591- Talc 319L15B, 3/26/76; WCD (CA) 0001612.			
1039		7/20/1972	Letter to PH Bixby, Metropolitan Talc, from SZ Lewin, NYU; Re: XRD analysis results for 4 specimens, 7/20/72; Sample No 4609 to SZ Lewin, 5/25/72; WCD (CA)0001553-1556.			
1040		1971-1982	WCD File for 1615 Talc, 1971-1982; WCD (CA) Moore0001515-1898.			
1041		10/16/1973	Correspondence between Whittaker, Clark & Daniels and EF Fullam regarding testing, 10/16/73 and 10/19/73; Testing Report - Determination of Asbestos in Talc by Light-Optical Microscopy for Whittaker, Clark & Daniels, Report No 1621, 11/20/73; InGiudice/WCD/0170-0174			
1042		1971-1992	WCD File for 399 Talc, 1971-1992; WCD (CA) Moore0001301-1514.			
1043		1978-1980	ES Laboratories Talc Analyses (Asbestos) of 643 North Carolina Talc, 12/15/78 to 3/10/80.			
1044		8/18/1978	McCrone Project MA-3591- Testing of 2450 NC Talc, Whittaker Clark & Daniels, 8/18/78.			
1045		5/1/1977	NIOSH Results of Talc Samples from "Analysis of Talc by X-Ray Diffraction and Polarized Light Microscopy," May 1977; QE-CPC00004071-75			
1046		12/23/1976	Letter to R Krammes, from JP Schelz, Johnson & Johnson; Re: Round Robin Set of Coded Samples, 12/23/76.			
1047		9/1/1974	Appendix A: Detailed Discussion of Occurrence of Asbestos As An Accessory Mineral and Mining Activity In These Areas, Identification and Assessment of Asbestos Emissions From Incidental Sources, EPA-650/2-74-087, RJ Kuryvial, et al, Battelle, September 1974			
1048		10/16/1989	Cyprus Industrial Minerals Sales Report for Second Half of 1988 showing Sales to Whittaker, Clark & Daniels, 10/16/89; IMERYS105785-105830.			
1049		8/24/1976	Industrial Hygiene Walk-Through Report at American Talc Co, Alpine, Alabama, NIOSH, 8/24/76.			
1050		1/20/1998	Luzenac America Memo to T Hubbard, et al, from J Gauntt; Re: Private Label Products and Customer Mailing, 1/20/98; IMERYS231188-231212.			
1051		3/5/2009	Whittaker, Clark & Daniels ,Inc's Responses to Plaintiffs' Manufacturer Interrogatories Directed to Defendant, Scarduzio v AW Chesterton, et al, 3/5/09; Verified.			
1052		Undated	Handwritten list of Talcs and Talc Sources by Year and Customer, Undated.			
1053		9/21/1973	Memo to JJ Travers, from WC Forbes, Dept Geological Services, Univ of Illinois, 9/21/73; Goodhue WCD 000016-21.			
1054		2/19/2016	Defendant Coty Inc's Second Amended Answers to Plaintiff's First Supplemental Interrogatories and Document Requests, Hug v Brenntag North America, et al, 2/19/16; Verified.			

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1055		1/11/2017	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiffs' First Supplemental Interrogatories and Document Requests, Greco v 3M Company, et al, Middlesex County, New Jersey, 1/11/17.			
1056		1975-1996	WCD Sales Report to Revlon and Revlon/Almay, 1975-1996; WCD Lashley Discoc Docs 001056-1181.			
1057		Undated	Photo of 1615 AGI Talc Bag, Lot 1010505; WCD002399.			
1058		1971-1993	WCD File for 184 Talc, 1971-1993; WCD (CA) Moore0001279-1300.			
1059		4/13/1976	Talc Analysis (Asbestos), 141 Talc, Montana-Canada, McCrone Report 3591, 4/13/76; WCD (CA) Moore0000660-662.			
1060		1975-1981	Sales Report to Charles of the Ritz, 1975-1981; WCD Alderice Disc Docs 001062-1070.			
1061		1971-1992	WCD File for 141 Talc, 1971-1992; WCD (CA) Moore0000596-1278.			
1062		2/16/2012	Deposition of Luker Van Stewart, Bernard v Brookfield Properties Corp, et al, 2/16/12.			
1063		1979-1982	ES Laboratories Talc Analyses for 3300 Montana Talc, 5/15/79 to 11/1/82; WCD (IL) Garcia 0465-0521.			
1064		1970s	Basic Materials for Cosmetics, 1970s; WCD (IL) Garcia 1392-1532.			
1065		1984-1990	ES Laboratories Talc Analyses for 1629 Talc, 4/5/85 to 10/10/90; WCD002732-2800.			
1066		4/13/1976	Talc Analysis (Asbestos), 123 Talc, Montana-Canada, McCrone Report 3591, 4/13/76; WCD (CA) Moore0000216-218.			
1067		1971-1985	WCD File for 123 Talc, 1971-1985; WCD (CA) Moore0000171-595.			
1068		4/21/1988	WCD File for 7 Talc, 4/21/88; WCD (CA) Moore0000169-170.			
1069		4/30/1942	Talcum Powder #50664, Indian Talc #455, Whittaker, Clark & Daniels, Jean Vivaudou Account, 4/30/42.			
1070		10/9/1987	Talc Analysis (Asbestos), 5251 Talc, Korea II, ES Labs Report 219X, 10/9/87; WCD (CA) Moore0003710.			
1071		1982-1992	WCD File for 5251 Talc, 1982-1992; WCD (CA) Moore0003661-3728.			
1072		1975-1988	WCD Sales Report to Pennwalt, 1975-1988; Shackne WCD 001013-1016.			
1073		1/1/1997	WCD Sales Report to Novartis, 1997; Shackne WCD 001012.			
1074		1992-1997	WCD Sales Report to Ciba-Geigy, 1992-1997; Shackne WCD 001006-1010.			
1075		9/13/2016	Defendant, Whittaker, Clark & Daniels, Inc.'s Answers to Plaintiffs' First Set of Interrogatories, Edwards v Alcatel-Lucent USA, Inc, et al, Madison County, IL, 9/13/16.			
1076		2/5/1974	Letter to JP Simko, Colgate, from LB McCrone; Re: Analysis of Two Talc Samples Designated as 516 Cashmere Bouquet and NC Regal, 2/5/74; McCrone 0170-0179.			
1077		3/25/1992	Imerys Memo from RC Munro; Re: Cyprus Ore Reserves - Arsenic & Tremolite, 3/25/92; IMERYS219720-22.			
1078		2/15/1978	Talc and the OSHA Asbestos Standard 29CFR 1910.1001, CIMC, 2/15/78; THAN010465-466.			
1079		1973-1978	McCrone Testing File for WCD, 1973-1978; WHIT-MA3591-0001-364; Affidavit.			
1080		1979-1982	McCrone Testing File for WCD, 1979-1982; WHIT-MA8683-0001-17; Affidavit.			

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1081		6/6/2013	Plaintiffs' First Request for Admissions to Defendant Whittaker, Clark & Daniels, Kaenzig v Charles B Chrystal Co, Inc, et al, 6/6/13.			
1082		1986-1987	Suppliers Listing, 12/12/86 to 9/21/87.			
1083		Undated	Product Listing with Codes, Undated.			
1084		1/26/2015	Letter to L Kagan, Levy Konigsberg, from NJ Grimbergen, Hoagland Longo; Re: Plaintiff Request for Documents No 13, Workers Compensation Records, 1/26/15.			
1085		3/18/2015	Brenntag Share Price, 3/18/15. www.brenntagnorthamerica.com			
1086		1/1/2015	Brilliant National Services, LinkedIn, 2015.			
1087		1/1/2012	DB Mobility Networks Logistics, DB US Holding Corporation, 2012. www.dbusholding.com			
1088		1/1/2015	DB US Holding Corporation, LinkedIn, 2015.			
1089		1/1/2015	Dennis St George, Asst General Counsel, DB US Holding Corporation, LinkedIn, 2015.			
1090		11/2/1971	Final Report of X-Ray Diffraction Analysis, No 4633 WCD Blend, SZ Lewin, 11/2/71.			
1091		8/25/1971	Final Report of X-Ray Diffraction Analysis, No 4633 WCD Blend, SZ Lewin, 8/25/71.			
1092		11/2/1971	Final Report of X-Ray Diffraction Analysis, No 5 WCD Talc, Canadian, Conley Mine, SZ Lewin, 11/2/71.			
1093		10/19/1973	Letter to RR Krammes, from LB McCrone; Re: Analysis of Twelve talc samples labeled A-L, 10/19/73; WHIT-MA03591-0079-90.			
1094		11/2/1981	Memo to F Roesch, from CU Driscoll; Re: Canada Talc Co, 11/2/81.			
1095		Undated	Excerpt of WCD Reference Book, Talc Product Codes, Undated; JNJ000308215-8217.			
1096		3/4/1969	Johnson & Johnson Material Specification 01-143 for Talc, Lo Micron, 3/4/69; Revised 3/12/70; JNJ000343635-637.			
1097		1977-1987	Whittaker, Clark & Daniels Sales Report to Johnson & Johnson, 1977-1987; ZOAS000001-24.			
1098		11/28/1979	Whittaker, Clark & Daniels Invoice to Johnson & Johnson for 1615 Talc BC, 11/28/79; JNJ000684441.			
1099		4/1/1953	Advertisement - Whittaker White Italian Bentonite USP, Drug and Cosmetic Industry, April 1953; JNJ000874100-107.			
1100		5/18/2018	Letter to SJ Purdy, Simon Greenstone, from S Pantuch, Foley Mansfield; Re: Production of Sales and Testing Records in the Schackne Matter, 5/18/18.			
1101		Undated	ES Laboratories Talc Analysis (Asbestos) of 127 Talc, BS-568, Invoice L-3397, Undated; Shackne WCD 001416.			
1102		8/25/1971	Talc Analyses, North Carolina 2450 and 643, SZ Lewin, 8/25/71; WCD-Hirschberg (WA) 000133-142.			
1103		8/25/1971	Talc Analyses, North Carolina 618, SZ Lewin, 8/25/71.			
1104		8/25/1978	Talc Analysis of 156, Vermont, ES Labs, 7/1/87; WCD Greco 000084-86.			
1105		7/9/1974	Memo to All Whittaker Agents, from J Woodruff; Re: Commissions - Direct Shipments, 7/9/74.			
1106		1/1/1976	The Geology of Montana Talc Deposits, RH Olson, Eleventh Industrial Minerals Forum, Special Publication 74, 1976.			
1107		5/27/2021	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiff's First Set of Requests for Admissions, Garcia v Avon Products, Inc. et al. 5/27/21; Verified.			
1108		11/16/1964	Lab Notebook 2692-7 Evaluate Talcs - Upgrade Talcs by Flotation and Other Techniques, Pfizer, Coty Div, 11/16/64; PFE Hug00007161-7162.			

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1109		5/18/2021	Defendant Whittaker, Clark & Daniels, Inc's Objections and Answers to Plaintiff's First Set of Interrogatories, Garcia v Avon Products, Inc, et al, 5/18/21.			
1110		5/15/1995	Deposition of George J Dippold, Volume II, Carulo v Keene Corporation, et al, 5/15/95.			
1111		3/2/2016	Excerpt of Deposition of Theodore Hubbard Re Talc Codes, 3/2/16. (14 pp)			
1112		1/1/1964	Agreement between WCD and Imperial Products Co, 1964.			
1113		11/4/1964	Johnson & Johnson Memo to WH Ashton, from MR Stalker; Re: Beneficiated Talc, Charles Mathieu, Inc, 11/4/64; JNJAZ55 000011210-11.			
1114		12/2/1977	Letter to A Langer, from M Roark; Re: Samples of old talc products from Helena Rubenstein, 12/2/77.			
1115		7/18/1966	Eastern Magnesite Memo to EE Eskilsen, from RN Miller; Re: Visit to Societa Talco e Grafite Val Chisone, 7/18/66; WTALC000009373-9383.			
1116		8/24/2021	Defendant Whittaker, Clark & Daniels, Inc's Supplemental Responses to Plaintiff's First Set of Requests for Production, Garcia v Avon Products, Inc, et al, 8/24/21; Attachment: Sales Report to Charles of the Ritz, 1982-1987; WCD (IL) Garcia 3799-3804			
1117		1/27/1970	Johnson & Johnson Memo to DT Walker, from HL Hogan; Re: Talc - Kolmar, 1/27/70; JNJ000305658-59.			
1118		8/1/1970	Agreement Between Pfizer and WCD, 8/1/70; PFI_SEL_00010356-10361.			
1119		1/1/1978	Sales of talc grades of WCD to Avon in 1978.			
1120		1978-1982	WCD Sales to Avon, 1978-1982; WCD(IL) Garcia 0001-12.			
1121		3/29/1995	Deposition of George J Dippold, Volume I, Carulo v Keene Corporation, et al, 3/29/95.			
1122		3/2/2020	Deposition of Dennis St George in the Hirschberg Matter dated March 2, 2020 and all Exhibits thereto			
1123		1975-1982	WCD Sales to Avon, 1975-1982; WCD(NY)-Purser-000001-33.			
1124		1980-2004	WCD Sales to Avon, 1980-2004.			
1125		6/15/1979	McCrone Project MA3591, Analysis of 844NB Talc, 6/15/79.			
1126		5/16/1972	Letter to GJ Dippold, from SZ Lewin, NYU; Re: X-ray analysis of No 1621 Lo Micron AGI, Lot No 3-10-11, 5/16/72.			
1127		1980-2004	WCD Sales to Elizabeth Arden, 1980-2004.			
1128		1975-2004	WCD Sales to Johnson & Johnson, 1975-2004.			
1129		1979-1981	Cyprus Industrial Minerals Sales to WCD, 1979-1981.			
1130		3/12/1982	List of Products Produced at Clark Minerals Corporation, 3/12/82 and 6/1/83.			
1131		4/4/1991	Material Safety Data Sheet (MSDS) for Talc, April 1991.			
1132		1/26/1983	Defendant Whittaker, Clark & Daniels Answers to Plaintiff's Supplemental Interrogatories, Westfall v WCD, et al, 1/26/83.			
1133		6/22/1981	Memo to CU Driscoll and F Roesch, from JC Woodruff; Re: Clark Minerals, 6/22/81.			
1134		5/30/2018	Letter to SJ Purdy, Simon Greenstone, from S Pantuch, Foley Mansfield; Re: WCD Response to Plaintiffs' Request for Production of Documents, Von Salzen case, 5/30/18; WCD-VonSalzen (CA)-000001 to WCD-Von Salzen(CA)-000930.			
1135		8/18/1976	Cyprus Laboratory Report from P Colville; Re: Tremolite in Talc, 8/18/76.			
1136		9/27/2010	Imerys Industrial Sales Activity Report, 9/27/10; IMERYS085825-850.			

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1137		11/11/2013	Imerys Industrial Sales Activity Report, 11/11/13; IMERYSO404647-404647.022.			
1138		12/13/2018	Deposition of Dennis St George, Pipes v Johnson & Johnson, et al, 12/13/18.			
1139		5/29/2019	Affidavit of Brad Owens, Ratcliff v American Honda Motor Co, Inc, et al, US District Court for the Middle District of North Carolina, 5/29/19.			
1140		5/7/1968	RT Vanderbilt Memo, from ME Stearns; Re: Talc No 399 from Whittaker, Clark & Daniels Company versus NYTAL 400 and Westal 404, 5/7/68; VANDERBILT000130869-870.			
1141		11/8/1985	Memo from RG Light; Re: 1986 II Shin Projection, 11/8/85.			
1142		3/2/2016	Excerpt of the Deposition of Theodore Hubbard, Dalis v Brenntag North America, et al, 3/2/16. (4 pp)			
1143		5/1/1977	Sample Identification and Correspondence regarding NTIS Analysis of Talc by X-Ray Diffraction and Polarized Light Microscopy, McCrone Associates Inc, May 1977; Affidavit.			
1144		9/13/2016	Whittaker, Clark & Daniels Responses to Plaintiff's First Set of Interrogatories, Edwards v Alcatel-Lucent USA, Inc, et al, Madison County, IL, 9/13/16.			
1145		Undated	South Plainfield Flow Sheet, Undated; LEHMAN02168.			
1146		1/1/2015	Brenntag Website - Share Price, 2015. www.brenntagnorthamerica.com			
1147		1/1/2015	Linkedin Page for Brilliant National Services, Inc, 2015.			
1148		1979-1981	Cyprus Sales Reports to WCD, 1979-1981; ITA 110-114.			
1149		1971-1993	WCD File for 1625 Talc, 1971-1993; WCD (CA) Moore0002266-2446.			
1150		1971-1993	WCD File for 2450 Talc, 1971-1993; WCD (CA) Moore0002247-2879.			
1151		1971-1998	WCD File for 2755 Talc, 1971-1993; WCD (CA) Moore0002880-3159.			
1152		6/12/1972	Talc Analysis (Asbestos), 2755 Talc, Montana, ES Labs Invoice No 1428, 6/12/72; WCD (CA) Moore0002888-2890.			
1153		1979-1993	WCD File for 3300 Talc, 1979-1993; WCD (CA) Moore0003160-3304.			
1154		1971-1990	WCD File for 5141 Talc, 1971-1990; WCD (CA) Moore0003305-3660.			
1155		4/13/1976	Talc Analysis (Asbestos), 5141 Talc, Montana, McCrone 319L41, 4/13/76; WCD (CA) Moore0003333-3335.			
1156		8/27/2021	Document Authentication Stipulation, Garcia v WCD, et al			
1157		10/19/1973	Letter to RR Krammes, from LB McCrone; Re: Analysis of Twelve talc samples labeled A-L, 10/19/73; WCD (OK)- Eggers 000013-16.			
1158		4/11/2018	Defendant Whittaker, Clark & Daniels, Inc's Responses to Document Demands in Plaintiff's Notice of Deposition of WCD Corporate Representative, Krempecki v Defendants, Middlesex County, NJ, 4/11/18.			
1159		8/31/1981	Letter to R Krammes, Whittaker, Clark & Daniels, from RJ Hinch, McCrone; Re: Analysis of talc sample 693RO6, 8/31/81; McCrone2-00729-732.			
1160		1986-1987	WCD Sales Re Ruco Incorporated, 1986-1987; WCD(MO) Strunk 0001.			
1161		3/23/2009	Statement of Ernie Tartaglia, 3/23/09.			
1162		Undated	#5211 Lo Micron, Undated.			
1163		10/11/1968	Letter to al, Bristol Myers, from SR Mountsier; Re: Reports from Cosan Lab and Troy Chemical on testing of #5211 talc, 10/11/68; WCD-Cooper (NJ) 0001-3.			
1164		2/3/1969	Memo to CB Clark; Re: Metropolitan Talc Meeting, 2/3/69; WCD-Cooper (NJ) 0004-7.			

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1165		2/14/1969	Memo to CB Clark; Re: Metropolitan Talc Meeting, 2/14/69; WCD-Cooper (NJ) 0008-9.			
1166		1/26/1970	Memo to File, from RG Smith; Re: Verticle Mill - Metropolitan Talc, 1/26/70; WCD-Cooper (NJ) 0010-12.			
1167		1/1/1979	Whittaker Agreements, Excerpt of Cyprus Mines Corporation Acquisition of Assets of Charles Mathieu and Subsidiaries, 1979; ITA 101-118.			
1168		1/14/1983	Deposition of George Dippold, 1/14/83.			
1169		8/18/2017	Excerpt of the Deposition of John Hopkins, Herford v AT&T Corp, et al, 8/18/17.			
1170		9/8/2011	Excerpt of the Deposition of K Lehman, 9/8/11. (p28)			
1171		10/20/2015	Declaration of Dennis St George, 10/20/15.			
1172		1/23/2015	Letter to L Kagan, Levy Phillips Konigsberg, from DR Kuszmerski, Hoagland Longo; Re: Documents Produced Pursuant to Notice of Deposition, Gilvin v WCD, 1/23/15.			
1173		12/2/2014	Plaintiffs' Supplemental Interrogatories and Document Requests to Defendant Whittaker, Clark & Daniels, Inc ("WCD"), Gilvin v Brenntag North America, et al, 12/2/14.			
1174		1/16/1978	Excerpt of WCD Marketing Guide for Cosmetic- Pharmaceutical Industries, 1/16/78; WCD(IL) Garcia 1147-1157.			
1175		11/17/1980	Agreement between Carbola Chemical and WCD, 11/17/80.			
1176		12/8/1980	Special Meeting of Board of Directors of WCD, 12/8/80.			
1177		11/12/1980	Resolution of the Board of Directors of Carbola Chemical Co, 11/12/80.			
1178		11/6/1979	Letter to WC Cooper, from MC Koenig, Timac Chemical, 11/6/79.			
1179		4/1/1987	Product Data Sheet for 618 Talc BC, E85, April 1987.			
1180		Undated	Product Data Sheet for 1643 Talc BC, Undated.			
1181		11/11/1977	Agreement between Metropolitan Talc and WCD, 11/11/77; ITA 261-269.			
1182		8/27/2021	List of Authentic Documents, Garcia v WCD, et al			
1183		11/4/2013	Johnson & Johnson Email to R Reese, from J Roberts; Re: Talc Price Change- FW: Brenntag Specialties Price Change Letter, 11/4/13; JNJ000414336-414337.			
1184		3/7/1990	Letter to J Boccarossa, Chesebrough-Pond's, from F McGonigle; Re: Your Specifications for 5251 Talc BC (RM No 51-1-583), 3/7/90; CONOPCO-MARK DAVIS 000158.			
1185		Undated	Fax to H Winterroth, Chesebrough-Pond's, from GJ Dippold; Re: Samples of 1521 Blend, Undated; 1521 Talc Blend Product Data, August 1983; CONOPCO-MARK DAVIS 000159-161.			
1186		1/26/1989	Letter to R Wasilewski, Chesebrough-Pond's, from TW Grunstra; Re: Product Data and MSDS for No 1521 Talc Blend, 1/26/89; CONOPCO-MARK DAVIS 000162-171.			
1187		5/1/1993	Material Safety Data Sheet (MSDS) for Talc, May 1993.			
1188		4/1/1991	Material Safety Data Sheet (MSDS) for Talc, April 1991.			
1189		Undated	WCD Product Data for 618 Talc BC, I69, Undated.			
1190		Undated	WCD Product Data for 618 Talc BC, C73, Undated.			
1191		Undated	WCD Product Data for 618 Talc BC, E85, Undated.			
1192		1/1/1984	WCD Product Data for 618 Talc BC, B85, January 1984.			
1193		1/1/1984	WCD Product Data for 618 Talc BC, January 1984.			
1194		Undated	WCD Product Data for 4475 Talc BC, D24, Undated.			
1195		Undated	WCD Product Data for 4475 Talc BC, I29, Undated.			
1196		3/1/1984	WCD Product Data for 1623 Lo Micron Talc BC Talc BC, I29, March 1984.			
1197		Undated	WCD Product Data for 1615 AGI Talc BC, L612, Undated.			
1198		Undated	WCD Product Data for 1615 AGI Talc BC, I99, Undated.			

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1199		3/22/1976	WCD Product Data for 1615 AGI Talc BC, C63, 3/22/76.			
1200		2/22/1976	WCD Product Data for 1615 AGI Talc BC, D44, 2/22/76.			
1201		1/26/1989	Letter to R Wasislewski, Chesebrough-Pond's, from TW Grunstra; Re: Product Data and MSDS for No 1521 Talc Blend, 1/26/89; CONOPCO-MARK DAVIS 0001628-1631.			
1202		1972-1992	XRD Talc Analysis of 1625 Talc, 1972-1992; WCD(CA) DAVIS 0004739-4912.			
1203		1972-1991	XRD Talc Analysis of 2450 North Carolina Talc, 1972-1991; WCD(CA) DAVIS 0004913-5329.			
1204		Undated	Blends, 1521 Talc, Undated; WCD(CA) DAVIS 0005407.			
1205		1985-1989	WCD Sales Report to Evyan Perfumes, 1985-1989; WCD(CA) DAVIS 0004380.			
1206		2/13/2001	Luzenac Call Report at WCD, South Plainfield, NJ, 2/13/01; IMERYS338060-338062.			
1207		8/8/2016	Excerpt of the Deposition of Theodore Hubbard, Depoian v American International Industries, Inc, et al, 8/8/16.			
1208		9/13/2016	Defendant Whittaker, Clark & Daniels, Inc's Answers to Plaintiffs' First Set of Interrogatories, Smith v Alcatel-Lucent, et al, Madison County, IL, 9/13/16; Verified.			
1209		9/7/1972	Debit Memo to Metropolitan Talc for Shipments of 1615 to Coty Prods from May 1, 1972 to August 28, 1972, 9/7/72; WCD-ROY-000014.			
1210		2/4/1974	WCD Cost, Metropolitan Talc, 1615 Talc to Coty, North Carolina, 2/4/74; WCD-ROY-000015.			
1211		8/4/2016	Excerpt of the Deposition of Theodore Hubbard re Talc 4628, Colpitts v American International Industries, Inc, et al, 8/4/16.			
1212		6/20/2003	Certificate Regarding Source of Raw Material, Whittaker, Clark & Daniels, 3465H Supra H Talc, 6/20/03; Moore_EL_00000912-918; CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER.			
1213		6/10/1997	Whittaker, Clark & Daniels Material Safety Data Sheet (MSDS) for Talc, January 1997 (stamped 6/10/97); Estee Code 69-0064; Moore_EL_00000756-759; CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER.			
1214		4/10/1972	Letter to V Basmajian, Len Ron Manufacturing, from FF Roesch, WCD; Re: XRD Reports on Talcs supplied by WCD, 4/10/72; Report of X-Ray Diffraction Analysis, Metropolitan No 4601 (11-24-71), 12/1/71; Report of X-Ray Diffraction Analysis, No 2450 WCD (Talc, North Carolina), 8/25/71; Letter to VBasmajian, Len Ron Manufacturing, from B Svitila, Fluid Chemical Co; Re: XRD analysis on 141 Alpine Talc, 8/24/72; Letter to BA Svitila, Fluid Chemical, from FF Roesch, WCD; Re: Meeting with FDA regarding methodology, 4/24/72; Report of X-Ray Diffraction Analysis, No 141 WCD (Talc, Alabama), 8/25/71; Moore_EL_00001297-1304.			
1215		3/2/1999	Price Change Notice to Chanel, BG Supra A (*1707), 3/2/99; CHANEL-ROY-000194.			
1216		9/8/1988	Letter to Revlon Research Center, from F McGonigle, Whittaker, Clark & Daniels; Re: Quarterly analysis of talc sources as of August 23, 1988, 9/8/88; Rev-NJ-000477.			
1217		1982-1989	ES Laboratories Talc Analysis, 1629 Talc, Montana and Australia, 6/11/82 to 3/24/89; WCD 2732-2798.			
1218		1978-1980	ES Laboratories Talc Analysis, Talc 1232, California, 5/26/78 to 2/19/80; WCD (CA) RUNNE 0004792-4815.			
1219		1/7/1971	Letter to DE Stinger, Eagle Rubber, from SR Mountsier; Re: Your phone call, 1/7/71; WCD (CA) Moore 0003768-3769.			

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1220		1975-1976	ES Laboratories Talc Analysis, 141 Talc, Alabama, 9/15/75 to 4/13/76; WCD (OK) Eggers 000032-35.			
1221		11/2/1971	ES Laboratory Talc Analysis (Asbestos) - 4615 Talc, Canada, SZ Lewin, 11/2/71 to 3/22/76; WCD0242-247, 265.			
1222		Undated	Laboratory Report to G Dippold; Re: Testing of Three Samples of Carbola Chemical Talc, Undated.			
1223		1/28/1966	Sales and Distribution Agreement between Whittaker, Clark & Daniels and Pfizer, 1/28/66; PFI SEL 00010344-10349.			
1224		8/9/1966	THAN Sales Bulletin to All Industrial Salesmen, from M Mason; Re: Talc, Chas Pfizer & Co, Comparative list of United Sierra and Pfizer talcs, 8/9/66; THAN 1599-1600.			
1225		6/13/1955	Letter to Mr Sellers, THAN, from PH Bixby, Imperial Products; Re: Alatalc, Alabama Insecticide Grade Talc, 6/13/55; THAN8538-8539.			
1226		8/30/1955	Letter to BH Sellers, THAN, from PH Bixby, Imperial Products; Re: Alatalc, Alabama Insecticide Grade Talc, 8/30/55; THAN8535.			
1227		1970-1971	WCD Sales Invoices to Thompson Hayward (THAN) for Korean White Snow Talc, 1970-1971; THAN 71-PV1122(5)-1139(5).			
1228		1975-1997	Sales Report to the Mennen Company, 1975-1997.			
1229		1/1/1977	Excerpt of the CTFA Cosmetic Ingredient Dictionary, Second Edition, NF Estrin, Ed, 1977.			
1230		10/29/2021	Exhibit 34 = WCD Codes, Moore v WCD, 10/29/21.			
1231		1975-2004	WCD Sales Reports to Chanel, Coty Products, Estee Lauder, Len Ron- Estee Lauder, L'Oreal USA, Len Ron Mfg Co, Maybelline, Revlon, and Schering Corporation, 1975-2004; WCD(NY) Peltz-000001-168.			
1232		7/10/1979	Purchasing Dept Memo; Customer: Coty Products; Supplier: Metropolitan Talc Company, 11/1/78 to 7/10/79, 7/10/79; WCD-ROY-000019.			
1233		9/28/1998	Notes/History; Customer: Coty Products, P Driscoll, 9/28/98; WCD-ROY-000025.			
1234		1991-2001	WCD and Brenntag Material Safety Data Sheets (MSDS) for Talc, April 1991- April 2001; WCD (CA)Moore 0024654-24689.			
1235		6/13/1960	WCD Data Sheet on Asbestos, 6/13/60.			
1236		7/8/1971	Letter to CU Driscoll, from PH Bixby, American Talc Co; Re: New York Post article of June 30, 1971, 7/8/71; WCD (CA) Moore 0003760-3763.			
1237		3/16/1972	Letter to RW Kirkwood, Canadian Talc, from GJ Dippold; Re: Occupational Health and Safety Act, 3/16/72; WCD-Pipes(OK)-1078.			
1238		4/6/1973	Letter to A Weissler, FDA, from RR Roesch; Re: Sample of industrial talc no longer in production, 4/6/73; WCD-Pipes(OK)-1174.			
1239		7/19/1971	Memo to CU Driscoll, from SR Mountsier, Jr; Re: Meeting on Asbestos vs Talc, 7/19/71; WCD (CA) Moore 0003766-3767.			
1240		1971-1976	ES Labs Test Reports for 4615 Talc, Canada, S Lewin, 11/2/71 to 3/22/76; WCD0242-245,247, 265.			
1241		3/2/2021	Excerpt of the Deposition of Dennis St George, Hirshberg v Johnson & Johnson, et al, 3/2/21.			
1242		4/26/1975	Englehard Invoice to WCD, Order No 12645, Invoice No 16007, Emtal #500 and #549 Talc, 4/26/75; BASF _EMTAL000041573.			
1243		8/13/1990	Cyprus Memo to EF McCarthy, from NA Nordhauser; Re: Cosmetics and Pharmaceuticals: One and Five Year Plan, 8/13/90; IMERYS095823-825.			

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1244		3/5/1999	Alpine Operations, Closure Recommendation and Implementation Plan, Luzenac North America, 3/5/99; IMERY5054061-81.			
1245		1/1/2013	Answers to Supplemental Interrogatories and Requests for Production, Argento v Charles B Chrystal Co, et al, 2013; Verified; w attachments.			
1246		3/2/1972	Letters to Agsco, Canada Talc Industries, Independent Gravel Co, Canadian Talc, SA Mineraria Imole Pontine, Enco Chemical, Ore and Chemical Corp, and US Gypsum, from GJ Dippold; Re: Occupational Safety and Health Act of 1970, 3/2/72 to 5/3/72; WCD000815-822			
1247		4/21/2003	Luzenac North America 2002 Sales by Location by Product by Customer, Report No GS1008, 4/21/03; IMERY5237301.			
1248		2/5/2001	Luzenac America Memo to RJ Zazenski, from JW Pier, et al; Re: Analytical Monthly Report - January 2001, 2/5/01; IMERY5417067-417039.			
1249		Undated	Mineral and Pigment Solutions/ Brenntag Material Safety Data Sheet (MSDS), IMP Talcs, Undated; RATCLIFF_EL-CL000022.			
1250		11/17/1982	Englehard Minerals Sales Report, 11/17/82; BASF EMTAL000041187-41200.			
1251		3/12/1976	CTFA Memo to NF Estrin, from AS Curry; Re: Current talc analyses, 3/12/76; WCD000004.			
1252		1988-1992	WCD Sales Report to Fisons-Pennwalt Corporation, 1988-1992; WCD-McBride(IN)-020897-898.			
1253		Undated	Letter from SR Mountsier, Jr; Re: Complaint regarding talcs used in rubber industry, Undated; WCD(CA) Moore 0004370-4371.			
1254		7/2/1971	File Memorandum from KR Klippel; Re: Talc, American Talc Company, 7/2/71; WCD(CA) Moore 0003756.			
1255		Undated	Exhibit 74 - Summary Table of Findings of asbestos Minerals and asbestos in Montana talc WCD Sold (Attorney Work Product)			
1256			CTFA Memo to Dr Roesch, from N Estrin; Re: Newspaper Article entitled, "Asbestos Cancer Risk Linked to Low Level of Contact With Fiber," Chemical Marketing Reporter, 9/23/74; WCD(CA) Moore 0004429-4430. 587.			
1257		8/26/1974	Memo to CU Driscoll, from F Roesch; Re: CTFA Talc Subcommittee, 8/26/74; WCD(CA) Moore 0004323-4324.			
1258		9/5/1975	CTFA Memo to Members of Standards Committee and Members of Talc Committee; Re: Final version of Cosmetic Talc Standard, 9/5/75; WCD000064-65.			
1259		1994-2000	WCD Sales Report to 3M Manufacturing Co, 1994-2000; WCD(CA) RUNNE 0004359-4360.			
1260		1983-2004	WCD Sales Report to Bondo Mar-Hyde Corporation, 1983-2004; WCD(CA) RUNNE 0004361-4371.			
1261		1979-2004	WCD Sales Report to DAP, 1979-2004; WCD(CA) RUNNE 0004372-4379.			
1262		1979-1982	WCD Sales Report to Georgia Pacific, 1979-1982; WCD(CA) RUNNE 0004380-4382.			
1263		1975-1982	WCD Sales Report to Kelly Moore Paint Co, 1975-1982; WCD(CA) RUNNE 0004383-4384.			
1264		1975-2001	WCD Sales Report to Union Carbide and UCC South Charleston Plant, 1975-2001; WCD(CA) RUNNE 0004385-4390.			

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1265		1978-1980	Talc Analyses - 1232 California Talc, Walter C McCrone, 4/19/78 to 2/12/80; WCD(CA) RUNNE 0004787-4816.			
1266		1977-1981	Talc Analyses - 367 Georgia Talc, ES Laboratories, 11/2/77 to 12/23/88; WCD(CA) RUNNE 0004413-4576;			
1267		1979-1981	Talc Analyses - 2882 Texas Talc, 11/26/79 to 8/31/81; WCD(CA) RUNNE 5813-5849.			
1268		1/23/1975	Talc Analyses - 2606 Texas Talc, ES Laboratories, 1/23/75; WCD(CA) RUNNE 5111-5220.			
1269		9/17/1993	Talc Analyses - 290 China Talc, ES Laboratories, 9/6/89 to 9/17/93; WCD(CA) RUNNE 4406-4408.			
1270		6/28/1978	Talc Analyses - 296 Nevada Barytes, ES Laboratories, 6/28/78; WCD(CA) RUNNE 4409-4412.			
1271		11/13/1978	Talc Analyses - 804 Calcium Carbonate, ES Laboratories, 11/13/78; WCD(CA) RUNNE 4784-4786.			
1272		11/13/1978	Talc Analyses - 2460 Georgia Clay, ES Laboratories, 11/13/78; WCD(CA) RUNNE 5107-5110.			
1273		4/14/1992	Talc Analyses - by XRD, WCD #106, ES Laboratories, 4/14/92; WCD(CA) RUNNE 4402-4405.			
1274		1998-2004	WCD Sales Report to L'Oreal, 1998-2004; WCD(CA)Chapman00000104-123.			
1275		1976-2004	WCD Sales Report to Maybelline, 1976-2004; WCD(CA)Chapman00000124-148.			
1276		1975-1992	WCD Sales Report to Noxell, 1975-1992; WCD(CA)Chapman00000149-172.			
1277		1977-2002	WCD Sales Report to Revlon, 1977-2002; WCD(CA)Chapman00000173-246.			
1278		1975-1978	WCD Sales Report to Shulton, 1975-1978; WCD(CA)Chapman00000247-248.			
1279		1/28/1977	Memo to DF McKenzie, from JF Bartonik, OSHA; Re: Asbestos in French Talc #2, 1/28/77; WCD-McBride(IN)-001716.			
1280		10/21/1987	Letter to L Driscoll, from RC Wolfe, Avon Products; Re: California Proposition 65, 10/21/87; WCD-McBride(IN)-003006-3009.			
1281		9/8/1978	Letter to CR Haynes, CTFA, from RR Krammes; Re: Updated list of products for CTFA Cosmetic Ingredient Directory, 9/8/78; WCD-McBride(IN)-002034-2036.			
1282		7/24/1980	Letter to R Krammes, from DB Tennyson, Murphy Engineering; Re: Talcum Powder Specification U-T-30C, 7/24/80; WCD-McBride(IN)-002473-2478.			
1283		12/10/1993	Letter to TK Kwasizur, Luzenac America, from MC Argyelan' Re: Overview of operating subsidiaries, Talc Operations Group, 12/10/93; WCD-McBride(IN)-003085-3102.			
1284		1/23/1974	Memo to G Dippold, from FF Roesch; Re: CTFA Subcommittee Meeting on Talc, 1/23/74; WCD-McBride(IN)-004040-4081.			
1285		7/15/1975	Lab Report No 957K, DTA Analysis for Talcs, 7/15/75; WCD-McBride(IN)-004083-4084.			
1286		7/16/1975	Letter to G Dippold, from WK Hill, Markel, Hill & Byerley; Re: July 14 F-D-C Report, 7/16/75; WCD-McBride(IN)-004085-4088.			
1287		7/31/1975	Safety Study of Italian Talcs, 7/31/75; WCD-McBride(IN)-004089-4103.			
1288		2/18/1976	Handwritten Reports on Asbestos/ Talc, 2/18/76; WCD-McBride(IN)-004120.			
1289		5/15/1984	Letter to G Dippold, et al, from W Glenn, Jr, Pioneer Talc; Re: Federal Regulations - talc fiber, 5/15/84; WCD-McBride(IN)-004299-4300.			

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1290		5/17/1984	Letter to G Dippold, et al, from W Glenn, Jr, Pioneer Talc; Re: Fiber results from US Dept of Interior, 5/17/84; WCD-McBride(IN)-004301-4302.			
1291		7/31/1986	WCD Response to NIOSH Survey, 7/31/86; WCD-McBride(IN)-004304-4324.			
1292		7/1/1992	OSHA amends asbestos standards, WCD Advertisement, Ceramic Industry, July 1992; WCD-McBride(IN)-004332.			
1293		Undated	WCD Product Data for 1625 Talc BC with handwritten notes on other talc grades; WCD-McBride(IN)-003004.,			
1294		5/26/1993	Cosmetics, Food and Pharmaceutical Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			
1295		2001-2004	WCD Sales Report to Pharma Tech Industries, 2001-2004; WCD-McBride(IN)-022841.			
1296		1992-1994	WCD Sales Report to Ciba-Geigy, 1992-1994; WCD-McBride(IN)-020895-96.			
1297		1975-1988	WCD Sales Report to Pennwalt Corporation and Keystone Div of Pennwalt, 1975-1988; WCD-McBride(IN)-020900-20902.			
1298		6/12/1972	Talc Analysis (Asbestos), Product Number 4609, Italy & Montana, ES Laboratories, WCD 6/72-1, 6/12/72; WCD-NYCAL-006524-6525.			
1299		8/9/1971	Memo to CU Driscoll, from SR Mountsier, Jr; Re: Meeting on Asbestos & Talc Ad Hoc Committee, August 3, 1971, 8/9/71; WCD-NYCAL-006549-6550.			
1300		7/19/1971	FDA to Convene As Hoc Cmte on Talc, FDC Reports, 7/19/71; WCD-NYCAL-006558-6559.			
1301		1972-1993	Memorandum of Meeting between FDA Representatives and CTFA, Johnson & Johnson, et al; Re: Asbestos in Cosmetics Containing Talc, Such as Dusting Powders and Face Powders, 8/11/72; Meeting of Talc Group, 3/21/73; Meeting Notes of CTFA Talc Subcommittee, 9/6/74; Minutes of CTFA Talc Task Force, 3/11/76; Minutes of CTFA Talc Subcommittee Meeting, 7/8/76; Draft Minutes of Talc Interested Party Task Force, 2/2/93; WCD-NYCAL-006565-6570..			
1302		1/24/1973	Letter to EF Marriner, Johns-Manville, from M Kleinfeld, MD; Re: Response to request for medical data on workers exposed to commercial talc dust, 1/24/73; WCD-NYCAL-006579.			
1303		Undated	Letter to R Krammes; Re: Recent inquiry for assurance regarding talc supplied to you, Undated; WCD-NYCAL-006618.			
1304		12/27/1973	Asbestos Particles in Food and Drugs, Summary of FDA Proposal (38FR27076), 12/27/73; WCD-NYCAL-006620.			
1305		1/1/1976	Confidential Pre-Publication Copy of "Consumer Talcums and Powders: Mineral and Chemical Characterization," AN Rohl, AM Langer, IJ Selikoff, A Tordini, R Klimentidis, Journal of Tox and Enviro Health, 1976; WCD-NYCAL-006627-6675.			
1306		4/1/2001	Material Safety Data Sheet (MSDS) for Talc, April 2001; WCD-NYCAL-006692-6695.			
1307		12/17/1987	Letter to F McGonigle, from AG Rich, Avon; Re: Talcs supplied by WCD and Clark Colors, 12/17/87; WCD-Schmitz(CA)004167-4178.			
1308		5/25/1989	Letter to A Osborne, Revlon Research Center, from E Browarny; Re: Grades of talc used at Revlon, 5/25/89; Rev-NJ-000800.			

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1309		10/12/2017	Excerpt of the Deposition of Dennis St George, Tucker v Chanel, Inc, et al, 10/12/17.			
1310		7/17/1972	Avon Teletype to LJ Richards, from SN Zia; Re: Pasadena Carload Receipt of Talc Designated as Montana, Code 0815, from American Talc with WC&D Labels, 7/17/72; AV_FORNI-0005036.			
1311		5/25/2000	Luzenac America Memo to F Panion, from J Gauntt; Re: Grand Island Customer Conversion Update, 5/25/00; IMERYS140178-140221.			
1312		12/31/1980	Cyprus Industrial Minerals Product Sales Report, 12/31/80; IMERYS233640-932.			
1313		1/1/2004	Luzenac 2004 Customer Specific Product List; IMERYS131284-289.			
1314		Undated	Sierra Talcs for Cosmetic and Pharmaceutical Uses, Sierra Talc, Undated; CAMC-Abeyta-002634-2639.			
1315		9/20/1971	Memo to R Boyd, from JC Woodruff; Re: Ribelin Distributors, Firestone Synthetic Rubber & Latex Company, Lake Charles, LA, 9/20/71.			
1316		1972-1987	ES Laboratories, Talc Analysis of 156. Origin: Vermont, 7/14/72 to 7/1/87; WCD Greco 000084-94.			
1317		7/10/1972	Avon Memo to CG Christie, from RA Arzapalo; Re: Visit to Whittaker, Clark & Daniels on Talc Specifications, 7/10/72; AV_LEBRECHT-0006029-30; AV_PIPES_0005848.			
1318		10/24/1972	Letter to CU Driscoll, from BE Warner, The Hitchcock Corp; Re: Report from Dr Charles Manning of NC State University, 10/24/72; Report on Talc Samples from Hitchcock Mining Co, 10/16/72; WCD(CA)Moore 0024569-24581.			
1319		5/7/1973	Letter to D Ferry, Charles Mathieu, from WH Ashton, Johnson & Johnson; Re: Stefano's report on Val Chisone, 5/7/73; WCD(CA)Moore 0003959-3964.			
1320		12/3/1974	Letter to TH Collier, Firestone Synthetic Rubber & Latex Co, from RR Krammes; Re: XRD testing of #4408 talc, 12/3/74.			
1321		1976-1990	Brenntag Product Data Sheets for 1615 Talc, 1976 to 1990s; WCD(IL)Garcia 0669-679.			
1322		1/26/1976	Letter to D Ferry, Metropolitan Talc, from FF Roesch; Re: Revised Agreement between Charles Mathieu and WCD, 1/26/76.			
1323		8/25/1977	Letter to G Dippold, from JP Bartels, Pfizer; Re: NBS Analysis of 80 Industrial Talc Samples, 8/25/77; WCD(CA)Moore 0024567-24568.			
1324		1/1/1990	The Unique Supplier, WCD Brochure, 1990; WCD(IL)Garcia 1679-1683.			
1325		1/10/2008	Answers to Plaintiffs' First Set of Interrogatories on Behalf of Whittaker, Clark & Daniels, Gerber v 84 Lumber Co, et al, 1/10/08.			
1326		1/1/1990	WCD Notes on Grades of Talc Sold to Revlon, 1990; WCD Alderice Disc Docs 003912-3913.			
1327		10/16/1972	Report on Talc Samples from Hitchcock Mining Co, 10/16/72; WCD(CA)DAVIS 0004941-4951.			
1328		1986-2004	WCD Sales Report to Washington Penn Plastics Co, Washington, PA, 1986-2004; WCD(PA)-Rugg-00001-17.			
1329		5/14/1971	Letter to DE Stinger, Eagle Rubber Co, from SR Mountsier; Re: Rubber dusting talcs, 5/14/71; WCD-NYCAL-000026-27.			
1330		10/18/1973	Telephone Call, Lucy McCrone, 10/18/73; Letter to RR Krammes, from LB McCrone; Re: Twelve talc samples labeled A-L, 10/19/73; WCD-NYCAL-000393-406.			
1331		1991-2001	Material Safety Data Sheets (MSDS), April 1991 to April 2001; WCD(PA)-Rugg-00020-49.			

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1332		1976-1980	BASF Invoices to WCD, Emtal 500, 1976-1980; BASF EMTAL000041565-41620.			
1333		Undated	Cross Over Chart, Paint Grades, Undated; VANDERBILT000534733.			
1334		10/1/1999	Luzenac America United States and Canada Cosmetic Sales, October 1999; IMERY5342919-342926.			
1335		1/29/1984	Memo to G Dippold; Re: X-Ray Diffraction, File 720T, 1/29/84; WCD-McBride(IN)-002778-2779.			
1336		12/29/1992	Memo to G Dippold, et al, from S Stephens; Re: WCD Meeting - Chicago Paint Convention, October 1992, 12/29/92; WCD-McBride(IN)-004342-4343.			
1337		1987-2004	WCD Sales Report to American International Industries, 1987-2004; WCD-McBride(IN)-000001-4.			
1338		6/7/1967	Tentative Avon Products, Inc Ingredient Specifications, Regal 93 Talc, Jasmin, Wishing, 1964-1968, 6/7/67; AV_Hirshberg_000001-23.			
1339		9/20/1971	Avon Products Raw Ingredient Testing Specification for Code 0815-1, Talc- Northern, Revision #1, 9/20/71; API0017948-5-6.			
1340		7/17/1972	Avon Teletype to LJ Richards, from SN Zia; Re: Pasadena Carload Receipt of Talc Designated as Montana, Code 0815, from American Talc with WC&D Labels, 7/17/72; AV_FORNI_005036.			
1341		1/9/1978	Avon Basic Batch Formula for 2-9804-1HN Sweet Honesty #64843-03, Revision #3, 1/9/78; AV Garcia 000001-3.			
1342		1/3/1977	Avon Products Raw Ingredient Testing Specification for Code 0752-1, Olympic Talc, Revision #1, 1/3/77; AV_STD_000940-949.			
1343		1971-1976	XRD Analysis of 4615 Canada Talc, SZ Lewin, 11/2/71 to 5/24/76; WCD0242-267.			
1344		1976-1980	XRD Analysis of 4662 Vermont Talc, ES Laboratories, 11/12/76 to 4/9/80; WCD0268-289.			
1345		7/17/1975	Letter to F Eby, Amoco Chemical Co, from WC Cooper; Re: XRD scans of 4615, 4660 and 4665 Polytal, 7/17/75; WCD0290.			
1346		5/5/1978	Amoco Memo to AE Ruscilli, from BF Eby; Re: Asbestos and Talc used at New Castle, 5/5/78; WCD0291.			
1347		5/5/1978	Letter to BF Eby, Amoco, from RR Krammes; Re: Analysis of 4662 Polytal VT, 5/5/78; WCD0299.			
1348		8/18/1976	Typical Talc Prices, BF Eby, Amoco, 8/18/76; WCD0309.			
1349		1991-1994	Correspondence between DR Ferry, Charles Mathieu, and Luzenac regarding Importation of Italian talc, 1991-1994; AB-ITA-20-001357-1363.			
1350		1/1/1999	Luzenac Alpine Sales By Product, 1999; IMERY5054017-28.			
1351		1/21/1999	Luzenac Email to J Gauntt, from M Keener; Re: Cosplan, 1/21/99; IMERY5054116-129.			
1352		1998-1999	Luzenac America File for Supra A, 1998-1999; IMERY5099858-889.			
1353		6/21/2001	Luzenac and Whittaker Clark & Daniels Joint Call Report at Maybelline, Clark, NJ, 6/21/01; IMERY5337824-337825.			
1354		3/31/1977	Letter to NF Estrin, CTFA, from JP Schelz, Johnson & Johnson ; Re: Enclosed tables representing initial work-up of data for round robin testing. 3/31/77; JNINL61_000020469-73.			
1355		10/19/1973	Letter to F Roesch, Whittaker, Clark & Daniels, from GW Sandland, Bristol Myers; Re: Six samples of talc, 10/19/73; Report of CTFA Talc Subcommittee on Method to Detect Chrysotile and Tremolite in Talc, 12/10/73; WCD000141; WCD000115-122.			

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1356		11/22/1946	Mennen Standard Practice Bulletin, Quinsana Formula, 11/22/46; Mennen-00004634.			
1357		9/16/1952	Mennen Standard Practice Bulletin, Baby Powder Formula, 9/16/52; Mennen-00004629.			
1358		1/21/1953	Mennen History, Interview of Jacob Manheimer, 1/21/53; CP-MENNEN-000748.			
1359		2/3/1953	Mennen Standard Practice Bulletin, Bath Powder for Men Formula, 2/3/53; CP-MENNEN-00000796.			
1360		7/23/1957	Avon Tentative Ingredient Specifications, Code No 0770, Talc #399, 7/23/57; AV STD 002006.			
1361		8/1/1957	Excerpt of WCD Bulletin No 54-1, Revised August 1957. (6 pp)			
1362		10/29/1965	Pfizer Evaluation of Victorville Talcs - Evaluation of Competitive Talcs and Victorville Talcs, Progress Report No 2, 10/29/65; PFI SEL 00010289-10299.			
1363		1/1/1970	Excerpt of Basic Materials for Cosmetics, 1970s; WCD (IL) Garcia 1392-1395; 1469-1488. (24 pp).			
1364		6/1/1973	Metropolitan Talc Sales Report to Coty, 1615 AGI Talc BC, 6/1/73; WCD-ROY-000015.			
1365		10/29/1973	Johns-Manville Report 414-3, Determination of Content of Asbestos Type Minerals in Talc Samples, Hazen Research, 10/29/73; MTC 000578-591; Affidavit.			
1366		2/12/1976	Cyprus Call Reports at Colgate-Palmolive, 2/12/76 to 4/19/76; CYP00000697-698; CYPRUS(2015)000722--723.			
1367		1976-1982	Coty Div, Pfizer, Testing of 1615 Italian Talc, 7/16/76 to 2/19/82; PFE Hug00007180 and various bates.			
1368		1978-1981	Coty Div, Pfizer, Testing of 643 North Carolina Talc, 5/1/78 to 7/9/81; PFI SEL 00009842 and various bates.			
1369		4/10/1979	Coty Batch Card, Product #5-0341-20-801-000, L'Aimant, 4/10/79.			
1370		7/26/1983	Letter to Ms. Grace, Colgate-Palmolive, from RE Ellis, McCrone; Re: Asbestos analysis of talc sample labeled RCT1004C, 7/26/83; McCRONE0215-218.			
1371		3/2/2016	Deposition of Theodore Hubbard, Dalis v Brenntag North America, Inc, et al, 3/2/16.			
1372		Undated	Cyprus Industrial Minerals Advertisement - Call Cyprus before it's too late, Undated; NOXELL-CG-000714.			
1373		3/12/1982	Letter to D Willis, Noxell Corporation, from Dick; Re: Sample of RCT1004CX talc as a replacement for Italian talc, 3/12/82; NOXELL-CG-000721.			
1374		2000-2004	Whittaker, Clark & Daniels Sales Report of Sales to L'Oreal USA, 2000-2004; WCD Chamberlain Discovery 000266-284.			
1375		9/28/1981	Canada Talc Industries Ltd Report to PT Barnes, from DG Ogden; Re: Mineralogy of Canada Talc Industries Talc Ore as mined and processed at Madoc, Ontario, 9/28/81; WCD-McBride(IN)-004289-4295.			
1376		10/17/2018	Excerpt of the Deposition of Brian Kolman, Pyle v Pfizer, Inc, et al, 10/17/18. (8 pp)			
1377		3/2/2021	Deposition of Dennis St George, Hirshberg v Johnson & Johnson, et al, 3/2/21.			
1378		Undated	Exhibit 24, Authentication Chart, Garcia v Whittaker, Clark & Daniels, Inc, et al			
1379		8/27/2021	Excerpt of the Deposition of Dennis St George, Garcia v Avon Products, Inc, et al, 8/27/21. (6 pp)			
1380		1975-2004	Whittaker, Clark & Daniels Sales Report of Sales to Chattem, 1975 – 2004; WCD Chamberlain Discovery 000160-171.			

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1381		1978-2003	Whittaker, Clark & Daniels Sales Report to Noxell Corp, Cover Girl, 1978-2003; WCD_Chamberlain(PA)_000316-340.			
1382		2/16/2012	Excerpt of the Deposition of Luker Van Stewart, Tedrick v Colgate Palmolive, 2/16/12. (15 pp)			
1383		1999-2001	Color Techniques Sales Report to Whittaker, Clark & Daniels, 1999-2001; Color T000607-610.			
1384		3/2/2016	Excerpt of Deposition of Theodore Hubbard Re Talc Codes, 3/2/16. (10 pp)			
1385		3/2/2016	Excerpt of Deposition of Theodore Hubbard Re Talc Codes, 3/2/16. (17 pp)			
1386		2/12/2008	Distribution Agreement between Luzenac America and Brenntag Specialties, 2/12/08; IMERY5296000-296017.			
1387		10/21/1981	XRD Talc Analysis of 2450 North Carolina Talc, 8/25/71 to 10/21/81; WCD-Graham(OR)00002661-3093.			
1388		11/12/2021	Authenticity and Business Record Stipulation, Lynne Roy and Mae Moore v Whittaker, Clark & Daniels, et al, Deposition Day 2 for Moore, Day 1 for Roy, 11/12/21.			
1389		2/25/1972	Avon Memo to CP Randa, et al, from SN Zia; Re: Talcs, 2/25/72; AV_JENKINS_S-0005242-5243.			
1390		4/15/1981	XRD Talc Analysis (Asbestos), 1745 Talc, ES Laboratories, 4/15/81 to 9/15/81; WCD003084-3090.			
1391		12/12/1997	Luzenac America Memo to S Abarca, et al, from K Ailsieger; Re: Table of Cosmetic/Pharmaceutical/Food products (by location), 12/12/97; IMERY5426200-426201.			
1392		9/11/1998	WCD Quotation to Chanel for 3465 Supra A, 9/11/98; CHANEL-ROY-000192-193.			
1393		10/29/2021	Exhibit 18 - Recap of pre-1970 sales, Coty, Chanel, Lanvin and Nestle LeMeur			
1394		Undated	Evaluate Talcs - Upgrade Talcs by Flotation or Other Techniques, Coty Div, Pfizer, Undated; PFE-Hug00007161-7162.			
1395		11/10/1998	Luzenac America Memo to R Aragon, from L Forstmann; Re: Supra A Talc, 11/10/98; IMERY5056594.			
1396		7/6/1998	Domestic Talc Usage in TX, OK, AR, MS, LA from 1998 Competition Database, Luzenac America, 7/6/98; IMERY5219749-219754.			
1397		1/1/1962	Avon Annual Report, 1962.			
1398		1985-1996	WCD Sales Report to Revlon and Revlon/Almay, 1985-1996; WCD Lashley Discoc Docs001090-1181.			
1399		1975-1989	WCD Sales Report to Noxell, 1975-1989; WCD-EGLI (CA)-04366-4383.			
1400		1975-2004	WCD Sales Report to Avon, 1975-2004; WCD-EGLI (CA)-00001-110.			
1401		4/14/2022	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiff's Request for Production of Documents, Set Two, Egli v Johnson & Johnson, et al, Alameda County, CA, 4/14/22; Verified.			
1402		12/21/2021	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiff's Request for Production of Documents, Egli v Johnson & Johnson, et al, Alameda County, CA, 12/21/21; Verified.			
1403		11/13/2020	Defendant Whittaker, Clark & Daniels, Inc's Responses to Plaintiff's Dieden Interrogatories, Egli v Johnson & Johnson, et al, Alameda County, CA, 11/13/20; Verified.			
1404		3/15/1998	WCD/Brenntag Material Safety Data Sheet (MSDS) for Talc, Manufacturer: Luzenac America, 3/15/98; IMERY5466967-466972.			

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1405		9/1/1999	WCD/Brenntag Material Safety Data Sheet (MSDS) for Talc, Manufacturer: Luzenac America, 9/1/99; IMERY5466961-466966.			
1406		1/26/2004	Luzenac America Email to R Zazenski, from G Myers; Re: Per Our Phone Conversation, 1/26/04; IMERY5466959.			
1407		1/1/2009	Luzenac America Sales to Brenntag Specialties, A Perkinson, January 2009; IMERY5295883-295885.			
1408		4/1/2001	WCD/Brenntag Material Safety Data Sheet (MSDS) for 195 Talc Superiore M10 DEC, April 2001; Color T000462-465.			
1409		12/1/2017	Brenntag Specialties Product Data Sheet: Talc - Pharmaceutical Grade, WCD 2755 USP BC - Lo-Micron, December 2017; Color T000485.			
1410		1971-1972	List of WCD Product Numbers and Names and WCD Reports of X-Ray Diffraction Analysis Test for Asbestos, 1971-1972.			
1411		4/11/2013	Deposition of Theodore Hubbard, Argento and Kaenzig v CB Chrystal, et al, 4/11/13.			
1412		1972-1987	WCD Positive Testing Chart- Asbestos Confirmed by PLM and Asbestos by XRD, no PLM Results Reported, 1972-1987.			
1413		1983-1993	ES Laboratories Testing of 1625 Talc for Whittaker, Clark & Daniels, 1983-1993; WCD-ROY-001239 and various bates.			
1414			All Documents Showing Whittaker, Clark & Daniels or Brenntag Specialties Membership in Trade Organizations			
1415			All Documents Produced by Whittaker, Clark & Daniels or Brenntag Specialties in this Case			
1416			All Documents Produced by Whittaker, Clark & Daniels or Brenntag Specialties in any Case			
1417			All Documents Discussed or Attached to any Whittaker, Clark & Daniels or Brenntag Specialties Corporate Representative Deposition			
1418			All Documents Discussed, Cited or Attached to any Expert Report			
1419			All Documents Discussed, Cited or Attached to any Expert Deposition			
1420			All Documents Attached In Response to Any Motions Filed in this Case			
1421			Whittaker, Clark & Daniels or Brenntag Specialties 10-K, 10-Q and Annual Reports			
1422		1/1/2002	Tabulation of Asbestos-Related Terminology, H Lowers, G Meeker, USGS, 2002.			
1423		10/17/2017	Cosmetics Q&A: Why are cosmetics not FDA-approved? 10/17/17. www.fda.gov/cosmetics/resources			
1424		1/1/1898	A Textbook of Mineralogy, ES Dana, 1898, 1908.			
1425		5/18/2003	US Geological Survey, Asbestos Bearing Talc Deposits, Southern Death Valley Region, 39th Forum on the Geology of Industrial Minerals, BS Van Gosen, HA Lowers, SJ Sutley, May 18-24, 2003.			
1426		1/1/2004	A USGS Study of Talc Deposits and Associated Amphibole Asbestos Within Mined Deposits of the Southern Death Valley Region, California. US Geological Survey Open-File Report 2004-1092, BS Van Gosen, HA Lowers, SJ Sutley, 2004.			
1427		1/1/2004	"Using the geologic setting of talc deposits as an indicator of amphibole asbestos content," BS Van Gosen, HA Lowers, SJ Sutley, Environmental Geology, 2004.			
1428		1/1/1967	"Mortality Among Talc Miners and Millers in New York State," Arch Environ Health, M Kleinfeld, J Messite, O Kooyman, M Zaki, 1967.			

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1429		7/1/1968	"Fibrous and Mineral Content of Cosmetic Talcum Products," LJ Cralley, MM Key, DH Groth, et al, American Industrial Hygiene Assoc Journal, July/August 1968.			
1430		1/1/1972	"Asbestosform Impurities in Commercial Talcum Powders," DW Snider, DE Pfeiffer, JJ Mancuso, The Compass of Sigma Gamma Epsilon. 1972.			
1431		8/3/1972	Letter to A Weissler, FDA, from SZ Lewin; Re: Analytical Results on 102 Talc Powders by X-Ray Diffraction Method, 8/3/72.			
1432		7/31/1973	FDA Memorandum to RM Schaffner, from A Weissler; Re: Summary and Comments on Prof Lewin's Analytical Results for Asbestos in Talc. 7/31/73.			
1433		12/1/1974	"Asbestos in Talc," AN Rohl, Environ Health Perspectives, December 1974.			
1434		12/1/1974	"Identification and Quantitation of Asbestos in Talc," AN Rohl and AM Langer, Environ Health Persp, December 1974.			
1435		1/1/1976	"Consumer Talcums and Powders: Mineral and Chemical Characterization," AN Rohl, AM Langer, IJ Selikoff, A Tordini, R Klimentidis, Journal of Tox and Enviro Health, 1976; Table 1: USA Consumer Talcs/ American OTC Products.			
1436		1/1/1984	"Evaluation by Electron Microscopy Techniques of Asbestos Contamination in Industrial, Cosmetic and Pharmaceutical Talcs," L Paoletti, S Caiazza, G Donelli, F Pocchiari, Regulatory Toxicology and Pharm. 1984.			
1437		1/1/1986	Asbestos E Talco: Determinazione Del Contenuto Di Particelle Minerali Fibrose in Polveri Di Talco Commerciali Mediante Tecniche Associate Di Microscopia Ottica [Asbestos and Talc: Determination of the Content of Fibrous Mineral Particles in Commercial Talcum Powders by Associated Techniques of Optical Microscopy], A Marconi, M Maccione, L Rossi, Med Lavoro. 1986.			
1438		1/1/1986	"Asbestos content of lung tissue in asbestos associated diseases: a study of 110 cases," PC Pratt, AR Brody, Br J Ind Med, 1986.			
1439		1/1/1990	"A Standard TEM Procedure for Identification and Quantitation of Asbestiform Minerals in Talc," T Kremer and JR Millette, The Microscope, 1990.			
1440		1/1/1994	"Asbestos-Related Disease Associated With Exposure to Asbestiform Tremolite," S Srebro, V Roggli, Am J Int Med, 1994.			
1441		1/1/1995	"Malignant Mesothelioma Associated with Low Pulmonary Tissue Asbestos Burdens: A Light and Scanning Electron Microscopic Analysis of 18 Cases," S Srebo, V Roggli, G Samsa, Mod Path. 1995.			
1442		1/1/2002	"Mesothelioma Among Workers in Asbestiform Fiber-bearing Talc Mines in New York State," M Hull, J Abraham, B Case, Ann Occup Hyg. 2002.			
1443		1/1/2002	"Tremolite and mesothelioma," VL Roggli, RT Vollmer, KJ Butnor, TA Sporn, Ann Occup Hyg, 2002.			
1444		4/20/2006	United States Environmental Protection Agency – Region IX, Response to the November 2005 National Stone, Sand & Gravel Association Report Prepared by the R.J. Lee Group, Inc, Evaluation of EPA's Analytical Data from the El Dorado Hills Asbestos Evaluation Project. 4/20/06			

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1445		1/1/2006	US Geological Survey, Mineralogy and Morphology of Amphiboles Observed in Soils and Rocks in El Dorado Hills, California, GP Meeker, HA Lowers, GA Swayze, et al, 2006.			
1446		1/1/2007	Translation of "Asbest in Talkumpudern und Speckstein – heutige," [Asbestos in talc powders and soapstone – the present state], Gefährstoffe – Reinhalt, M Mattenklott, 2007.			
1447		1/1/2008	"Separation and characterization of respirable amphibole fibers from Libby, Montana," JS Webber, DJ Blake, TJ Ward, Inhalation Toxicology, 2008.			
1448		1/1/2010	Volume 93: Carbon Black, Titanium Dioxide and Talc, IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, 2010.			
1449		1/1/2010	"Industrial-Grade Talc Exposure and the Risk of Mesothelioma," B Price, Crit Rev Toxicol, 2010.			
1450		9/1/2010	"Restrictive definition of asbestos and the assessment of potential health hazards: insights from Northern Chile," R Oyazun, J Lillo, J Oyazun, et al, International Geology Review, Vol 52, No 9, September 2010.			
1451		1/1/2012	IARC Monographs, Arsenic, Metals, Fibres, and Dusts - Volume 100 C - A review of human carcinogens, 2012.			
1452		1/1/2012	"Malignant Mesothelioma Incidence Among Talc Miners and Millers in New York State," M Finkelstein, Am J Indust Med, 2012.			
1453		1/1/2013	"Pneumoconiosis and Malignant Mesothelioma in a Family Operated Metal Casting Business That Used Talc from New York State," M Finkelstein, Am J Indust Med, 2013.			
1454		1/1/2014	"Asbestos in commercial cosmetic talcum powder as a cause of mesothelioma in women," R .Gordon, S Fitzgerald, JR Millette, Int J Occup Environ Health, 2014; Erratum in Int J Occup Environ Health. 21(4): 347-348. 2014.			
1455		1/1/2015	"Procedure for the analysis of talc for asbestos," JR Millette, The Microscope, 2015.			
1456		1/1/2014	"Response to Gordon - Asbestos in commercial cosmetic talcum powder as a cause of mesothelioma in women," Int J Occup Environ Health, 2014; Int J Occup Environ Health. 21(4):342-6, 2015.			
1457		6/17/1973	Newspaper Article - Doctor Admits He May Have Been Mistaken, Home News, 6/17/73; JNJ000343318.			
1458		12/4/2015	ANSES Opinion (French Agency for Food, Environmental and Occupational Health & Safety) on "Health Effects and the Identification of cleavage fragments of amphiboles from quarried minerals." 12/4/15.			
1459		9/1/2017	MAS Project 14-1852: Below the Waist Application of Johnson & Johnson Baby Powder, WE Longo, MW Rigler, WB Egeland, September 2017.			
1460		9/12/2018	Letter concerning: 'Response to: 'The epidemiology of malignant mesothelioma in women: gender differences and modalities of asbestos exposure' by Marinaccio et al', MM Finkelstein, Occup Environ Med. 9/12/18.			
1461		2/7/1997	Letter to F Mebus, Specialty Minerals, from GR Dunmyre, RJ Lee; Re: TEM Asbestos Results for Samples LV #06074-0000, -00001 and -00002. 2/7/97; FosVan00159-160.			
1462		4/15/2008	Report of Results: MVA7459: Analysis of Talc Powder, JR Millette, MVA Scientific, 4/15/08.			

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1463		4/15/2008	Analysis of Talc Sample 7459-T0896, Paul & Hanley, MD Mount, MVA Scientific, 4/15/08.			
1464		1/28/2013	Report of Results: MVA9471: Analysis of Snow Goose Talc 400S, SP Compton, JR Millette, 1/28/13.			
1465		7/8/2015	Report of Results: MVA11054: Analysis of Grantham Mine Talc for Asbestos, SP Compton, 7/8/15.			
1466		1/1/1972	A Report to the Consumer, "Asbestos & Talc," I Honoroff, 1972; CRMC-Talc-Micro-001603-6; Affidavit.			
1467		11/8/1983	Letter to M Novitch, FDA, from P Douillet; Re: Petition for labeling of warning of the hazardous effects produced by asbestos in cosmetic talc, 11/8/83; PCPC000587-592.			
1468		3/1/1976	Memorandum of a Telephone Conversation between Dr RL Shapiro and Dr A Langer, Mt Sinai, 3/1/76.			
1469		3/10/1976	Newspaper Article - Asbestos Found in Ten Powders, New York Times, 3/10/76; CPC-BCALTRSCPT00000891.			
1470		3/26/1976	Newspaper Article - Talcum Study Clarified by NY Hospital, M Burros, The Washington Post, 3/26/76; TI06930961.			
1471		6/16/1972	Newspaper Article - High Levels of Asbestos Found in 3 Paints and 2 Talcums Here, G Lichtenstein, New York Times, 6/16/72.			
1472		9/3/1972	Talc Analyses (Asbestos), Product Number 1615, Italy, SZ Lewin, NYU, 9/3/72; WCD002473-2475.			
1473		10/19/1973	Letter to F Roesch, Whittaker, Clark & Daniels, from GW Sandland, Bristol Myers; Re: Six samples of talc, 10/19/73; Report of CTFA Talc Subcommittee on Method to Detect Chrysotile and Tremolite in Talc, 12/10/73; WCD000141; WCD000115-122			
1474		12/15/1972	Letter to GW Wright, Saint Luke's Hospital, from FL Pundsack, Johns-Manville; Re: Stanton samples for experimental work in rats, 12/15/72; CRMC-Talc-Micro-000053; Affidavit.			
1475		3/22/1976	Memorandum of Meeting at Environmental Sciences Laboratory, Mt Sinai School of Medicine; Re: Analytical Methodology for the Detection and Determination of Asbestos Minerals in Talc, 3/22/76; HHS00000018-21; FDA Letter attached.			
1476		1/1/1985	"Peritoneal mesothelioma and malignant lymphoma in mice caused by fibrous zeolite," M Ozesmi, et al, British Journal of Industrial Medicine, 1985.			
1477		7/8/1977	Letter to CS Thompson, RT Vanderbilt, from W Ashton; Re: Attached letter re Talc sample FD-14, 7/8/77; Memo to AJ Goudie, from FR Rolle; Re: Characterization of Tremolite-Talc, FD-14 (Dr W Smith, Farleigh Dickinson University), 5/25/72.			
1478		1/1/2014	Chrysotile Asbestos, WHO, 2014.			
1479		Undated	Color Photographs of AGI 1615 Italian Talc			
1480		7/19/1971	FDA to Convene As Hoc Cmte on Talc, FDC Reports, 7/19/71; PFZ001162 00064.			
1481		1/1/2002	"Cosmetic Talc Should Not Be Listed as a Carcinogen: Comments on NTP's Deliberations to List as a Carcinogen," AP Wehner, Regulatory Toxicology and Pharmacology, 2002.			
1482		1/1/1977	"Inhalation of Talc Baby Powder by Hamsters," AP Wehner, GM Zwicker, WW Carlton, et al, Fd Cosmet Toxicol, 1977.			
1483		8/3/1971	Memorandum of a Symposium, Asbestos and Talc, A Weissler, FDA, 8/3/71.			

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1484		10/31/1968	Johns-Manville Report 404-39; Title: Body Talcum Powders - Petrographic Examination, 10/31/68; CRMC-TALC-000053-54; Affidavit.			
1485		7/11/1986	Letter to P Douillet, from HJW Swanson, FDA; Re: Response to November 8, 1983 Citizen Petition, Docket No 83P-0404, 7/11/86; FDA000003601-3700; Affidavit.			
1486		1/1/1971	Talc (fibrous) - Tremolite, 1971.			
1487		10/29/1973	Johns-Manville Report 414-3, Discussion, 10/29/73; MTC 000563-591; Affidavit.			
1488		4/6/1984	Cyprus Memo to GD Lessner, from HM Harlan; Re: Willow Creek Mine and Greenhorn Claim, Madison County, Montana, 4/6/84; CPC-BCALTRSCPT00000892-902.			
1489		1/1/1926	Talc Deposits of Canada, ME Wilson, Economic Geology Series No 2, 1926.			
1490		3/1/1951	Talc Investigations in Vermont: Preliminary Report, Geological Survey Circular 95, AH Chidester, MP Billings, WM Cady, March 1951.			
1491		7/13/1971	FDA Memorandum from RM Schaffner; Re: Meeting on Investigation of talcum powder, July 8, 1971, 7/13/71.			
1492		3/23/1972	Memorandum of Conference between the FDA and Selikoff and Staff; Re: Medical Hazards of Asbestos, Talc and Other Mineral Particles, 3/23/72.			
1493		7/1/1971	FDA Memorandum to MD Kinslow, from EL Brisson; Re: Asbestos in Baby Powder, 7/1/71.			
1494		9/30/2000	Evaluation of the Market for Talc in Cosmetic Applications, Chemical Contract Marketing, 9/30/00; IMERYS147287-306.			
1495		4/18/1979	Letter to AM Harvey, RT Vanderbilt, from HR Ludwig, NIOSH; Re: Identification of 100 Talc Samples analyzed under Contract No CDC-210-75-0063 by McCrone, 4/18/79; CAMC-Herford-000173-200; Affidavit.			
1496		12/20/1973	Letter to Hearing Clerk, FDA, from RG Draftz, IIT Research Institute; Re: Comments on Proposed Standards for Asbestos Particles in Talc, 12/20/73; JNJNI61_000020261-264.			
1497		1/1/2014	Stimuli to the Revision Process: Modernization of Asbestos Testing in USP Talc, LH Block, D Beckers, K Moore, et al, 2014.			
1498		9/13/2016	Generally Recognized as Safe (GRAS), FDA SCOGS, 9/13/16.			
1499		Undated	Slide - Three Types of Asbestos, Undated.			
1500		Undated	Slide - Tools for State-of-the-Art Testing, Undated.			
1501		4/7/2017	About USP, www.usp.org/print/about-usp , 4/7/17.			
1502		1/1/2011	Revision Bulletin, Talc, USP, 2011.			
1503		3/31/2017	Ingredients - Talc, FDA; www.fda.gov/cosmetics/productsingredients , 3/31/17.			
1504		8/11/1972	Memorandum of Meeting between FDA Representatives and CTFA, Johnson & Johnson, et al; Re: Asbestos in Cosmetics Containing Talc, Such as Dusting Powders and Face Powders, 8/11/72.			
1505		3/12/1973	Letter to the Editor from SZ Lewin - Asbestos Report, Wall Street Journal, 3/12/73; JNJMX68 000004614.			
1506		7/10/1973	Memorandum to G Thompson, FDA, from SZ Lewin, NYU; Re: Determination of Asbestos Contents of Commercial Talcum Powders, Attachment to Table I, 7/10/73.			
1507		12/4/2015	FDA Documents Responsive to FOIA Request 2015-9061, 12/4/15; Affidavit.			
1508		8/13/1949	"Asbestosis and Cancer of the Lung," JAMA, 8/13/49.			

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1509		7/20/1972	FDA Memorandum to RM Schaffner, from A Weissler; Re: Background Memorandum on Asbestos in Talc, 7/20/72; AV RODRIGUEZN-0001763-66.			
1510		9/26/2013	Letter to L Kagan, Levy Phillips & Konigsberg, from ML Lazarus, Hoagland Longo; Re: Kaenzig v Whittaker Clark & Daniels, 9/26/13; Certification of Robert Patrick Nolan, 9/26/13.			
1511		1/1/1942	"Commercial Talc: Animal and Mineralogical Studies," RZ Schulz, CR Williams, Industrial Hygiene & Toxicology, 1942.			
1512		8/23/1976	"Asbestos Minerals and Their Non-Asbestos Analogs," SG Ampian, Review of Mineral Fibers Session of Electron Microscopy of Microfibers, Pennsylvania State University, August 23-25, 1976; INJINI 61 000009102-9131.			
1513		1/1/1981	"Pulmonary Pathology in Workers Exposed to Nonasbestiform Talc," NV Vallyathan, JE Craighead, Human Pathology, January 1981.			
1514		1/1/1974	"The Effects of the Inhalation of Asbestos in Rats," JC Wagner, G Berry, et al, Br J Cancer, 1974.			
1515		3/23/1976	CBS Channel 2 News Report regarding Mt Sinai Testing of Baby Powders, 3/23/76; LoGiudice/WCD/0396.			
1516		3/5/1979	Talc Analysis (Asbestos), 156 Talc, Vermont, McCrone, MA-3591, 3/5/79; WCD-Greco 000048-52.			
1517		8/3/1971	Discussion Session on "Asbestos and Talc," FDA, 8/3/71.			
1518		12/14/1979	Pfizer Memo to PR Saueracker, from DG Brant; Re: Montana Talc at Victorville, 12/14/79.			
1519		6/30/1980	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #5210, 6/30/80; WCD002181.			
1520		9/17/1980	Talc Analysis (Asbestos), 156 Talc, Vermont, ES Laboratories, ES 5279, 9/17/80; WCD-Greco 000158-161.			
1521		2/19/1983	Newspaper Article - Company News; Cyanamid to Close Facility in New Jersey, New York Times, 2/19/83.			
1522		11/18/1983	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #6544, 11/18/83; WCD001756.			
1523		3/13/1984	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report, 3/13/84; WCD001762.			
1524		4/26/1984	Letter to GJ Dippold, WCD, from WJ Campbell, Bureau of Mines; Re: Analysis of 18 talc samples received in March 1984, 4/26/84; WCD000928-930.			
1525		5/3/1984	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #6790, 5/3/84; WCD002794.			
1526		11/3/1986	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7966, 11/3/86; WCD002748.			
1527		11/6/1984	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7090, 11/6/84; WCD001773.			
1528		11/6/1984	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7090, 11/6/84; WCD002799.			
1529		4/5/1985	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7255, 4/5/85; WCD002733.			
1530		7/11/1985	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7361, 7/11/85; WCD002736.			
1531		1/27/1986	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7590, 1/27/86; WCD002739.			
1532		7/16/1986	Talc Analysis, Whittaker, Clark & Daniels, ES Laboratory Report ES #7823, 7/16/86; WCD002745.			
1533		1986-1987	Tremolite Test, K Lehman, Cyprus Industrial Minerals, 1986-1987; LEHMAN01696 and various bates.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1534		7/2/1974	Johns-Manville Memo to W VanDerBeeck, from WB Reitze; Re: Los Angeles Talc Plant, 7/2/74; CRMC-Talc-Micro-001927; Affidavit.			
1535		10/6/1971	FDA Memo to Participants in "Asbestos and Talc" Discussion Session at FDA on August 3, 1971, 10/6/71.			
1536		12/10/1976	Letter to H Letterman, Bristol-Myers, from LB McCrone; Re: Analysis of Talc Samples, 12/10/76.			
1537		1/7/1976	FDA Memo to to HJ Eiermann, from RL Yates; Re: Tabulated Results of DCST's Analyses for Asbestos Minerals in Lewin, Field Activity Surveillance (FAS), Investigational and Consumer Talc Products. 1/7/76: HHS00000152-166.			
1538		9/1/2017	SGPB:11: Cosmetic Talc Report, J Webber, Webber Environmental Health Consulting, 9/1/17.			
1539		10/1/1992	North Eastern Ores of the Luzenac Group, 10/1/92; IMERYS416223-268.			
1540		6/7/1972	Fed Reg Part 1910 Occupational Safety and Health Standards: Standards for Expsoure to Asbestos Dust, 6/7/72.			
1541		6/24/2015	Certification of Leah C Kagan, Fishbain v Colgate-Palmolive, et al, 6/24/15.			
1542		1/1/1944	Chapter 88: Occupational Disease Law, State of New Jersey, 1944.			
1543		1/4/1962	"Fatal Aspiration of Talcum Powder By a Child: Report of a Case," JJ Molnar, G Nathenson, S Edberg, NEJM, 1/4/62.			
1544		8/29/1975	Walk Through Industrial Hygiene Survey, The Hitchcock Corporation, Murphy, North Carolina, JM Dement, NIOSH, 8/29/75.			
1545		9/28/1977	Cosmetic Regulatory Activities: Past, Present and Future, HJ Eiermann, FDA, Midwest Chapter of the Society of Cosmetic Chemists. 9/28/77: Mennen-00003119-3121.			
1546		10/4/1983	United States Patent 4,407,789 for Ground Rice Hulls in Body Powders, Colgate-Palmolive, 10/4/83.			
1547		4/13/1976	Talc Analysis (Asbestos) 1615 Talc, Italy, McCrone MA-3591, 4/13/76; ITA-Polakow-000544-548.			
1548		7/17/1991	Colgate Memo to B Pierce, from S De Salva; Re: Talc - Hong Kong, 7/17/91; QE-CPC00000082.			
1549		9/6/1973	Letter to R Schaffner, FDA, from CH Costello, Colgate; Re: Asbestos in Talc, 9/6/73.			
1550		Undated	An Analysis of Our Talc Competitors, Johns-Manville Desertalc, Undated.			
1551		5/8/1973	"Characteristics of Talc Dusts," RS Lamar, Proceedings on the Symposium on Talc, Information Circular 8639, 5/8/73.			
1552		1/1/1921	Counties of California - Mineral Production and Significant Mining Activities of 1949, California Journal of Mines and Geology, 1921.			
1553		8/1/1950	Bulletin 156: Mineral Commodities of California: Geologic Occurrence, Economic Development, and Utilization of the State's Mineral Resources, August 1950.			
1554		5/1/1977	Appendix A: Data Summary, Analysis of Talc by X-Ray Diffraction and Polarized Light Microscopy, WC McCrone & Associates, May 1977.			
1555		1/1/1948	Bulletin No 56: Talc Deposits of the Murphy Marble Belt, EC Van Horn, North Carolina Dept of Conservation and Development, 1948.			
1556		3/1/1992	Health Assessment Document for Talc, US EPA, March 1992.			
1557		3/9/1976	Newspaper Article - Asbestos in talc powders dangerous, S Johnson, The Citizen, Ottawa, 3/9/76; CPC-BCALTRSCPT00000984-85.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1558		1/1/1976	"The Geology of Montana Talc Deposits," RH Olson, Eleventh Industrial Minerals Forum, Special Publication 74, Montana College of Mineral Science and Technology, State of Montana, 1976; CPC-BCALTRSCPT00001094-1139.			
1559		8/16/2012	Talc in Cosmetics, www.fda.gov, 8/16/12; CPC-BCALTRSCPT00001180-85.			
1560		3/19/1976	FDA Memorandum to Acting Director, from RM Schaffner, Associate Director for Technology; Re: Asbestos in Talc - Proposed Regulation. 3/19/76.			
1561		3/8/1976	Newspaper Article - Asbestos Fibers Found in Baby Powder, The Washington Post, 3/8/76.			
1562		5/1/1968	"Triclinic Talc and Associated Amphiboles from Gouverneur Mining District, New York," M Ross, WL Smith, WH Ashton, The American Mineralogist, Vol 53, May-June 1968.			
1563		9/4/1973	Johns-Manville Memo to RS Lamar, from VE Wolkodoff; Re: Petrographic Calculation of Chrysotile and Tremolite - Family Fibers in Commercial Talcs by FDA Proposal of August 20, 1973, 9/4/73; CRMC-Talc-Micro-001352-1353; Affidavit.			
1564		7/8/1971	Memorandum of Meeting at FDA; Re: Contamination of Talc with Asbestos, 7/8/71.			
1565		3/15/1976	Memorandum of Meeting Between FDA Representatives and Industry Representatives; Re: Asbestos in Talc, 3/15/76.			
1566		10/1/1974	FDA Memorandum to VO Wodlicka, from HJ Eiermann; Re: Asbestos Contamination of Cosmetic Talc, 10/1/74.			
1567		1/1/1979	Memoir 45: Talc and Chlorite Deposits in Montana, RB Berg, Montana Bureau of Mines and Geology, 1979; GUNTER0000081483.			
1568		9/8/1972	Letter to AJ Goudie, Johnson & Johnson, from JM Wehrung, Sperry Rand; Re: Asbestoform particles, 9/8/72; JNJ000248953-954.			
1569		1/1/1998	Map showing areas with potential for talc deposits in the Gravelly, Greenhorn, and Ruby Ranges and the Henrys Lake Mountains of southwestern Montana, BS Van Gosen, RB Berg, JM Hammarstrom. USGS. 1998.			
1570		4/4/2016	Beaverhead Mine, Madison County, Montana, USGS, 4/4/16.			
1571		4/4/2016	Panamint Mine, Death Valley, Section III: Inventory of Historical Resources, The West Side, 4/4/16.			
1572		Undated	Plant Listing for the Talc and Soapstone Industry, Undated.			
1573		9/22/2008	The structure of the talc supply market, M O'Driscoll, Industrial Minerals, Presented at the 3rd China Liaoning International Magnesia Materials Exposition, September 22-24, 2008.			
1574		1/1/1967	Geology of Madoc and North Huntingdon Townships, Hewitt, Ontario Dept of Mines Open File Report 5000, 1967.			
1575		11/1/2001	Correspondence between RT Vanderbilt and CDC regarding Analysis of Talc by X-Ray Diffraction, 1979; Affidavit of Louise Moore, 11/1/01; QE-CPC00004048-75.			
1576		8/18/2012	Obituary for Heinz Josef Eiermann, 8/18/12.			
1577		8/8/1978	Lack of Authority Hampers Attempts to Increase Cosmetic Safety, Report to the Congress by the Comptroller General of the United States, HRD-78-139. 8/8/78.			
1578		9/8/2015	"The Hard Truth About the Softest Mineral: Tougher Testing Sought to Detect Asbestos in Talc," M Levin, Fair Warning, 9/8/15.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1579		1/1/2006	"Talc," EF McCarthy, NA Genco, EH Reade, Industrial Minerals & Rocks: Commodities, Markets, and Uses, 7th Edition, JE Kogel, NV Trivedi, JM Barker, ST Krukowski, Eds, 2006.			
1580		4/16/1979	Letter to WC McCrone, from HR Ludwig; Re: 100 Talc Samples under Contract CDC 210-75-0063, 4/16/79; CAMC-Logiudice-002711-16.			
1581		1/1/1977	Selected Silicate Minerals and Their Asbestiform Varieties: Mineralogical Definitions and Identification-Characterization, Bureau of Mines Information Circular 8751, 1977; CAMC-Logiudice-004141-202.			
1582		2/14/1973	Johns-Manville Memo to PA Martinson, from S Speil; Re: Talc Producers' Association (Proposed), RS Lamar's letter of January 31, 1973, 2/14/73; CRMC-Talc-Micro-000513-15.			
1583		6/27/1972	Desert Minerals Memo to EB Smith, from NB Scheffel; Re: Talc Producers Meeting June 1, 1972, 6/27/72; CRMC-Talc-Micro-004966-71.			
1584		10/19/1972	Johns-Manville Memo to EB Smith, from RS Lamar; Re: XRD analysis of talc samples for simulated bag tests at Lompoc per OSHA, 10/19/72; CRMC-Talc-Micro-004874-81; Affidavit.			
1585		1/1/1972	Translation - Tumors in Rats After the Intraperitoneal Administration of Fibrous Dusts, F Pott, KH Friedrichs, Medical Inst of Atmospheric Hygiene and Silicosis Research, Naturwissenschaften, 1972: JNJ000249494-497.			
1586		6/17/1972	Newspaper Article - Talc Warning Is Labeled False, G Lichtenstein, New York Times, 6/17/72; JNJ000244804			
1587		6/27/1972	NIOSH Memo Re: Talcum Experiment, RD Zumwalde, 6/27/72; JNJ 000260698-99.			
1588		7/14/1972	Talc Analysis (Asbestos), Product Number 156, Vermont, ES Laboratories, 7/14/72; WCD Greco 000094-95.			
1589		9/30/1972	Letter to GJ Dippold, Whittaker, Clark & Daniels, from SZ Lewin, New York University; Re: Analysis of four most recent talc samples, 9/30/72.			
1590		9/30/1972	Talc Analysis (Asbestos) Product 1615, Italy, SZ Lewin, 9/30/72; WCD002473; Letter to GJ Dippold, from Lewin, NYU; Re: Analysis of 4 recent talc samples, 9/30/72; WCD002474.			
1591		1/1/1980	The Particle Atlas, Volume VI: Electron Optical Atlas and Techniques, Vol VI, WC McCrone, J Brown, Ian Stewart, Edition Two, 1980.			
1592		1/1/1980	The Particle Atlas, Volume I: Principles and Techniques, WC McCrone, JG Delly, Edition 2, 1980.			
1593		11/1/1989	"The Regulatory and Mineralogical Definitions of Asbestos and Their Impact on Amphibole Dust Analysis," JW Kelse, CS Thompson, American Industrial Hygiene Association Journal, 50(11):613-622. November 1989.			
1594		1/1/1990	"Health Effects of Tremolite," H Weill, et al, Am Rev Respir Diseases, 1990.			
1595		1/1/1991	"Health Effects of Tremolite, Now and in the Future," BW Case, Annals of The New York Academy of Sciences, The Third Wave of Asbestos Disease: Exposure to Asbestos in Place, Vo. 643, 1991.			
1596		5/1/1995	ISO 10312 (International Standard), Ambient Air - Determination of asbestos fibres - Direct transfer transmission electron microscopy method, First Edition, 5/1/95.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1597		3/1/2001	Some Facts About Asbestos, US Geological Survey (USGS) Fact Sheet, FS-012-01, March 2001.			
1598		1/1/2008	"Asbestos: By Any Other Name, Is It Still?" R Glenn, RJ Lee, et al, Bureau of National Affairs (BNA), Occupational Safety & Health Reporter, 2008.			
1599		1/1/1993	Chapter 12: Health Effects of Mineral Dusts Other Than Asbestos, M Ross, WC Cooper, Health Effects of Mineral Dusts, Reviews in Mineralogy, Vol 28, GD Guthrie, BT Mossman, Eds, 1993: JN1000089019-43.			
1600		1/1/2011	"Applying Definitions of 'Asbestos' to Environmental and 'Low-Dose' Exposure Levels and Health Effects, Particularly Malignant Mesothelioma," BW Case, et al, J Toxicol & Environ Health, Part B, 2011.			
1601		1/1/2011	Exemplar: Asbestos, Risk Assessment, Epidemiology, and Health Effects, Second Edition, RF Dodson, SP Hammar, 2011.			
1602		6/4/2012	Position Statement on Asbestos, Joint Policy Committee of the Societies of Epidemiology (JPC-SE), 6/4/12.			
1603		1/1/2013	"Asbestos," US Dept of Labor, OSHA website: https://www.osha.gov/SLTC/asbestos , 2013.			
1604		4/1/2016	"Measurement of Fibers," PA Baron, NIOSH Manual of Analytical Methods (NMAM), 5th Edition, April 2016.			
1605		4/5/2018	Definition of "crystal habit." Printed April 5, 2018 from http://www.dictionary.com/browse/crystal-habit .			
1606		Undated	Slide picture, "Asbestos" - Anthophyllite Asbestos and Tremolite Asbestos			
1607		Undated	Slide picture, "Asbestos" - Chrysotile, Crocidolite, and Amosite			
1608		2/1/1974	"Detection and Determination of Chrysotile in Talc," HA Rose, Journal of Pharmaceutical Sciences, February 1974.			
1609		7/1/1984	EPA Report - DRAFT - "Methodology for the Measurement of Airborne Asbestos By Electron Microscopy," G Yamate, et al, July 1984.			
1610		7/1/1993	EPA Test Method - "Method for the Determination of Asbestos in Bulk Building Materials." EPA/600/R-93/116, July 1993.			
1611		11/17/1994	Asbestos Sampling, SOP# 2015, EPA, 11/17/94.			
1612		8/1/2004	"A Discussion of Asbestos Detection Techniques for Air and Soil," Prepared by Anthony Perry for US EPA, August 2004.			
1613		1/1/2008	D 5756-02 - Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Mass Surface Loading, 2002, Reapproved 2008.			
1614		4/1/2011	"USP Expert Panel on Talc," Posted April 1, 2011 on www.usp.org (U.S. Pharmacopeial Convention)			
1615		4/29/2011	USP on Talc, "Talc-Revision Bulletin: POSTPONEMENT," Date: April 29, 2011 (U.S. Pharmacopeial Convention)			
1616		8/1/2011	USP on Talc, "Revision Bulletin - Talc," The United States Pharmacopeial Convention, 8/1/11.			
1617		2/8/2012	Standard Test Method for Determination of Asbestos in Soil, ASTM, Work Item No. WK17170, 2/8/12.			
1618		4/29/2014	Email to RJ Lee, from ASTM Committee D22 Staff Manager David Bradley; Re: ASTM-Draft Method-Use In Court, 4/29/14.			
1619		6/18/2014	"USP Priority Excipient Monograph Modernization Updates," The USP Excipients Stakeholder Forum, Meeting #2, 6/18/14.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1620		9/1/1966	"Geology and Genesis of the Talc Deposits in the Pinerolese," L Peretti, Bulletin of the Subalpine Mining Association - Year III, No 3-4, September - December 1966; Affidavit; Italian version attached.			
1621		9/29/1971	Letter to M Berdick, Chesebrough-Ponds, from McCrone; Re: Pond's Talc Samples, 9/29/71; Letter to CU Driscoll, WCD, from M Berdick; Re: McCrone Report dated September 29, 1971, 10/11/72; Letter to M Berdick, from FF Roesch, WCD; Re: McCrone Report 10/16/72			
1622		12/8/1972	Pfizer Memo to JE Clements, Coty, from HD Stanley; Re: Asbestos in Talc, 12/8/72; PFE-Hug00007104-7123			
1623		1/1/1976	"Mortality study of talc miners and millers," GF Rubino, G Scansetti, G Piolatto, CA Romano, J Occup Med, 1976.			
1624		1969-1992	Briscese Lab Notebook (1969-1992). D's Exhibit 6472 in Winkel Trial (2015). Bates# CPC-NB000000001 - 00001277. See pgs. CPC-NB00000053-61; 336-345.			
1625		3/17/1976	Letter to TC Chalmers, from AM Langer; Re: The Ongoing Talc Study in the Environmental Sciences Laboratory, 3/17/76.			
1626		9/21/1976	Pfizer Memo to T Johnson, Coty Div, from FW Mebus; Re: Analysis of six samples of talc 1615, 12/21/76 & Various Dates; (Redacted) 38pgs.			
1627		11/9/1977	Colgate Sample Talc 1615, Lab #4811, MA Project 5500, 11/9/77; McCrone 0077.			
1628		11/16/1977	McCrone Tests on Colgate talc, set 1 of 2, 1970s-1980s; COL 00477-701/ McCrone 0001-0226; See McCrone 0075, 11/16/77.			
1629		5/15/1984	MSHA Inspection Report, South Plainfield Mill, Cyprus Industrial Minerals Co, 5/15/84; CAMC-Herford-000119-125.			
1630		11/20/1986	Fax to K Lehman, from B Anderson; Re: Tremolite Test, 11/20/86; Lehman 01696-1839.			
1631		10/10/1988	"Geology of the Italian high-quality cosmetic talc from the Pinerolo district (Western Alps)," Sandrone and Zucchetti, Zuffar Days - Symposium Held in Cagliari, October 10-15, 1988.			
1632		4/8/2008	"Rodoretto talc mine (To, Italy): studies for the optimization of the cemented backfilling," D Peila, C Oggeri, et al, RMZ-Materials and Geoenvironment, Vol 55, No 2, 4/8/08.			
1633		1/1/2015	"Critical reappraisal of Balangero chrysotile and mesothelioma risk," E Ilgren, et al, Epidemiology Biostatistics and Public Health, 2015.			
1634		4/16/2009	Excerpt from the Deposition of Victor L Roggli, O'Boyle v AW Chesterton Company, et al, 4/16/09.			
1635		1/1/2017	"Letter on: 'Cosmetic talc as a risk factor for pleural mesothelioma: a weight of evidence evaluation of the epidemiology,'" D Mirabelli, Inhalation Toxicology, Vol 29, No 8, 2017.			
1636		1/1/1963	"Anthophyllite Asbestos in North Carolina," S Conrad, et al, NC Dept of Conservation & Develop/Div of Mineral Resources, Bulletin 77. 1963.			
1637		Undated	Personal Care Products That Contain Talc; IMERYS119354-119446.			
1638		10/13/1977	ES Laboratories, Talc Analysis of 156. Origin: Vermont, 10/13/77; WCD Greco 000008-11.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1639		5/26/1978	Talc Analysis (Asbestos), Product Number 156, Vermont, Product Lot # 236, ES Laboratories, 5/26/78; WCD Greco 000124-127.			
1640		1/24/1978	Talc Analysis of 156, Origin: Vermont, McCrone, 1/24/78; WCD Greco 000118-123			
1641		8/25/1978	Talc Analysis of 156. Origin: Vermont, McCrone, 8/25/78; WCD Greco 000128-132.			
1642		11/14/1978	Talc Analysis of 156. Origin: Vermont, ES Laboratories, 11/14/78; WCD Greco 000012-15.			
1643		2/13/1979	Talc Analysis of 156, Origin: Vermont, McCrone, 2/13/79; WCD Greco 000133-137.			
1644		7/1/1987	Talc Analysis (Asbestos), Product Number 156, Vermont, Product Lot # 9184, ES Laboratories, 7/1/87; WCD Greco 000084-86.			
1645		5/30/1989	Nichols (US Dept of Labor) response to May 30, 1989 FOIA request for fiber samples from talc mines in the Northeast United States; BASF RIMONDI 000170 to 207.			
1646		4/23/2018	Report of Results: MVA12588: Investigation of Vermont Talc Samples for Asbestos, SP Compton, 4/23/18 (and BACK UP DATA)			
1647		1/1/1984	"Letter to the Editor: Biological Effects of Fibers: Stanton's Hypothesis Revisited," J Dunnigan, Environmental Health Perspectives, 1984.			
1648		10/1/1969	"Asbestos and Health in 1969," G Wright, American Review of Respiratory Disease, October 1969; FDA00001819-1831.			
1649		1/1/1970	"Talc Pneumoconiosis: A Treated Case," RL Moskowitz, Chest, 1970.			
1650		1/1/1982	Definitions for Asbestos and Other Health-Related Silicates, ASTM STP 834, B Levadie, 1982; JNJ000280407-447.			
1651		1/1/1991	Correspondence: On talc, tremolite and tergiversation, BW Case, British Journal of Industrial Medicine, 1991.			
1652		1/1/1990	"Pulmonary Toxicity of Inhaled and Intravenous Talc," MA Hollinger, Toxicology Letters, 1990.			
1653		1/1/2000	"Talc Induces Apoptosis in Human Malignant Mesothelial Cells In Vitro," M Nasreen, et al, Am J Resp Crit Care Med, 2000.			
1654		1/1/1990	"Human Epidemiology: A Review of Fiber Type and Characteristics in the Development of Malignant and Nonmalignant Disease," JA Merchant, Environmental Health Perspectives, 1990.			
1655		1/1/1974	"Tumorigenic Effects of Fibrous Dust in Experimental Animals," F Pott, F Huth, KH Friedrichs, Environmental Health Perspectives, 1974.			
1656		6/1/1996	"Respiratory Disease as a Result of Talc Inhalation," G Scancarello, et al, JOEM, June 1996.			
1657		1/1/1981	"Relation of Particle Dimension to Carcinogenicity in Amphibole Asbestos and Other Fibrous Minerals," MF Stanton, et al, JNCI, 1981.			
1658		5/2/1978	RT Vanderbilt Memo to AM Harvey, from KC Rieger; Re: Characterization of CPS 275-1 and FD-14 Samples, 5/2/78.			
1659		Undated	Final Report on Biologic Tests on Sample CPS-275-1, WE Smith, Repoort Submitted to RT Vanderbilt, Undated.			
1660		1/1/1995	"Quantitative Comparison of Asbestos and Talc Bodies In An Individual With Mixed Exposures," RF Dodson, SP Hammar, et al, Am Journal of Industrial Medicine, 1995.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1661		1/1/2005	"An Autopsy Case of Primary Pericardial Mesothelioma in Arc Cutter Exposed to Asbestos Through Talc Pencils," F Fujiwara, et al, <i>Industrial Health</i> , 2005.			
1662		1/1/1991	"Translocation of Inhaled Asbestos Fibers from the Lung to Other Tissue," Y Suzuki, N Kohyama, <i>Am Journal of Industrial Medicine</i> , 1991.			
1663		1/1/1991	"Background Incidence of Mesothelioma: Animal and Human Evidence," EB Ilgren, <i>Regulatory Toxicology and Pharmacology</i> , 1991.			
1664		11/7/1986	Letter to H Wensley, Mass Dept of Health, from AG Wylie, Univ of Maryland; Re: Comments for Hearing, 11/7/86.			
1665		1/1/1982	"Biological Effects of Tremolite," JC Wagner, et al, <i>British Journal of Industrial Medicine</i> , 1982.			
1666		1/1/1985	"Inhalation Studies on the effects of tremolite and brucite dust in rats," JMG Davis, et al, <i>Carcinogenesis</i> , 1985.			
1667		1/1/1990	"Editorial: On talc, tremolite and tergiversation," R Geger, WKC Morgan, <i>British Journal of Industrial Medicine</i> , 1990.			
1668		1/1/1979	"Occupational Exposures to Non-Asbestiform Talc in Vermont," MG Boundy, JM Dement, et al, <i>Dusts and Disease</i> , RA Lemen, Ed, 1979.			
1669		1/1/1967	Practical Guide To The Recognition of Impurities in Talc, Societa Talco E Grafite Val Chisone, Undated; JNJ000270519-549.			
1670		1/1/1974	Table 3: Mineral Dusts, Title 296 WAC, Labor & Industries Occupational Health, 1974.			
1671		7/15/1999	Case Records of the Massachusetts General Hospital, Case 21-1999, <i>NEJM</i> , 7/15/99.			
1672		1/1/2001	"Letter to the Editor: Talc Should Not Be Used for Pleurodesis in Patients with Nonmalignant Pleural Effusions," RW Light, <i>Am J Resp Crit Care Med</i> , 2001.			
1673		9/1/1993	Toxicology and Carcinogenesis Studies of Talc in F344/N Rats and B6AC3F Mice (Inhalation Studies), National Toxicology Technical Report No 421, September 1993.			
1674		11/21/1976	Newspaper Article - Talc Workers Death Rate High, Rutland Herald, 11/21/76.			
1675		5/8/1973	Proceedings on the Symposium on Talc, Information Circular 8639, 5/8/73.			
1676		12/20/1977	General Electric Technical Information Series 77-MAI-017, Evaluation of Asbestos Content in Commercial Talcs, RJ Schoen, 12/20/77.			
1677		Undated	Talc, RJ Piniakiewicz, EF McCarthy, NA Genco, <i>Industrial Minerals and Rocks</i> , Undated.			
1678		11/2/1976	Newspaper Article - Exposure to Talc Dust May Be Related to Death of Workers, Health Unit Says, Wall Street Journal, 11/2/76.			
1679		Undated	"The Detection and Identification of Asbestos and Asbestiform Minerals in Talc," HD Stanley, 34th Annual EMSA Meeting, Undated.			
1680		Undated	Talc: Physical and Chemical Data, IARC Monographs, Vol 42, Undated.			
1681		4/1/1993	"Mortality and Cancer Incidence in a Cohort of Rubber Workers in Moscow," LG Solionova, <i>Scand J Work Environ Health</i> , April 1993.			
1682		1/1/1980	"The Comparative Effects of Three Chrysotiles by Injection and Inhalation in Rats," JC Wagner, G Berry, JW Skidmore, FD Pooley, <i>IARC</i> , 1980.			
1683		3/18/1976	FDA Memorandum to RM Schaffner, from HJ Eiermann; Re: Asbestos in Talc, 3/18/76; Kazan FDA FOIA 000067-69.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1684		3/25/1976	Memo to B Stephenson, from T Biesada; Re: Media Coverage - Talcs, 3/25/76; PFI KA 00000038-43.			
1685		3/27/1976	Newspaper Article - Less asbestos found in new talc, Toronto Star, 3/27/76; JNJ000277175.			
1686		7/18/1977	Proceedings of Workshop on Asbestos: Definitions and Measurement Methods, Attendance List and Excerpts, July 18-20, 1977.			
1687		12/7/1978	NIOSH Memo to SA Miller, from TM Quinn; Re: Status Report on Talc, 12/7/78.			
1688		7/15/1980	Transcript of Proceedings: National Workshop on Substitutes for Asbestos: Technical and Economic Aspects, EPA/CPSC, 7/15/80; CAMC-Greco-000305-363.			
1689		1/1/1955	"Talc Pneumoconiosis," M Kleinfeld, J Messite, IR Tabershaw, AMA Archives of Industrial Health, Vol 12, 1955.			
1690		1/1/1973	"A Study of Workers Exposed to Asbestiform Minerals in Commercial Talc Manufacture," M Kleinfeld, J Messite, AM Langer, Environmental Research, 6: 132-42, 1973.			
1691		5/1/1974	"Mortality Experiences Among Talc Workers: A Follow-Up Study," M Kleinfeld, J Messite, MH Zaki, Journal of Occupational Medicine, Vol 16, No 5, May 1974.			
1692		1/1/2002	"A Critical Review of Mesothelioma Among Workers in Asbestiform Fiber-bearing Talc Mines in New York State," MJ Hull, JL Abraham, BW Case, Ann Occup Hyg, 46 (Supp 1): 132-35, 2002. J Addison. Undated.			
1693		1/1/2004	"Reconstruction of a Century of Airborne Asbestos Concentrations," JS Webber, KW Jackson, PP Parekh, Environ Scit Tech, 38: 707-14, 2004.			
1694		3/1/1965	"Effect of Talc Dust Inhalation on Lung Function," M Kleinfeld, J Messite, J Shapiro, Arch Environ Health, Vol 10, March 1965.			
1695		2/1/1973	Biological Effects of Asbestos, National Institutes of Health, 2/1/73; FDA00001872-1971.			
1696		1/1/1980	"Asbestos Fibers in the General Population," A Churg, ML Warnock, American Review of Respiratory Disease, 1980.			
1697		1/1/1999	"Tissue Burden of Asbestos in Nonoccupationally Exposed Individuals From East Texas," RF Dodson, MG Williams, JR Bruce, Am J Ind Med, 1999.			
1698		7/30/1975	Health Study of Italian Talcs, "Mortality Study of Talc Miners and Millers, GF Rubino, et al, American Industrial Health Conference, April 14, 1975, Whittaker, Clark & Daniels, 7/30/75; LoGiudice/WCD/0322-335.			
1699		9/4/2000	"Talcum Powder, Anti-Perspirants & Deodorants Can Cause Cancer," I Hussain, OBGyn.net Forum, 9/4/00.			
1700		6/1/2000	"Executive Summary: A mortality study in the French talc producing industry," P Wild, June 2000.			
1701		1/1/1985	Talc and Pyrophyllite, Bureau of Mines Bulletin 675, Mineral Facts and Problems, 1985; CAMC-Greco-000367-380.			
1702		1/1/1990	"Similarities in Lung Cancer and Respiratory Disease Mortality of Vermont and New York State Talc Workers," SH Lamm, JA Starr, 1990.			
1703		2/1/1980	Occupational Exposure to Talc Containing Asbestos: Morbidity, Mortality and Environmental Studies of Miners and Millers, NIOSH Technical Report, JM Dement, RD Zumwalde, et al, February 1980.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1704		4/8/1993	State of Montana Letter from RA Miller; Re: Environmental Assessment, Regal Mine, Barretts Minerals fka Pfizer, 4/8/93.			
1705		12/31/1975	Letter to Dr F Haslam, BAT, from Moyler, Yardley; Re: Analysis of Italian Talc Batch 73859, 12/31/75.			
1706		5/22/2014	Letter to S Smith, Law Offices of Peter G Angelos, from S Fitzgerald, SIA; Re: AGI Talc Powder Testing, 5/22/14.			
1707		8/1/2017	Report of Results: MVA11730: Investigation of Italian Talc Samples for Asbestos, SP Compton, MVA, 8/1/17.			
1708		8/28/1973	Johns-Manville Memo to RS Lamar, from VE Wolkodoff; Re: Determination of Chrysotile by TEM in Commercial Talcs, 8/28/73; Affidavit.			
1709		4/6/2018	Analytical Test Report of the Gunter Argonaut Samples, M Gunter, RJ Lee, 4/6/18.			
1710		5/1/1977	NIOSH Results of Talc Samples from "Analysis of Talc by X-Ray Diffraction and Polarized Light Microscopy," PB84190651, May 1977; QE-CPC00004071-4075.			
1711		4/1/2008	"Le cave di serpentino: Nell'Intrico Normativo," F Bonomo, Molte Contraddizioni Nell'Uso Delle Pietre Verdi in Italia, April 2008.			
1712		1/1/2013	Statement on the Relative Vulnerability of Children to Asbestos Compared to Adults, Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment, CC/13/S1, UK, 2013.			
1713		2/18/2017	Glossary: Acicular, Imperial College Rock Library, 2/18/17.			
1714		1/1/1984	Glossary for Health-Related Silicates, ASTM, 1984; JNJ000280439-447.			
1715		1/1/1979	"Asbestiform and Acicular Mineral Fragments," T Zoltai, NYAS, 1979.			
1716		3/13/1974	WR Grace Memo to T Feit from JC Yang; Re: Current Activities on Tremolite Determination at Battelle Institute, 3/13/74.			
1717		5/22/1970	Desert Minerals Letter to Our Customers and Distributors, from EJ Ellsworth; Re: FDA Regulations Affecting Talc (Magnesium Silicate), 5/22/70; CRMC-Talc-Micro-004929-30.			
1718		9/26/1972	Desert Mineral Memo from FB Smith; Re: Meeting Call, Talc: FDA-OSHA Matters, 9/26/72; CRMC-Talc-Micro-004786-87.			
1719		10/3/1972	Letter to Hearing Clerk, FDA, from RP Carter, Johns-Manville; Re: Response to FDA proposed regulations governing the use of talc in food and food packaging material, 10/3/72; CRMC-Talc-Micro-004861-66.			
1720		11/30/1972	Desert Minerals Memo to HM Jackson, et al; Re: FDA- OSHA Talc Meeting, November 28, 1972, 11/30/72; CRMC-Talc-Micro-004829-34.			
1721		12/13/1972	Desert Minerals Memo to HR Keefe, from EB Smith; Re: Status Report FDA - OSHA Talc Considerations, 12/13/72; CRMC-Talc-Micro-004829-34.			
1722		12/15/1972	Desert Minerals Memo to FJ Solon, et al, from EB Smith; Re: FDA Response to Proposed Regulations for Talc, 12/15/72; CRMC-Talc-Micro-004829-34.			
1723		8/8/1972	Desert Minerals Memo to PA Martinson, from EB Smith; Re: OSHA, 8/8/72; CRMC-Talc-Micro-004943-44.			
1724		12/19/1972	Desert Minerals Memo to FJ Solon; Re: OSHA Talc Meeting, December 18, 1972, 12/19/72; CRMC-Talc-Micro-004816-18.			
1725		1/30/1975	Johns-Manville Memo to HR Keefe, from EM Fenner; Re: Talc Labeling, 1/30/75; CRMC-Talc-Micro-003031-33.			

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1726		2/3/1975	Johns-Manville Memo to EM Fenner, from HR Keefe; Re: Talc Label, Your Letter January 30, 1975, 2/3/75; CRMC-Talc-Micro-003009-10.			
1727		3/2/1973	Letter to Dr L Adamson and S Lang, Environmental Defense Fund, from A Weissler, FDA; Re: Reply to your letter about asbestos, 3/2/73; CRMC-Talc-Micro-002591-93; Affidavit.			
1728		3/20/1975	Johns-Manville Memo to PA Martinson, from RS Lamar; Re: An Assessment of the J-M Position with Talc, 3/20/75; CRMC-Talc-Micro-001835-1839; Affidavit.			
1729		11/21/1974	US Dept of Labor Field Information Memorandum #74-92 to OSHA Assistant Regional Directors and Area Directors, from BJ White; Re: Tremolite and Talc, 11/21/74; CRMC-Talc-Micro-003081-83.			
1730		1/11/1979	Letter to SM Wolfe and B Gordon, Public Citizen Health Research Group, from D Kennedy, FDA; Re: Your letter of August 4, 1978 and the question of talc carcinogenesis, 1/11/79.			
1731		8/4/1978	Letter to D Kennedy, FDA, from SM Wolfe and B Gordon; Re: Talc Carcinogenesis, 8/4/78.			
1732		3/23/1976	Memo to Editors, from Dr TC Chalmers, Mount Sinai; Re: Recent media reports concerning research on talc, 3/23/76.			
1733		3/9/1976	Memorandum of Telephone Conversations, from HJ Eiermann, FDA; Re: Asbestos in Talc, March 9-11, 1976.			
1734		3/9/1976	Memorandum of Telephone Conversation between Arthur Langer, Mt Sinai, and HJ Eiermann, FDA; Re: Asbestos in Talc, 3/9/76.			
1735		3/8/1976	Memorandum of Telephone Conversation between JD Klein, Channel 7 News, and HJ Eiermann, FDA; Re: Asbestos in Talc, 3/8/76.			
1736		6/19/1974	Letter to FDA, from HJ Knudsen, A/S Norwegian Talc; Re: Asbestos particles - FDA proposal on adulteration of food and drugs. Fed Reg Sept 28, 1973, page 27076, 6/19/74.			
1737		6/27/1973	Petition to FDA Requesting Immediate Promulgation of Regulations Under the Federal Food, Drug and Cosmetic Act to Prohibit the Adulteration of Food and Drugs with Asbestos, Center for Science in the Public Interest and Environmental Defense Fund. SH Lang 6/27/73.			
1738		10/5/1976	FDA Memo to GH Boone, from RL Yates; Re: Asbestos in Talc, 10/5/76.			
1739		12/2/1976	FDA Memo to RL Yates, Division of Cosmetics Technology, from TM Hopes; Re: Asbestos in Talc, 12/2/76; FDA Memo to GH Boone, from L Auerbach; Re: Results of Survey of Chrysotile and Tremolite Asbestos in Talc. 11/23/76.			
1740		1/7/1975	Memorandum of Meeting Between FDA Representatives and Cosmetic Industry Representatives; Re: Status of Regulations Regarding Asbestos in Talc. 1/7/75.			
1741		1/2/1975	Johns-Manville Memo to P Kotin, from HR Keefe; Re: Talc and Asbestos, 1/2/75; CRMC-Talc-Micro-003040-44.			
1742		1/7/1975	Johns-Manville Memo to HR Keefe, from RS Lamar; Re: Your Memo of January 2, 1975 to P Kotin, Talc and Asbestos, 1/7/75; NPCA Safety & Health Bulletin No 20: Talc and the OSHA Asbestos Standard 1910.93a, 12/5/74; CRMC-Talc-Micro-003060-66.			
1743		1/1/2006	"Asbestos in the Susa Valley and the rocks containing them," R Compagnoni, C Groppo, It Geol Soc Rep, 2006.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1744		11/1/2018	"Letter concerning: 'Response to: 'The epidemiology of malignant mesothelioma in women: gender differences and modalities of asbestos exposure' by Marnaccio et al,' A Marinaccio. et al. <i>Occup Environ Med.</i> November 2018.			
1745		1/1/2019	Chapter: Analytical Analyses of Human Tissues for the Presence of Asbestos and Talc, RE Gordon, <i>Electron Microscopy - Novel Microscopy Trends</i> , 2019.			
1746		1/1/2019	Chapter: Cosmetic Talcum Powder as a Causative Factor in the Development of Diseases of the Pleura, RE Gordon, <i>Diseases of Pleura</i> , 2019.			
1747		1/1/2019	Pre-Publication of "A 37-year update on mortality patterns in an expanded cohort of Vermont talc miners and millers," TA Fordyce, <i>JOEM</i> , 2019.			
1748		1/1/1943	"The Dust Hazard in Tremolite Talc Mining, Including Roentgenological Findings in Talc Workers," W Siegal, AR Smith, L Greenburg, <i>January 1943</i> .			
1749		3/1/1954	Fundamental Studies of Talc: I, Constitution of Talcs, JA Pask, MF Warner, <i>March 1954</i> .			
1750		6/1/1962	"On the Relative Stability of Talc, Anthophyllite and Enstatite," WS Fyfe, <i>American Journal of Science</i> , June 1962.			
1751		11/1/1967	Talc and Asbestos at Dadeville, Alabama, TL Neathery, et al, <i>Bureau of Mines Report 7045</i> , November 1967.			
1752		4/13/1968	"Correspondence: Asbestos Bodies," HC Lewinsohn, <i>BMJ</i> , 4/13/68.			
1753		1/1/1968	Talc and Anthophyllite Deposits in Tallapoosa and Chambers Counties, Alabama, TL Neathery, <i>Geological Survey of Alabama, Bulletin 90</i> , 1968.			
1754		7/1/1972	Fiber Exposure During Use of Baby Powders, JM Dement, RD Zumwalde, et al, <i>NIOSH</i> , July 1972.			
1755		9/28/1973	Asbestos Particles in Food and Drugs: Notice of Proposed Rulemaking, FDA, Fed Reg 21 CFR Parts 121, 128, 133, 9/28/73.			
1756		1/1/1977	"Nature and Range of Mineral Dusts in the Environment," DR Bowes, <i>Phil Trans R Soc Lond</i> , 1977.			
1757		7/15/1999	ISO Standard 13794 - Ambient air - Determination of asbestos fibres - indirect-transfer transmission electron microscopy method, <i>First Edition</i> , 7/15/99.			
1758		7/18/1977	Proceedings of Workshop on Asbestos: Definitions and Measurement Methods, July 18-20, 1977.			
1759		1/1/1983	"Identification of Chlorite and Serpentine in Cosmetic and Pharmaceutical Talc," AM Blount, AH Vassiliou, <i>Environmental Health Perspectives</i> , 1983.			
1760		1/1/1991	"Amphibole Content of Cosmetic and Pharmaceutical Talcs," AM Blount, <i>Environmental Health Perspectives</i> , 1991.			
1761		8/1/2010	"Asbestiform Antigorite - Implications for the risk of assessment of fibrous silicates," JL Keeling, MD Raven, PG Self, 21st Australian Clay Minerals Conference, August 2010.			
1762		2/25/1973	Talc or Soapstone? EH Bentzen, North Carolina State University, AIME Annual Meeting, February 25 to March 1, 1973; IMERYS432244-64.			
1763		5/2/1972	Letter to SM Jarrett, Bureau of Mines, from RC Bacon, RT Vanderbilt; Re: Your letter of April 25, 5/2/72; ING002050-2051.			
1764		6/17/1986	Occupational Exposure to Asbestos: Final Rule, OSHA, Fed Reg 29 CFR Parts 1910, 1915 and 1926, 8/10/94.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1765		10/1/2009	"Asbestos Sans Mineralogy? A View from a Different Hilltop," G Meeker, Elements, October 2009.			
1766		1/1/1978	"Variation of Properties of Chrysotile Asbestos Subjected to Milling," AM Langer, MS Wolff, AN Rohl, IJ Selikoff, JOTEH, 1978.			
1767		1/1/1980	"Characterizing and Discriminating the Shape of Asbestos Particles," HG Siegrist, AG Wylie, Environmental Research, 1980.			
1768		1/1/1980	"On the Milling and Ultrasonic Treatment of Fibres for Biological and Analytical Applications," KR Spurny, et al, IARC, 1980.			
1769		1/1/1980	On the Milling and Ultrasonic Treatment of Asbestos and Glass Fibers in Biological and Analytical Applications," KR Spurny, AIHA Journal, 1980.			
1770		10/9/1974	Letter to EB Vanderbilt, RT Vanderbilt, from JB Stender, OSHA; Re: Reply to your letter of September 26, 10/9/74; SW GOODHUE 000063.			
1771		1/1/1963	Mining and Milling Methods and Costs, Eastern Magnesite Talc Co, Johnson Mine, Johnson, VT, HL Burmeister, Bureau of Mines Information Circular 8142, 1963.			
1772		1/11/1972	Letter to OSHA, from IJ Selikoff, Mount Sinai; Re: Comments relative to proposed asbestos standards, 1/11/72.			
1773		3/24/2019	Analysis of Cashmere Bouquet Cosmetic Talcum Powder Products for Amphibole Asbestos Expert Report, WE Longo, MW Rigler, MAS, 3/24/19.			
1774		4/7/1955	"The Effects of Inhaled Talc-Mining Dust on the Human Lung," GWH Schepers, TM Durkan, AMA Archives of Industrial Health, 4/7/55.			
1775		10/1/1967	"Ovarian Cancer and Asbestos," J Graham, R Graham, Environmental Research, Vol 1, No 2, October 1967.			
1776		1/1/1978	Talc-coated rice as a risk factor for stomach cancer," GN Stemmerman, LN Kolonel, Am J Clin Nutr, 31: 2017-19, 1978.			
1777		1/1/1979	"Biologic Tests of Tremolite in Hamsters," WE Smith, DD Hubert, HJ Sobel, E Marquet, Dusts and Disease, 1979.			
1778		1/1/1979	"Significance of Aspect Ratio in Regulation of Asbestos Fiber Exposure," AM Langer, Health Hazards of Asbestos Exposure, IJ Selikoff and EC Hammond, Eds, 1979.			
1779		1/1/1979	"An Epidemiologic Study of a Group of Talc Workers," JF Gamble, W Fellner, MJ Dimeo, American Review of Respiratory Disease, Vol 119, 1979.			
1780		1/1/1979	Relationship of Mineral Habit to Size Characteristics for Tremolite Cleavage Fragments and Fibers, WJ Campbell, RL Virta, et al, Bureau of Mines Report of Investigation 8367, 1979.			
1781		1/1/1985	"Metsovo Lung: Pleural Calcification and Restrictive Lung Function in Northwestern Greece, Environmental Exposure to Mineral Fiber as Etiology," SH Constantopoulos, JA Goudevenos, N Saratzis, AM Langer, IJ Selikoff, HM Moutsopoulos, Environmental Research 38: 319-31, 1985.			
1782		1/1/1986	"Malignant Mesothelioma Caused by Childhood Exposure to Long-Fiber Low Aspect Ratio Tremolite," F Magee, JL Wright, N Chan, L Lawson, A Churg, American Journal of Industrial Medicine 9:529-533, 1986.			
1783		1/1/1987	"Mortality From Lung Cancer and Respiratory Disease Among Pottery Workers Exposed to Silica and Talc," TL Thomas, PA Stewart, American Journal of Epidemiology, Vol 125, No 1, 1987.			

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1784		1/1/1987	"Association of Metsovo Lung and Pleural Mesothelioma with Exposure to Tremolite-Containing Whitewash," AM Langer, RP Nolan, SH Constantopoulos, HM Moutsopoulos, The Lancet, Vol 1, 1987.			
1785		7/1/1987	"Geographic Patterns for Pleural Mesothelioma Deaths in the United States, 1968-81," PE Enterline, VL Henderson, JNCI, Vol 79, No 1, July 1987.			
1786		1/1/1987	"Mineralogical analysis of bronchoalveolar lavage in talc pneumoconiosis," P De Vuyst, P Dumortier, P Leophonte, R Vande Weyer, JC Yernault, Eur J Respir Dis, 70: 150-56, 1987.			
1787		4/15/1989	"Mesothelioma and Asbestos Fiber Type: Evidence From Lung Tissue Analyses," JC McDonald, B Armstrong, B Case, D Doell, WTE McCaughey, AD McDonald, P Sebastien, Cancer, 63: 1544-47, 4/15/89.			
1788		8/1/1990	Human Disease Consequences of Fiber Exposures: A Review of Human Lung Pathology and Fiber Burden Data, VL Roggli, <u>Environmental Health Perspectives, August 1990.</u>			
1789		10/22/1990	"Distinguishing Between Amphibole Asbestos Fibers and Elongate Cleavage Fragments of Their Non-Asbestos Analogues," AM Langer, RP Nolan, J Addison, Mechanisms in Fibre Carcinogenesis, RC Brown, JA Hoskins and NF Johnson, Eds, <u>October 22-25, 1990.</u>			
1790		5/1/1991	"Exposure to Asbestiform Minerals and Radiographic Chest Abnormalities in a Talc Mining Region of Upstate New York," EF Fitzgerald, AD Stark, N Vianna, A Hwang, Archives of Environmental Health, Vol 46, No 3, May/June 1991.			
1791		8/15/2000	"Exposure to Nitrosamines, Carbon Black, Asbestos, and Talc Mortality from Stomach, Lung, and Laryngeal Cancer in a Cohort of Rubber Workers," K Straif, U Keil, D Taeger, D Holthenrich, Y Sun, M Bungers, SK Weiland, American Journal of Epidemiology, <u>8/15/00.</u>			
1792		9/1/2001	Public Health State - Asbestos, CAS#: 1332-21-4, ATSDR, September 2001.			
1793		1/1/2002	"Anomalous optical properties of fibrous tremolite, actinolite, and ferro-actinolite," JR Verkouteren, AG Wylie, American Mineralogist, 87: 1090-1095, 2002.			
1794		1/1/2002	"Mortality among Workers at a Talc Mining and Milling Facility," Y Honda, C Beall, E Delzell, K Oestensstad, I Brill, R Matthews, Ann Occup Hyg, 46(7): 575-585, 2002.			
1795		12/22/2005	"A Review of Carcinogenicity Studies of Asbestos and Non-Asbestos Tremolite and Other Amphiboles," J Addison, EE McConnell, Proceedings of the International Symposium on the Health Hazard Evaluation of Fibrous Particles Associated with Taconite and the Adjacent Duluth Complex, March 30-April 1, 2003 <u>12/22/05.</u>			
1796		5/1/2009	Special Report: Policy, A review of human carcinogens - Part C: metals, arsenic, dusts, and fibres, IARC, The Lancet, Vol 10, May 2009.			
1797		1/1/2015	"Supplemental Data: Critical Reappraisal of Balangero chrysotile and mesothelioma risk," EB Ilgren, FD Pooley, JA Hoskins, Epidemiology Biostatistics and Public Health, 2015.			
1798		Undated	Talc and Colgate Documents from Johns-Manville, CRMC-Colgate-Micro-000001-22; Affidavit attached.			
1799		8/15/1975	Summary Minutes of the OTC Panel on Antiperspirant Drug Products, Twelfth Meeting, July 9-10, 1975, 8/15/75.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1800		1/1/1947	"The Dust Hazard in Tremolite Talc Mining," L Greenburg, Yale J Biol Med, 1947.			
1801		1/1/1979	"Mortality Patterns Among Miners and Millers of Non-Asbestiform Talc: Preliminary Report, SG Selevan, JM Dement, JK Wagoner, JR Froines, 1979.			
1802		2/1/1973	"Talc: A Possible Occupational and Environmental Carcinogen," HP Blejer, R Arlon, Presented at 15th Annual Western Industrial Health Conference, Oct 1, 1971, Journal of Occupational Medicine, February 1973.			
1803		3/1/1971	"Talc Pneumoconiosis: Significance of Sublight Microscopic Mineral Particles," A Miller, AS Tierstein, ME Bader, RA Bader, IJ Selikoff, American Journal of Medicine, March 1971.			
1804		7/31/1972	"Pulmonary Talcosis from Cosmetic Talcum Powder," K Nam, DR Gracey, JAMA, 7/31/72.			
1805		1/1/1964	"Lung Function in Talc Workers: A Comparative Physiologic Study of Workers Exposed in Fibrous and Granular Talc Dusts," M Kleinfeld, J Messite, J Shapiro, O Kooyman, R Swencicki, Archives of Environmental Health, 1964.			
1806		1/1/1933	"Effects of Certain Silicate Dusts on the Lungs," WC Dreesen, American Public Health Association Meeting, 10/27/32, Journal of Industrial Medicine, 1933.			
1807		1/1/1933	"Talcum Powder Granuloma," R Feinberg, Archives of Pathology, 1933.			
1808		2/1/1935	"The Effects of Exposure to Dust in Two Georgia Talc Mills and Mines," WC Dreesen, JM Dallavalle, Public Health Reports, 2/1/35.			
1809		8/19/1938	"Silicosis and Similar Dust Diseases: Medical Aspects and Control," RR Sayers, RR Jones, 8/19/38.			
1810		4/1/1942	"Pneumoconiosis in the Talc Industry," FW Porro, JR Patton, AA Hobbs, The American Journal of Roentgenology and Radium Therapy, April 1942.			
1811		1/1/1946	"Pathology of Talc Pneumoconiosis with Report of an Autopsy," FW Porro, NM Levine, Northern New York Medical Journal, 1946.			
1812		1/1/1947	"Pneumoconiosis Due to Talc in the Cosmetic Industry," N Millman, Occupational Medicine, 1947.			
1813		1/1/1948	Abstract of "The Dust Hazard in Tremolite Talc Mining, L Greenburg, Yale J Biol Med, 1947, British Journal of Industrial Medicine, 1948.			
1814		1/1/1948	Abstract of "Pneumoconiosis Due to Talc in the Cosmetic Industry," N Millman, Occup Med, British Journal of Industrial Medicine, 1948.			
1815		12/1/1949	"Other Lung Diseases Due to Dust," AT Doig, Postgraduate Medical Journal, December 1949.			
1816		11/1/1949	"A Study of Workers Exposed to Talc and Other Dusting Compounds in the Rubber Industry," WL Hogue, FS Mallette, Journal of Industrial Hygiene and Toxicology, November 1949.			
1817		1/1/1949	"Talc Pneumoconiosis," AJG McLaughlin, E Rogers, KC Dunham, Brit J Ind Med, 1949.			
1818		4/1/1951	Abstract of "Talcosis pulmonum," A Brus-Hansen, J Frost, J Georg, Egeskr F Laeger, 12/7/50, Bulletin of Hygiene, April 1951.			
1819		4/19/1952	"Talc Pneumoconiosis," PS Friedman, MA Bell, L Solis-Cohen, JAMA, 4/19/52.			
1820		11/1/1953	"Talc Pneumoconiosis," HA Lyons, US Navy, The Military Surgeon, November 1953.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1821		1/1/1955	"An Experimental Study of the Effects of Talc Dust on Animal Tissue," GWH Schepers, TM Durkan, AMA Archives of Industrial Health, 1955.			
1822		1/1/1956	"Massive Pulmonary Fibrosis from the Inhalation of Talc," AC Hunt, Thorax, 1956.			
1823		7/11/1956	Medico-Legal Opinion in Respect of Occupational Chest Disease, GWH Schepers, Saranac Laboratory, OCD67, 7/11/56.			
1824		1/1/1959	Annual Report of the Chief Inspector of Factories on Industrial Health, Ministry of Labor, London, 1959.			
1825		1/1/1959	"Pulmonary Talcosis, a Clinical and Environmental Study," J Messite, G Reddin, M Kleinfeld, AMA Archives of Industrial Health, 1959.			
1826		1/1/1960	"A Structural Study of Talc and Talc-Tremolite Relations," IS Stemple, GW Brindley, Journal of the American Ceramic Society, January 1960.			
1827		1/1/1962	"Evoluzione Clinica E Radiologica Delle Pneumoconiosi Nell'industria Estrattiva Del Talco, G Scansetti, L Rasetti, F Ghemi, Med Lavoro, 1962.			
1828		1/1/1963	"Talc Pneumoconiosis: A Report of Six Patients with Postmortem Findings," M Kleinfeld, CP Giel, JF Majeranowski, J Messite, Archives of Environmental Health, 1963.			
1829		1/1/1964	"Talc Pneumoconiosis (Talcosis)," AIG McLaughlin, Occupational Health, 1964.			
1830		2/1/1964	Pneumoconiosis," GWH Schepers, The American Journal of Nursing, February 1964.			
1831		1/1/1965	"Lung Function Changes in Talc Pneumoconiosis," M Kleinfeld, J Messite, J Shapiro, R Swencicki, J Sarfaty, Journal of Occupational Medicine, January 1965.			
1832		2/1/1967	"Commercial Talc and Talcosis," B Weiss, EA Boettner, Arch Env Health, February 1967.			
1833		1/1/2011	"Morphological and Chemical Mechanisms of Elongated Mineral Particle Toxicities," AE Aust, PM Cook, RF Dodson, Journal of Toxicology and Environmental Health, Part B, 14: 40-75, 2011.			
1834		7/1/1943	Foundation Facts, Industrial Hygiene Foundation, July 1943.			
1835		9/1/1950	Abstract of "Asbestosis," H Wyers, Industrial Hygiene Digest, IHF, September 1950.			
1836		12/10/1937	Abstract of "Dust Dangers Exposed," MH Kronenberg, References to Recent Literature on Industrial Disease, Air Hygiene Foundation of America (IHF), 12/10/37.			
1837		2/1/1948	Abstract of "The Dust Hazard in Tremolite Talc Mining," L Greenburg, Yale J Biol Med, 1947, Foundation Facts, February 1948.			
1838		4/1/1952	Abstract of "Pneumoconiosis Due to Talc," G Kohler, G Leopold, W Steyer, Foundation Facts, Industrial Hygiene Digest, IHF, April 1952.			
1839		10/1/1955	Abstract of "The Effects of Inhaled Talc-Mining Dust on the Human Lung," GWH Schepers, TM Durkan, Foundation Facts, Industrial Hygiene Digest, October 1955.			
1840		1/1/1956	Abstract of "Investigations on the Behavior of the Most Important Mineral Dusts in Human Lungs with Special Reference to Their Chemical and Crstallographic Properties and Their Occurrence in Mining," M Landwehr, E Bruckmann, Foundation Facts, Industrial Hygiene Digest, January 1956.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1841		4/1/1960	Abstract of "Talcosis in a Rubber Factory," KH Clausen, Foundation Facts, Industrial Hygiene Digest, April 1960.			
1842		8/1/1960	Abstract of "Pneumoconiosis (Talcosis) in Soapstone Workers," A Ahlmark, T Bruce, A Nystrom, Foundation Facts, Industrial Hygiene Digest, August 1960.			
1843		2/1/1961	Abstract of "The Pathological Anatomy of Talc Lungs," HA Muller, Foundation Facts, Industrial Hygiene Digest, February 1961.			
1844		3/1/1961	Abstract of "The Relation Between Lung Dust and Lung Pathology in Pneumoconiosis," G Nagelschmidt, Foundation Facts, Industrial Hygiene Digest, March 1961.			
1845		2/1/1962	Abstract of "Fatal Aspiration of Talcum Powder by a Child: Report of a Case," JJ Molnar, G Nathenson, S Edberg, Foundation Facts, Industrial Hygiene Digest, February 1962.			
1846		2/1/1967	Abstract of "Talc Granulomas of the Skin," MJ Tye, K Hashimoto, F Fox, Foundation Facts, Industrial Hygiene Digest, February 1967.			
1847		5/1/1955	Abstract of "Talcosis of Unusually Rapid Development," GP ALivisatos, AE Pontikakis, B Terzis, Foundation Facts, Industrial Hygiene Digest, May 1955.			
1848		5/1/1965	Abstract of "Lung Function Changes in Talc Pneumoconiosis," M Kleinfeld, Foundation Facts, Industrial Hygiene Digest, May 1965.			
1849		8/18/1979	"Controversy: Cosmetic Talc and Ovarian Cancer," DL Longo, RC Young, The Lancet, 8/18/79.			
1850		1/1/1979	"Fibrous Mineral Content of Consumer Talc-Containing Products," AN Rohl, AM Langer, 1979.			
1851		8/23/2016	5208.1 Non-Asbestiform Tremolite, Anthophyllite, and Actinolite, Subchapter 7, General Industry Safety Orders, California Code of Regulations, 8/23/16.			
1852		1/1/2007	"Asbestos fibers in ovarian tissue from Norwegian pulp and paper workers," H Langseth, BV Johansen, JM Nesland, K Kiaerheim, Int J Gynecol Cancer, 2007.			
1853		10/14/1983	"Letter to the Editor: Talc and Ovarian Cancer," P Hartage, et al, JAMA, 10/14/83.			
1854		1/1/1999	"Correlation of asbestos fiber burdens in fallopian tubes and ovarian tissue," DS Heller, RE Gordon, N Katz, Am J Obstet Gynecol, 1999.			
1855		1/1/1996	"The relationship between perineal cosmetic talc usage and ovarian talc particle burden," DS Heller, C Westhoff, RE Gordon, N Katz, Am J Obstet Gynecol, 1996.			
1856		1/1/1997	"Talc and Amosite/Crocidolite Preferentially Deposited in the Lungs of Nonoccupational Female Lung Cancer Cases in Urban Areas of Japan," H Yamada, H Hashimoto, M Akiyama, Y Kawabata, K Iwai, Environ Health Perspect, 105: 504-8, 1997.			
1857		4/14/1984	"Talc and mesothelioma," TK Ng, The Medical Journal of Australia, Vol 140, No 8, 4/14/84.			
1858		2/1/2018	Excerpt of the Deposition of Frederick D Pooley, Ratcliff v Borgwarner Morse Tec, et al, 2/1/18.			
1859		1/1/1972	"A study of the mortality of workers in an anthophyllite asbestos factory in Finland," M Nurminen, Work-environ health, 1972.			
1860		1/1/1974	"Mortality and morbidity among the working population of anthophyllite asbestos miners in Finland," LO Meurman, R Kiviluoto, M Hakama, British Journal of Industrial Medicine, 1974.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1861		1/1/1974	"Elemental Analysis of Asbestos Fibers by Means of Electron Probe Techniques," IB Rubin, CJ Maggiore, Environmental Health Perspectives, 1974.			
1862		11/1/1976	"The Biology of Talc," GY Hildick-Smith, British Journal of Industrial Medicine, November 1976.			
1863		1/1/1982	"Diffuse Malignant Mesothelioma: Prospective Evaluation of 69 Patients," AP Chahinian, TF Pajak, et al, Annals of Internal Medicine, 1982.			
1864		1/1/2010	"Malignant Mesothelioma in a Patient with Anthophyllite Asbestos Fibres in the Lungs," JI Phillips, J Murray, Ann Occup Hyg, 2010.			
1865		1/1/2013	"Lung Cancer Probably Related to Talc Exposure: A Case Report," J Kim, C Oak, TW Jang, et al, Industrial Health, 2013.			
1866		1/1/2013	"Letter to the Editor: Reply to Letter by Nolan and Colleagues - Re: The Carcinogenicity of New York State Talc Dusts in Humans," MM Finkelstein, American Journal of Industrial Medicine, 2013.			
1867		1/1/1983	"Mesothelioma in Pet Dogs Associated with Exposure of Their Owners to Asbestos," LT Glickman, A Churg, et al, Environmental Research, 1983.			
1868		1/1/1988	Case 9: Talcosis in a Vermont Talc Miner: Not Idiopathic Pulmonary Fibrosis, SUNY Upstate Medical University, 1988.			
1869		1/1/1982	"Talcum Powder Pneumoconiosis: Diagnosis by Transbronchial Biopsy Using Energy-Dispersive X-ray Analysis," PD Goldbach, JL Abraham, Western Journal of Medicine, 1982.			
1870		1/1/1933	"The Problem of Serpentinization and the Origin of Certain Chrysotile Asbestos Talc and Soapstone Deposits," HH Hess, Society of Economic Geologists, 1933.			
1871		5/8/1973	"Mineralogy, Identification and Quantification of Airborne Talc Dust," TD Oulton, Proceedings of the Symposium on Talc, 5/8/73; BASF002689-697.			
1872		1/1/1996	"Mechanisms of mineral fibre carcinogenesis," AB Kane, IARC Scientific Publication 140, 1996.			
1873		11/24/2014	Final Report to the Legislature Minnesota Taconite Workers Health Study, 11/24/14.			
1874		1/1/1979	"Asbestos, Fibrous Minerals and Acicular Cleavage Fragments: Nomenclature and Biological Properties," AM Langer, AN Rohl, JJ Selikoff, 1979.			
1875		1/1/1991	"Analysis of Amphibole Asbestos in Chrysotile and Other Minerals," J Addison, LST Davies, Ann Occup Hyg, 1991.			
1876		Undated	"Talc Pneumoconiosis," SH El-Ghawabi, et al, Undated; FDA000000914-924.			
1877		1/1/1959	"Talc and Steatite, Their Relations with Asbestos and Their Effect in Intratracheal Animal Experiments on Rats," H Luchtrath, KG Schmidt, 1959 (Translation from Original German); JNIN161_0000012588-643.			
1878		1/1/2007	Talc Specification, USP, IP 2007; JNJS71R_000000690.			
1879		1/1/1984	"A Definition for Asbestos," M Ross, RA Kuntze, RA Clifton, Special Technical Publication 834, ASTM, 1984.			
1880		9/1/2001	Tremolite Asbestos Health Consultation, Tremolite Asbestos and Other Related Types of Asbestos, CDC, September 2001.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1881		12/1/2008	"Differentiating Non-Asbestiform Amphibole and Amphibole Asbestos by Size Characteristics," M Harper, EG Lee, SS Doorn, A Hammond, Journal of Occup and Environmental Hygiene, December 2008.			
1882		Undated	Images of Fibrous and Asbestiform Minerals, USGS, Undated.			
1883		1/1/2016	"Geology of the Fontane talc mineralization (Germanasca valley, Italian Western Alps), P Cadoppi, G Perrone, et al, Journal of Maps, 2016.			
1884		1/1/1978	"New biopyriboles from Chester, Vermont: I. Descriptive Mineralogy," DR Veblen, American Mineralogist, 1978.			
1885		1/1/1978	"New biopyriboles from Chester, Vermont: II. The crystal chemistry of jimthompsonite, clinojimthompsonite, and chesterite, and the amphibole-mica reaction," DR Veblen, DW Burnham, American Mineralogist, 1978.			
1886		8/1/1976	Triple and Mixed Chain Biopyriboles from Chester, Vermont, A Thesis presented by DR Veblen, Harvard University, August 1976.			
1887		1/1/1957	Vermont Mines and Mineral Localities, Part I: Southern Vermont, P Morrill, RG Chaffee, Dartmouth College Museum, 1957.			
1888		12/1/1983	Asbestiform and/or Fibrous Minerals in Mines, Mills and Quarries, W Bank, MHSA, December 1983; JNJ000025997-26024.			
1889		1/1/1980	Surface Charge Measurements of Amphibole Cleavage Fragments and Fibers, EJ Schiller, SL Payne, Bureau of Mines Report 8483, 1980.			
1890		1/1/1948	Excerpt from History of Factory and Mine Hygiene, L Teleky, 1948.			
1891		3/26/1976	Newspaper Article - New Row on Sinai Talc Data, M Burros, New York Post, 3/26/76.			
1892		1/1/2001	"Letter to the Editor: Talc Should Not Be Used for Pleurodesis in Patients with Nonmalignant Pleural Effusions," AJ Ghio, V Roggli, 2001.			
1893		Undated	Product Safety: Nine Baby Powders Found to Have Asbestos Fibers, Hospital Reports, Undated.			
1894		3/24/1976	Newspaper Article - Report on Talc Research 'Corrected,' Newsday, 3/24/76.			
1895		2/6/1973	Newspaper Article - FDA Plans to Impose Limits on Asbestos in Certain Cosmetics, J Spivack, The Wall Street Journal, 2/26/73; JNJ000313830.			
1896		3/9/1976	Newspaper Article - FDA urged to study baby powders, J Walcott, The Record, 3/9/76.			
1897		1/1/1997	Table I. Anthophyllite Analysis, Rock-Forming Minerals, Vol 2B: Double-Chain Silicates, WA Deer, The Geological Society, London, 1997.			
1898		1/1/1947	"Diseases of the Lung Resulting from Occupational Dusts Other Than Silica," KM Perry, Thorax, 1947.			
1899		1/1/2006	Abstract - Behavior of fibrous antigorite on mesothelial Met-5A cell line, V Cardile, et al, Toxicology Letters, 2006.			
1900		1/1/2010	"Effects of asbestiform antigorite on human alveolar epithelial A549 cells: A morphological and immunohistochemical study," A Pugnali, et al, Acta histochemica, 2010.			
1901		1/1/2008	"Identification and enumeration of asbestos fibers in the mining environment: Mission and modification to the Federal Asbestos Standard," AM Langer, Reg Tox & Pharm, 2008.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1902		1/1/1980	"Pleural calcification, pleural mesotheliomas, and bronchial cancers caused by tremolite dust," S Yazicioglu, et al, Thorax, 1980.			
1903		12/11/1943	"The Talcum Powder Problem in Surgery and Its Solution," MG Seelig, DJ Verda, FH Kidd, JAMA, 12/11/43.			
1904		5/1/1972	"Asbestos and Talc - Inescapable Hazards," I Honoroff, Prevention, May 1972.			
1905		1/1/1987	"The Determination of Tremolite Asbestos in Talc Powder Samples," TWS Pang, FA Schonfeld, MA Nazar, Ann Occ Hyg, 1987.			
1906		6/1/1994	"Malignant Peritoneal Mesothelioma in a 17-Year-Old Boy with Evidence of Previous Exposure to Chrysotile and Tremolite Asbestos," A Andron, S Bosia, et al, Human Pathology, June 1994.			
1907		5/8/1973	"Applicability of Asbestos Standard to Fibrous Talc," WJ Nicholson, Proceedings of the Symposium on Talc, Washington DC, 5/8/73.			
1908		1/1/1898	Excerpt from A Textbook of Mineralogy, ES Dana, 1898.			
1909		12/24/1994	"Malignant pleural mesothelioma associated with exposure to tremolite," D Luce, et al, The Lancet, December 24-31, 1994.			
1910		1/1/2000	"Environmental Exposure to Tremolite and Respiratory Cancer in New Caledonia: A Case-Control Study," D Luce, et al, American Journal of Epidemiology, 2000.			
1911		1/1/1976	"Chemical and Physical Properties of British Talc Powders," FD Pooley, N Rowlands, 1976.			
1912		8/10/1977	Talc Workers Health Study Report, DH Wegnan, WA Burgess, JM Peters, Harvard School of Public Health, 8/10/77.			
1913		3/1/1984	Hazards of Baby Powder? TJ Wagner, M Hindi-Alexander, Pediatric Nursing, March/April 1984.			
1914		1/1/1977	"The Detection and Identification of Asbestos and Asbestiform Materials in Talc," HD Stanley, RE Norwood, Pfizer, Proceedings of the Workshop on Talc, 1977; CRMC-Talc-Micro-000662-67.			
1915		1/1/1992	"Five Cases of Pleural Mesothelioma with Endemic Pleural Calcifications in a Rural Area in Greece," L Sichletidis, et al, Med Lav, 1992.			
1916		1/1/1989	"Mesothelioma in Cyprus," K McConnochie, et al, IARC, Lyons, 1989.			
1917		1/1/1991	"Variations in the Carcinogenicity of Tremolite Dust Samples of Differing Morphology," JMG Davis, et al, Annals NYAS, 1991.			
1918		12/1/1974	"Electron Microscopical Investigation of Asbestos Fibers," AM Langer, AD Mackler, FD Pooley, Environmental Health Perspectives, December 1974.			
1919		1/1/1981	"Asbestos and Other Ferruginous Bodies: Their Formation and Clinical Significance," AM Churg, ML Warnock, AM J Pathol, 1981.			
1920		1/1/1982	"Pulmonary Asbestos Body Counts and Electron Probe Analysis of Asbestos Body Cores in Patients with Mesothelioma: A Study of 25 Cases," VL Roggli, et al, Cancer, 1982.			
1921		1/1/1989	"Mineral Fiber Concentration in Lung Tissue of Mesothelioma Patients in Finland," T Tuomi, et al, American Journal of Industrial Medicine, 1989.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1922		1/1/1992	"Fibrous Minerals in the Lungs of Mesothelioma Patients: Comparison Between Data on SEM, TEM, and Personal Interview Information," T Tuomi, American Journal of Industrial Medicine, 1992.			
1923		6/19/1995	Letter to C Skinner, Yale University, from JW Kelse, RT Vanderbilt; Re: Anthophyllite, 6/19/95.			
1924		1/1/1961	"Contributo allo studio dei minerali della Valle del Chisone (Alpi Cozie)," Vol 31: 140-167, E Grill, 1961.			
1925		1/1/1955	"Talcosis of Unusually Rapid Development," GP Alvisato, AE Pontikakis, B Terzis, Brit Jr Industr Med, Vol 12: 43-49, 1955.			
1926		1/1/1966	"Quantitative Determination of Chrsotile, Amosite and Crocidolite by X-ray Diffraction," JV Crable, American Industrial Hygiene Association Jr, 293-297, 1966.			
1927		12/15/1970	Newspaper Article - Consumer: Balloons Hazardous to Your Health?, Washington Post, 12/15/70.			
1928		5/20/1974	AIA Memorandum, To Members, From RH Mereness; Re: Answers to Questions addressed to Irving J Selikoff, 05/20/74.			
1929		6/25/1986	Department of Health & Human Services Memorandum, To D Lemen, From B Glenn; Re: OSHA Final Rule on Occupational Exposure to Asbestos, 06/25/86.			
1930		9/1/1997	"Pulmonary Carcinogenicity of Inhaled Particles and the Maximum Tolerated Dose," G Oberdorster, Envir Health Perspectives, Vol 105, Supplement 5, 1347-1355, 1997.			
1931		7/23/1990	NSA response, To: Tom Hall, From: FA Renninger; Re: Docket No. H-033d Post-hearing Brief, 07/23/90.			
1932		1/1/1991	"Fiber dimensions and mesothelioma: a reappraisal of the Stanton hypothesis," AB Kane, Mechanisms in Fibre Carcinogenesis, Series A: Life Sciences, Vol 223, 1991.			
1933		2/1/2001	"An unusual case of mixed-dust exposure involving a "noncommercial" asbestos," RF Dodson, JL Levin, Environ Health Perspectives, Vol 109, 199-203, Feb 2001.			
1934		1/1/2002	"A cohort mortality and nested case-control study of French and Austrian talc workers," P Wild, et al, Occup Environ Med, Vol 59, 98-105, 2002.			
1935		1/1/2006	"Lung cancer risk and talc not containing asbestiform fibres: a review of the epidemiological evidence," P Wild, Occup Environ Med, 2006.			
1936		1/1/2007	"Metamorphic veins from the serpentinites of the piemonte zone, western alps, italy: a review" C Groppo, R Compagnoni, Periodico di Mineralogia, Vol 76, 127-153, 2007.			
1937		1/1/2007	"Ubiquitous fibrous antigorite veins from the lanzo ultramafic massif, internal wester alps (italy): characterisation and genetic conditions," C Groppo, R Compagnoni, Periodico di Mineralogia, Vol 76, 169-181, 2007.			
1938		1/1/2015	"Surface alteration mechanism and topochemistry of iron in tremolite asbestos: a step toward understanding the potential hazard of amphibole asbestos," A Pacella, et al, Chemical Geology, Vol 405, 28-39, 2015.			
1939		9/18/1948	"Correspondence - Dangerous Talc," Brit Med Jr, 9/18/48.			
1940		1/1/1987	"Talc and related lung diseases," M Kleinfeld, J Messite, CP Giel, I. Environmental and Occupational Disease, Vol 42, Ch 21, 1987.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1941		5/30/2003	"Report on the peer consultation workshop to discuss a proposed protocol to assess asbestos-related risk," Eastern Research Group, EPA Contract No 68-C-98-148, 5/30/03.			
1942		4/19/2013	"Inventory of cosmetic talc and cornstarch products circa mid 1970s," RP Nolan, Environmental Studies International, 4/19/13.			
1943		1/1/1934	"Dust in Industry - Types of dust that cause occupational diseases," LU Gardner, Dreesen, National Safety Council, 1934.			
1944		1/1/1972	Talc in Ontario, DF Hewitt, Industrial Mineral Report 40, Ontario Dept of Mines, 1972.			
1945		1/1/2006	"Talc (without asbestos fibres)," M A K-collection part 1: M A K value documentations, Vol 22, 225-279, 2006.			
1946		10/29/1976	Samples received by NBS from OSHA, 10/29/76..			
1947		4/9/1989	Letter To: Tom Hall, OSHA, From: John Addison, NAMAS; Re: Hearings concerning the occupational exposure to asbestos, tremolite, anthophyllite, and actinolite, 29 CFP, Part 1910 and 1926. 4/9/89.			
1948		12/13/1990	Letter To: Tom Hall, OSHA, From: BW Case, University of Pittsburgh; Re: Proposed supplement rulemaking concerning occupational exposure to asbestos, tremolite, anthophyllite, and actinolite. 12/13/90.			
1949		1/1/2007	"The Geology of Asbestos in the United States and Its Practical Applications," BS Van Gosen, 2007.			
1950		3/29/1976	Newspaper Article- Medical Center Clarifies Report on Talc Research, M Burros, The Des Moines Register, 3/29/76.			
1951		12/18/1954	"Talc Pneumoconiosis in the Textile Industry," B Mann, JB Deasy, British Medical Journal, 12/18/54.			
1952		1/1/1997	"Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution," Consensus Report, Scand J Work Environ Health, Vol 23 No 4, 1997.			
1953		1/1/2015	"Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution 2014: recommendations," H Wolff, et al, Consensus Report, Scand J Work Environ Health, Vol 41 No 1, 2015.			
1954		2/14/1986	Absence of Lung Cancer Risk from Exposure to Tremolitic Talc, SH Lamm, 2/14/86; JNJTALC000321020-27.			
1955		1/1/2017	"Poster: Presence of asbestos in consumer talc products: evaluating a "Zero Tolerance" policy," J Steffen, T Tran, ES Fassler, DE Egilman, APHA, 2017.			
1956		1/1/1992	"Talc Pneumoconiosis: A Pathologic and Mineralogic Study," AE Gibbs, FD Pooley, et al, Human Path, 1992.			
1957		Undated	Nonmetallics: Definition, Classification, Occurrence, Origin, Utilization, M Kuzvart, Industrial Rocks and Minerals in the 21st Century, Undated.			
1958		4/1/2006	"Carcinogenicity of carbon black, titanium dioxide and talc," R Baan, K Straif, et al, The Lancet, April 2006.			
1959		4/16/2018	Talc, www.fda.gov, 4/16/18.			
1960		6/25/1977	"Editorial: Cosmetic Talc Powder," The Lancet, 6/25/77.			
1961		1/1/1979	"Normal use levels of respirable cosmetic talc: preliminary study," RI Aylott, GA Byrne, JD Middleton, ME Roberts, International Journal of Cosmetic Science, 1979.			
1962		8/16/2012	Particle Analysis: Case 7: Tremolite Asbestos Fibers in Children's Play Sand, SUNY Upstate Medical University, JL Abraham, 8/16/12.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1963		1/1/2015	"Safety Assessment of Talc As Used in Cosmetics," MM Fiume, I Boyer, WF Bergfeld, et al, International Journal of Toxicology, 2015; JNJTALC000066638-701.			
1964		1/1/2014	"Mortality Experience among Minnesota taconite mining industry workers," EM Allen, BH Alexander, JH Mandel, et al, Occup Environ Med. 2014.			
1965		1/1/2015	"A case-control study of mesothelioma in Minnesota iron ore (taconite) miners," CS Lambert, BH Alexander, JH Mandel, et al, 2015.			
1966		1/1/1990	"Phyllosilicates: Associated Fibrous Minerals, AM Langer and FD Pooley," Health Related Effects of Phyllosilicates, J Bignon, Ed, 1990.			
1967		1/1/1982	Glossary for Health Related Silicates, WP Ellis, ASTM Committee C-17, 1982.			
1968		1/1/2018	"Mesothelioma and other lung disease in taconite miners; the uncertain role of non-asbestiform EMP," JH Mandel, NU Udo, Toxicology and Applied Pharmacology, 2018.			
1969		5/30/2000	Newspaper Article - Asbestos Industry pays Crayola's Experts millions, A Schneider, C Smith, Seattle Post-Intelligencer, 5/30/00.			
1970		6/28/2018	"The Effect of Grinding on Tremolite Asbestos and Anthophyllite Asbestos," A Bloise, R Kusiorowski, AF Gualteri, Minerals, 6/28/18.			
1971		11/26/2017	Expert Report of Gerald Markowitz and David Rosner, 11/26/17.			
1972		6/28/2018	Supplementary Materials - "The Effect of Grinding on Tremolite Asbestos and Anthophyllite Asbestos," A Bloise, R Kusiorowski, AF Gualteri, Minerals, 6/28/18.			
1973		1/1/1979	"Characterization of Cleavage Fragments and Asbestiform Amphibole Particulates," WJ Campbell, EB Steel, RL Virta, MH Elsner, Dusts and Disease, 1979.			
1974		6/23/1992	NTP Technical Report on the Toxicology and Carcinogenesis Studies of Talc in F344/N Rats and B6C3F Mice (Inhalation Studies), Peer review June 23-24, 1992; JNJ000008945-9227.			
1975		1/1/1977	Cosmetic Talc Powder, Lancet Editorial Draft, FJC Roe, 1/1/77; JNJ000038318--325.			
1976		1/1/2018	IMiGPoster: "Asbestos-Free" Mesothelioma: Evaluating the Carcinogenicity of Cleavage Fragments following Hill's Considerations," J Steffen, T Tran, E Fassler, D Egilman, 2018.			
1977		3/1/1970	"The Pulmonary Response to Fibrous Dusts of Diverse Compositions," P Gross, RTP deTreville, et al, AIHA Journal, March-April 1970.			
1978		1/1/2018	Commentary on "Assessment of Health Risk From Historical Use of Cosmetic Talcum Powder," D Egilman, J Steffen, New Solutions, 2018.			
1979		1/1/2018	"Detection Limits for Elongated Mineral Particles - What are the health effects of censored data?" D Egilman, JE Steffen, T Tran, et al, ASTM Talk, 2018.			
1980		1/1/2011	"Pulmonary Talcosis 10 Years After Brief Teenage Exposure to Cosmetic Talcum Powder," A Shakoar, et al, BMJ Case Reports, 2011.			
1981		9/1/1997	"Dose- Response Relationship of Fibrous Dusts in Intraperitoneal Studies," M Roller, F Pott, B Bellmann, et al, Environ Health Perspectives, Vol 105, Supp 5: Particle Toxicity, September 1997.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
1982		1/1/1969	"Asbestos Exposure and Its Results in Italy," EC Vigliani, 1969.			
1983		Undated	Newspaper Article - Letter to the Editor: Asbestos Report, SZ Lewin, 3/12/73.			
1984		1/1/1990	"Asbestos Content of Talcs from Italian Mines and Fibre Concentration in Various Commercial Talcum Powders Used in Italy," A Marconi, U Verdel, NATO ASI Series, Vol G21, J Bignon, Ed. 1990.			
1985		5/26/1977	"Exposure to Industrial Talc in Vermont Talc Mines and Mills," MG Boundy, K Gold, WA Burgess, Jm Dement, AIHA Conference, 5/26/77; INJ000338234-254.			
1986		1/1/1975	"The Trace Element Geochemistry of Selected Serpentinized Alpine Type Ultramafic Intrusions in Vermont," The Ohio State University, MJ Blackman, 1975.			
1987		1/1/2018	Letter concerning: Glynn, ME, Keeton KA, Gaffney SH, Sahmel J. Ambient Asbestos Fiber Concentrations and Long-Term Trends in Pleural Mesothelioma incidence Between Urban and Rural Areas in the United States (1973-2012). Risk Anal 2018 Mar; 38(3): 454-71 MM Finkelstein 2018			
1988		1/1/2017	"Mesothelioma With No Evidence of Commercial Amphibole Asbestos Exposure - 35 Cases With Chrysotile, Non-Commercial Amphibole or Asbestiform Talc by Lung Fiber Burden Analysis," S Sanyal, JL Abraham, B Burnett, B58 Occupational Lung Disease: Case Studies, Epidemiology, and Mechanisms, Thematic Poster Session, 2017.			
1989		1/1/1988	"Asbestos and Other Fibrous Minerals: Mineralogy, Crystal Chemistry, and Health Effects," HCW Skinner, M Ross, C Frondel, 1988.			
1990		1/1/2018	"Detecting asbestos fibres and cleavage fragments produced after mechanical tests on ophiolite rocks: clues for the asbestos hazard evaluation," G Belardi, G Vignaroli, D Passeri, et al, Journal of Mediterranean Earth Sciences, 2018.			
1991		11/23/2010	Email to J Gasper; Re: FDA Asbestos in Talc Study - Final Report, 11/23/10.			
1992		1/1/2007	"Toxicity and Carcinogenicity Mechanisms of Fibrous Antigorite," V Cardile, L Lombardo, M Balazy, Int J Environ Res Public Health, 2007.			
1993		8/1/2014	Antigorite: Is it the Forgotten Asbestos? SM Fitzgerald, EA Harty, Health Hazards, August 2014.			
1994		1/1/1988	"Fibrogenic and Carcinogenic Effects of Antigorite," H Wozniak, E Wiecek, J Stetkiewicz, Polish Journal of Occupational Medicine, 1988.			
1995		1/1/2016	"Increased Lung Cancer Mortality in Taconite Mining: The Potential for Disease from Elongate Mineral Exposure," JH Mandel, et al. 2016.			
1996		12/1/2004	"Mineral Chemistry of Talc from Different Origins in the Dongyang Talc Deposit," D Shin, I Lee, S Koh, J Min Soc Korea, December 2004.			
1997		10/14/2010	Letter to RL Williams, USP, from J Woodcock, FDA; Re: Collaboration on standards for testing products, 10/14/10.			
1998		1/1/2019	"Asbestos in commercial Indian talc," S Fitzgerald, AL Frank, et al, American Journal of Industrial Medicine, 2019.			
1999		6/1/2019	Letter to the Editor: Malignant Mesothelioma and Its Nonasbestos Causes, MM Finkelstein, Arch Pathol Lab Med, June 2019.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2000		1/1/2019	"A comparison of asbestos fiber potency and elongate mineral particle (EMP) potency for mesothelioma in humans," MM Finkelstein, Toxicology and Applied Pharmacology, 2019.			
2001		7/1/2019	Fighting Independent Risk Assessment of Talc and Glyphosphate: Whose Benefit Is It Anyway?" A Morabia, AJPH Editorials, July 2019.			
2002		7/1/2019	"Nondetected": The Politics of Measurement of Asbestos in Talc, 1971-1976," D Rosner, G Markowitz, M Chowkwanyan, AJPH, July 2019.			
2003		1/2/1973	Letter to BI Castleman, from PT Adamo, FDA; Re: Reply to your October 24, 1972 letter, 1/2/73.			
2004		10/24/1972	Handwritten Letter to GF Meyer, FDA, from BI Castleman; Re: Your letter to Senator Mathias, 10/24/72.			
2005		1/5/1973	Handwritten Letter to Senator Mathias, from BI Castleman; Re: Reply from FDA regarding asbestos filters in food and beverage processing, 1/5/73.			
2006		5/17/1974	Letter to B Castleman, Center for Science in the Public Interest, from RD Pontefract, Health and Welfare Canada; Re: Your letter regarding rat feeding experiment, 5/17/74.			
2007		5/29/1974	Letter to RD Pontefract, Health and Welfare Canada, from B Castleman; Re: Results of rat feeding experiments, 5/29/74.			
2008		Undated	International Regulatory Resource Manual, North and South America Regional Guide, Undated.			
2009		7/18/1971	Newspaper Article - You'll Be Alright If You Just Stop Breathing, New York Times, 7/18/71.			
2010		10/14/1971	Newspaper Article - The Lethal Powder Puff? C Whelton, The Village Voice, 10/14/71; JNJTALC000063399-401..			
2011		1/1/1962	The Serpentine-Group Minerals, GT Faust, JJ Fahey, Geological Survey Professional Paper 384-A, 1962; JNINL61_000017292-391.			
2012		8/1/2007	"Part 1: Understanding the components of the fundamental sampling error: a key to good sampling practice," RCA Minnitt, et al, Journal of the South African Institute of Mining and Metallurgy, August 2007.			
2013		9/29/1971	Letter to EJ Ellsworth, Desert Minerals, from HE Stokinger, ACGIH; Re: Your letter of Sept 22 regarding a mineralogic definition for fibrous and non-asbestiform talc, 9/29/71; CRMC-Talc-Micro-001471.			
2014		7/21/1971	Letter to TE Remmers, Desert Minerals, from HE Stokinger, ACGIH; Re: Your letter, 7/21/71; CRMC-Talc-Micro-001474-76.			
2015		7/26/1971	Memo to T Remmers, Desert Minerals; Re: Guilty until proven innocent by "Do-Gooders Inc", Chemical Week article entitled, "Asbestos in the Boudoir, 7/14/71, 7/26/71; CRMC-Talc-Micro-001528.			
2016		8/13/1971	Newspaper Article - Asbestos in Talcum? FDA to Test, S Lawrence, New York Post, 8/13/71; JNJ000244819.			
2017		2/20/1973	Letter to EB Smith, Johns-Manville, from WT Caneer, CSMRI; Re: Reply to your question re physical removal of 100% tremolite, Project F20941, 2/20/73; CRMC-Talc-Micro-001624.			
2018		3/31/1975	Letter to P Kotin, Johns-Manville, from WE Smith, Farleigh-Dickinson; Re: Conversation with Hildick-Smith regarding two papers presented at AIHA conference, 3/31/75; CRMC-Talc-Micro-002780.			

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2019		4/22/1976	Letter to WH Ashton, J&J, from RS Lamar, Johns-Manville; Re: Reprint of Rubino study, 4/22/76; CRMC-Talc-Micro-002830-2838.			
2020		2/12/1973	Desert Minerals Memo to FJ Solon, et al, from EB Smith; Re: Ftalc Producers Association Meeting, February 5, 1973, 2/12/73; CRMC-Talc-Micro-002891-2892.			
2021		11/13/1972	Desert Minerals Memo to WL VanDerbeek, et al; Re: FDA- OSHA Meeting No Three Re: Talc November 9, 1972, 11/13/72; CRMC-Talc-Micro-004867-4871.			
2022		4/1/2001	Composite Samples: A Guide for Regulators and Project Managers on the Use of Composite Samples, Guidance Document No 12-10, April 2001.			
2023		7/27/1988	NIOSH Officials Say Updated Research Reaffirms Position on Regulation of Talc, OSHA Reporter, 7/27/88.			
2024		3/11/2016	Baumgardner Affidavit, CRMC-Talc-Micro-000001-005259; CRMC-JM-Talc-000001-41, 3/11/16.			
2025		5/6/1980	Johns-Manville Memo to JL Konzen, et al, from P Kotin; Re: Letter from JC Wagner, 5/6/80.			
2026		1/1/2016	"A Review of Mortality Associated with Elongate Mineral Particle (EMP) Exposure in Occupational Epidemiology Studies of Gold, Talc, and Taconite Mining," JH Mandel, et al, American Journal of Industrial Medicine, 2016.			
2027		1/1/1994	"Incidence of cancer among anthophyllite miners in Finland," LO Meurman, et al, Occup Environ Med, 1994.			
2028		1/1/1994	"Four cases of mesothelioma among Finnish anthophyllite miners," A Karjalainen, LO Meurman, E Pukkala, Occup Environ Med, 1994.			
2029		12/1/1963	"Clinical, Radiological, Electrocardiographic, and Spirographic Findings in Workers in the Talc Extracting Industry," GC Coscia, G Perelli, Arch Sci Med, December 1963; JNJ000249627-637.			
2030		6/29/1973	Memo to G Hildick-Smith, from DR Petterson; Re: Italian Talc Study, 6/29/73; Program of Epidemiological Research on a Sample of Talc Extraction Workers, Universita di Torino; JNIAZ55 000008877-8883.			
2031		1/1/2003	"An Update of a Mortality Study of Talc Miners and Millers in Italy," M Coggiola, et al, American Journal of Industrial Medicine, 2003.			
2032		1/1/2008	"Excess of mesotheliomas after exposure to chrysotile in Balangero, Italy," D Mirabelli, et al, Occup Environ Med, 2008.			
2033		7/1/2017	"Mortality of Talc Miners and Millers from Val Chisone, Northern Italy: An Updated Cohort Study," E Pira, M Coggiola, P Boffetta, et al, JOEM, July 2017.			
2034		5/14/1972	The Detection of Ventilatory Abnormalities in Talc Workers, GP Theriault, et al, AIHA Conference, May 14-19, 1972; WTALC00002500-2511.			
2035		1/1/1969	"Studies on the Carcinogenic Effects of Asbestos Dust," P Gross, RTP De Treville, Pneumoconiosis, Proceedings of the International Conference, 1969, Oxford Univ Press, 1970; JNJ000249418-422.			
2036		12/1/1972	Letter to JP Leineweber, Johns-Manville, from WE Smith, Farleigh-Dickinson; Re: Our conversation about talc, 12/1/72; Asbestos, Talc and Nitrites in Relation to Gastric Cancer; MTC017574-581.			
2037		6/8/1973	"Penetration of Asbestos through the Digestive Tract of Rats," Nature, RD Ponteacry, HM Cunningham, Nature, 6/8/73; JNJTALC000070427-428.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2038		5/8/1973	"Experimental Studies on Biological Effects of Tremolite Talc on Hamsters," WE Smith, Presentation for Symposium on Talc Dust Hazards, US Bureau of Mines, 5/8/73; JNJTALC000094110-122.			
2039		1/1/1979	"Mortality and Morbidity Among Talc Miners and Millers in Italy," GF Rubino, G Scansetti, G Piolatto, Dusts and Disease, 1979.			
2040		1/1/1979	"Mortality Patterns Among Miners and Millers Occupationally Exposed to Asbestiform Talc," DP Brown, JM Dement, JK Wagoner, Dusts and Diseases, 1979.			
2041		2/16/2018	TEM Analysis of Historical 1978 Johnson's Baby Powder Sample for Amphibole Asbestos: Expert Report, WE Longo, MW Rigler, MAS, Revision #1, 2/16/18.			
2042		3/11/2018	Preliminary Analysis Report, Johnson's Baby Powder Sample Set, MAS Project #14-1683, Final, WE Longo, MW Rigler, MAS, 3/11/18.			
2043		3/21/2018	Analysis for the Presence of Asbestos Fibers in Talc Product, SGPB 11-22-71(1) and SGPB 11-22-17(2), WE Longo, MAS, 3/21/18.			
2044		8/2/2017	Analysis of Johnson & Johnson Baby Powder and Valiant Shower to Shower Talc Products for Amphibole (Tremolite) Asbestos, Expert Report, WE Longo, MW Rigler, MAS, 8/2/17.			
2045		8/21/2017	Talc Size Distribution of Johnson & Johnson and Valiant Shower to Shower Amphibole Positive Samples, WE Longo, MW Rigler, MAS, 8/21/17.			
2046		3/11/2018	Supplemental Expert Report & Analysis of Johnson & Johnson Baby Powder and Valiant Shower to Shower Talc Products for Amphibole Asbestos, Expert Report, WE Longo, MW Rigler, MAS, 3/11/18.			
2047		10/1/2018	Analysis of Historical Johnson's Baby Powder, M69042, WE Longo, MW Rigler, MAS, October 2018.			
2048		10/1/2018	The Analysis of Johnson & Johnson's Historical Baby Powder & Shower to Shower Products from the 1960s to the Early 1990's for Amphibole Asbestos, WE Longo, MW Rigler, MAS, October 2018.			
2049		1/1/2019	Johnson's Baby Powder Application to Baby During Diaper Change: A Hygiene Study, WE Longo, M Rigler, WB Egeland, M Bennett, MAS, January 2019.			
2050		1/1/2019	Johnson's Baby Powder Application to Baby During Diaper Change: A Work Practice Study, WE Longo, M Rigler, WB Egeland, M Bennett, MAS, January 2019.			
2051		2/1/2019	The Analysis of Johnson & Johnson's Historical Product Containers and Imerys' Historical Railroad Car Samples from the 1960's to the Early 2000's for Amphibole Asbestos, 2nd Supplemental Report, WE Longo, MW Rigler, MAS, 2/1/19.			
2052		1/1/1983	19th Forum on the Geology of Industrial Minerals: Guidebook for Field Trips, Ontario Geological Survey Miscellaneous Paper 111, SE Yundt, 1983.			
2053		1/1/2019	"Mesothelioma Associated with the Use of Cosmetic Talc," J Moline, R Gordon, Journal of Occupational and Environmental Medicine, 2019. [Pre-publication copy]			
2054		11/1/1971	Letter to SR Mountsier, WCD, from SZ Lewin, NYU; Re: Two unresolved questions from Sept 11, 1971 report, 11/1/71.			
2055		9/23/1974	Asbestos Cancer Risk Linked to Low Level of Contact with Fiber, Chemical Marketing Reporter, 9/23/74.			

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2056		10/15/1974	Pfizer Memo to W Stephenson, from EK Hamilton; Re: Safety Theme- Asbestiform v Non-Asbestiform Tremolite in Talc, 10/15/74; Booker-MTI000091-92.			
2057		10/7/1974	Pfizer Memo to JP Bartels, from HD Stanley; Re: Latest RT Vanderbilt Action in Talc Regulations, 10/7/74; Booker-MTI000109-11.			
2058		9/6/1974	Pfizer Memo to JP Bartels, from HD Stanley; Re: Lastest OSHA and NIOSH opinion on Tremolite in Talc, 9/6/74; Booker-MTI000112-113.			
2059		8/27/1974	Pfizer Memo to HD Stanley, from DW Holstein; Re: NPCA Occupational Health Task Force Meeting on August 20, 1974, 8/27/74; Booker-MTI000114-18.			
2060		6/19/2003	Letter to Superfund Regional Managers, from MB Cook, OERR; Re: RJ Lee Asbestos Testing Laboratories, 6/19/03.			
2061		7/26/1972	Letter from RC Bacon, RT Vanderbilt; Re: Recent meeting with EPA officials, 7/26/72.			
2062		8/13/1971	Pfizer Memo to W Stephenson, from T Biesada; Re: Asbestos in talc, 8/13/71; PFI MO 00001788-89.			
2063		7/23/1971	Pfizer Memo to JP Bartels, et al, from AT Gronet; Re: Talc/Asbestos Controversy, 7/23/71; PFI_KA_00000422-424.			
2064		2/8/2018	Email to L Poye, from WE Longo; Re: XRD Analysis, 1/11/18; Chain of Custody; Report- PLM and XRD Analysis of 26 Johnson & Johnson Talcum Powder Samples, 2/8/18.			
2065		9/27/2017	Letter to D LaTerra, Levy Konigsberg, from BW Walther, Shook Hardy & Bacon; Re: Lanzo v Cyprus Amax, 9/27/17.			
2066		2/1/1982	Mineral Resource Provinces of Vermont, CA Ratte, February 1982.			
2067		6/12/1974	Johns-Manville Memo to Filtration and Minerals Div, from HR Keefe; Re: Talc Labeling, 6/12/74; CRMC-Talc-Micro-000076.			
2068		10/19/2012	Letter to FA Anderson, CIR, from WG Kelly, CRE; Re: Initial Comments on CIR Draft Scientific Literature Review for "Talc as Used in Cosmetics," (Posted by CIR Aug 22, 2012), 10/19/12.			
2069		8/21/1974	Johns-Manville Memo to CJ Sulewski, from PA Martinson; Re: Talc Labeling, 8/21/74; CRMC-Talc-Micro-001658-1659.			
2070		8/3/1979	Memo to DA Jacobs, from RE Lomas; Re: MSHA Criteria Dust & Fiber, 8/3/79.			
2071		10/25/1985	Letter to LY Chang, University of Maryland, from CS Thompson, RT Vanderbilt: Ann Wylie's promotion, 10/25/85.			
2072		4/22/1992	Letter to BT Mossman, University of Vermont, from JW Kelse, RT Vanderbilt; Re: Lung Cancer/ Mesothelioma Related Assays, 4/22/92.			
2073		3/23/1979	FDA Memorandum to PP McGrath, from JA Wenniger; Re: Identification of Cosmetic Samples Analyzed for Asbestos by Scanning Electron Microscopy (SEM), 3/23/79.			
2074		3/5/1973	Letter to M Briggs, Edgemoor Geriatric Hospital, from GK Thompson, FDA; Re: Your letter re talc products, 3/5/73.			
2075		8/22/2006	Agenda of the Joint Teleconference of the Talc Section of the Industrial Minerals Association- North America, Eurotalc and University of Vermont. 8/22/06: IMERYS003243.			
2076		1/1/2018	ASTM D7712-18 - Standard Terminology for Sampling and Analysis of Asbestos, 2018.			
2077		5/6/1980 - 5/8/1980	Proceedings of the First NCI/EPA/NIOSH Collaborative Workshop: Progress on Joint Environmental and Occupational Cancer Studies, FULL, May 6-8 1980.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2078		2/20/2015	US Food and Drug Administration, Protecting and Promoting Your Health, Talc, 02/20/15.			
2079		10/1/1991	Health-based recommended occupational exposure limit for talc dusts, Dutch expert committee for occupational standards, October 1991.			
2080		5/1/2001	Letter to CW Jameson, NTP Report on Carcinogens, from DD Harris, Luzenac America; Re: Comments on the NTP Proposal, 5/1/01.			
2081		11/24/2004	Letter to Dr CW Jameson, NTP, from J Godla, Luzenac America; Re: Comments in Response to NTP's Federal Register Notice of October 25, 2004, Regarding Nominations to the 12th RoC and Review Procedures, 11/24/04.			
2082		1/7/2007	Ann Wylie's Testimony Before United States Senate, 1/7/07.			
2083		1993-1998	Payments from RT Vanderbilt to AG Wylie, 1993-1998; RT-DOCS/Compel-03236-246.			
2084		11/3/1994	Letter to F Pooley, Univ of Wales, Cardiff, from AG Wylie, Univ of Maryland at College Park; Re: Photographs, 11/3/94.			
2085		1995-2007	RJ Lee Invoices to RT Vanderbilt for Talc Analysis, 1995-2007; RT-Docs/Compel-03222-346.			
2086		11/23/2004	Letter to CW Jameson, from CRE; Re: Comments on the revised RoC procedures and the two talc nominations for the 12th RoC, 11/23/04.			
2087		4/4/2001	Letter to CW Jameson, NTP, from J Tozzi, CRE; Re: Comments on the proposal to list talc, 4/4/01.			
2088		12/13/2000	Draft Report on Carcinogens Background Document for Talc Asbestiform and Non-Asbestiform, Meeting of the NTP Board of Scientific Counselors Report on Carcinogens Committee, December 13-14, 2000.			
2089		4/20/2010	Email to J Gasper; Re: Cosmetic Grade Talc, 4/20/10.			
2090		3/10/2010	Email to J Gasper, from PA Hansen; Re: FDA - Talc and Asbestos Project, 3/10/10.			
2091		4/20/2010	Email to J Gasper; Re: Another Bulk Raw Supplier Bites the Dust, 4/20/10.			
2092		4/17/1996	Newspaper Article - Women's health concerns prompt condom makers to stop using talc, Jersey Journal, 4/17/96; LUZ011817.			
2093		8/1/2016	Talc, USP Revision Bulletin: Postponement, 6/30/11, www.usp.org 8/1/16.			
2094		12/30/1971	BAT Research and Development Memo to F Haslem, from RB Richardson; Re: Asbestos in Talc - Summary of Work Done for Yardleys in December 1971, 12/30/71.			
2095		5/31/1994	Note to S Carr, from J Bailey; Re; Manuscript for Talc Worksop, 5/31/94.			
2096		6/28/1994	Draft minutes of the talc meeting held at NIEHS June 28, 1994, 06/28/94; JNJ 000015720-722.			
2097		6/28/1994	Final minutes of the talc meeting held at NIEHS, 06/28/94; JNJ 000016576-579.			
2098		12/6/2000	Website: "Proposal by NIEHS to list talc not containing asbestiform fibers as a "Reasonably Anticipated" human carcinogen in the upcoming tenth report on carcinogens; Failure to consider the views of, and adequately coordinate with, the primary regulatory agency, FDA," the center for regulatory effectiveness, 12/06/00; IMERYS 236477-524.			

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2099		8/20/1973	Mineral Industry Surveys, US Department of the Interior Bureau of Mines, Talc Soapstone, and Pyrophyllite in 1972, RCB Morton, FF Osborn. 08/20/73: PFZ01162 015966-968.			
2100		10/13/1982	ASTM, The need for specific definitions for health related minerals, meeting schedule, 10/13/82; PFZ01162 016046.			
2101		12/5/1978	United States Department of Interior Letter to J Beaman, Continental Minerals, from RA Clifton; Re: Answer to your telephone inquiry, 12/5/78: PFZ01162 016077-086.			
2102		8/28/2003	Talc: Questions and Answers, Prevent Cancer, 08/28/03; C&M-LUZ 00014485-486.			
2103		10/24/2005	Talc removed from 12th RoC, Rose Sheet, Pharma Intelligence, 10/24/05.			
2104		1/1/1975	Background on Talc Dust and Response to Reviewers' Comments (for reference for Assemblyman Hinchey), I Sperber, 1975.			
2105		11/4/1975	Letter to G Sandland, Bristol-Myers, from HM Davis, FDA; Re: Reply to your letter of October 9, 1975, Lewin Samples, DCST Numbers, 11/4/75; HHS00000015.			
2106		3/19/1976	Letter to AM Langer, Mt Sinai, from RL Yates, FDA; Re: Follow up to March 18, 1976 conversation, DCST subsamples, 3/19/76; HHS00000017.			
2107		9/1/2018	Analysis of Cashmere Bouquet Talcum Powder Submitted by the Law Offices of Peter Angelos, Appendix C, M65748, WE Longo, MW Rigler, MAS, September 2018.			
2108		9/25/2018	Analysis of Colgate-Palmolive-Cashmere Bouquet Cosmetic Talc Products for Amphibole Asbestos, Supplemental Expert Report, WE Longo, MW Rigler, MAS, 9/25/18.			
2109		1/1/2019	Analysis of J&J's Historical Talc Samples From the 1960's, WE Longo, MW Rigler, MAS, January 2019.			
2110		1/1/2019	Analysis of J&J's Historical Talc Samples From the 1970's, WE Longo, MW Rigler, MAS, January 2019.			
2111		1/1/2019	Analysis of J&J's Historical Talc Samples From the 1980's, WE Longo, MW Rigler, MAS, January 2019.			
2112		1/1/2019	Analysis of J&J's Historical Talc Samples From the 1990's, WE Longo, MW Rigler, MAS, January 2019.			
2113		1/1/2019	Analysis of J&J's Historical Talc Samples From the 2000's, WE Longo, MW Rigler, MAS, January 2019.			
2114		11/9/2017	Johnson & Johnson Talc Analysis M66203, WE Longo, MAS, 11/9/17.			
2115		11/5/2018	Verification of Lee Poye's TEM and of J&J's Historical Vermont Talc-Containing Shower-to-Shower Talcum Powder Samples, WE Longo, MAS, 11/5/18.			
2116		2/23/2019	Report of Evaluation of Cosmetics and Cosmetic Talc for FDA, DT Crane, OSHA, 2/23/19.			
2117		11/1/2019	FDA Advises Consumers to Stop Using Certain Cosmetic Products - 10/18/19 Johnson's Baby Powder voluntarily recalled after testing positive for asbestos; 9/6/19 Beauty Plus Global voluntarily recalled 4 cosmetic products; 6/6/19 Beauty Plus Global and Claires Stores, Inc voluntarily recalled their respective cosmetic products that tested positive for asbestos; 3/5/19 FDA advised consumers not to use certain Claire's cosmetic products, 11/1/19. www.fda.gov/cosmetics			

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2118		3/5/2019	Statement from FDA Commissioner Scott Gottlieb, MD, and Susan Mayne, PhD, Director of the Center for Food Safety and Applied Nutrition, on tests confirming a 2017 finding of asbestos contamination in certain cosmetic products and new steps that FDA is pursuing to improve cosmetics safety, 3/5/19. www.fda.gov/news			
2119		4/25/2019	AMA Analytical Services Certificate of Analysis 300396 for FDA, Task 3 Analysis of Official Samples, CLIN 1 - 8 Samples, Claire's JoJo SIWA, 4/25/19; First Revision, 4/30/19.			
2120		6/7/2019	FDA Warns of contaminated kids' makeup at Claire's for the second time this year, MarketWatch, J Settembre, J Passy, 6/7/19.			
2121		8/30/2019	AMA Analytical Services Certificate of Analysis 307491-12 for FDA, Task 3 Analysis of Official Samples, CLIN 1 - 10 Samples, 2nd Group, Beauty Plus, 7/24/19, Third Revision, 8/30/19.			
2122		2/21/2019	AMA Analytical Services Certificate of Analysis, Task 2 - Analysis of Demonstration Samples, A-TK4428 FDA, Summary of Asbestos in Talc Analysis, Revision 1, 2/21/19.			
2123		8/30/2019	AMA Analytical Services Certificate of Analysis, CLIN 1- Task 3 (2 samples), 308004, Beauty Plus, Revision 2, 8/30/19.			
2124		8/30/2019	AMA Analytical Services Certificate of Analysis 307491-11 for FDA, Task 3 Analysis of Official Samples, CLIN 1 - 10 Samples, 2nd Group, Beauty Plus, 7/3/19, Third Revision, 8/30/19.			
2125		3/5/2019	FDA Finds Asbestos in Three Claire's Cosmetic Products, C Terhune, Reuter's, 3/5/19.			
2126		3/11/2019	Asbestos Found in Claire's Cosmetics, FDA Says, M Park, CNN Health, 3/11/19.			
2127		3/5/2019	FDA Says Tests Confirm Asbestos in Make-Up from Claire's, Justice, C Kelly, USA Today, 3/5/19.			
2128		8/30/2019	AMA Analytical Services Certificate of Analysis 307491-11 for FDA, Task 3 Analysis of Official Samples, CLIN 1 - 2 Samples, 3rd Group, 308004-1, Beauty Plus, 8/14/19, Third Revision, 8/30/19.			
2129		10/18/2019	Talc, FDA Updated Safety Alert, 10/18/19. www.fda.gov/cosmetics			
2130		1/1/2015	Samples Chart: Talc Samples Tested by Plaintiff Experts, 2015.			
2131		3/26/2018	Sample Information and Analysis Results, M68379-001 and 002, March 7, 2018, 3/26/18.			
2132		1/1/1927	"Origin of the Vermont Talc Deposits," JL Gillson, Society of Economic Geologists, 1927.			
2133		3/7/2018	MAS Sample Information and Analysis Results, Simon Greenstone Johnson & Johnson Baby Powder Samples M68379-001 and M68379-002, 3/7/18.			
2134		7/1/2017	29 CFR Ch 17 Fed Reg Part 1910.1001 Asbestos, OSHA, 7/1/17.			
2135		9/24/2018	Analysis of Cashmere Bouquet Cosmetic Talcum Powder PLM/Blount Supplemental Notebook, WE Longo, MAS, 9/24/18.			
2136		9/1/2018	Analysis of Cashmere Bouquet Cosmetic Talcum Powder Submitted by Levy Konigsberg, Appendix B, WE Longo, MW Rigler, MAS, September 2018.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2137		1/1/2020	"Letter to the Editor: Response to Vermont Talc-Miners Cohort Study Update," DE Egilman, D Madigan, T Tran, JOEM, January 2020.			
2138		1/6/2020	Executive Summary: Preliminary Recommendations on Testing Methods for Asbestos in Talc and Consumer Products Containing Talc, FDA, 1/6/20.			
2139		1/1/2020	"Mesothelioma Associated with the Use of Cosmetic Talc," J Moline, R Gordon, Journal of Occupational and Environmental Medicine, January 2020.			
2140		11/1/1978	"Epidemiologic Evidence of the Effect of Type of Asbestos and Fiber Dimensions on the Production of Disease in Man," WC Cooper, National Bureau of Standards Special Publication 506, Proceedings of the Workshop on Asbestos, November 1978; IN1000053291-53302			
2141		1/1/2019	"Letter to the Editor: Re Fordyce et al (2019) Vermont Talc Miners and Millers Cohort Study Update," MM Finkelstein, JOEM, 2019.			
2142		1/1/1979	"A Study of the Size Distributions of Airborne Amosite Fibres in the Manufacture of Asbestos Insulation Boards," ST Beckett, JL Jarvis, Ann Occup Hyg, 1979.			
2143		1/1/1976	"Mortality Patterns Among Hard Rock Gold Miners Exposed to an Asbestiform Mineral," JD Gillam, JM Dement, RA Lemen, et al, Annals of the NYAS, 1976; VM-LANGEVIN-000877-884.			
2144		2/1/2020	"Serous Ovarian Cancer Caused by Exposure to Asbestos and Fibrous Talc in Cosmetic Talcum Powders," JE Steffen, T Tran, DS Egilman, et al, JOEM, February 2020.			
2145		5/1/1972	US Gypsum Memo to C Roach, from M Schmidt; Re: Fibrous Talc v Asbestos, 5/1/72.			
2146		8/15/1994	Asbestos and Other Fibers by PCM, Method 7400, Issue 2, 8/15/94.			
2147		1/1/2011	Part 763 - Asbestos, Subpart E - Asbestos-Containing Materials in Schools, EPA, 2011. (AHERA)			
2148		1/1/1995	D 5755-95 - Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure Number Concentrations, ASTM, 1995.			
2149		1/1/2011	D7712-11 - Standard Terminology for Sampling and Analysis of Asbestos, ASTM, 2011.			
2150		1/1/1983	Program Guide - Identification of Asbestos, Parts 1, 2 and 3, WC McCrone, 1983.			
2151		4/20/1973	Letter to AT Spiher, GRAS Review Branch, FDA, from R Carter, Johns-Manville; Re: October 3, 1972 Letter to FDA requesting extension for written comments, 4/20/73.			
2152		6/8/1992	Section IV Mineralogical Considerations, Preamble to Final Rules, Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, OSHA 57 FR 24310, 6/8/92.			
2153		6/12/2000	OSHA Memo from DT Crane; Re: Background Information Regarding the Analysis of Industrial Talcs, 6/12/00.			
2154		1/1/2006	OSHA Chemical Sampling Information for Talc (containing asbestos), 2006.			
2155		12/3/1973	Letter to Hearing Clerk, FDA, from WC McCrone; Re: Comment on Asbestos Particles in Food and Drugs, 12/3/73; Kazan FDA FOIA 001300-1325.			
2156		1/16/1973	Newspaper Article - Dr Stanton Reports Fine Microscopic Fibers Cause Cancer in Laboratory Rats, The NIH Record, 1/16/73.			

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2157		3/7/1973	Newspaper Article - Size of Fiber, Not Material, Seen As Cause, Medical Tribune, 3/7/73.			
2158		1/1/2018	Appendix C - Definitions for Regulated Asbestos, OSHA Evaluation of Cosmetics and Cosmetic Talc for FDA, 2018.			
2159		1/1/1982	Survey of Asbestiform Minerals, EPA, 1982.			
2160		1/1/1991	Talc (without asbestos fibres), MAK, Germany, 1991.			
2161		1/1/2004	Talc (free of asbestos fibres), MAK, Germany, 2004.			
2162		11/30/1973	Johns-Manville Memo to FJ Solon, from EM Fenner; Re: ASTM Committee E-34, 11/30/73; CRMC-Talc-Micro-000763-765.			
2163		3/11/1976	Talc Tests Wanting, FDA Experts Admit, J Walcott, Record, 3/11/76.			
2164		4/18/1974	Minutes of the Third Meeting of the ASTM Committee E-34 Task Group on Naturally Occurring Inorganic Fibers, April 18-19, 1974; JNJ000086646-663.			
2165		1/1/1957	Talc in the New England- New York Region, The Resources of the New England-New York Region, Part Two, Chapter 32, Special Subjects, Regional, Vol 3, 1957.			
2166		3/11/1976	Memorandum of Meeting Between Industry Representatives and FDA, 3/11/76; HHS00000065-66.			
2167		1/24/1973	Letter to Dr EF Marriner, Johns-Manville, from M Kleinfeld; Re:Medical data on workers exposed to commercial talc dust, 1/24/73; CRMC-Talc-Micro-001238; Affidavit.			
2168		1/29/1974	Johns-Manville Memo to JA McKinney, from WB Reitze; Re: Labeling of Talc Products, 1/29/74; CRMC-Talc-Micro-000734; Affidavit.			
2169		6/18/1974	Johns-Manville Memo to HR Keefe, from WB Reitze; Re: Talc Labeling, 6/18/74; CRMC-Talc-Micro-000735; Affidavit.			
2170		6/14/1973	Johns-Manville Memo to RP Carter, et al, from EM Fenner; ACGIH Documentation for Talc TLV, 6/14/73; CRMC-Talc-Micro-000838-44; Affidavit.			
2171		5/9/1973	Johns-Manville Memo to J McClain, from WC Streib; Re: Definition - Fibrous Talc, 5/9/73; CRMC-Micro-Talc-002907; Affidavit.			
2172		3/16/1981	Letter to L Murino, Cyprus Industrial Minerals, from RM Ellis, McCrone & Assoc; Re: Asbestos analysis of Cyprus Monoblend Lot #110865, 3/16/81; McCrone 0205.			
2173		4/1/1974	"Asbestos," WC McCrone and IM Stewart, American Laboratory, April 1974.			
2174		6/20/1978	Navy Memo to Commander, Naval Sea Systems Command, from Commander, Mare Island Naval Shipyard; Re: Review of Tremolite Talc containing asbestos fibers on Mare Island Naval Shipyard, 6/20/78; CRMC-Talc-Micro-001712-14; Affidavit.			
2175		6/6/1968	Minutes of the Asbestos Textile Institute Board of Governor's Meeting, 6/6/68; CRMC-Talc-Micro-000753-55; Affidavit.			
2176		8/31/1973	Johns-Manville Memo to PA Martinson, from RS Lamar; Re: FDA Proposed Specifications on Talc, 8/31/73; CRMC-Talc-Micro-001355-57; Affidavit.			
2177		8/24/1971	Letter to Dr A Weissler, FDA, from S Speil, Johns-Manville; Re: Discussion of testing methods, 8/24/71; CRMC-Talc-Micro-001138; Affidavit.			
2178		8/31/1973	Johns-Manville Memo to PA Martinson, from RS Lamar; Re: FDA Proposed Talc Regulation; More Number Exercises; Hope for Reeves? 8/31/73; CRMC-Talc-Micro-001358-60; Affidavit.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2179		9/29/1972	Johns-Manville Memo to WC Streib, from S Speil; Re: RS Lamar Letter of September 5, 1972, 9/29/72; CRMC-Talc-Micro-001127-28; Affidavit.			
2180		8/11/1971	Johns-Manville Memo for File; Re: FDA Meeting - Asbestos in Cosmetic Talcs, August 3, 1971 - Washington DC, 8/11/71; CRMC-Talc-Micro-001139-48; Affidavit.			
2181		8/28/1973	Johns-Manville Memo to FL Pundsack, from S Speil; Re: Tremolite in Talc, 8/28/73; CRMC-Talc-Micro-001179-85; Affidavit.			
2182		12/17/1968	Johns-Manville Notes for the File; Re: FDA Seminar on Fibers, Talc, Etc, December 13, 1968, Washington, DC, 12/17/68; CRMC-Talc-Micro-001464-65; Affidavit.			
2183		Undated	Detection of Asbestiform Amphibole Minerals in Cosmetic Grade Talc, FDA, Undated.			
2184		Undated	Cosmetic Talc, Analytical Methods, FDA, Undated.			
2185		Undated	Asbestos in Talc, DCST Methodology, FDA, Undated.			
2186		5/30/1973	Appendix A- FDA Memo to Dr A Weissler, from Microanalytical Branch; Re: Microscopic examination of cosmetic talc products for asbestos minerals, 5/30/73.			
2187		8/29/1975	Letter to Dr J Moore, NIEHS, from RE Shapiro, FDA; Re: Samples of tremolite for animal feeding studies, 8/29/75.			
2188		6/1/1978	Special Report on Talc Resources: A Supply and Marketing Study, C Wendel, Mining and Minerals Division, National Park Service, June 1978.			
2189		11/15/1985	Letter to Assemblyman Maurice Hinchey, New York State Assembly, from I Sperber, The College at New Paltz; Re: Investigation of talc dust, 11/15/85.			
2190		3/22/1976	Mount Sinai Memo to TC Chalmers, from IJ Selikoff; Re: Suggested changes, Draft Release on Talcum Powders, 3/22/76.			
2191		3/15/1976	Newspaper Article - Asbestos Found in Ten Powders, The New York Times, 3/15/76.			
2192		3/2/1976	Mount Sinai Memo to IJ Selikoff, from AM Langer; Re: Release of Information Concerning Asbestos in Consumer Talcum Products, 3/2/76.			
2193		12/14/1988	Letter to V Shafer, CPSC, from IJ Selikoff, Collegium Ramazzini; Re: Workshop on the Definition of Particles on March 20-22, 1989, 12/14/88.			
2194		11/25/1975	Mount Sinai Memo to AM Langer, from IJ Selikoff; Re: Wagner study, 11/25/75.			
2195		8/26/2009	Record Certification, Mount Sinai Medical Center, 8/26/09.			
2196		8/9/1971	WCD Memo to CU Driscoll, from SR Mountsier; Re: Meeting on Asbestos and Talc Ad Hoc Committee, August 3, 1971, 8/9/71; LoGiudice/WCD/0001-4.			
2197		9/21/1973	Memo to JJ Travers, from WC Forbes, Dept Geo Service, University of Illinois; Re: Evaluation of proposed FDA test for "Determination of Asbestos in Talc by Optical Microscopy," 9/21/73; LoGiudice/WCD/0141-46.			
2198		10/1/1999	United States and Canada Cosmetic Sales, Luzenac America, October 1999; IMERY342919-926.			
2199		12/4/1974	Letter to EK Hamilton, Pfizer, from A Goodwin, MESA; Re: Definition of Fiber, 12/4/74.			
2200		12/12/1979	Johns-Manville Memo to P Kotin, from GW Wright; Re: Thickened pleura in floor tile manufacturing operation using talc, 12/12/79; CRMC-Talc-Micro-002715; Affidavit.			

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2201		7/1/1968	"Identification and Control of Asbestos Exposures," LJ Cralley, Public Health Service, NIOSH Summary and Publication, July-August 1968; CRMC-Talc-Micro-001723-29; Affidavit.			
2202		4/25/1978	FDA Memorandum of Telephone Conversation between L Donaldson and RH Schaffner; Re: Asbestos in food and cosmetics. 4/25/78.			
2203		Undated	FDA Memorandum of Need - Body burden and distribution of asbestos in common laboratory animals, Selikoff and Smith, Undated.			
2204		1/1/2017	"Cause-Specific Mortality and Cancer Morbidity in 390 Male Workers Exposed to High Purity Talc, A Six-Decade Follow-Up," E Wergeland, et al, American Journal of Industrial Medicine, 2017.			
2205		1/11/1979	FDA Memo to JA Wenninger, from RL Yates; Re: Talc Samples for Analysis by Scanning Electron Microscopy (SEM) for Amphibole and Serpentine fibers, 1/11/79.			
2206		6/30/1971	Newspaper Article - Talc Mfr Chafes at Warning, S Lawrence, NY Post, 6/30/71.			
2207		8/18/1974	Newspaper Article - Talc powder serious to health if it contains too much asbestos, R Winter, Rochester Democrat and Chronicle, 8/18/74.			
2208		2/20/1974	Statement by Alexander M Schmidt, FDA, Before the Subcommittee on Health, Senate Committee on Labor and Public Welfare, 2/20/74.			
2209		8/25/1971	Letter to EB Smith, Desert Minerals, from CA Chrystal, Charles B Chrystal Co; Re: New York newspaper article regarding asbestos in talc, 8/25/71; Newspaper Article - Asbestos in Talcum? FDA to Test, S Lawrence, Undated; CRMC-Talc-Micro-001535-36; Affidavit			
2210		8/7/1977	Newspaper Article - Talc powder a hazard? Green Bay Press-Gazette, Green Bay, Wisconsin, 8/7/77.			
2211		3/8/1976	Newspaper Article - Asbestos Fibers Discovered in Some Popular Cosmetics, The Town Talk, Alexandria, Louisiana, 3/8/76.			
2212		3/9/1976	Newspaper Article - Cancer risks in body talc? M Burros, Detroit News, 3/9/76.			
2213		4/13/1971	Newspaper Article - Cosmetic firms want US to keep ingredients secret, Seattle Times, 4/13/71.			
2214		5/2/1972	Newspaper Article - Cosmetics and federal health regulations, B Varro, Seattle Times, 5/2/72.			
2215		9/23/1973	Newspaper Article - New drive on to tighten cosmetics controls, L Mouat, Seattle Times, 9/23/73.			
2216		3/8/1976	Newspaper Article - Body powder study shows contamination, Seattle Times, 3/8/76.			
2217		2/23/1979	American Mining Congress Memo to Chief Executive Officers, et al, from DC Branard; Re: National Academy of Sciences Study of Health Effects of Asbestos and Other Fibrous Materials, 2/23/79; PF701162_012898-911.			
2218		8/1/1972	Newspaper Article - Too Much Talcum Powder Blamed in Death of Man, 39, Chicago Tribune, 8/1/72.			
2219		9/11/1972	Deadly Powder, Time, 9/11/72; JNJMX68_00004619.			
2220		8/19/1980	Directory of Vermont Mineral Industries, CA Ratte, DM Vanecek, Office of the State Geologist, 8/19/80; BASF_RIMONDI000495-536.			
2221		1/6/1977	Cambridge Email to ES Wood, from JC Yang; Re: Status on Animal Studies, 1/6/77.			

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2222		10/13/1982	What is Talc? RA Clifton, ASTM Conference, 10/13/82; JNJ000288144-166.			
2223		5/2/2016	Talc, safecosmetics.org, 5/2/16.			
2224		11/17/1994	Press Release - Dusting with Cancer: Coalition Urges Chicago Drug Stores to Label Talc, Cancer Prevention Coalition, 11/17/94.			
2225		4/13/2016	Talc, FDA, 4/13/16.			
2226		3/17/1975	FDA Delays Action on Asbestos-Containing Talc in Food, Food Chemical News, 3/17/75.			
2227		9/25/2009	Invoice to FDA from AMA Analytical Service for Talc Testing, 9/25/09.			
2228		4/13/1976	Letter to DR Bowes, from IJ Selikoff; Re: Little disturbance last month, 4/13/76.			
2229		3/15/1976	Letter to IJ Selikoff, Mt Sinai, from DR Bowes, The University Glasgow; Re: Washington Post article, 3/15/76.			
2230		3/1/1992	"Talc Review: Consolidation and competition," M O'Driscoll, Industrial Minerals, March 1992; IMERYS138547-555.			
2231		1/1/1990	"Morbidity and Mortality in Talc-Exposed Workers," E Wergeland, et al, American Journal of Industrial Medicine, 1990.			
2232		5/5/1998	United States Patent, 5,747,007 -Dustless Baby Powder, Song, et al, Patty Cake, 5/5/98.			
2233		8/28/2003	Website CHEC, Chemical Profile: Talc, Significant Statistics, 8/28/03; C&M-LUZ 00014489-493.			
2234		9/1/1979	Comment, Talc Sensing, Talc Destiny in Diversity, Industrial Minerals, September 1979; PFZ01162 016791-820.			
2235		10/1/1978	Mineral fibres - A general review, Industrial Minerals, October 1978; PFZ01162 016780-788.			
2236		4/2/1975	Trial Testimony of Sarkis Ampian and Ralph Zumwalde, Brennan vs Borg-Warner Corp, OSAHRC, 4/2/75; PFZ01162_016476-775.			
2237		4/1/1975	Trial Testimony of D McKee and W Dixon, Brennan vs Borg-Warner Corp, OSAHRC, 4/1/75; PFZ01162 016087-463.			
2238		1/1/1996	"Is there transplacental transfer of asbestos? A Study of 40 Stillborn Infants," AK Haque, et al, Pediatric Pathology & Laboratory Medicine, 1996.			
2239		8/16/1974	Newspaper Article - Why talcum powder may be a health hazard, R Winter, San Francisco Chronicle, 8/16/74; PFZ01162_015969.			
2240		1/1/2001	Riebeckite, Mineral Data Publishing, 2001.			
2241		1/1/2001	Arfvedsonite, Mineral Data Publishing, 2001.			
2242		6/1/2015	Good Manufacturing Practices (GMP): A Practical Guide for the Cosmetics Industry, CTPA, June 2015.			
2243		1/5/2018	Talcum Powder and Cancer, American Cancer Society, 1/5/18. www.cancer.org/cancer/cancer-causes/talcum-powder-and-cancer			
2244		4/7/1977	Canadian Cosmetic, Toiletry and Fragrance Association (CCTFA) Memo to Active Members, from NR Richardson; Re: Talc Standards, 4/7/77.			
2245		2/15/1983	Note on the Pathogenicity of Tremolite Asbestos, Report #2/83/DP/R/99, JMG Davis, 2/15/83.			
2246		12/5/2018	Talc - Potential Risk of Lung Effects and Ovarian Cancer, Government of Canada, 12/5/18.			
2247		1/1/2010	Talc, Threshold Limit Values, ACGIH, 2010.			
2248		9/7/2017	Can soapstone contain Asbestos, Artistix, 9/7/17.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2249		7/1/1984	Glossary for Health-Related Silicates, STP834, ASTM, July 1984.			
2250		1/1/2016	Cosmetic Talc: A CTPA Guide, Cosmetic, Toiletry and Perfumery Association, 2016.			
2251		1/1/2020	"Tissue burden evaluation of elongated mineral particles in two individuals with mesothelioma and whose work history included manufacturing tile," RF Dodson, LW Poye, Ultrastructural Pathology, 2020.			
2252		1/1/2001	"Case Report: Malignant Mesothelioma From Neighborhood Exposure to Anthophyllite Asbestos," WN Rom, SP Hammar, RF Dodson, et al, American Journal of Industrial Medicine., 2001.			
2253		1/10/2020	Testing Methods for Asbestos in Talc and Cosmetic Products Containing Talc; Public Meeting; Request for Comments, FDA Notice, 1/10/20.			
2254		10/11/2019	AMA Analytical Certificate of Analysis for Johnson & Johnson Baby Powder Samples 308006, 4th Group, 15 Samples, PO # HHSF223201810337P, 10/3/19, Rev 2, 10/11/19.			
2255		10/16/1973	Correspondence between Whittaker, Clark & Daniels and EF Fullam regarding testing, 10/16/73 and 10/19/73; Testing Report - Determination of Asbestos in Talc by Light-Optical Microscopy for Whittaker, Clark & Daniels, Report No 1621, 11/20/73; LoGiudice/WCD/0170-0174.			
2256		1/1/1985	"The Phase Relationship of Talc and Amphiboles in a Fibrous Talc Sample," RL Virta, Bureau of Mines Report of Investigations 8923, 1985.			
2257		1/1/1988	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, Bureau of Mines, 1988.			
2258		1/1/1989	The Talc Industry - An Overview, RL Virta, Bureau of Mines Information Circular 9220, 1989.			
2259		8/1/2001	Talc, RL Johnson and RL Virta, American Ceramic Society Bulletin, August 2001.			
2260		1/1/2006	Worldwide Asbestos Supply and Consumption Trends from 1900 through 2003, USGS Circular 1928, RL Virta, 2006.			
2261		1/1/1999	"Cancer Mortality Among Women in the Russian Printing Industry," MA Bulbulyan, et al, American Journal of Industrial Medicine, 1999.			
2262		Undated	Comments of RL Virta on NTP Talc Definition Issue, Undated.			
2263		5/1/2008	Amphibole-Group Minerals from New York State, Rocks & Minerals, Vol 83, May/June 2008.			
2264		11/1/2019	"Talc, Asbestos, and Epidemiology: Corporate Influence and Scientific Incognizance," TH Tran, JE Steffen, DS Egilman, et al, ISEE Commentary, Epidemiology, November 2019.			
2265		11/20/1972	Johns-Manville Memo to WL VanDerbeek, from RJ Amberg; Re: Tremolite in Asbestos Fibre Flintkote Company, 11/20/72; CRMC-Talc-Micro-004524.			
2266		6/14/2016	Asbestos, The Mineralogical Society of America, 6/14/16.			
2267		1/1/1970	"Recent Discussions of Pyroxenes and Amphiboles, I. Amphibole Seminar, The American Mineralogist, Vol 55, January-February 1970.			
2268		11/1/1970	"Iron-Magnesium Distribution in the Tremolite-Actinolite Series," RWT Wilkins, The American Mineralogist, November-December 1970.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2269		11/1/1978	"The "Asbestos" Minerals: Definitions, Description, Modes of Formation, Physical and Chemical Properties, and Health Risk to Mining Community," M Ross, Proceedings of the Workshop on Asbestos: Definitions and Measurement Methods Held at NBS, <u>July 18-20, 1977, November 1978</u> .			
2270		11/1/1978	"History of Asbestos-Related Mineralogical Terminology," T Zoltai, Proceedings of the Workshop on Asbestos: Definitions and Measurement Methods Held at NBS, July 18-20, 1977, <u>November 1978</u> .			
2271		11/1/1978	"Identification of Selected Silicate Minerals and Their Asbestiform Varieties," WJ Campbell, Proceedings of the Workshop on Asbestos: Definitions and Measurement Methods Held at NBS, <u>July 18-20, 1977, November 1978</u> .			
2272		9/1/2000	Industrial Minerals of the United States - US Talc - Baby Powder and Much More, USGS Fact Sheet FS-065-00, September 2000.			
2273		1/1/2019	ASTM D6620-19 Standard Practice for Asbestos Limit Based on Counts, 2019.			
2274		1/1/2020	"Asbestos in Talc and Mesothelioma: Review of the Causality Using Epidemiology," MS Kanarek, JC O'Brien, Medical Research Archives, 2020.			
2275		1/1/2020	"Letter to the Editor: New Information on Talc and Mesothelioma," JB Shrager, Annals of Thoracic Surgery, 2020.			
2276		1/1/2020	"Asbestos-related cancers: the 'Hidden Killer' remains a global threat," N van Zandwijk, G Reid, AL Frank, Expert Review of <u>Anticancer Therapy</u> , 2020.			
2277		1/1/2020	"Malignant mesothelioma following repeated exposures to cosmetic talc: A case series of 75 patients," TS Emory, JC Maddox, RL Kradin, American Journal of Industrial Medicine, 2020.			
2278		1/1/2020	"Editorial Commentary: Evidence that cosmetic talc is a cause of ovarian cancer," D Egilman, D Madigan, M Yimam, T Tran, <u>Gynecol Pelvic Med</u> , 2020.			
2279		6/29/1971	Newspaper Articles - EPA Warning on Talc, New York Post, 6/29/71; Powder Probe, Daily News, 6/20/71; JNJ000260542.			
2280		8/22/2017	Quality Assurance Report: Johnson & Johnson and Valiant Shower to Shower Amphibole Positive Samples, WE Longo, MW Rigler, <u>MAS</u> , 8/22/17.			
2281		8/2/2017	Photographs of Johnson & Johnson and Valiant Shower to Shower As Received Containers, WE Longo, MW Rigler, <u>MAS</u> , 8/2/17.			
2282		1/1/2018	MAS Project 14-1852: Below the Waist Application of Johnson & Johnson Baby Powder, Supplemental Report #2, WE Longo, MW Rigler, <u>WB Egeland</u> , January 2018.			
2283		1/1/1984	Geology and Geochemistry of Talc Deposits in the Madoc Area, Ontario, Thesis, GJ Simandl, Concordia University, 1984.			
2284		Undated	JBP-STs Aspect Ratio Distribution with Blount-Campbell NIST 1867 Tremolite Standard; TEM Fiber Data for Johnson's Baby Powder - <u>M65205-001</u>			
2285		1/31/2019	Quality Assurance Report: Johnson & Johnson's JBP and STs, Imerys Railcar and Asian Talc for Amphibole Asbestos, WE Longo, <u>MW Rigler</u> , <u>MAS</u> , 1/31/19.			
2286		9/1/2001	Excerpt from The Health Effects of Chrysotile: Contribution of Science to Risk-Management Decisions, Canadian Mineralogist, 2001.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2287		5/9/2018	Expert Report of R Mark Bailey, PG on Asbestos in Talc Products from the Fontane Mine, Val Germanasca, Italy, 5/9/18.			
2288		1/1/1985	Talc in the Tudor Formation, Grenville Supracrustal Series, Southeastern Ontario, EP Dillon, PS Barron, Open File Report 5530, Ontario Geological Survey, 1985.			
2289		1/1/2004	"Talc Inhalation is a Life-Threatening Condition," Y Dekel, L Rath-Wolfson, et al, Pathology Oncology Research, 2004.			
2290		7/16/1976	Testing of Coty Talc 1615, 7/16/76 to 7/28/76; PFE-Hug00007189-7190.			
2291		7/16/1976	Pfizer Memo to DS Young, from HD Stanley; Re: TS-5222 Addendum - Section 4, 7/16/76; PFI SEL 00003592-3599.			
2292		8/30/1976	Testing of Coty Talc, WCD 1615, 8/30/76; PFE-Hug00007195.			
2293		8/1/1981	Minerals Found Associated with Talc at Windham, Vermont, AM Blount, August 1981; Blount0131-0137.			
2294		2000-2002	MSHA's Personal Asbestos/ Fiber Compliance Air Sampling Results, January 10, 2000 Through March 25, 2002 - in Fibers/cc; Blount0138-0146.			
2295		9/10/2008	"Asbestiform Antigorite Occurrence in South Australia," JL Keeling, et al, Ninth International Congress for Applied Mineralogy, 9/10/08.			
2296		1/1/2008	"A Review of Carcinogenicity Studies of Asbestos and Non-Asbestos Tremolite and Other Amphiboles," J Addison, EE McConnell, Reg Tox & Pharm, 2008.			
2297		1/1/2012	"An Inter-Laboratory Study to Determine the Effectiveness of Procedures for Discriminating Amphibole Asbestos Fibers from Amphibole Cleavage Fragments in Fiber Counting by Phase-Contrast Microscopy," M Harper, et al, Ann Occup Hyg, 2012.			
2298		11/1/2003	"Talc Pneumoconiosis among soapstone handicraft workers in a rural area of Ouro Preto, Minas Gerais, Brazil," OM Bezerra, et al, Cad Saude Publica, Rio de Janeiro, November-December 2003.			
2299		1/1/2004	"Inhalation Pulmonary Talcosis: High-Resolution CT Findings in 3 Patients," E Marchiori, et al, J Thoracic Imaging, 2004.			
2300		2/27/1974	Memorandum Prepared by Johns-Manville Products Corporation in Response to Eleven Questions Posed by the Food and Drug Administration at a Meeting Held on Feb 27, 1974, 2/27/74.			
2301		2/1/1995	Polarized Light Microscopy of Asbestos, ID-191, DT Crane, October 1992, Revised February 1995; Blount0071.			
2302		12/8/1986	Report on samples obtained from Vermont Talc Co Mine and Troy prospect, September 18-19, 12/8/86; Blount0094-95.			
2303		1/1/1979	"Pulmonary disease caused by the inhalation of cosmetic talcum powder," IP Wells, et al, British Journal of Radiology, 1979; JNJ000340808-810.			
2304		2/10/1994	OSHA Reference Method - Mandatory, 1910.1001 Appendix A, 6/8/92, 2/10/94; Blount0096-97.			
2305		1/1/1991	"Talc: USA and Europe competitive markets," J Burger, Industrial Minerals, January 1991; Blount0115-116.			
2306		1/1/2010	"Respiratory effects from industrial talc exposure among former mining workers," RC Loyola, et al, Rev Saude Publica, 2010.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2307		1/1/1996	"Mineral Phases and Some Reexamined Characteristics of the International Union Against Cancer Standard Asbestos Samples," N Kohyama, et al, American Journal of Industrial Medicine, 1996.			
2308		1/1/2011	"Letter to the Editor: Talc asbestosis and pulmonary tuberculosis in a patient exposed to the talc used in the production of soccer balls," OM Dias, et al, J Bras Pneumol, 2011.			
2309		8/5/2020	"Asbestos: Why is the cosmetics industry not taking responsibility?" B Bargh, Cosmetics Business, 8/5/20.			
2310		1/28/1974	Letter to I Stewart, McCrone, from JP Simko; Re: Analysis of Three samples of talc, PO 614953, 1/28/74; Attachments: Project Cost Record MA 3805, 1/30/74; Letter to JP Simko, from R Shimps; Re: Results of analysis of samples designated 516, Cashmere Bouquet and NC Regal, 2/5/74; CPC-WINKETBSCPT00000623-30			
2311		1986-1988	Cyprus Minerals XRD Analysis/ Testing of Talc, Supra and Mistron, 1986-1988; LEHMAN01830-1852; CPC-FISHBAINTRSCPT0000143-65.			
2312		1/11/1986	Cyprus Hold Memo from K Lehman, 1/11/86; LEHMAN01831.			
2313		4/21/2006	Report of Findings: Evaluation of Airborne Asbestos Exposure to Workers during Installation and Removal of Tremco Window Caulk and Tape, EPI Project No 25257, 4/21/06.			
2314		7/14/2008	ASTM Symposia and Workshops - D22 Air Quality: 2008 Johnson Conference: Critical Issues in Monitoring Asbestos, July 14-18, 2008; Blount0047-52..			
2315		2/8/2008	2008 Johnson Conference Program: Preliminary Program, 2/8/08; Blount0053-62.			
2316		4/1/2008	Understanding the NU-430/435, Nuaire, Class II, Type B2 Biological Safety Cabinet/ Fume Hood, April 2008.			
2317		9/1/2014	Operation & Maintenance Manual for Nuaire Labgard ES Energy Saver Class II, Type B2 Laminar Flow Biological Safety Fume Hood, Models NU-435-400/600, Series 66, Revision 2, September 2014.			
2318		11/1/1948	Abstract- "Pulmonary Dust Disease," AR Riddell, Ind Med, 17: 168-70, 1948, American Ceramic Society Abstracts, November 1948.			
2319		1/1/1951	Abstracts - "Respiratory Disease- an industrial hazard," AT Doig, Glasgow Med J, 30 [July] 235, 1949; Report on third International Conference of Experts on Pneumoconiosis," Bull Inst Mining Met, 1950, American Ceramic Society Abstracts, 1951.			
2320		1/1/1963	Abstracts - "Types of asbestos, their study by optical methods, a pathogenic action," KG Schmidt, Staub, 20(6): 1060, APCA Abstr.; Fiberglass: Some Properties and New Applications," PV Toolet, American Ceramic Society Abstracts, 1963.			
2321		1/1/1950	Abstract - "Review of pneumoconiosis and dust suppression in mines: Medical aspects of pneumoconiosis," AC Heppleston, Trans Inst Mining Engrs, 108: 456-64, 1949, American Ceramic Society Abstracts, 1950.			
2322		1/1/1986	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 1986.			
2323		1/1/1987	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 1987.			
2324		1/1/1991	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 1991.			
2325		1/1/1990	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 1990.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2326		1/1/1994	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 1994.			
2327		1/1/2004	Talc and Pyrophyllite, RL Virta, Minerals Yearbook, 2004.			
2328		1/1/2021	"Anthrophyllite asbestos from Staten Island, New York: Longitudinal fiber splitting, M Germine, JH Puffer, Archives of Environmental and Occupational Health, 2021.			
2329		6/6/1985	Department of Health & Human Services Memorandum to WG Flamm, from R Brown, QRAC (Quantitative Risk Assessment Committee); Re: Asbestos in Talc, 6/6/85.			
2330		1/1/1943	"Industrial Hygiene: Report on Study of Talc Miners and Millers in St Lawrence County, NY, W Siegal, AR Smith, L Greenburg, 1943; Rampey032957-032962.			
2331		1/1/2012	Synthesis of Knowledge on Tremolite in Talc, Report R-755, C Dion, et al, Institut de recherche, 2012.			
2332		1/1/2002	Chapter 8: Malignant Mesothelioma in Women, VL Roggli, et al, 2002.			
2333		1/1/2011	"Malignant Mesothelioma: A Clinical Study of 238 Cases," SE Haber and JM Haber, Industrial Health, 2011.			
2334		3/3/1972	Johnson & Johnson Memo to RL Sundberg, from RS Russell; Re: Domestic Talc Sources (101) North Carolina, 3/3/72; IMERYS117967-117972.			
2335		1/27/1964	Bulletin No 966, Carson Frailey's Washington Letter, DCAT, 1/27/64; WCD000880-89.			
2336		1/1/2016	Report of Activities, 2015 Resident Geologist Program, Open File Report 6319, Ontario Geological Survey, 2016.			
2337		2/1/1979	"Cosmetic talc properties and specifications," RW Grexa, CJ Parmentier, Cosmetics & Toiletries, February 1979.			
2338		12/17/2010	Barretts Minerals Material Safety Data Sheet (MSDS) for USP Talc and Microtalc, 12/17/10.			
2339		2/1/2001	Final Environmental Impact Statement Amending and Adopting the Draft Environmental Impact Statement, Barretts Minerals, Regal, Life-of-Mine Expansion Plan, Montana Dept of Environmental Quality, February 2001.			
2340		1/1/1900	"Talc and Pyrophyllite Deposits in North Carolina," JH Pratt, The North Carolina Geological Survey, Economic Paper No 3, 1900.			
2341		1/1/1937	"Talc Deposits of North Carolina," JL Stuckey, Society of Economic Geologists, 1937.			
2342		1/1/1919	The Mining Industry in North Carolina During 1913-1917 Inclusive, Economic Paper No 49, The North Carolina Geological and Economic Survey, JH Pratt, HM Berry, 1919.			
2343		6/12/2020	Expert Report of R Mark Bailey, PG on Asbestos in Talc Products from the Fontane Mine, Val Germanasca, Italy, 6/12/20.			
2344		11/16/2020	Expert Report R Mark Bailey, P.G. on Asbestos in Talc Products from the Hammondsville Mine, Vermont, USA, 11/16/20.			
2345		7/14/2020	Expert Report R Mark Bailey, P.G. on Asbestos in Talc from the Mt Fitton Talc District, South Australia, Australia, 7/14/20.			
2346		12/4/2017	Expert Report R Mark Bailey on Asbestos in Talc, Death Valley, California, 12/4/17.			
2347		Undated	Statistical Excel Spreadsheet (Stokes Table)			
2348		7/1/2012	ISO 22262-1 - Air Quality - Bulk Materials - Part 1: Sampling and qualitative determination of asbestos in commercial bulk materials. First Ed. 7/1/12.			
2349		10/18/2019	Email to R Lanham, FDA, from L Szczepaniak, Johnson and Johnson; Re: List of J&J Meeting participants for your records, 10/18/19; JNJTALC001282059.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2350		Undated	"Tests for Carcinogenicity of Asbestos," WE Smith, et al, Health Research Institute, Farleigh Dickinson University, Undated.			
2351		9/1/1974	Identification and Assessment of Asbestos Emissions from Incidental Sources of Asbestos, RJ Kuryvial, EPA-650/2-74-087, September 1974.			
2352		8/1/1997	"Letter to the Editor: Asbestos Disease in Foundrymen," AM Langer, RP Nolan, JOEM, August 1997.			
2353		5/4/1979	Letter to Cyprus Mines Corp, from DR Ferry, Charles Mathieu; Re: Acquisition of Charles Mathieu, 5/4/79; ITA 120-21.			
2354		3/1/1976	Newspaper Article - Asbestos fibers turn up in powder, M Burros, The Washington Post, March 1976.			
2355		3/9/1976	Newspaper Article - List 10 Talc As Perils, Daily News, 3/9/76; IMERYSO61769.			
2356		3/9/1976	Newspaper Article - 10 body powders linked to cancer, Times-Union, 3/9/76; IMERYSO61771.			
2357		Undated	Newspaper Article - Top 3 Crayon Makers To Eliminate Talc From Product To Ease Fears of Asbestos, Washington Post, Undated; VANDERBILT000062802-62803.			
2358		1/1/1989	Talc in Southeastern Ontario, PS LeBaron, S van Haaften, Open File Report 5714, Ontario Geological Survey, 1989.			
2359		1/1/1964	Talc Resources of the United States, Geological Survey Bulletin 1167, AH Chidester, AEJ Engel, LA Wright, USGD, 1964.			
2360		1/1/1976	Mines and Mineral Deposits in Death Valley National Monument, California, Special Report 125, California Division of Mines and Geology, JR Evans, 1976; PFI_GIBB_00000247-306.			
2361		8/1/1978	Environmental Consequences of Mineral Extraction: Death Valley and Organ Pipe Cactus National Monuments, Report to the Congress of the United States, August 1978.			
2362		1/1/1966	Stratigraphy and Structure, Death Valley, California, Geological Survey Professional Paper 494-A, CB Hunt, DR Mabey, 1966.			
2363		1/1/2011	Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California, BS Van Gosen, JP Clindenbeard, Open-File Report 2011-1188, USGS, 2011.			
2364		11/28/2018	Asbestos in Talc, Session C - Interpretation of Testing Data, M Sanchez, JIFSAN Symposium, 11/28/18.			
2365		11/28/2018	Asbestos in Talc, Main Session, C Sheehan, JIFSAN Symposium, 11/28/18.			
2366		Undated	Power Point Presentation - The Mineral Fibers of Potential Concern in Talc, B Van Gosen, USGS, Undated.			
2367		7/8/1974	Johns-Manville Memo to RB Von Wald, from H Kranich; Re: Talc Labeling Letter, 7/8/74; CRMC-Talc-Micro-000085-87; Affidavit.			
2368		10/15/1974	Johns-Manville Memo to Labeling Review Committee, from EM Fenner; Re: Labeling Review Committee Meeting, October 15, 1974, Review of Talc Label, 10/15/74; CRMC-Talc-Micro-000062-64; Affidavit.			
2369		9/20/1974	Johns-Manville Memo to Area Sales Managers, from HR Keefe; Re: Talc Label, 9/20/74; CRMC-Talc-Micro-000065-68; Affidavit.			
2370		11/7/1974	Johns-Manville Memo from P Kotin; Re: Talc Labeling, 11/7/74; CRMC-Talc-Micro-000069; Affidavit.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2371		10/25/1974	Johns-Manville Memo to RP Carter, from PA Martinson; Re: Labeling Desertalc Products, 10/25/74; CRMC-MAD-000315.			
2372		3/31/1975	Johns-Manville Memo to DB Tash, from RK Comann; Re: Talc Quality and Plans, 3/31/75; CRMC-Talc-Micro-001833-1839; Affidavit.			
2373		1/31/1975	Pfizer Monthly Testing Report, General OSHA and FDA Talc Regulations, HD Stanley, 1/31/75; PFI_SEL_00004393-4398.			
2374		4/18/1980	Pfizer Memo to PR Saueracker, from DG Brant; Re: California CP Talc, Asbestos Regulations, 4/18/80; PFI_SEL_00000401-404.			
2375		11/1/1985	Material Safety Data Sheet (MSDS) for California Talc, Pfizer, 11/1/85; 008277-78.			
2376		3/5/1987	Pfizer Memo to PR Saueracker, from DG Brant; Re: Current Labelling Program at Victorville - History and Rationale, 3/5/87; PFZ001162_02795.			
2377		8/15/1968	United Sierra Grand Island Products, United Sierra, 8/15/68; AB-CYP-10-000006.			
2378		4/12/1989	Johns-Manville Memo to H Marsh, from RL Goodbinder; Re: Interview of April 7, 1989 with Earl B Smith, 4/12/89; CRMC-JM-Talc-000003-11.			
2379		3/22/1971	Johns-Manville Desertalc List of Distributors, 3/22/71; CRMC-JM-Talc-000012-17.			
2380		5/25/1989	Desert Minerals Product Line Descriptions, RL Goodbinder, Draft 2, 5/25/89; CRMC-JM-Talc-000018-22.			
2381		11/7/1972	Desert Minerals Memo to F Richards, from EB Smith; Re: Talc National Account Candidates, 11/7/72; CRMC-JM-Talc-000023-26.			
2382		2/18/1980	Comments to the CPSC in Response to Consumer Products Containing Asbestos, Advance Notice of Proposed Rulemaking, Center for Occupational Hazards, M McCann, PA Porter, 2/18/80.			
2383		1/14/2009	Deposition of Henry T Mulryan, Cyprus Industrial Minerals, 1/14/09.			
2384		1/1/1980	"Anthophyllite Asbestos: microstructures, intergrown sheet silicates, and mechanisms of fiber formation," DR Veblen, <u>American Mineralogist</u> , 1980.			
2385		11/1/2006	Affidavit of Richard S Lamar, Cyprus Industrial Minerals, 1/8/08; RJ Lee Report on Mineral Analysis of Talc Ore, Grantham Talc Mine, Death Valley, CA, 11/1/06.			
2386		7/17/1956	Johns-Manville Memorandum 12-38; Re: Microscopic Examination of Talc from Eastern Magnesia Talc Co, 7/17/56; CRMC-Talc-Micro-000231.			
2387		8/10/1971	Pfizer Memo from RE Norwood and HD Stanley; Re: Asbestos in Talc "Analytical Methodology Conference at FDA, Wash DC, August 3, 1971, 8/10/71; PFI_KA_00000001-10.			
2388		7/16/2004	Letter to CW Jameson, NTP, from DD Harris, Luzenac; Re: Comments on the talc nominations for the 12th RoC, 7/16/04.			
2389		2/3/1977	Newspaper Article - Labor Agency Cancels Its Safety Exemption on Industrial Talcs, <u>Wall Street Journal</u> , 2/3/77.			
2390		7/12/1971	Newspaper Article - Report from Mr Kretchmer - Watchman, What of Environment? It's Beset - And So Is the Watchman, <u>Natl Observer</u> , 7/12/71; JNJALC000436984.			
2391		7/16/1972	Newspaper Article - Asbestos Detected in Test of Drugs, JE Brody, <u>New York Times</u> , 7/16/72.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2392		7/2/1987	Newspaper Article - Asbestos Found in Baby Powder, According to Japanese Reports, Tokyo, 7/2/87; JNJALC000636060.			
2393		3/5/1997	Newspaper Article - Feminine Products Pose Risk? D Henderson, Charleston South Carolina Post and Courier, 3/5/97; IMERY330949.			
2394		3/5/1997	Newspaper Article - Possible Link Between Cancer, Spray, Winnipeg Free Press, 3/5/97; IMERY330960.			
2395		3/5/1997	Newspaper Article - Double Dose of Bad News for Women, Ohio Morning Journal, 3/5/97; IMERY330962.			
2396		3/5/1997	Newspaper Article - Link May Exist Between Cancer and Hygiene Products, Wilmington Morning Star, 3/5/97; IMERY331055.			
2397		3/4/1997	Newspaper Article - Study links cancer, powders, Seattle Times, 3/4/97; IMERY331061.			
2398		9/1/2001	Toxicological Profile for Asbestos, ASTDR, September 2001.			
2399		10/10/1971	Health Study, Dust, Dunn Talc & Clay Mill and Tecopa Pit & Mill, Western Talc Co, GW Sutton, US Bureau of Mines, October 10-18, 1971; FOS025935-947.			
2400		11/1/1960	"Problem Areas in Pneumoconiosis," M Kleinfeld, J Messite, AMA Arch Environ Health, November 1960.			
2401		3/28/1968	Newspaper Article - Asbestos Blamed for Increase in Ovary Cancer," G Getze, The Philadelphia Inquirer, 3/28/68.			
2402		12/1/1979	"The talcum-powder-cancer controversy," SELF, December 1979; JNJ000030515-30516.			
2403		1/1/1992	"Perineal Exposure to Talc and Ovarian Cancer Risk," BL Harlow, DW Cramer, WR Welch, Obstet Gynecol, 1992.			
2404		1/1/1992	"Mineral Fiber Exposure and the Development of Ovarian Cancer," KA Rosenblatt, et al, Gynecologic Oncology, 1992.			
2405		1/1/1996	"Asbestos Exposure and Ovarian Fiber Burden," DS Heller, RE Gordon, S Gerber, American Journal of Industrial Medicine, 1996.			
2406		1/1/1997	"Perineal Powder Exposure and the Risk of Ovarian Cancer," LS Cook, et al, American Journal of Epidemiology, 1997.			
2407		1/1/1999	"Genital Talc Exposure and Risk of Ovarian Cancer," DW Cramer, BL Harlow, et al, Int J Cancer, 1999.			
2408		1/25/2019	Declaration of William Longo, Koretoff v Arkema, Inc f/k/a Pennwalt Corporation, et al, 1/25/19.			
2409		3/5/1976	Colgate Laboratory Notebook 6164-99, X-Ray Diffraction, P Briscese, 3/5/76; CPC-NB00000061.			
2410		1/24/1968	Letter to WH Lycan, Johnson & Johnson, from WR Brown, Battelle; Re: Data on the beneficiation of talc by flotation, 1/24/68; JNJ000087825.			
2411		1/1/1969	Schimmel Briefs No 348, Talc for Baby Powder Refined by Flotation, 1969; JNJ000868282-283.			
2412		1/1/1941	Talc, Excerpt of The Chemistry and Manufacture of Cosmetics, MG de Navarre, 1941. (excerpt)			
2413		11/29/2019	Expert Report of David Madigan - Talc & Asbestos - J&J, 11/29/19.			
2414		5/6/2019	Expert Report of David Madigan - Cashmere Bouquet General Report, 5/6/19.			
2415		7/8/2019	Expert Report of David Madigan - Chanel General Report, 7/8/19.			
2416		9/11/2020	Expert Report of David Madigan - Jean Nate General Report, 9/11/20.			

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2417		1/1/2021	"A Review of the Talc Industry's Influence on Federal Regulation and Scientific Standards for Asbestos in Talc," T Bird, JE Steffen, TH Tran, DE Egilman, New Solutions, 2021.			
2418		1/1/2021	"Supplement: A Review of the Talc Industry's Influence on Federal Regulation and Scientific Standards for Asbestos in Talc," T Bird, JE Steffen, TH Tran, DE Egilman, New Solutions, 2021.			
2419		9/11/2020	Expert Report of David Madigan - Old Spice General Report, 1/3/20.			
2420		12/13/2019	Declaration of William Longo, 12/13/19.			
2421		5/22/2019	Declaration of William Longo, 5/22/19.			
2422		1/1/1972	Who's Who in the Cosmetics Industry, 1972; LoGiudice/WCD/0006-83.			
2423		1/1/1972	Newspaper Article - Talc in Cosmetics, Foods, Drugs May Pose Carcinogenic Risks, Pediatric News, January 1972; JNJ000244812.			
2424		1/1/923	Excerpts of Alabama and Georgia Talc Deposits, Directory of Commercial Minerals in Georgia and Alabama Along the Central of Georgia Railway, TP Maynard, 1923.			
2425		1/1/1941	Circular 16: The Talc Deposits of Talladega County, Alabama, L McMurray, Geological Survey of Alabama, 1941.			
2426		1/1/1955	Bulletin 65: Index to the Minerals and Rocks of Alabama, HD Pallister, Geological Survey of Alabama, 1955.			
2427		7/13/2018	Letter to JD Satterley, from LW Poye, J3 Resources; Re: Hayes v Colgate - Shower to Shower Samples, 7/13/18.			
2428		1/15/1999	Chemical Sampling Information for Talc (Containing Asbestos), OSHA, 1/15/99.			
2429		9/29/2020	Supplement Report 1: MAS Project #M71166: Off-the-Shelf 2020 JBP Talcum Powder Analysis, WE Longo, MAS, 9/29/20.			
2430		9/29/2020	Project Summary, Excerpt of Supplement Report 1: MAS Project #M71166: Off-the-Shelf 2020 JBP Talcum Powder Analysis, WE Longo, MAS, 9/29/20.			
2431		1/31/2021	MAS Chart of J&J Testing (current as of January 31, 2021)			
2432		7/18/1977	"Practical Aspects of Talc and Asbestos," CJ Parmentier and GJ Gill, Cyprus Industrial Minerals Company, National Bureau of Standards Special Publication 506, Proceedings of the Workshop on Asbestos: Definitions and Measurement Methods Held at NBS, July 18-20, 1977.			
2433		1/29/2014	ATSDR Case Studies in Environmental Medicine, Asbestos Toxicity, 1/29/14.			
2434		1/1/1975	Talcum Products Collected and Analyzed for Asbestos Under FY 75 Import Cosmetic Sampling Program, FDA, 1975.			
2435		1/1/2020	Letter to the Editor: Misrepresentation by Egilman et al of the Fordyce et al (2019) Vermont Talc Miners and Millers Cohort Study Update, JOEM, January 2020.			
2436		1/1/2017	International Analysis of age-Specific Mortality Rates From Mesothelioma on the Basis of the International Classification of Diseases, 10th Revision, P Boffetta, et al, American Society of Clinical Oncology, 2017.			
2437		9/1/1976	The Health Effects of Asbestos Inhalation: A Review of the Literature, D Gilbert, September 1976.			
2438		1/1/1982	"Interpretation of the Carcinogenicity of Amosite Asbestos and Ferroactinolite on the Basis of Retained Fiber Dose and Characteristics In Vivo," PM Cook, et al, Toxicology Letters, 1982.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2439		12/4/1973	Letter to FDA, from D Thorp, Ohio Lung Assn; Re: Comments Regarding Asbestos in Food and Drugs, Federal Register September 28, 12/4/73.			
2440		5/17/2011	7881 Calculation of Number Asbestos Fibers per Oz, JR Millette, 5/17/11.			
2441		3/28/2013	7881 Calculation of Number Asbestos Fibers per Oz, JR Millette, 3/28/13.			
2442		Undated	Video - Keith Lehman - Metropolitan Talc			
2443		9/1/1974	A-1 Appendix A: Detailed Discussion of Occurrence of Asbestos as an Accessory Mineral and Mining Activity In These Areas, Identification and Assessment of Asbestos Emissions from Incidental Sources of Asbestos, RJ Kuryvial, EPA-650/2-74-087, September 1974			
2444		1/1/1968	National Inventory of Sources and Emissions: Asbestos, APTD-70, EPA, 1968.			
2445		8/9/2016	Ingredients > Talc, FDA, 8/9/16.			
2446		4/1/2008	"Perineal Talc Use and Ovarian Cancer: A Critical Review," JE Muscat, MS Huncharek, Eur J Cancer Prev, April 2008.			
2447		5/1/1977	Analysis of Talc by X-Ray Diffraction and Polarized Light Microscopy, WC McCrone & Associates, May 1977; INTERNET AVON-0000009-103.			
2448		1/27/2010	Imerys PPT - SHORT VERSION Overview ASTM Method fo Asbestos in Cosmetic and Pharmaceutical Talc Products, J Pier, 1/27/10; IMERYS271833.			
2449		1/1/2006	100 Years: From Talco E Grafite to "Rio Tinto- Luzenac Val Chisone", 2006.			
2450		Undated	Schematic Geologic Map of the Northern Sector of Italy			
2451		1/1/1987	The Mineral Industry of China, Bureau of Mines Minerals Yearbook, E Chin, 1987; JNJTALC000453925-943.			
2452		9/6/2018	MAS TEM Coefficient of Variation for Tremolite and Anthophyllite in Talc: A Quality Control Study, 9/6/18.			
2453		1/10/2020	Expert Report of David Madigan - Cashmere Bouquet General Report, 1/10/20.			
2454		11/30/1978	Annual Scientific Meeting, Advance Registration, November 30-December 1, 1978.			
2455		8/2/1983	Letter to RW Johnson, Cyprus Talc Co., from OSHA; Re: Compliance Visit of the Panamint Mine, Inyo County, California, 8/2/83.			
2456		1/1/1974	United Sierra and Cyprus Minerals Logos, Circa 1974 to Present.			
2457		3/14/1945	Letter to CC Morris, US Public Bonds Admin, from O Booth, Sierra Talc; Re: Kennedy Minerals request for road improvement in Warm Springs Canyon, Death Valley, CA, 3/14/45.			
2458		Undated	"Characterization and Occurrence of Talc," HT Mulryan, Cyprus Mines Corporation, Undated.			
2459		1/1/1949	Directory of Producers of Metallic and Nonmetallic Minerals in California During 1949.			
2460		1/1/1990	Cosmetic Talc: A CTPA Guide, The Cosmetic Toiletry & Perfumery Association, London, 1990; CPC-NYCALTRSCPT00004428-77.			
2461		7/11/1986	Memo to P Douillet, from HJW Swanson; Re: Asbestos warning statement on talc, 7/11/86; CPC-BCALTRSCPT00001199-1202.			
2462		1/1/1995	"Talc: Consumer Uses and Health Perspectives, " Regulatory Toxicology and Pharmacology, 21: 211-15, 1995; FDA00000403-7.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2463		11/17/1994	Letter to Commissioner Kessler, FDA, from J Cashen, Cancer Prevention Coalition; Re: Cosmetic talc and cancer, 11/17/94; Attachment: Citizen Petition Seeking Carcinogenic Labeling On All Cosmetic Talc Products, 11/17/94; FDA00000222-231.			
2464		4/4/1995	Letter to LD Jaffe, FDA, from K Ashdown, Cancer Prevention Coalition; Re: Petition to require labeling on cosmetic talc, 4/4/95; FDA00000238-39.			
2465		7/11/1995	Letter to J Cashen, Cancer Prevention Coalition, from JE Bailey, FDA Office of Cosmetics and Colors; Re: Response to your citizen petition, 7/11/95; FDA00000285.			
2466		1/1/1994	"Biological Effects of Cosmetic Talc," AP Wehner, Fd Chem Toxic, 1994; FDA00000317-28.			
2467		11/1/1978	"Misidentification of Asbestos in Talc," JB Krause, WH Ashton, National Bureau of Standards Special Publication 506, Proceedings of the Workshop on Asbestos: Definitions and Measurement Methods Held at NBS, July 18-20, 1977, November 1978; FDA00000343-57.			
2468		1/1/1995	"Talc: Occurrence, Characterization, and Consumer Applications," R Zazenski, WH Ashton, SD Gettings, et al, Regulatory Toxicology & Pharmacology, 1995; FDA00000856-67.			
2469		5/13/2008	Petition Seeking a Cancer Warning on Cosmetic Talc Products, Cancer Prevention Coalition, 5/13/08; FDA000001326-31.			
2470		1943-1986	Cyprus Industrial Minerals Talc Products, 1943 to 1986; LUZ00000027-28.			
2471		3/1/1995	Talc Products for Personal Care Applications, Luzenac America, March 1995; LUZ00000061-63.			
2472		3/2/1966	"Asbestos Dust Called a Hazard To At Least One-Fourth of US," JE Brody, New York Times, 3/2/66; CPC-WINKELTRSCPT00000287.			
2473		5/20/2014	Deposition of Keith B Lehman, Diaz and Fishbain v Brenntag North America as Successor-in-Interest to Mineral Pigment Solutions, Inc, as a Successor to Whittaker, Clark & Daniels, Inc, et al, Superior Court of New Jersey, Middlesex County, 5/20/14; CPC-FISHBAINTRSCPT00000001-56.			
2474		9/8/2011	Videotaped Deposition of Keith B Lehman, Vol I, Bernard and Sauer v Brookfield Properties Corp, et al, Supreme Court of the State of New York, County of New York, 9/8/11; CPC-NYCALTRSCPT00011722-79.			
2475		9/16/2011	Videotaped Deposition of Keith B Lehman, Vol II, Bernard and Sauer v Brookfield Properties Corp, et al, Supreme Court of the State of New York, County of New York, 9/16/11; CPC-NYCALTRSCPT00011780-838.			
2476		9/23/2011	Videotaped Deposition of Keith B Lehman, Vol III, Bernard and Sauer v Brookfield Properties Corp, et al, Supreme Court of the State of New York, County of New York, 9/23/11.			
2477		1/24/1967	United States Patent 3,300,387 - Pressed Powder Antiperspirant and Method of Preparation, Kolmar Laboratories, 1/24/67.			
2478		1/1/2005	"Lettere in Redazione: Mesotelioma maligno della pleura in barbiere: caso di esposizione professionale atipica indiretta ad amianto," L Riboldi, C Mensi, Z Canti, S Giordano, G Chiappino, Medicina del Lavoro, 2005.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2479		1/1/1974	X-Ray Diffraction Procedures for Polycrystalline and Amorphous Materials, HP Klug, LE Alexander, Mellon Institute, Second Edition, 1974.			
2480		5/8/1973	"Aspects of Mineralogy of Talc," AM Langer, Proceedings of the Symposium on Talc, Washington, DC, May 8, 1973.			
2481		1927-1992	Mount Sinai Archives, Irving J Selikoff Papers, Finding Aid, 1927-1992.			
2482		6/6/1972	Letter to G Hildick-Smith, Johnson & Johnson, from IJ Selikoff; Re: Contribution to Research Fund, 6/6/72; Attachments: Mt Sinai Archive Documents re Consumer Talc; Authentication attached.			
2483		6/3/1985	Research Proposal: Summary of Reviewer's Comments HRC# 18-099; Title: Complaisance Regarding Talc: Attitudes and Ideologies About an Environmental Hazard Commonly Seen as Safe and Pleasant to Use. Irwin Spierber. 6/3/85.			
2484		Undated	Documents and Photos from Alpine, AL Mill marked APLINE 0001-0163.			
2485		Undated	Photos from Alpine, AL Mill, Undated; PLANT 0001-9.			
2486		Undated	Charles Mathieu, Inc Corporate Documents, Donald Ferry; MET0001-MET0112.			
2487		8/3/1979	Agreement for the Sale and Purchase of Certain Assets of American Talc Company, Inc between Cyprus Georesearch Company and American Talc Company, Inc, 8/3/79; ITA 123-151.			
2488		8/3/1979	Letter to Cyprus Georesearch Company, from Charles Mathieu; Re: Obligation to purchase wholly-owned subsidiaries, 8/3/79; ITA 153-64.			
2489		8/3/1979	Agreement for the Sale and Purchase of Certain Assets of Metropolitan Talc Company, Inc between Cyprus and Metropolitan Talc, 8/3/79; ITA 166-95.			
2490		8/3/1979	Agreement for the Sale and Purchase of Certain Assets of Resource Processors, Inc. between Cyprus and Resource Processors, Inc, 8/3/79; ITA 197-400.			
2491		5/31/1994	Letter to DR Ferry, Cyprus, from TJ Kwasizur; Luzenac; Re: Charles Mathieu & Co European Talc Purchases, 5/31/94; ITA 468.			
2492		7/20/1994	Letter to TJ Kwasizur, Luzenac, from PH Bixby, Cyprus; Re: Charles Mathieu & Co - Contract for Sale, 7/20/94; ITA 469-78.			
2493		12/31/1980	Cyprus Product Sales/ Customer by Salesman & Region, Eastern Region 12/31/80; Charles Mathieu Commissions on Italian Crude, 1979-1987; CM Invoices to Cyprus for Crude Italian Talc, 1980-1983; ITA 495-518.			
2494		Undated	Willow Creek Mine, Madison County, Montana, Undated; ITA 557-58.			
2495		6/5/1992	Agreement of Transfer and Assumption between Cyprus Talc Corp (Newco) and Cyprus Mines Corp, 6/5/92; ITA 559-640.			
2496		1/1/1914	Geological Survey of Georgia, Bulletin No 29, A Report on the Asbestos, Talc and Soapstone Deposits of Georgia, OB Hopkins, 1914.			
2497		11/13/1971	Field Trip Guide Book: Stratigraphy and Structure of the Murphy Belt, North Carolina, WR Power, JT Forrest, Carolina Geological Society, November 13-14, 1971.			
2498		8/4/1993	Proposed Outline for Talc Technical Presentation at the FDA Talc Symposium, R Zazenski, Luzenac America, 8/4/93; PCPC000419-21.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2499		2/2/1994	Letter to Dr WE Gilbertson, FDA, from Dr AP Wehner, Biomedical & Environmental Consultants, Inc; Re: Productive workshop, 2/2/94; PCPC000034-36.			
2500		1/1/1989	"Establishing Aerosol Exposure Concentrations for Inhalation Toxicology Studies," TR Lewis, PE Morrow, RO McClellan, OG Raabe, GL Kennedy, BA Schwetz, TJ Goehl, JH Roycroft, RS Chhabra, Toxicology and Applied Pharmacology, 99: 377-83, 1989.			
2501		2/1/1979	Draft Talc Standard Prepared for NIOSH, SRI International, February 1979; PCPC000284.			
2502		2/2/1994	Letter to AL Brown, University of Wisconsin Medical School, from Dr AP Wehner; Re: Reprints of our talc work, 2/2/94.			
2503		5/23/1973	"The Evaluation of Chemical Binders and Their Effect on Pressed Powders," ML Schlossman, AJ Feldman, J Soc Cosmet Chem, 24: 357-62, 5/23/73.			
2504		1/1/1970	Worked Examples in X-Ray Spectrometry, RH Jenkins, B De Vries, Phillips Technical Library, 1970.			
2505		10/22/1990	"Distinguishing Between Amphibole Asbestos Fibers and Elongate Cleavage Fragments of Their Non-Asbestos Analogues," AM Langer, RP Nolan, J Addison, Proceedings of a NATO Advanced Research Workshop on Mechanisms in Fibre Carcinogenesis, October 22-25, 1990.			
2506		1/1/1991	"Association of Tremolite Habit with Biological Potential: Preliminary Report," RP Nolan, AM Langer, GW Oechsle, J Addison, DE Colflesh, Mechanisms in Fibre Carcinogenesis, RC Brown, et al. Eds. 1991.			
2507		10/31/2014	Newspaper Article - Study: Cosmetic talc products carry asbestos peril, A Schneider, Seattle Post-Intelligencer, 10/31/14.			
2508		2/24/1975	Letter to H Romer, from RM Schaffner, FDA; Re: Status of FDA Review of talc for asbestos contamination, 2/24/75.			
2509		8/20/1973	FDA Memorandum; Re: Asbestos in Cosmetic Talcs - Action Memorandum, 8/20/73.			
2510		1/1/1973	Comments on the Proposed Method of Identifying Chrysotile and Amphibole in Talc, M Ross, USGS, 1973.			
2511		8/24/1976	Industrial Hygiene Walk-Through Report at American Talc Co, Alpine, Alabama, NIOSH, 8/24/76.			
2512		10/29/2021	Excerpt of the Deposition of Dennis St George, Moore v Johnson & Johnson, et al, 10/29/21. (7 pp)			
2513		2/16/2012	Deposition of Luker Van Stewart, In Re: New York City Asbestos Litigation, 2/16/12.			
2514		4/1/2014	Letter to S Epstein, Cancer Prevention Coalition, from SM Musser, FDA; Re: Response to Citizen Petitions dated November 17, 1994 and May 13, 2008, 4/1/14.			
2515		9/18/2017	Ingredients - Talc, FDA; www.fda.gov/cosmetics/productsingredients , 9/18/17.			
2516		Undated	Figure A-2 Map of Area of Alpine, Alabama Containing Metamorphic Rocks			
2517		Undated	Color Photos - 1615 AGI Talc			
2518		1/1/2007	Minerals in the Economy of Alabama, LS Dean, Geological Survey of Alabama Information Series 64R, 2007.			
2519		2/10/2017	Imerys Talc America, Inc's Responses to Plaintiff's First Supplemental Interrogatories and Document Requests, Schoeniger v Brenntag North America, et al, 2/10/17; Verified.			
2520		2/16/2016	Declaration of Patrick J Downey, Alfaro v American Talc Co, et al, 2/16/16.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2521		5/12/2005	Code of Federal Regulations Title 29, Part 1926 - Safety and Health Regulations for Construction, Subpart Z - Toxic and Hazardous Substances, 5/12/05.			
2522		1/1/1992	Cyprus Industrial Minerals Domestic Producing Locations, Key Product Specifications, January 1992; ITA-Alfaro000393-398.			
2523		1/14/2013	Talc in Cosmetics, www.fda.gov,1/14/13; ITA-Polakow-000129-132.			
2524		4/11/1975	Vanderbilt-Grantham Action Plan, Asbestos-Talc Study, Project No 9790-4, Cyprus Industrial Minerals, 4/11/75; CAMC-Abbott-000247-344.			
2525		Undated	Cyprus Industrial Minerals Technical Bulletin - Certification of Compliance, OSHA Asbestos Standard 1910.93a, Undated; CAMC-Abbott-000345.			
2526		2/12/1980	Talc and the OSHA Asbestos Standard 29CFR 1910.1001, Cyprus Industrial Minerals, 2/12/80; CAMC-Greco-000023-25.			
2527		1/22/1979	Letter to E Baumel, NIOSH, from GJ Gill, Cyprus Industrial Minerals; Re: Concerns re Talc Criteria Document, 1/22/79; CAMC-Greco-000272-276.			
2528		6/9/1980	Supra Talcs and the OSHA Asbestos Standard 29 CFR 1910.1001, Cyprus Industrial Minerals, 6/9/80; ITA-Polakow-000127-128.			
2529		7/26/1984	Letter to TP Hall, OSHA, from KF Julin, Amoco/ Cyprus Industrial Minerals; Re: Late comments pertaining to OSHA Proposed Regulations, 7/26/84; CAMC-Greco-000364-366.			
2530		9/1/1986	Cyprus Standard Test Method 01, Asbestiform Mineral Analysis in Talc, September 1986; ITA-Goodhue-000035-52.			
2531		9/30/1991	Letter to J Paterno, Synthetic Specialties, from RJ Zazenski; Re: Asbestiform Mineral Testing - Cyprus Talc Products, 9/30/91; ITA-Abeyta-00447-49.			
2532		6/7/2001	Email to DA Dorman, from R Zazenski, Luzenac America; Re: Talc Specification, 6/7/01.			
2533		3/6/2012	Imerys Talc Rodoretto H6/11 High Capacity Sample, December 23, 2011, Turin Polytechnic, P Marini, 3/6/12; AB-Polakow-000524-526.			
2534		3/4/2012	Imerys Talc, R01/12 Campione Solido Della Fronte, Politecnico Di Torino, February 29, 2012, P Marini, 3/4/12; AB-Polakow-000537-538, 1797-1826.			
2535		2/16/2004	"Controllo dell' eventuale presenza di fibre di amianto nell' atmosfera e nel minerale abbattuto della miniera di Rodoretto," Politecnico Di Torino, 2/16/04; AB-Polakow-001865-1876.			
2536		Undated	South Plainfield Tremolite Tests, K Lehman, Undated; LEHMAN01711-1839; ITA-Polakow-000210-285.			
2537		Undated	CIM Talc Mines and Markets; IMERYS332266-67.			
2538		Undated	Luzenac America Product Brochure			
2539		10/23/2003	Talc Suppliers in the USA and Canada, 10/23/03; IMERYS147356-379.			
2540		10/2/2014	Imerys PPT- Talc as a Consumer Product Ingredient: Cosmetic Applications and Regulatory Compliance, J Pier, Society of Cosmetic Chemists California Scientific Seminar, 10/2/14; IMERYS178244.			
2541		10/29/2021	Whittaker, Clark & Daniels Codes, Moore v WC&D, 10/29/21.			
2542		6/28/2002	Luzenac History North America, 1919-2002, 6/28/02; IMERYS077321-327.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2543		1/1/2011	"An uncommon hazard: Pulmonary talcosis as a result of recurrent aspiration of baby powder," C Frank, L Jorge, <i>Respiratory Medicine ME</i> , 2011.			
2544		1/1/2010	"Letter to the Editor: Talcosis due to abundant use of cosmetic talcum powder," A van Huisstede, et al, <i>European Respiratory Review</i> , 2010.			
2545		1/8/1976	Report of the Examination of Talc Samples obtained from Mount Sinai Hospital, FD Pooley, University College, Cardiff, 1/8/76; JNJNL61 000069018-69077.			
2546		1/1/2011	Pleural Plaques: Information for Health Care Professionals, <i>British Thoracic Society</i> , 2011.			
2547		5/20/1978	Reply to Letter to the Editor Regarding Hamilton and Hardy," NJ Vianna, AK Polan, <i>The Lancet</i> , 5/20/78.			
2548		1/1/2013	ASTM D7521-13 Standard Test Method for Determination of Asbestos in Soil, 2013.			
2549		5/12/2011	Characterization of Fibertal #6 (MVA Sample 8836-W0637) by Transmission Electron Microscopy (TEM) With Associated Energy Dispersive Spectroscopy (EDS), McLinc Project MVA002203 B, J Millette, 5/12/11.			
2550		6/3/2011	Characterization of IT325 (MVA Sample 8836-W0639) by Transmission Electron Microscopy (TEM) With Associated Energy Dispersive Spectroscopy (EDS), McLinc Project MVA002203 D, J Millette, 6/3/11.			
2551		6/1/2011	Characterization of Nyltal 200 (MVA Sample 8836-W0638) by Transmission Electron Microscopy (TEM) With Associated Energy Dispersive Spectroscopy (EDS), McLinc Project MVA002203 C, J Millette, 6/1/11.			
2552		3/19/2018	Winchite, mindat.org, 3/19/18.			
2553		1/1/1971	Asbestos in Ontario, MA Vos, Ontario Dept of Mines, 1971.			
2554		1/1/1999	ASTM D6480-99 Standard Test Method for Wipe Sampling of Surfaces, Indirect Preparation, and Analysis for Asbestos Structure Number Concentration by Transmission Electron Microscopy, 1999.			
2555		1/1/2015	ASTM D6281-15 Standard Test Method for Airborne Asbestos Concentration in Ambient and Indoor Atmospheres as Determined by Transmission Electron Microscopy Direct Transfer (TEM), 2015.			
2556		9/1/2014	ISO 22262-2 Air Quality - Bulk Materials, Part 2: Quantitative Determination of Asbestos by Gravimetric and Microscopical Methods, 9/1/14.			
2557		11/28/2018	JIFSAN Symposium, Asbestos in Talc, Main Session, 11/28/18.			
2558		1/1/1983	"Expandable Layer Silicates Associated with the Hydrothermal Talc Deposits of Murphy, North Carolina," AM Blount, et al, <i>Economic Geology</i> , 1983.			
2559		5/1/2020	Johnson's Baby Powder Application to Baby During Diaper Change: A Hygiene Study Supplemental, WE Longo, M Rigler, WB Egeland, M Bennett, MAS, May 2020.			
2560		5/11/2018	Asbestos Standard: Amphibole: Anthophyllite, MAS, 5/11/18; RIGLER00010-15.			
2561		2/19/2021	PCME Fibers/cc Air From Chinese Talc, M Rigler, 2/19/21.			
2562		6/12/1973	Englehard Technical Service Request to GA Hemstock, from JH Shafer; Re: Emtal Mine Waste Rock, Asbestos-form Particles and Free Silica, TSR No T-2, 6/12/73; BASF02462-66.			
2563		2/1/2019	Analysis of Johnson & Johnson Baby Powder and Valeant Shower to Shower Talc Products for Amphibole Asbestos: Chinese, WE Longo, MW Rigler, MAS, February 2019.			

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2564		6/28/2019	Talcum Powder Application to Baby and Diaper Change II: A Hygiene Study, WE Longo, WB Egeland, M Bennett, MAS, Revision #1, 6/28/19.			
2565		6/6/2019	Rebuttal Expert Report on California Proposition 65: The Analysis of Chinese Source Talcum Powder used by Johnson & Johnson in their Baby Products, WE Longo, M Rigler, MAS, 6/6/19.			
2566		4/16/2018	Email to M Lanier, from A Blount; Re: JBP samples, 4/16/18; BLOUNT0023.			
2567		12/1/1988	"An Epidemiological Study in an Anatolian Village Environmentally Exposed to Tremolite Asbestos," Yi Baris, N Bilir, P Sebastien, et al, British Journal of Industrial Medicine, December 1988.			
2568		1/1/1973	"Asbestos in the Environment," WJ Nicholson, FL Pundsack, Biological Effects of Asbestos, IARC, 1973.			
2569		1/1/2018	"Analytical transmission electron microscopy of amosite asbestos from South Africa," M Germine, JH Puffer, Archives of Environmental & Occupational Health, 2018.			
2570		4/1/2021	Screening Assessment, Talc, Health Canada, April 2021.			
2571		8/1/1951	Special Report 8: Talc Deposits of Steatite Grade, Inyo County, California, August 1951.			
2572		1/1/1978	Asbestos, Kirk-Othmer Encyclopedia of Chemical Technology, Vol 3, 3rd Edition, 1978.			
2573		12/23/1987	Summary of Supra Lot S12027 Pallet Samples, 12/23/87; LEHMAN01838-1840.			
2574		10/28/2011	MAS Report - Johnnie A Jones Project, 10/28/11.			
2575		Undated	California and Montana Talc Sources, Undated; CAMC-R Foster 000952-953.			
2576		1/1/1957	Figure 1. Map of Southern Death Valley- Kingston Range Region, Wright, 1957.			
2577		1/1/1990	"Petrogenesis and Timing of Talc Formation in the Ruby Range, Southwestern Montana," DL Anderson, et al, Economic Geology, 1990.			
2578		1/1/1990	Precambrian Geology and Bedded Iron Deposits of the Southwestern Ruby Range, Montana, US Geological Survey Professional Paper 1495, HL James, 1990.			
2579		1/1/1991	"Talc Formation in the Regal-Keystone Mine of the Ruby Range, Dillon, Montana," AC Larson, 1991.			
2580		1/1/2002	"Using Fluid Inclusions to Help Unravel the Origin of Hydrothermal Talc Deposits in Southwest Montana," CH Gammons and DO Matt, Northwest Geology, 2002.			
2581		1/1/2007	"Talc in Southwestern Montana," MT Cerino, JF Childs, RB Berg, Northwest Geology, 2007.			
2582		1/1/2020	"Asbestos Contamination in Talc-Based Cosmetics: An Invisible Cancer Risk," T Stoiber, S Fitzgerald, NS Leiba, Environmental Health Insights, 2020.			
2583		1978-1981	Pfizer Testing of 643 Talc, 1978-1981; Various bates.			
2584		6/12/1972	ES Laboratories Talc Analysis (Asbestos) for 1615 Italy, Analysis of Three Talc Samples Labelled #2755, #4609 and #4615, Whittaker, Clark & Daniels, 6/12/72; WCD002478-02482.			
2585		11/16/1977	Letter to JP Simko, Colgate, from LB McCrone; Re: Microscopical examination of two samples - French Talc Lot 5854-11/3 and Talc 1615-Lab #4811- 11/3, 11/16/77; MCCRONE0075.			
2586		8/5/1974	Talc, Soapstone and Pyrophyllite in 1973, Mineral Industry Surveys, US Bureau of Mines, 8/5/74.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2587		9/1/1985	UK Cosmetics - Make up minerals, J Robbins, Industrial Minerals, September 1985; JNJMX68 00000895-907.			
2588		9/6/1973	FDA Project: Asbestos and Other Contaminants in Talc, FY: 1974, J Stuart, 9/6/73.			
2589		1/1/1979	Talc and Chlorite Deposits in Montana, RB Berg, Memoir 45, Montana Bureau of Mines and Geology, 1979.			
2590		1/1/1982	"An Epidemiological-Industrial Hygiene Study of Talc Workers," J Gamble, et al, Ann Occup Hyg, 1982.			
2591		4/30/1973	Statement of Umberto Stefano, MD, Talco E Grafite, Val Chisone, Italy, 4/30/73; JNJ000270588-591.			
2592		11/26/1973	Johnson & Johnson Memo to D Petterson, et al, from WH Ashton; Re: Attached Johns-Manville Memo, 11/26/73; Letter to WT Caneer, CSMRI, from VE Wolkodoff; Re: Response to your phone call, 10/29/73; JNJMX68_000007044-7046.			
2593		2/16/1972	Determinazione Petrografica Di Silicati Asbestoidi, Societa Talco e Grafite Val Chisone, 2/16/72; JNJTALC00028941-414; Report from Turin Polytechnic, 2/16/72.			
2594		8/6/1971	Letter to WT Caneer, Colorado School of Mines, from W Ashton, Johnson & Johnson; Re: Drum of Italian rock from the Crosetto Mine in the Chisone Valley, 8/6/71; JNJTALC000291207-209.			
2595		5/8/1973	Johnson & Johnson Memo Memo to G Hildick-Smith, from WH Ashton; Re: Italian Talc Safety, Case Histories of Talc Workers, Societa Talco de Grafite Val Chisone, Pinerolo, Italy, 5/8/73; JNIAZ55 000008888.			
2596		10/15/1957	Progress Report on Studies of the Physical Properties of Talc, Their Measurement, and Comparison to Johnson & Johnson, Battelle, 10/15/57; JNIAZ55 000001034-1065.			
2597		10/1/2009	Talc, Prepared for EPA by Rio Tinto Minerals and Barretts Minerals, EF McCarthy, J Pier, E Ronald and G Tomaino, October 2009; IMERYS036155-036196.			
2598		11/27/2000	Email to M Chudkowski, CPCUS, from R Zazenski, Luzenac America; Re: Winning Hand, 11/27/00; Comments by CRE on the Proposed Listing of Non-Asbestiform Talc for the Report on Carcinogens, Tenth Edition, 11/29/00; JNJNL61_000012330-12340.			
2599		Undated	Narrative, Talc - NTP Regulatory Challenge, S Jarvis, Luzenac America, Undated; IMERYS-A 0021921-21929.			
2600		11/7/2013	Assessing the Safety of Cosmetic Ingredients: Recent Case Studies, Workshop for Risk Assessment of Cosmetics, Seoul, Korea, B Heldreth, CIR, 11/7/13.			
2601		4/15/2013	Email to J Tozzi, CRE, from W Kelly, Jr; Re: Missed Kelly phone call, 4/15/13.			
2602		3/18/2013	CIR Expert Panel Meeting, Talc, March 18-19, 2013.			
2603		12/11/2009	RJ Lee Powerpoint - Comments on Standard of Asbestos Limit in Cosmetic and Raw Materials, 12/11/09.			
2604		1/29/2010	RJ Lee Powerpoint - Comments on Standard of Asbestos Limit in Cosmetic and Raw Materials, Asbestos Technical Seminar, Beijing, China, 1/29/10.			
2605		1/1/1973	Asbestos in the Allamoore Talc District, Hudspeth and Culberson Counties, Texas, RG Rohrbacher, Bureau of Economic Geology, Geological Circular 73-1, 1973.			
2606		5/30/1973	Letter to A Weissler, FDA, from H Stanley, Pfizer; Re: Results of testing talc samples, 5/30/73; Booker-MTI000720-722.			
2607		1/1/1932	Excerpt from Dana's Textbook on Mineralogy, Fourth Edition, WE Ford, 1932.			

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2608		1/1/1980	"Characteristics of a Potassian Winchite-Asbestos from the Allamore Talc District, Texas," AG Wylie, C Huggins, Canadian Mineralogist, 1980.			
2609		3/7/2013	Report of Results: MVA9391: Characterization of Three Samples of Imerys Talc, JR Millette, MVA Scientific Consultants, 3/7/13.			
2610		Undated	Talco e Grafite Material Safety Data Sheet (MSDS) for Talc 5/0, Undated; RATCLIFF EL-CL000067.			
2611		1/1/1914	Report of the State Geologist on the Mineral Industries and Geology of Vermont, GH Perkins, 1913-1914, 1914.			
2612		1/1/1925	Geology of the Gouverneur Quadrangle, HP Cushing and DH Newland, New York State Museum, 1925.			
2613		6/3/1963	Letter to RS McClellan, Gouverneur Talc, from RO Bloomer, St Lawrence University; Re: Western Talc samples, 6/3/63; FosterVAN000068-70.			
2614		1/1/1964	Talc for Baby Powder Refined by Flotation, Schimmel Briefs, No 348, 1964; JNJ000868282-868283.			
2615		5/17/2001	Luzenac America Memo to DD Harris, from RJ Zazenski; Re: LNA Product Certification Program, 5/17/01; IMERYS081140-081141.			
2616		1/1/1987	Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs Volume 1 to 42, Supplement 7, 1987.			
2617		1/12/1979	FDA Memorandum to PP McGrath, from JA Wenninger; Re: Cosmetic Talc Products for Scanning Electron Microscopy (SEM) Analysis, 1/12/79; Memo to JA Wenninger, from RL Yates; Re: Talc Samples for Analysis by Scanning Electron Microscopy (SEM) for Amphibole and Serpentine Fibers, 1/11/79; CP-MENNEN-00001383-1386.			
2618		Undated	Osmanthus Talc Brochure, Matsumura Sangyo, Longsheng Talc Powder Factory, Gangxi, China, Undated; AV_JENKINS_S-0002248-2256.			
2619		2/9/2016	Affidavit of Barry I Castleman, Owens v American Truetzschler, Inc, et al, State of South Carolina, County of Laurens, 2/9/16.			
2620		11/1/1967	Johnson & Johnson Memo from WH Ashton; Re: Metropolitan Talc, Lot G 716 Preliminary Evaluation, 11/1/67; JNJAZ55 000012423-30.			
2621		3/31/1976	Johnson & Johnson Memo to WR Dean and AH Netherwood, from IW Sloan; Re: Telephone Conversation - Dr Pooley, 3/31/76; JNJITLC000102214-15.			
2622		1/1/1991	"The Epidemiology of Ovarian Cancer," MB Daly, 1992.			
2623		1/1/1979	"A new method of reducing preferred orientation in diffractometer samples," AM Blount, AH Vassiliou, American Mineralogist, 64: 922-24, 1979.			
2624		8/8/1979	Cyprus Minerals Board Meeting, 8/8/79; ITA 309-12.			
2625		9/7/1983	David Howard Westfall v Whittaker, Clark & Daniels, Metropolitan Talc Co, Pfizer, Omya and Windsor Minerals, CA No 79-0269B, US District Court, Rhode Island, 9/7/83.			
2626		6/18/2015	Government Records, Alabama Secretary of State, American Talc Company, Inc, 6/18/15.			
2627		2/27/1975	Letter to FD Pooley, from RE Shapiro, FDA; Re: Your letter of February 7 and seminar, 2/27/75; Attachment: Letter to RE Shapiro, from FD Pooley; Re: Visit to discuss talc, 2/7/75.			
2628		10/31/2014	FDA: Weak laws, sparse resources handcuff agency, A Schneider, Seattle Intelligencer, 10/31/14.			
2629		11/1/2014	Deadly mix on your shelf? A Schneider, Hearst Newspapers, 11/1/14.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2630		11/30/2000	Letter to CW Jameson, National Toxicology Program (NTP), from J Addison and AM Langer; Re: Substances Under Review for Possible Listing in the Report on Carcinogens, Tenth Ed: <u>Asbestiform and Nonasbestiform Talc</u> , 11/30/00.			
2631		10/13/1982	Definitions for asbestos and other health-related silicates, B Levadie, ASTM STP 834, 10/13/82; JNJ000282407-282447.			
2632		9/22/1975	"Animal Experiments with Talc," JC Wagner, G Berry, FD Pooley, et al, Inhaled Particles IV: Proceedings of an International Symposium Organized by the British Occupational Hygiene Society, September 22-26, 1975, 1977.			
2633		4/7/1946	Proceedings of the Eighth Annual Meeting of the American Conference of Governmental Industrial Hygienists, ACGIH, April 7-10, 1946.			
2634		12/12/1997	Luzenac America Memo to S Abarca, et al, from K Ailslieger; Re: Table of Cosmetic/Pharmaceutical/Food Products (by location), 12/12/97; IMERYS426200-426201.			
2635		6/28/1993	Luzenac America Product Data for Supra A, Product #1707, 6/28/93; IMERYS095321.			
2636		11/10/1998	Luzenac America Memo to RF Aragon, from L Forstmann; Re: Supra A and Altalc 400, 11/10/98; IMERYS056593-056595.			
2637		4/9/1979	Letter to R Norwood, Pfizer, from AC Heideman and JT Ganotes, California Dept of Health Services; Re: Comparison standard for talcs, 4/9/79; PFI_SEL_00005544-5545.			
2638		1/1/1955	"The Genesis of Talc in the Valle Germanasca (Cottian Alps), E Grill, et al, Lombardo Institute, 1955.			
2639		7/20/1988	Cyprus Lab Report 88-179, Beaverhead Mine Development, 7/20/88; LUZ00000069-70.			
2640		3/25/1992	Luzenac Memo to Distribution, from RC Munro; Re: Cyprus Ore Reserves - Arsenic and Tremolite, 3/25/92; IMERYS219720-219722.			
2641		5/20/1969	United Sierra Lab Report No 3790-16; Re: Grantham talc pieces obtained in mine 3/25/69 and other samples 4/29/69, 5/20/69; CAMC-Booker-001649-1652.			
2642		2/29/1956	Summary Report on An Investigation of Selected Talc Deposits of the United States to Johnson & Johnson, Battelle Memorial Institute, 2/29/56; JNJMX68_000000528-571.			
2643		8/9/1971	Johns-Manville Memo to FD Richards, from S Speil; Re: Tremolite in Grantham talc, 8/9/71; CRMC-WK-Pfizer-Micro-000057-59.			
2644		9/2/1971	Electron Microscope Examination of the Grantham Talc Sample, from Johnson and Johnson, FD Pooley, University College, Cardiff, 9/2/71; JNJ000090050.			
2645		4/21/1972	Cyprus Memo to SG Maguire, from JD Mulryan; Re: Cosmetic Talc - Keeler, 4/21/72; CAMC-Abbott-000746-748.			
2646		5/5/2006	Rio Tinto Powerpoint - Asbestos 101, 5/5/06; IMERYS422037.			
2647		10/1/2003	Luzenac Education Program- Marketing, October 2003; IMERYS132536.			
2648		2/1/2016	The Talc Resources of the World: A Historical Perspective, E McCarthy, February 2016; IMERYS377455-468.			
2649		Undated	Luzenac America Cosmetic, Pharmaceutical and Food Group "Market and Potential," Undated; IMERYS204565-601.			

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2650		1/1/1988	Strategic Developments in North American Talc: A Multiclient Report, Kline & Company, 1988; IMERY5416547-761.			
2651		6/1/2015	List of Approved External Fiber Testing Laboratories, Imerys, June 2015; IMERY5369317-319.			
2652		6/21/2002	Luzenac America Email to J Gauntt, et al, from R Zazenski; Re: Luzenac History North America, 6/21/02; IMERY5417832-843.			
2653		6/21/2002	Luzenac America Email to J Gauntt, et al, from R Zazenski; Re: History, 6/21/02; IMERY5417839-840.			
2654		7/17/2002	Luzenac America Email to E McCarthy, from M Clark; Re: Houston History Material, 7/17/02; IMERY5417844-849.			
2655		10/1/1983	1982 Mining Review, California Geology, October 1983.			
2656		8/31/1976	Background Information for the Non-Metallic Minerals Industry, Volume II, Plant Listings, Pedco Environmental, for EPA, 8/31/76.			
2657		1978-1979	Minerals Yearbook, Volume II Area Imports: Domestic, Bureau of Mines, 1978-79.			
2658		12/22/2003	Death Valley Historic Research Study, A History of Mining, Section III: Inventory of Historical Resources The West Side, 12/22/03.			
2659		1/1/1954	Map 12-3. Map of Southern Death Valley-Kingston Range region, Noble and Wright, 1954.			
2660		1/1/1968	Talc Deposits of the Southern Death Valley-Kingston Range Region, California, LA Wright, Special Report 95, 1968.			
2661		1/1/1957	Talc and Soapstone, LA Wright, Bulletin 176: Mineral Commodities of California, 1957.			
2662		1/1/1971	Tenovous Institute for Cancer Research Brochure, 1971; AV PIPES-0087127-140.			
2663		4/7/1971	Newspaper Article - Talc found in many tumours, South Wales Echo, 4/7/71; AV PIPES-0087142.			
2664		4/28/1971	Newspaper Article - Cancer peril in talc? The Sun, 4/28/71; AV PIPES-0087144.			
2665		4/30/1971	Newspaper Article - Research into talc and cancer, The News, 4/30/71; AV PIPES-0087147.			
2666		1971-1975	Cyprus Talc Product Specifications, 7/30/71 and 4/2/75; CAMC-Booker-001542-1558.			
2667		11/1/1983	Cyprus Talc Product Specifications, November 1983; CAMC-Booker-001563-1564.			
2668		7/5/1973	Letter to S Zwicker, EPA, from RF Bassett, American Mineral Co/Desert Minerals; Re: Talc ore with tremolite at Dunn, California plant, 7/5/73; CAMC-Talc-Micro-004757.			
2669		3/21/1973	Pfizer Product Applications Bulletin No 67, OSHA Regulations on Talc, 3/21/73; Booker-MTI000229-230.			
2670		10/1/1972	United Sierra Talc Price List, 10/1/72; CAMC-R-Foster-006370-6373.			
2671		2/1/1971	World-Wide Operations of United Sierra, HT Mulryan, Industrial Minerals, February 1971.			
2672		1919-2002	Overview: History, LNA Timeline, 1919-2002; IMERY5156183-156187.			
2673		3/5/1999	Luzenac America Alpine Operations: Closure Recommendation and Implementation Plan, 3/5/99; IMERY5054061-054081.			
2674		8/7/1989	Review of Mt Seabrook QC Testing Program, August 7-11, 1989; IMERY5048647-048714.			
2675		1/1/1957	Geology and Mineral Resources of the Congonhas District Minas Gerais, Brazil, Geological Survey Professional Paper 290, PW Guild, 1957.			

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2676		1/1/2013	The Mineral Industry of Brazil, Y Soto-Viruet, USGS Minerals Yearbook, 2013.			
2677		12/30/1969	Madoc Talc: Comprehensive Report, Johnson & Johnson, 12/30/69; JNJ000244109-244128.			
2678		1/1/1997	Luzenac: The global talc producer, L Jones and G Vinandy, IM French Supplement, 1997; IMERYS231026-231029.			
2679		1/1/1991	Talc: USA & Europe Competitive Markets, J Burger, Industrial Minerals, January 1991; IMERYS231036-231041.			
2680		5/1/2003	Talc, Industrial Minerals IM, May 2003; IMERYS231030-231035.			
2681		1/1/1957	No 1718 Fibrous Mineral Filler, Whittaker, Clark & Daniels, 1957.			
2682		1/10/1975	Cyprus Memo to WM Stephenson, from GA Wells; Re: Talc - Tremolite, 1/10/75; PFZ001162 01316-1321.			
2683		8/18/1976	Cyprus Laboratory Report 76-0262-CIM-BS, Tremolite in Talc, 8/18/76.			
2684		1986-1988	Cyprus Lot Testing for Supra Talc, K Lehman, 1986-1988; LEHMAN01735 and various bates.			
2685		8/1/1964	Sierra Talc & Chemical Co, Div of Cyprus Mines Corporation, Assigned Values, 8/1/64.			
2686		7/17/2019	Report of Results: MVA13252: Examination of Pfizer California Talc for Asbestos, SP Compton, MVA Scientific Consultants, 7/17/19.			
2687		2/7/2013	Letter to J Ruff, Dehay & Elliston, from MS Sanchez, RJ Lee; Re: RT Vanderbilt - Ganoë Case, RJ Lee Grp Number LLH211687, 2/7/13.			
2688		5/1/1977	A Report of the Fiber Content of Eighty Industrial Talc Samples Obtained from, and Using the Procedures of the Occupational Safety and Health Administration (OSHA), May 1977; CAMC Phyllis Smith 000212-257.			
2689		4/6/2016	Deposition of Edward Gramling, Hug v Brenntag North America, Inc, et al, 4/6/16.			
2690		10/18/2019	FDA News Release - Baby powder manufacturer voluntarily recalls products for asbestos, 10/18/19.			
2691		1/1/1959	Baby Powders, January 1959; JNJTALC000020219-20222.			
2692		6/9/1975	Letter to CS Thompson, RT Vanderbilt, from WC McCrone; Re: Analysis of 6 samples bearing designations CPS-206-1 through CPS-206-6, 6/9/75; VM-LANGEVIN-013620.			
2693		4/27/1972	Letter to WW Ethier, from RW Howard, RT Vanderbilt; Re: Westal 303 - Your Code 5340, 4/27/72; FOS024434.			
2694		4/18/2008	Letter to H Brink, Paul & Hanley, from MD Mount, MAS; Re: Brenda Williams v J&J, Asbestos Concentration in Talc, 4/18/08.			
2695		1/26/1998	Report of Investigation, Studies of Industrial Talc, A Wylie, 1/26/98; FosVan00175-80.			
2696		1/23/2013	Deposition of Ann Wylie, Ganoë v Air & Liquid Systems, 1/23/13.			
2697		2/3/1997	Memo to P Val Alstine and J Copeland, from GP Tomaino; Re: To Characterize three RT Vanderbilt Western Mine Talc Samples from California, 2/3/97; FosVan00161-170.			
2698		6/4/1970	Memo to RC Bacon, from AC Thompson; Re: Mineralogy - Western Talc, 6/4/70; FOS025900.			
2699		2/21/1968	Mennen Raw Material Specifications 10,304 Re: 4601 Metro #1 Talc, 2/21/68; Mennen-00004650.			
2700		1/14/1964	Memo to LR Moretti, from CC Treischel; Re: Mineral Composition of Western Talc Co Ores Based on Chemical Analyses, 1/14/64; FosVan00024.			

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2701		4/1/1975	Talc Today - the culmination of twenty years' growth, Industrial Minerals, April 1975; JNJNL61 000009747-9760.			
2702		1/1/1975	"Mineralogy and Chemistry of British Talc and Consumer Talcum Products," FD Pooley, 1975; JNJTALC000167976-167988.			
2703		10/17/2019	Email to L Szczepaniak, Johnson & Johnson, et al, from R Lanham, FDA; Re: Conference Call #2, Johnson's Baby Powder, Batch #22318RB/ Positive Sample found for chrysotile, a type of asbestos, 10/17/19; JNJTALC001282054-1282055.			
2704		1/12/1990	Cyprus Memo to EP Tiritas, from EH Reade; Re: Geologic Mapping, 1/12/90; IMERYS096935-947.			
2705		1/1/1992	Cyprus Schedule 5.11 Active Contracts, 1992; CAMC-Greco-000945-998.			
2706		4/3/1971	Guidebook, Fifth Annual Field Trip, A Glimpse of Some of the Geology and Mineral Resources, Sierra Blanca - Van Horn Country, Hudspeth and Culbertson Counties, Texas, El Paso Geological Society, 4/3/71.			
2707		11/30/1978	Letter to MW Glenn, from JF Gamble, NIOSH; Re: Preliminary Tables of the Medical Data, 11/30/78; WCD000853-875.			
2708		12/12/1978	Letter to MW Glenn, from A Griefe, NIOSH; Re: Preliminary Tables of the Environmental Data, 12/12/78; WCD000849-852..			
2709		3/14/1976	Johnson & Johnson Memo Re: Examination of American & British Talcum Powder Products by Dr FD Pooley, 3/14/76; WCD-NYCAL-012453-012454.			
2710		8/13/2021	J&J Cosmetic Talc Report, Tippin Case, Webber Environmental Health Consulting, 8/13/21.			
2711		8/13/2021	Appendix B: Summary Table of Pfizer TEM Test Results for Talc 1615, James Webber, J&J Cosmetic Talc Report, Tippin Case, Webber Environmental Health Consulting, 8/13/21.			
2712		5/13/2021	Expert Report of R Mark Bailey on Asbestos in Talc Products from Gouverneur Talc District, New York, 5/13/21.			
2713		1/17/2020	Declaration of Custodian of Records, Anthony V Lamacchia, for Cyprus Amax Minerals Company, Lebrecht v American International Industries, et al, Los Angeles, CA, 1/17/20.			
2714		1/1/1985	Cyprus Product/ Application, Cosmetic, 1985; CAMC-Ratcliff-000025-27.			
2715		2/14/1992	Cyprus Memo to D Anderson, et al, from EH Reade; Re: Crude Required to Produce Finished Goods, 2/14/92; IMERYS425389.			
2716		10/18/2012	Excerpt of the Deposition of Donald Burns, Manuel v BASF Catalysts, et al, 10/18/12.			
2717		1/1/1979	Excerpt of Memoir 45: Talc and Chlorite Deposits in Montana, RB Berg, Montana Bureau of Mines and Geology, 1979; GUNTER00000814-83.			
2718		9/27/2021	Talc, FDA, 9/27/21. www.fda.gov			
2719		9/1/2019	Testing Methodology, September 2019; Moore_EL_00000217-218.			
2720		8/12/1999	Luzenac America Memo to D Baker and J Gauntt, from J Godla; Re: Beaverhead and Antler Status, 8/12/99; IMERYS054143-157.			
2721		4/27/1999	Luzenac America Memo to B Beck, et al, from J Gauntt; Re: Cosmetic Accounts, 4/27/99; IMERYS056132-056141.			

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2722		2/7/1974	Leter to P Meijer, Central Laboratory TNO, from G Lee, Johnson & Johnson; Re: Meeting with Pooley re Analytical procedures for the examination of talc, 2/7/74; JNJ000252636-252637.			
2723		5/23/1958	Progress Report on The Physical Concentration of Talc Ores – Flotation to Johnson and Johnson, WE Brown, WL Smith and RD MacDonald, Battelle, 5/23/58; JNJ000087077-104.			
2724		7/31/1959	Progress Report on the Physical Concentration of Talc Ores – Flotation of Italian No 2 Talc to Johnson and Johnson, WE Brown, Battelle, 7/31/59; JNJ000087166-230.			
2725		12/27/1973	A Procedure to Examine Talc for the Presence of Chrysotile and Tremolite-Actinolite Fibers, Colorado School of Mines, Project No C10704, 12/27/73; JNJ000268037-45.			
2726		5/16/1973	Johnson & Johnson Memo to FR Rolle, from TH Shelley; Re: Proposed specs and preconcentration method, 5/16/73; J&J Memo to TH Shelley, from FR Rolle; Re: Proposed Specs for Analyzing Talc for Asbestos, 5/22/73; JNJAZ55_000001893-1898.			
2727		1/29/1974	Confidential Report - New Reagent Systems - Plant Trial at Windsor Minerals, V Zeitz, 1/29/74; Examination of Talc Ores and Products, Beneficiation Processes, Windsor Minerals, 5/8/74; JNJ000326070-105.			
2728		8/28/1973	Hazen Research Report 414-3, Project No 1431, Determination of Content of Asbestos Type Minerals in Talc Samples for Johns-Manville, 8/28/73; MTC000578-591.			
2729		1971-1976	Talc Analyses, Canada 4615 Talc, ES Laboratories and SZ Lewin, 11/2/71 to 3/22/76; WCD0242-247, 265.			
2730		10/1/1980	Johnson & Johnson Support to International Report for July-October 1980, 10/1/80; JNJ000065269-72.			
2731		2/1/2018	Excerpt of the Deposition of Frederick D Pooley, Beneficiation, Ratcliff v Borgwarner Morse Tec, et al, 2/1/18.			
2732		7/30/2021	Expert Report of Matt Sanchez in the Matter of Theresa M Garcia v Avon products, 7/30/21.			
2733		9/13/1973	Memo to WH Ashton, et al; Re: Summary Papers Prepared by Professor Pooley for his meeting on September 12, 1973, 9/13/73; Section 1-2, Pooley Report, Undated; JNJ000264500-510.			
2734		4/24/1974	Examination of Talc Samples, Argonaut Ore Body, MA3295, V Zeitz, Windsor Minerals, McCrone Project MA-3295, Copy 1 of 7, 4/24/74; JNJ000222859-866.			
2735		3/1/1974	Confidential Memo to Windsor Minerals, from RC Reynolds, Dartmouth; Re: Analysis of Talc Products and Ores for Asbestiform Amphiboles, March 1974; JNJNL61_00029410-43.			
2736		4/27/2009	EPA Region III Fact Sheet, Quality Control Tools: Blanks, Revision 1, 4/27/09.			
2737		3/11/1974	Letter to FR Rolle, from IM Stewart, McCrone; Re: Chrysotile content of sample, Shimps letter dated 11 February 1974, 3/11/74; JNJ000265803-804.			
2738		8/21/1995	J&J Consumer Companies Worldwide Specification, Analysis of Powdered Talc for Asbestiform Minerals by TEM, TM7024, 8/21/95; JNJNL61_000005032-40.			
2739		3/24/1987	Standard Operating Procedure - Talc, McCrone, 3/24/87; JNJNL61_000040532-35.			
2740		2/9/2021	Declaration of David Madigan, Moore v Johnson & Johnson, et al, 2/9/21.			

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2741		11/3/2020	Asbestos and Mesothelioma, D Madigan, 11/3/20.			
2742		1/1/1957	"The Communications Lines and Problems of a Toxicology Laboratory Working in Industry," HF Smyth, AMA Archives of Industrial Health, 1957.			
2743		1/1/1958	"An Epidemiological Study of Lung Cancer in Asbestos Miners," DC Braun, TD Truan, AMA Archives of Industrial Health, 1958.			
2744		11/5/2021	Declaration of Mark Rigler, Moore v Johnson & Johnson, et al, 11/5/21.			
2745		Undated	Talc Not Containing Asbestiform Minerals, Monograph No 3, 1st Draft, Undated; IMA-NA000627-738.			
2746		2/4/2020	Transcript of the FDA Public Meeting: Testing Methods for Asbestos in Talc and Cosmetic Products Containing Talc, 2/4/20.			
2747		7/5/1971	Correspondence between Cosmetic Corporation of America and Desert Minerals; Re: Certificate of Insurance, 7/5/91 to 7/19/71; CRMC-Talc-Micro-001520-1527.			
2748		7/30/1971	Memo to WB Grantham, from EJ Ellsworth; Re: Hazardous Substances Act, 7/30/71; CRMC-Talc-Micro-001534.			
2749		9/9/1971	Desert Minerals Definitions Asbestos & Talc Minerals, 9/9/71; CRMC-Talc-Micro-001537-1541.			
2750		7/12/1971	Asbestos in Talc, C&EN, 7/12/71; CRMC-Talc-Micro-001545.			
2751		1/10/1973	Johns-Manville Report No 414-T-2, Quantitative Measurement of Fibrous Tremolite in Talc Matrix by X-Ray Diffraction, 1/10/73; CRMC-Talc-Micro-001617-1623.			
2752		11/7/1974	Letter to PA Martinson, Johns-Manville, from HT Mulryan, Cyprus; Re: Talc label, 11/7/74; CRMC-Talc-Micro-001684.			
2753		1/3/1975	Letter to P Kotin, Johns-Manville, from JH Stender, OSHA; Re: Reply to your letters of December 17 and 19, 1974 re OSHA Field Memorandum 74-92, 1/3/75; CRMC-Talc-Micro-001699-1700.			
2754		10/4/1974	Johns-Manville Memo to FJ Solon, from RP Carter; Re: Tremolitic Talc, 10/4/74; CRMC-Talc-Micro-001854-1855.			
2755		1/18/1973	Desert Minerals Memo to S Speil, from RS Lamar; Re: Telephone Conversation 1/16/73 with William Ashton, Johnson & Johnson, 1/18/73; CRMC-Talc-Micro-001856-1857			
2756		9/1/1972	Desert Minerals Memo to GL Swallow, from EJ Bulava; Re: Grantham Talc Samples, 9/1/72; CRMC-Talc-Micro-001869-1870.			
2757		8/1/1978	Desert 51 and PV Talc Mines Reopen, Production Resumed, Ceramic Scope News, August 1978.			
2758		11/14/1978	Letter to Dr VE Rose, NIOSH, from RA Morkle, Bureau of Mines; Re: Comments on Criteria for a Recommended Standard, 11/14/78; PFI SEL 00000841-843.			
2759		4/1/1974	"Talc Dust and Its Toxicity, GS Rajhans, Ontario Ministry of Health, CIM Bulletin, April 1974; PFI SEL 00000620-621.			
2760		8/1/1977	Electron Microscope Measurement of Airborne Asbestos Concentrations: A Provisional Methodology Manual, AV Samudra, et al, ITT Research Institute, August 1977; PFI SEL 00004934-4964.			
2761		9/1/1979	Talc: Destiny in Diversity, GM Clarke, Industrial Minerals, September 1979; PFI SEL 00000897-925.			
2762		Undated	Talc and Health, JP Grange, Eurotalc, Undated; PFI SEL 00000626-628.			
2763		1/1/1972	Grantham Proposition, Johns-Manville Products Corp, January 1972; CRMC-WK-Pfizer-Micro-000166-178.			

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2764		5/1/1966	United Sierra Consumer Carload Prices, 5/1/66; THAN1423-1424.			
2765		9/20/1967	United Sierra Division of Cyprus Mines Corporation, Talc Operations, WW Gaskins, 9/20/67.			
2766		1/1/1908	Excerpt of A Textbook of Mineralogy, ES Dana, 1908.			
2767		4/14/1969	Mennen Laboratory Research 206-2, Micro Baby Powder 148aE, Metro Talc #1, 4/14/69; Mennen-00012148.			
2768		2/9/2006	Cosmetics, PA Ciullo, Industrial Minerals and Rocks, 2/9/06; IMERYS037294-037301.			
2769		Undated	Rio Tinto Powerpoint - Asbestos in Korean Baby Powder, Pharmaceutical and Cosmetic Products Containing Talc, Undated; IMERYS306626.			
2770		4/29/1998	Letter to JP Grange, Luzenac, from AP Wehner; Re: Comments, 4/29/98; IMERYS095372-095374.			
2771		1/1/1989	"Contemporary Issues in Toxicology: Establishing Aerosol Exposure Concentrations for Inhalation Toxicity Studies," TR Lewis, et al, Tox and Applied Pharm, 1989; PCPC000354-361.			
2772		7/26/1993	Newspaper Articles - Frequent use of talc may increase risk for cancer, Detroit News, 7/26/93; Female Physicians Are Likelier to Order 2 Key Cancer tests, Wall Street Journal, 8/12/93; PCPC000494-495.			
2773		1/1/1979	Occupational Exposures to Talcs Containing Asbestiform Minerals, JM Dement, RD Zumwalde, Dusts and Disease, RA Lemen, Ed, 1979.			
2774		4/27/1972	NIOSH Memorandum to Acting Deputy Director, from Engineering Technician; Re: Talcum sample results, 4/27/72; JNJ000260697.			
2775		3/18/1975	Handwritten Memo to DR Petterson; Re: Disclosing McCrone results to Harvard Study, 3/21/75; Clinical Data, 3/18/75; IMERYS235445-448.			
2776		Undated	Video - Mine site blast in Western Australia, Undated.			
2777		8/1/1984	Letter to CS Thompson, RT Vanderbilt, from AG Wylie, University of Maryland; Re: Sample Numbers published by Stanton, 8/1/84.			
2778		1/1/2009	D 5755-09 - Standard Test Method for Microvacuum Sampling and Indirect Analysis of Dust by Transmission Electron Microscopy for Asbestos Structure Number Concentrations, ASTM, 2009.			
2779		1/1/2021	"Malignant Mesothelioma: Ongoing controversies about its etiology in females," X Baur, et al, American Journal of Industrial Medicine, 2021.			
2780		1/22/2019	Amended Rule 26 Expert Report of Robert B Cook, In Re: Johnson & Johnson, US District Court, District of New Jersey, 1/22/19.			
2781		1/19/2005	Magnesita SA - Talc Flotation Process, 1/19/05; JNJALC000348935-348937.			
2782		1/1/2001	"Asbestos content of omentum and mesentery in nonoccupationally exposed individuals," RF Dodson, et al, Toxicology and Industrial Health, 2001.			
2783		3/3/2020	Letter to Dr SM Hahn, FDA, from R Krishnamoorthi, US Congress Committee on Oversight and Reform; Re: Testing methods, 3/3/20.			
2784		1/1/2019	"Health Effects of Censored Elongated Mineral Particles: A Critical Review," D Egilman, M Rigler, W Longo, et al, Detection Limits in Air Quality and Environmental Measurements, ASTM STP 1618, 2019.			

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2785		9/15/2011	Johnson & Johnson Email Chain to D Hicks, , et al, from S Jiwrajka; Re: Magnesita case, 9/15/11; JNJALC000154885-154887.			
2786		4/29/2011	Email Chain between D Hicks, Johnson & Johnson, and D Van Orden, RJ Lee; Re: Additional Magnesita Report Questions, 4/29/11; JNJALC000576244-576246.			
2787		5/24/2011	Email to D Hicks, Johnson & Johnson, and D Van Orden, RJ Lee; Re: Brazil Talc Samples - Report Question, 5/24/11; JNJALC000154217-154218.			
2788		3/11/2011	Johnson & Johnson Email to E Mendola and B Lattman, from R Reese; Re: Magnesita Talc Samples for Testing, 3/11/11; JNJALC000199599.			
2789		12/7/2010	Email to L Edkins, et al, from D Hicks, Johnson & Johnson; Re: 3Q10 Talc Analysis - RJ Lee Test Report, 12/7/10; JNJALC000187567.			
2790		12/10/2010	Johnson & Johnson Email to C Lee, et al, from D Hicks; Re: Magnesita Samples for Harmonized Specification Testing, 12/10/10; JNJALC000187822-187826.			
2791		7/12/2011	Johnson & Johnson Email to R Reese, from T Pinto; Re: Brazil Talc QC Analyses 070511.pdf, TLH105184 Report 063011.pdf, 7/12/11; JNJALC000338243-338244.			
2792		8/12/2011	Confidential RJ Lee PPT - Evaluation of Magnesita Talc: Summary of On-Going Testing of Talc for Johnson & Johnson, RJ Lee, 8/12/11; JNJALC000411867.			
2793		2/4/2020	"The Heavy Liquid Separation Method for the Analysis of Cosmetic Talc to Detect Amphibole and Chrysotile Asbestos," WE Longo, Presentation to FDA, 2/4/20.			
2794		Undated	Magnesita Open Pit Map, Cabeceiras, Brumado, Brazil; JNJALC000576217-576221.			
2795		1/1/1986	Asbestiform and Non-Asbestiform Amphiboles, Cadmium and Zinc in Quarry Samples from Franklin and Sparta, Sussex County, New Jersey, New Jersey Geological Survey Geologic Report 15, M Germine. 1986.			
2796		1/1/2020	"Crystal structure determination of a lifelong biopersistent asbestos fibre using single-crystal synchrotron X-ray micro-diffraction," C Giacobbe, et al, IUCrJ, 2020.			
2797		12/1/1962	"Application of Dispersion Staining to Microscopic Identification of Settled Dust," DG Grabar, McCrone Research Institute, Journal of the Air Pollution Control Association, December 1962.			
2798		10/6/2016	Excerpt of Trial Transcript, Depoian vs American International, 10/6/16.			
2799		10/7/2016	Excerpt of Trial Testimony of Alan Segrave, Colpitts vs American International Industries, et al, 10/7/16.			
2800		10/23/2017	Excerpt of Trial Testimony of Steven Compton, Herford vs AT&T Corp, et al, 10/23/17.			
2801		3/23/2016	Excerpt of Deposition of Patrick Downey, Alfaro vs American Talc Co, et al, 3/23/16.			
2802		Undated	Montana, California, and Other Crude Sources, Cyprus Industrial Minerals; CAMC-Ratcliff-000056.			
2803		2/27/2017	TEM Asbestos Analysis of Yellowstone Ore Composites, Summary Report, Luzenac America, 2/27/17; ITA-Ratcliff-001797-1799.			
2804		1/16/2003	Memorandum to M Cerino, Luzenac, from S Matolyak, Maxim; Re: TEM Analysis, 1/16/03; ITA-Ratcliff-001817.			

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2805		8/1/2011	Imerys Technical Report to N Sauvageau, from A Zamurs; Re: TEM Asbestos Analysis of Yellowstone Product Samples Q2 2011, Project A11366, 8/1/11; ITA-Ratcliff-001717-1719.			
2806		7/8/1971	CSMRI Report on Particle Size and Shape Distribution of Grantham, Italian and Vermont Talc Final Products, Johnson & Johnson, 6/24/71; JNJ000234805-812.			
2807		1/28/2016	Excerpt of the Deposition of Henry Mulyran, Owens v American Truetzschler, Inc, et al, 1/28/16.			
2808		7/13/1976	Cyprus Laboratory Report 76-0209-CIM-BS, Tremolite in Talc, Five Samples of Talc, 7/13/76.			
2809		9/16/1976	Cyprus Laboratory Report 76-0296-CIM-BS, Tremolite in Talc, 9/16/76.			
2810		9/17/1976	Cyprus Laboratory Report 76-0297-CIM-BS, XRD - Tremolite in Talc, 9/17/76.			
2811		1/20/2016	Excerpt of the Deposition of Henry Mulyran, Dalis vs Brenntag North America, Inc, et al, 1/20/16.			
2812		1/1/2017	"Analysis of an Authentic Historical Cosmetic Talc Sample - Further Evidence for the Lack of Cancer Risk," EB Ilgren, et al, Environment and Pollution, 2017.			
2813		1/1/2004	ASTM D6281-04 Standard Test Method for Airborne Asbestos Concentration in Ambient and Indoor Atmospheres as Determined by Transmission Electron Microscopy Direct Transfer (TEM). 2004.			
2814		1/31/2018	Talc and Asbestos, David Madigan, 1/31/18.			
2815		1/1/1998	"A Simple Technique for Measuring Asbestos Layer-Line Spacings During TEM Analysis," JS Webber, Microscope, 1998.			
2816		1/1/1990	"Examining Play Sand Products for Asbestos Contamination," JS Webber, et al, Bull Environ Contam Toxicol, 1990.			
2817		1/1/2011	Chapter 2: Asbestos Analysis Methods, JR Millette, Asbestos: Risk Assessment, Epidemiology, and Health Effects, RF Dodson and SP Hammar, Eds, Second Edition, 2011.			
2818		3/15/2019	Report of Results: MVA12478: Investigation of Montana Talc (American International Industries Microtalc 1745) for Asbestos, SP Compton, MVA Scientific, 3/15/19.			
2819		1/15/1969	USD-CMC Talc Products, 1/15/69; CAMC-Booker-002475.			
2820		11/24/1942	Newspaper Article - Your Family Doctor, M Fishbein, The Rock Island Argus, 11/24/42.			
2821		2/2/1944	Newspaper Article - Tremolite Talc Work Hazardous, New York Times Herald, 2/2/44.			
2822		1/1/1987	Excerpt on Talc, IARC Monograph on the Evaluation of the Carcinogenic Risk, 1987.			
2823		10/10/1972	Desert Minerals Memo to WL VanDerbeek, et al, from EB Smith; Re: FDA- OSHA Meeting Re Talc October 2, 1972, 10/10/72; CRMC-Talc-Micro-001299-1307; Affidavit.			
2824		6/16/1975	Cyprus Laboratory Report 4790- Asbestos, Samples from Bay Street, 6/16/75; CAMC-Booker-001580-1581.			
2825		10/30/1968	United Sierra Laboratory Report 3790-16, Grantham Talc, 10/30/68; CAMC-Booker-001589.			
2826		3/5/1969	United Sierra Laboratory Report 7790-10, Warm Springs and Beaverhead, 3/5/69; CAMC-Booker-001592.			
2827		2/16/1970	United Sierra Laboratory Report 7790-12, Typical Data - Cosmetic Talcs, 2/16/70; CAMC-Booker-001599-1600.			
2828		3/25/1970	United Sierra Laboratory Report 3790-13 and 3790-57, Ibex Crude, Death Valley, 3/25/70; CAMC-Booker-001602-1604.			

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2829		3/15/1971	United Sierra Laboratory Report 9790-Talc, Out of Specification Mill Test Results on Incoming Composite Samples, 3/15/71; CAMC-Booker-001605-1607.			
2830		12/17/1971	United Sierra Laboratory Report 3790-83, Recent Talc Samples from Monarch Mine, 12/17/71; CAMC-Booker-001610-1612.			
2831		12/22/1971	United Sierra Laboratory Report 1634-2, Mistrion 139 for Compania Pintuco, Medellin, Colombia, 12/22/71; CAMC-Booker-001614-1617.			
2832		5/4/1976	Cyprus Laboratory Report 76-0127-CIM-BS, SEM of C-400 and C-500 Special Blend Talcs, 5/4/76; CAMC-Booker-001634-1638.			
2833		9/12/1969	United Sierra Laboratory Report 6790-15, Surface areas of talc products and milling, 9/12/69; CAMC-Booker-001647-1648.			
2834		10/22/1971	United Sierra Laboratory Report 6790-16, Grantham Rocks, 10/22/71; CAMC-Booker-001659-1660.			
2835		Undated	United Sierra Fibrene C-400; CAMC-Booker-001538.			
2836		8/6/1985	Cyprus Technical Services Laboratory Report 85-LA-3, Manufacturing Service Request: Monthly Asbestiform Amphibole Testing, 8/6/85; ITA-Booker-001025-1036.			
2837		6/23/1975	Letter to J Videki, Ford Motor Co, from JM Dentler, Pfizer; Re: Certifications on asbestos in talc, 6/23/75; 8007 0899-900.			
2838		1/1/1968	Cyprus Major California Customers By Industry, 1968; CAMC-Booker-002530-2533.			
2839		1/1/1980	Abstract of "Expandable Chloritic Clays Associated with the Hydrothermal Talc Deposits of Murphy, North Carolina, AM Blount. Map of Murphv. NC, 1980: Blount0089-93.			
2840		11/4/1975	Asbestos Dust Stations, Dunn Talc Mining Division, 11/4/75; CRMC-Talc-Micro-001850.			
2841		Undated	Newspaper Article - Talc-Containing Products May Be Carcinogenic Risk, International Medical News Service, Undated; JNJ000244818.			
2842		10/18/2014	Asbestos, Mineralogical Society of America, 10/18/14.			
2843		9/1/2011	Report on Magnesita, Brumado, Brazil, S Galizia, September 2011; JNJALC000154889-894.			
2844		2020-2021	Certificate of Accreditation to ISO/IEC 17025:2017, MAS, LLC, Suwanee, GA, 7/1/20 to 6/30/21.			
2845		8/31/2005	Effect of Particle Size By Addison Davies Technique, NIST 1867 Tremolite, 8/31/05.			
2846		Undated	MAS Aspects Ratio Graph with Campbell and Blount Ratios			
2847		2019-2021	Scope of Accreditation to ISO/IEC 17025:2017, MAS, LLC, Suwanee, GA, Cert No 2925.01, 12/31/19 to 12/31/21.			
2848		9/23/2020	Johnson's baby talco Analysis Report, MAS Project #M71040, Albert Casaretto's Johnson baby talco Container, WE Longo, MAS, 9/23/20.			
2849		10/20/2020	Johnson's baby talco Analysis Report, MAS Project #M71040, Albert Casaretto's Johnson baby talco Container, Supplement 1, WE Longo, MAS, 10/20/20.			
2850		12/8/2020	Supplement Report 2, MAS Project #M71166 and M71180, Off-the-Shelf 2020 JBP Talcum Powder Analysis, WE Longo, MAS, 12/8/20.			
2851		1/1/1974	"Detection and Identification of Asbestos by Microscopical Dispersion Staining," WC McCrone, Environmental Health Perspectives, 1974.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
2852		4/13/2021	MAS Project #M71216, Two JBP, one Gold Bond Off-the-Shelf Talcum Powder Containers: Purchased from Lucky's, Talcum Powder Analysis. <u>WE Longo, MAS, 4/13/21.</u>			
2853		12/10/2019	RV Metcalf Testimony before Subcommittee on Economic and Consumer Policy Hearing Examining Asbestos in Talc, 12/10/19.			
2854		1/1/2015	Chapter 13: Environmental Forensic Microscopy, JR Millette, RS Brown, Introduction to Environmental Forensics, 2015.			
2855		1/1/2010	"Visual Estimation in the Analysis of Surface Particulate by Microscopy," JR Millette, WL Turner, Microscope, 2010.			
2856		1/1/2008	"Filter Preparation For Particle Analysis by Transmission Electron Microscopy," P Few, JR Millette, Microscope, 2008.			
2857		1/1/2005	"Asbestos Identification Using Available Standard Methods," JR Millette, BR Bandli, Microscope, 2005.			
2858		4/1/2004	Developing ASTM Standards for Monitoring Asbestos: A Continuing Challenge, ME Beard, JR Millette, JS Webber, April 2004. <u>www.astm.org/SNEWS</u>			
2859		1/9/2007	Material Safety Data Sheet (MSDS) Packet for 1866b, Common Commercial Asbestos, NIST, 1/9/07.			
2860		3/12/2003	Material Safety Data Sheet (MSDS) Packet for 1867a, Uncommon Commercial Asbestos, NIST, 3/12/03.			
2861		8/15/1994	NIOSH 7402, Asbestos by TEM, Issue 2, 8/15/94.			
2862		6/14/2019	Asbestos and Other Fibers by PCM, Method 7400, Issue 3, 6/14/19.			
2863		2/21/2018	Agreed Order and Stipulation Regarding Production of Talc Samples from Imerys Talc America Inc, In Re: Johnson & Johnson, NJ MDL, 2/21/18.			
2864		1/31/2018	Agreed Order and Stipulation Regarding the Johnson & Johnson Defendants' Production of Talcum Powder Products and Talc Samples, In Re: Johnson & Johnson, NJ MDL, 1/31/18.			
2865		3/4/2020	Mark Rigler Comments Regarding Testing Methods for Asbestos in Talc and Cosmetic Products Containing Talc; FDA Public Meeting February 4, 2020, 3/4/20.			
2866		1/27/1993	Letter to A Joslyn, Cahill, Gordon and Reindel, from IM Stewart; Re: Talc Sample Analysis, RJ Lee Group Project Number LBH211626, 1/27/93; BASF-EMCC-00038.			
2867		7/9/1975	Cyprus Laboratory Report 4790 - Panamint, X-Ray diffraction determination pf asbestos minerals present in Panamint talc and GEB, 7/9/75; CAMC_Phyllis_Smith_000088-89.			
2868		9/3/1975	Cyprus Laboratory Report 4790 - Asbestos, Thirty Six talc and chlorite samples from Keeler, 9/3/75; CAMC_Phyllis_Smith_000093-94.			
2869		Undated	Sierra and Cyprus Bag Identification; CAMC_Phyllis_Smith_001206-1215.			
2870		9/5/2006	Cyprus Amax Minerals Company's Third Amended Responses to Plaintiffs' Request for Production of Documents, Set One, Morgan v Acco-Air Conditioning Co, et al, 9/5/06; with Attachments.			
2871		Undated	Cyprus Product/ Application, Industrial, Undated; AB-CYP-10-000055.			
2872		Undated	Advertisement - Sierra Talc & Clay Co; AB-CYP-05-0000672.			
2873		8/3/2000	Maxim Memorandum to S Bartlett, from LB Kirk; Re: Luzenac Yellowstone Mine Bulk Sample Prep, 8/3/00; AB-ITA-04-000934-943.			

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2874		10/9/1969	Johnson & Johnson Memo to RJ Mortimer, from WH Ashton; Re: Alternate Domestic Talc Sources, File #101, 10/9/69; WTALC00010649-10650.			
2875		12/10/1970	Johnson & Johnson Research Foundation Memo to AH Campbell, from JR Bonomo; Re: Johnson's Baby Powder Acute Oral Toxicity Study in the Mouse - Project 101, 12/10/70; JNJ000236694.			
2876		9/3/1971	Preliminary Report on the Grantham Ore and the Shower to Shower and Medicated Powders, MA-2347, McCrone, 9/3/71; JNJ000269817-823.			
2877		Undated	Power Point - TEM Ore Certification Program, Luzenac America Technical Center			
2878		Undated	Issue briefing - talc quality assurance letters, Rio Tinto, Undated; IMERYS131722-131723.			
2879		2/1/2010	Luzenac Power Point - Talc: Geology, Mining and Processing for Cosmetic, Pharma and Food Applications, EF McCarthy, February 2010.			
2880		11/13/2000	Luzenac America Email to E Turner, from R Zazenski; Re: Drafting of the Eurotalc submission to NTP, 11/13/00; IMERYS239407-408.			
2881		2/2/1998	Luzenac Visit to H Anton Culver, UCI University of California; Re: Ovarian Cancer Issue, 2/2/98; IMERYS-A_0011964-11965.			
2882		11/30/2004	Letter of Proposal to FDA and NIEHS/NIH, R Zazenski, Luzenac America, 11/30/04; IMERYS284935-284937.			
2883		1/1/1954	Talc, Soapstone, Steatite and Pyrophyllite, Minerals for the Chemical and Allied Industries, SJ Johnstone, 1954.			
2884		4/22/2021	Talc, Government of Canada, 4/22/21.			
2885		2/16/1970	Letter to RG Smith, Whittaker, Clark & Daniels, from DR Ferry, Charles Mathieu; Re: Metropolitan Talc situation, 2/16/70.			
2886		3/10/1970	Letter to P Bixby, Metropolitan Talc, from CE Clark; Re: Canadian Talc, 3/10/70; FM-WCD-MOR-KAN 0002322-2324.			
2887		6/1/1997	Cosmetics, Food and Pharmaceutical Market Analysis, GE Gauntt, Luzenac, June 1997; Talc Usage by Industry from 1997 Competition Database, 3/24/97; IMERYS231083-1106.			
2888		5/14/1972	Talc Analysis (Asbestos) for 4615 Canada Talc, SZ Lewin, 5/14/72; WCD0243.			
2889		6/12/1972	Talc Analysis (Asbestos) for 4615 Canada Talc, ES Labs, 6/12/72; WCD0244.			
2890		7/18/1972	Letter to PH Bixby, Metropolitan Talc, from SZ Lewin, NYU; Re: XRD analysis of Talc 4601, 7/18/72.			
2891		7/20/1972	Talc Analysis (Asbestos) for 4615 Canada Talc, SZ Lewin, 7/20/72; WCD0246.			
2892		7/20/1972	Talc Analysis (Asbestos) for 4615 Canada Talc, SZ Lewin, 7/20/72; WCD0245.			
2893		7/20/1972	Letter to PH Bixby, Metropolitan Talc, from SZ Lewin, NYU; Re: XRD analysis of four samples, 7/20/72; WCD002469-2470.			
2894		8/3/1972	Letter to RF Miller, Windsor Minerals, from WD Inskeep; Re: Asbestos Content of Talcs, 8/3/72; WCD0293.			
2895		12/18/1972	Talc Analysis (Asbestos) for 4615 Canada Talc, GE Brown Princeton University, 12/18/72; WCD0247.			

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2896		4/19/1973	Letter to FF Roesch, Whittaker, Clark & Daniels, from A Weissler, FDA; Re: Sample of industrial talc, 4/19/73; Letter to Canadian Talc, from GJ Dippold; Re: Request for MSDS, 3/16/72; WCD-Pines(OK)-1173-1174- 1078.			
2897		11/21/1975	Amoco Memo to G Hauer, from J Zechinati; Re: Talc grades used at New Castle Polypropylene plant, 11/21/75; WCD0292.			
2898		4/13/1976	Talc Analysis (Asbestos) for 4615 Canada Talc, Code ID 319L15A, McCrone, 4/13/76; WCD0266.			
2899		5/24/1976	Talc Analysis (Asbestos) for 4615 Canada Talc, ES Labs, 5/24/76; WCD0267.			
2900		Undated	Production Capacities of Talc Manufacturers (USA and Canada); IMERY5231021.			
2901		Undated	Letter to P Douillet, from JP Hile, FDA; Re: Response to your November 8, 1983 Petition, Undated.			
2902		1/1/2019	"Letter to the Editor: Response to Marsh, GM, Lerardi, AM, Benson, SM & Finley, BL (2019). Occupational exposures to cosmetic talc and risk of mesothelioma: an updated pooled cohort and statistical power analysis with consideration of latency period. Inhalation Toxicology, 31(6), 213-233," D Madigan, D Feilman, Inhalation Toxicology, 2019.			
2903		1/1/2019	"Letter to the Editor: Letter concerning: Occupational exposures to cosmetic talc and risk of mesothelioma: an updated pooled cohort and statistical power analysis with consideration of latency period by Gary M Marsh et al (Inhal Toxicol 2019 Aug 5:1-11), MM Finkelstein, Inhalation Toxicology, 2019.			
2904		1/1/1964	Excerpt of Cosmetics and the Skin, FV Wells and II Lubowe, 1964.			
2905		9/22/2003	Luzenac Memo to T McCrum and R Godell, from R Zazenski; Re: Case Update: Requested Work product, 9/22/03; IMERY5-A 0013279-13282.			
2906		10/3/2004	Health and Environment Review - Luzenac North America, R Borden, I Firth and N Marshman, 10/3/04; IMERY5086188-86230.			
2907		8/10/2012	ASTM- D2207 Draft - Asbestos in Talc, 8/10/12.			
2908		8/10/2012	ASTM- D2207 Draft - Asbestos in Talc, WK30024 Draft 812012, 8/10/12.			
2909		4/1/1975	Johns-Manville Memo to PA Martinson, from HR Keefe; Re: Talc Business, Status, and Action Summary, Your Letter March 13, 1975, 4/1/75; CRMC-Talc-Micro-001822-1828.			
2910		5/1/1990	Testimony of Charles M Spooner, Hygeia, OSHA Hearing on Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite: Notice of Proposed Rule Making, May 1990; TW TLC 03208-03216.			
2911		1976-1986	McCrone Associates Testing Reports and Correspondence with Warner-Lambert and Whittaker, Clark & Daniels regarding Altalc 400, 4/27/76 to 4/27/86; CYPRUS_SMITHP-000126-139; WCD_SMITHP-001101-1102.			
2912		1//1/1990	"Concentrations of Fibres in Phyllosilicates," K Rodelsperger, et al, Health Related Effects of Phyllosilicates, NATO AEI Series G21, J Bignon, Ed, 1990; AV_STD_000734-742.			
2913		1/1/1980	"Carcinogenesis and Mineral Fibres," JC Wagner, G Berry, FD Pooley, British Medical Bulletin, 1980.			

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2914		2/20/1974	Cosmetic Safety Act of 1974: Hearings before the Subcommittee on Health of the Committee on Labor and Public Welfare, United States Senate, 93rd Congress, February 20-21, 1974.			
2915		1/14/1994	Proposed Rules: Human Drugs: Skin Protectant Products (OTC) - Talc; consumer uses and health perspectives; Meetings, Federal Register, Vol 59, No 10, 1/14/94.			
2916		10/28/1984	Newspaper Article - Beauty; A Dusting of Powder, D Blumenthal, New York Times, 10/28/84.			
2917		6/29/1992	Talc Shows "Clear Evidence" of Lung Carcinogenicity, Food Chemical News, 6/29/92.			
2918		Undated	Abstract of "Epidemiological Study on Chronic Respiratory Diseases Among French Talc Millers," P Leophonte, et al, Undated.			
2919		Undated	Note on Talc, NTP Study, BAT, Undated.			
2920		Undated	Note on Toxicology and Carcinogenesis Studies of Talc (US/NTP Study), BAT, Undated.			
2921		2/1/1975	Spotlight on Talc, February 1975; AV STD 002983-2990.			
2922		8/20/1974	Letter to W Nashed, Johnson & Johnson, from HJ Eiermann, FDA; Re: Protocol of Battelle Study, 8/20/74; AV_STD_009367.			
2923		3/10/1976	Memorandum of Meeting Between Andrew Maguire, etal and HJ Eiermann, FDA; Re: Asbestos in Talc and Other Cosmetic Regulatory Matters, 3/10/76; AV_STD_011256-11259.			
2924		2/7/1994	Talc Inhalation Carcinogenicity Issue May Need More Study, FDC Reports, The Rose Sheet, 2/7/94; AV_STD_024426-24428.			
2925		7/18/1975	Johns-Manville Memo to JP Leineweber, from WB Reitze; Re: Talc Analysis, 7/18/75; CRMC-Talc-Micro-000736.			
2926		6/6/1968	Minutes of the Board of Governors Meeting, Asbestos Textile Institute, 6/6/68; CRMC-Talc-Micro-000753-755.			
2927		9/9/1971	Definitions, Asbestos & Talc Minerals, Desert Minerals, 9/9/71; CRMC-Talc-Micro-001537-1541.			
2928		7/30/1971	Johns-Manville Memo to WB Grantham, from EJ Elsworth; Re: Hazardous Substance Act, 7/30/71; CRMC-Talc-Micro-001534-1536.			
2929		5/1/1991	Talcum Powder Danger, The Saturday Evening Post, May/June 1991; AV STD 012674.			
2930		1/21/1991	Cyprus Minerals Memo to RJ Buettner, from EF McCarthy; Re: 1990 Market Review and Competitive Situation, 1/21/91; IMERYS095791-95799.			
2931		7/22/1992	Letter to S Gettings, CTFA, from N Genco, Pfizer; Re: Pfizer Microtalc MP 10-52 used in NTP study, 7/22/92; AV STD 024431-24432.			
2932		1/1/2021	Asbestos and Other Elongate Mineral Particles: New and Continuing Challenges in the 21st Century, ASTM STP1632, JR Millette, JS Webber, Eds, 2021.			
2933		1/1/1991	Excerpt of "Talc: USA & Europe competitive markets," J Burger, Industrial Minerals, 1991.			
2934		3/1/1992	Excerpt of "Talc review: consolidation and competition," M O'Driscoll, Industrial Minerals, March 1992; IMERYS138547, 138552, 138555.			
2935		1/1/1995	Excerpt of Talc Resources of the Conterminous United States, RC Greene, USGS Open-File Report OF 95-586, 1995.			

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2936		12/1/2021	White Paper: IWGACP Scientific Opinions on Testing Methods for Asbestos in Cosmetic Products Containing Talc, Interagency Working Group on Asbestos in Consumer Products, December 2021.			
2937		1/13/2022	FDA News Release - FDA Releases Federal Interagency Working Group Scientific Opinions on Testing Methods for Asbestos in Talc-Containing Cosmetic Products. 1/13/22.			
2938		11/1/1985	Pfizer Material Safety Data Sheet (MSDS) for California Talc, November 1985.			
2939		6/1/2012	"Potential for Inhalation Exposure to Engineered Nanoparticles from Nanotechnology-Based Cosmetic Powders," Y Nazarenko, et al, Environmental Health Perspectives, June 2012.			
2940		12/5/1994	Talc Ovarian Cancer Warning Requested in Citizen Petition, F-D-C Reports, "The Tan Sheet", 12/5/94; JNJ000016340-16342.			
2941		11/1/1979	Pfizer Memo to S Shope, from FW Mebus; Re: Routine Analysis of Coty Talc for Fibrous Tremolite, 11/1/79; PFE-Hug00007079.			
2942		3/9/1976	Excerpt of Colgate Lab Notebook 6164-99, Re: 62130 X-Ray Diffraction, P Briscese, 3/9/76; CPC-NB-00000061.			
2943		8/18/1976	Pfizer Testing of Talc 1615 and 141 for Coty Products, 8/18/76; PFE HUG 0007191.			
2944		8/20/1976	Pfizer Testing of Talc 1615 for Coty Products, 8/20/76; PFE HUG 00007194.			
2945		12/16/1976	Pfizer Testing of Talc 1615 for Coty Products, 12/16/76; PFE HUG 00007198.			
2946		8/18/1977	Pfizer Testing of Talc 1615 for Coty Products, 8/18/77; PFI SEL 00009827.			
2947		9/6/1977	Pfizer Testing of Talc 1615 for Coty Products, 9/6/77; PFI SEL 00009828.			
2948		2/24/1978	Pfizer Testing of Talc 1615 for Coty Products, 2/24/78; PFE Hug 00007093.			
2949		3/1/1978	Pfizer Testing of Talc 1615 for Coty Products, March 1978; PFI GIBB 00000872.			
2950		4/28/1978	Pfizer Testing of Talc 1615 for Coty Products, 4/28/78; PFI SEL 00009833.			
2951		5/10/1978	Pfizer Testing of Talc 1615 for Coty Products, 5/10/78; PFI SEL 00009839-9840.			
2952		6/1/1978	Pfizer Testing of Talc 1615 for Coty Products, 6/1/78; PFI SEL 00009849.			
2953		6/6/1978	Pfizer Testing of Talc 1615 for Coty Products, 6/6/78; PFI SEL 00009850.			
2954		6/14/1978	Pfizer Testing of Talc 1615 for Coty Products, 6/14/78; PFI SEL 00009854.			
2955		7/20/1978	Pfizer Testing of Talc 1615 for Coty Products, 7/20/78; PFI SEL 00009860.			
2956		12/18/1978	Pfizer Testing of Talc 1615 for Coty Products, 12/18/78; PFI ROY 00000662.			
2957		1/18/1979	Pfizer Testing of Talc 1615 for Coty Products, 1/18/79; PFI ROY 00000673.			
2958		1/24/1979	Pfizer Testing of Talc 1615 for Coty Products, 1/24/79; PFI ROY 00000674.			
2959		2/14/1979	Pfizer Testing of Talc 1615 for Coty Products, 2/14/79; PFE Hug 00007212.			
2960		2/22/1979	Pfizer Testing of Talc 643 and 1615 for Coty Products, 2/16/79 to 2/22/79; PFE Hug 00007214-7215.			

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2961		4/6/1979	Pfizer Testing of Talc 1615 for Coty Products, 4/6/79; PFE Hug 00007086.			
2962		4/17/1979	Pfizer Testing of Talc 1615 for Coty Products, 4/17/79; PFE Hug 00007218.			
2963		4/27/1979	Pfizer Testing of Talc 1615 for Coty Products, 4/27/79; PFE Hug 00007220.			
2964		5/10/1979	Pfizer Testing of Talc 1615 for Coty Products, 5/10/79; PFE Hug 00007222.			
2965		5/30/1979	Pfizer Testing of Talc 1615 for Coty Products, 5/30/79; PFE Hug 00007087.			
2966		7/16/1979	Pfizer Testing of Talc 1615 for Coty Products, 7/16/79; PFE Hug 00007089.			
2967		7/18/1979	Pfizer Testing of Talc 1615 for Coty Products, 7/18/79; PFE Hug 00007091.			
2968		7/23/1979	Pfizer Testing of Talc 1615 and 643 for Coty Products, 7/23/79; PFE Hug 00007090.			
2969		7/27/1979	Pfizer Testing of Talc 1615 for Coty Products, 7/27/79; PFE Hug 00007092.			
2970		8/28/1979	Pfizer Testing of Talc 1615 for Coty Products, 8/28/79; Pfi SEL 00009721.			
2971		9/7/1979	Pfizer Testing of Talc 1615 for Coty Products, 9/7/79; PFI ROY 00000879.			
2972		2/5/1980	Pfizer Testing of Talc 1615 for Coty Products, 2/5/80; PFI GIBB 00000799.			
2973		2/19/1980	Pfizer Testing of Talc 1615 for Coty Products, 2/19/80; PFI SEL 00009731.			
2974		4/7/1980	Pfizer Testing of Talc 1615 AND 141 for Coty Products, 4/7/80; PFI SEL 00007139.			
2975		5/6/1980	Pfizer Testing of Talc 1615 for Coty Products, 5/6/80; PFI SEL 00007135.			
2976		5/12/1980	Pfizer Testing of Talc 1615 for Coty Products, 5/12/80; PFE Hug 00007140.			
2977		5/30/1980	Pfizer Testing of Talc 1615 for Coty Products, 5/30/80 and 6/4/80; PFE Hug 00007135-7136.			
2978		6/20/1980	Pfizer Testing of Talc 1615 for Coty Products, 6/20/80; PFE Hug 00007136.			
2979		6/30/1980	Pfizer Testing of Talc 1615 for Coty Products, 6/30/80; PFE Hug 00007138.			
2980		2/2/1981	Pfizer Testing of Talc 1615 for Coty Products, 2/2/81; PFI ROY 00000479.			
2981		2/6/1981	Pfizer Testing of Talc 1615 for Coty Products, 2/6/81; PFI ROY 00000917.			
2982		2/24/1981	Pfizer Testing of Talc 1615 for Coty Products, 2/24/81; PFE Hug 00007254.			
2983		3/12/1981	Pfizer Testing of Talc 1615 for Coty Products, 3/12/81; PFI GIBB 00000787.			
2984		9/17/1981	Testing of Coty Talc 1615, 9/17/81; PFE-Hug00007060.			
2985		2/19/1982	Pfizer Testing of Talc 1615 for Coty Products, 2/19/82; PFI ROY 00000430.			
2986		8/4/1982	MSHA Dust Sampling at Talc Properties, 8/4/82 and 8/24/82; MSHA Letter to Levy Konigsberg re FOIA Request, 10/19/17.			
2987		11/18/1985	Abstract of "Characteristics of Italian talcs and possibility of association with harmful minerals," U Verdel, et al, 11/18/85; JNJ000086585-86586.			
2988		4/23/1998	Letter to R Hatcher, Mehaffy & Weber, from AM Blount; Re: Up- to-date scientific view on asbestos, amphiboles and intermediate fibers, 4/23/98; JNJ000064241.			

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2989		6/1/2012	Deposition of Mickey Gunter, 6/1/12; with Gunter's Notes on Conversation with Alice Blount; GUNTER00002233.			
2990		1/1/2013	Imerys Powerpoint - Product Stewardship and Fiber Management, S Sharma and J Pier, January 2013.			
2991		Undated	Colgate Samples Chart: Talc Samples Tested by Plaintiff's Experts			
2992		Undated	Luzenac Applications and Recommended Products; IMERYS219966-219968.			
2993		1/27/1984	Memo to S Woolridge, from AL Mayhew; Re: Cantal samples, 1/27/84; Product Data for Talfil MM-45-75, CANTAL, Canada Talc Industries.			
2994		1/1/1953	Talc, Soapstone and Pyrophyllite, DR Irving, FP Uswald, Minerals Yearbook, 1953.			
2995		1/1/1979	Canada - now there are four, 1979.			
2996		10/29/2001	Luzenac North America Memo to J Godla, from E McCarthy; Re: Monthly Report - October 2001, 10/29/01; IMERYS417214.			
2997		4/24/1970	Letter to WH Ashton, J&J, from RS Lamar, Desert Minerals; Re: Grantham No 2 crude talc, 4/24/70; JNJALC000239331-333.			
2998		6/10/1999	Defendant Cyprus amax Minerals Company's Fourth amended Responses to Plaintiffs' Standard Interrogatories to Friction Defendants (GO129), In Re: Complex Asbestos Litigation, 6/10/99.			
2999		1/1/1955	"Talc Pneumoconiosis," M Kleinfeld, J Messite and IR Tabershaw, AMA Archives, 1955.			
3000		8/13/1979	Johns-Manville Memo to J Green, from B Diemer; Re: Desert Talc, 8/13/79; MT-CP-008227.			
3001		7/17/1979	Englehard Memo to GA Hemstock, from EJ Triglia; Re: Talc Investigation, 7/17/79; BASF00132-138.			
3002		9/2/1976	Pfizer Memo to JP Bartels, from RE Norwood; Re: Visit to Johns-Manville, 9/2/76; PFZ01162 019158-67.			
3003		6/8/1973	Letter to WH Ashton, Johnson & Johnson, from WT Caneer, Colorado School of Mines; Re: Meeting with Bowling Green State University Geological Staff, 6/8/73; JNJAZ55_000001871-1876.			
3004		6/8/1973	Letter to WH Ashton, Johnson & Johnson, from WT Caneer, Colorado School of Mines; Re: Meeting with Bowling Green State University Geological Staff, 6/8/73; FDA00003620-3627; Affidavit.			
3005		7/11/1986	Letter to P Douillet, from HJW Swanson, FDA; Re: Response to November 8, 1983 Citizen Petition, Docket No 83P-0404, 7/11/86; FDA000003601-3604; Affidavit.			
3006		1/12/1973	Johnson & Johnson Memo from RJ Mortimer; Re: Windsor Minerals, 1/12/73; Windsor Minerals Memo; Re: A comprehensive plan to meet the requirements of Windsor Minerals for milling capacity in the next five years, 12/28/72; JNJ000261816-824.			
3007		12/26/1972	Windsor Minerals Memo to W Ashton, from RN Miller; Re: Potential Cosmetic Talc Resources - Vermont, 12/26/72; JNJ000252174.			
3008		11/9/1973	A Proposal to Construct Processing Facilities for Johnson's baby Powder Talc and For Industrial Talc Products at Windsor Minerals, Vermont, 11/9/73; JNJ000300297-303.			
3009		6/3/1975	Cyprus Industrial Minerals Minerals Lab Work Request, Project 4790-Asbestos, Vanderbilt-Grantham Action Plan, 6/3/75.			

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3010		6/16/1975	Cyprus Industrial Minerals Report 4790- Asbestos, Samples from Keeler, 6/16/75.			
3011		9/4/1975	Cyprus Industrial Minerals Report 4790- Asbestos, Eleven samples from Bay Street, 9/4/75.			
3012		5/10/1976	Cyprus Industrial Minerals Memo to HT Mulryan, from P Colville; Re: 76-0127-CIM-BS, 5/10/76; Cyprus Research Co Lab Report, Supplement to 76-0127-CIM-DL Harris, 5/4/76.			
3013		1/12/1954	Letter to BH Sellers, Thompson-Hayward Chemical Co, from MW Glenn, American Talc Company; Re: Alabma Talc - your letter January 5th, 1/12/54; THAN 8540.			
3014		12/27/1972	Talc, Soapstone and Pyrophyllite in 1972, Mineral Industry Surveys, 12/27/72; WCD(CA) Moore 0003799.			
3015		7/11/2022	Updated Cosmetic Talc Report, DOBS-16, J Webber, 7/11/22.			
3016		7/11/2022	Appendix B: DOB-16, Updated Tippin Cosmetic Talc Report, Summary Table of Pfizer TEM Results for Talc 1615, Updated Cosmetic Talc Report, DOBS-16, J Webber, 7/11/22.			
3017		4/12/1960	Letter to HL Warner, Johnson and Johnson, from WE Chase, Battelle Memorial Institute; Re: Flotation studies of Italian talc, 4/12/60; JNJNL61 000001480-1484.			
3018		8/31/1959	Summary Report on Ultrasonic Comminution of Talc to Johnson and Johnson Research, Battelle Memorial Institute, 8/31/59; JNJNL61 000001369-1386.			
3019		8/31/1972	Memo from AJ Goudie; Re: Trip to Sperry Rand Microanalytical Lab, Rockville, Maryland, Project No 503, 8/31/72; JNJTALC000169515-516.			
3020		12/13/1973	J&J Benelux Memo to Worth, from W Nashed; Re: Asbestos in baby powder, 12/13/73; JNJAZ 000006532-6539.			
3021		9/26/1984	Letter to JP Grange, Talcs de Luzenac, from WH Ashton; Re: Talc Asbestos L Paoletti, et al, 9/26/84; JNJTALC000128194-128208.			
3022		8/25/1997	Letter to HL Hobson, from JL Abraham; Re: Exam of Johnson's Baby Power Sample, 8/25/97; JNJ000064544.			
3023		3/16/1998	Letter to JC O'Shaugnessy, from MR Hatcher, Mehaffy & Weber; Re: Coker vs Bill Thames Pharmacy, 3/16/98; JNJ000064591-92.			
3024		12/4/2000	Luzenac North America Email to R Zazenski, from M Hayes; Re: Bain asbestos analysis, 12/4/00; IMERYS288634-636.			
3025		3/31/2003	Luzenac Memo to D Crouse, from HA Rothschofp; Re: PLM Analysis of Argonaut Drilling Sample, Proj No A02703, 3/31/03; IMERYS482077-83.			
3026		2/24/2004	Email to S Mann, CPCUS, from J Hopkins, Innova; Re: Talc, 2/24/04; Memo to S Mann, from M Monseau; Re: Asbestos, 2/24/04; Letter to M Monseau, from M Ozdaglar, KCRA TV3, 2/23/04; Quantitative Analysis Report, Forensic Analytical, 1/5/04; INI000375386-389.			
3027		5/21/1992	Cyprus Memo to US Borax, from RC Munro; Re: Hamm Mine Core Drilling, 5/21/92; IMERYS238270-277.			
3028		3/26/1996	Johnson and Johnson; Memo to J Hopkins, from R Gallagher, Re: Optical Microscopy/ Dispersion Staining of Luzenac America Talc Composite Samples for 1995, 3/26/96; JNJ000240636.			
3029		1/29/1992	Cyprus Industrial Minerals Memo to J Scott, from JM Radcliffe; Re: Floation System Mineralogy, November 1991 Composites, Project No 92-004, 1/29/92; JNJ000280878-879.			

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3030		1/17/1989	Talc Analysis ES#9020, 731-98 Talc Powder, 200 Mesh, Qixia Shan Dong, ES Laboratories for Johnson & Johnson BP Division, 1/17/89; JNJ000062359-63.			
3031		3/14/1988	Letter to MA Nunes, from A Dickey, RJ Lee; Re: Analysis of talc sample 879-57 TALC L, 3/14/88; JNJ000062176-77.			
3032		9/28/1972	THAN Bulletin to All Industrial Salesmen, from P Kizer; Re: Asbestos in Talc, 9/28/72; THAN LIT 001467-1469.			
3033		2/20/1978	Excerpt of Geology and Ore Reserves of the Hammondsville Ore Body, Report of the Geology Section, WJ Gregg, Windsor Minerals, 2/20/78; IMERYS436972-7097.			
3034		2/9/1979	Handwritten Call Report from H Cohen; Re: BPC Quality Control, 2/9/79; JNJ000063167.			
3035		12/15/1977	Mineralogical Investigation of Three Main Contaminating Rock Types in the Talc Deposit of Windsor, Vermont, Mountain States Research and Development, Job No 522, 12/15/77; JNJ000338378-385.			
3036		4/4/1977	EMV Associates Report on the Analysis of Nine Talc and Rock Samples, 1977; Certificates of Microanalysis for Asbestos, A Composite and Old Stock Composite, 4/4/77; Handwritten Call Report from H Cohen; Re: BPC Quality Control, 2/9/79; JNJMX68_000008981-9004; JNJ000062160; JNJ000061156; JNJ000063167.			
3037		9/25/1972	Johnson & Johnson Memo to File, from W Nashed; Re: Shower to Shower/ Asbestos FDA Meeting,, September 21, 1972, 9/25/72; JNJ000086531-533.			
3038		11/30/1990	McCrone Project Cost Record for Johnson and Johnson Project MA-90013, TEM Analysis on one talc sample, PO ME-7885, 11/30/90; JOJO-MA90013-001-16; Affidavit.			
3039		1972-1973	Investigation of Possible Asbestos Contaminations in Talc Samples, Hutchinson, University of Minnesota Space Science Center, 1972-73; JOJO-MA2546-01282-1314; 00138-146; Affidavit.			
3040		10/13/1988	Windsor Minerals Memo to Dr M Gross, from RN Miller; Re: Rainbow Mine Sourced Grade 66 Composite Sample for Testing, 10/13/88; JNJALC000215210-216.			
3041		10/1/1987	Letter to RN Miller, Windsor Minerals, from J Schmidt, Johnson and Johnson; Re: Talc Samples from Mountain States R&D, May 1, 1987, 10/1/87; JNJ000266310.			
3042		3/30/1987	Letter to RN Miller, Windsor Minerals, from J Schmidt, Johnson and Johnson; Re: Windsor Minerals Raw Talc Submissions, 27 samples submitted March 5 through March 20, 1987, 3/30/87; Mineralogical Report, Proj No 2621, 2/12/87; JNJ000237376-77; JNJ000285289-95.			
3043		1/30/1987	Johnson and Johnson Memo to JA Molnar to RN Miller, from J Schmidt; Re: Windsor Minerals Raw Talc Submissions, November 1986 to January 1987, 1/30/87; JNJAZ55_000008177-8178.			
3044		4/29/1986	Letter to RN Miller, Windsor Minerals, from T Kremer, McCrone; Re: Results of Sample Analysis, McCrone Project No ME-2275, 4/29/86; JNJ000063285.			
3045		2/26/1985	Analytical Request and Report, Project No 2881, Chinese Talc, Sample 912-47 100T lot of cosmetic grade, WH Ashton, 2/26/85; JNJ000062436.			
3046		11/2/1984	Letter to RN Miller, Windsor Minerals, from ME Palenik, McCrone; Re: Analysis of four air filter samples, 11/2/84; JNJ000063266.			

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3047		2/24/1984	Letter to RA Arzapalo, Johnson & Johnson from DP Palenik, McCrone; Re: Analysis of sample 5-HV66, 2/24/84; JNJ000062127.			
3048		11/6/1980	Letter to HJ Grayson, Windsor Minerals, from RM Ellis, McCrone; Re: Talc sample from W Gregg KR, 11/6/80; JNJ000063236.			
3049		10/5/1978	Letter to RN Miller, Windsor Minerals, from GR Grieger, McCrone; Re: 38 talc samples, 10/5/78; JNJ000063173.			
3050		7/5/1976	Johnson and Johnson Handwritten Notes- Minerals in Baby Powder, Lot 228P, 7/5/76; Letter to J Krause, CSMRI, from WH Ashton, Johnson and Johnson; Re: Lot 228P, 3/16/76; JNJ000064762; JNJ000265171.			
3051		11/19/1975	Letter to V Zeitz, Windsor Minerals, from GR Grieger, McCrone; Re: 24 talc samples dated 9-2-75 for asbestiform minerals, 11/19/75; JNJ000066174-66175; WIND-04055-0451-452.			
3052		11/5/1975	Letter to V Zeitz, Windsor Mineral, from GR Grieger, McCrone; Re: Report of 1 July 1975, 11/5/75; JNJ000578954-955.			
3053		9/11/1975	Windsor Minerals Memo to V Zeitz, from I Stewart, McCrone; Re: Copy of talc analysis photos, 9/11/75; WIND-04055-0026-29.			
3054		1991-1992	Amphibole Scans - WWM, Grades 66 & 96, 1991-1992; AB-CYP-41-0001513-1668			
3055		7/1/1975	Letter to V Zeitz, Windsor Mineral, from GR Grieger, McCrone; Re: Examination of two groups of samples, 7/1/75; JNJ000291318-320; JNJ000296901.			
3056		10/10/1974	Letter to V Zeitz, Windsor Minerals, from RJ Shimps, McCrone; Re: Analysis of 11 talc samples, 10/10/74; JNJ000291308-310.			
3057		7/8/1974	Letter to R Rolle, Johnson & Johnson, from GR Grieger, McCrone; Re: Analysis of 21 samples, 7/8/74; JNJALC000287007-009.			
3058		1/29/1974	Confidential Report - New Reagent Systems - Plant Trial at Windsor Minerals, V Zeitz, 1/29/74; Examination of Talc Ores and Products, Beneficiation Processes, Windsor Minerals, 5/8/74; JNJ000326070-105.			
3059		4/4/1974	Johnson & Johnson Memo to G Lee, from WH Ashton; Re: Notes on Visit to Denver Area March 26 thru March 27, 1974, 4/4/74; JNJ000287913-915.			
3060		2/11/1974	Letter to FR Rolle, Johnson & Johnson, from R Shimps, McCrone; Re: Analysis of Samples S5-888, T-280 and S1-1028-72831, 2/11/74; JNJ000578775.			
3061		4/26/1973	Johnson & Johnson Memo to DD Johnston, from DR Petterson; Re: Windsor Minerals and Talc, 4/26/73; JNJ000294872-874.			
3062		4/27/1973	Microscopic Examination of Johnson's Baby Powder, 4/27/73; JNJ000273729.			
3063		4/19/1973	Johnson & Johnson Memo to FR Rolle, from DH Hamer; Re: Dispersion staining examination of retained samples of Johnson's baby powder – Project No 503, 4/19/73; JNJ000245155.			
3064		10/27/1972	Examination of Johnson's Baby Powder, Dr AJ Goudie, McCrone, Copy 1 of 4, Do Not Use, 10/27/72; JNJ000260833-835.			
3065		10/19/1972	Excerpt of Lewin Testing Results, 10/19/72.			

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3066		8/10/1972	Handwritten Notes - Lewin Samples of Shower to Shower, 8/9 and 8/10/72; JNJALC000061782, njntalc000062191-193.			
3067		8/9/1972	Handwritten List of Lewin Shower to Shower QA Retained Samples, February 1970 to August 1971, 8/9/72; JNJ000062193.			
3068		10/21/1971	Report to Windsor Mineral Co, Technical Report MA-2401, Examination of Talc Samples for Windsor Mineral Co, McCrone, 10/21/71: JNJ000260811-815.			
3069		7/7/1971	Letter to WH Ashton, Johnson & Johnson, from MG Pattengill, Colorado School of Mines; Re: X-ray analysis of 344-L Vermont talc product and the six monthly Vermont talc product samples, 7/7/71: JNJ000247079-81.			
3070		6/30/1971	Letter to WH Ashton, Johnson & Johnson, from MG Pattengill, Colorado School of Mines; Re: Analysis on sample 344L baby powder and six monthly Vermont finished product samples, 6/30/71: JNJALC000291142.			
3071		5/14/1971	Methodology, Colorado School of Mines, Undated; Johnson & Johnson Memo to G Hildick-Smith, from WH Ashton; Re: Assay of Talc in baby Powder, 5/14/71; Letter to WH Ashton, from MG Pattengill, CSMRI; Re: Analysis of Sample 344L Baby Powder, 5/10/71; JNJALC000291146-163.			
3072		4/14/1971	Letter to RS Russell, Johnson & Johnson, from RC Beers, CSMRI; Re: Two Vermont Final Product Samples, Project 200534, 4/14/71.			
3073		12/4/1970	Geological Audit Windsor Minerals, File #124 - Geology and Ore Reserves, Hammondsville Mine, Windsor Minerals, Colorado School of Mines, 12/4/70; JNJ000308591-750.			
3074		1/30/1967	Johnson & Johnson Memo to JT Dettre and JR Marvel, from RS Russell; Re: Baby-Mate Baby Powder, Subject sample, 1/30/67; JNJ000235800; Memo to RL Sundberg, from JT Dettre; Re: Sample of Baby-Mate, 1/16/67; JNJ000235800; JNINI61_000009897			
3075		4/7/1966	Battelle Research Report – Characterization of Flotation Tailings from the West Windsor Talc Plant to Johnson and Johnson, 4/7/66; JNJALC000301073-1102.			
3076		10/13/1961	Letter to WH Ashton, Johnson & Johnson, from WL Smith, Battelle; Re: Requested addendum to letter of July 11, 1961 re various grades of commercial talc, 10/13/61; JNJ000868183-187.			
3077		8/25/1961	Letter to WH Ashton, Johnson & Johnson, from WL Smith, Battelle; Re: Exploration work on Hammondsville Talc Deposit, 8/25/61; JNJMX68_000000758-760.			
3078		6/6/1961	Letter to WH Ashton, Johnson & Johnson, from WL Smith, Battelle; Re: Observations made at Wight Mine, Gouverneur Mine, Hammondsville Mine and subsequent petrographic examinations of the ores and beneficiation products, 6/6/61; JNITALC000129140-142			
3079		3/8/1960	Phase Report on Pilot-Plant Beneficiation of Italian Run-of-Mine Talc to Johnson and Johnson, RW Schatz, Battelle, 3/8/60; JNJ000086877-86896.			
3080		9/15/1959	Phase Report on An Investigation of the Measurement and Causative Factors of Luster in Fine Particulate Talcs to Johnson and Johnson, Battelle Memorial Institute, 9/15/59; JNITALC000668937-951.			

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3081		12/31/1959	Progress Report on The Physical Concentration of Talc Ores – Flotation of Italian Run-of-Mine Talc to Johnson and Johnson, WE Brown, Battelle, 12/31/59; JNJ000087123-165.			
3082		2/24/2020	Stipulation Regarding Documents Produced by Johnson & Johnson Defendants, Eggers v Colgate-Palmolive Company, et al, State of Oklahoma. 2/24/20.			
3083		2/24/2020	Excerpt of the Deposition of Susan Nicholson, Eggers v Colgate-Palmolive, et al, Vol 1, 2/24/20. (pp178-181)			
3084		5/18/1973	Johnson & Johnson Memo to W Ashton, from GE Heinze; Re: Talc Symposium – May 8, 1973 Department of the Interior, 5/18/73; JNJNL61 000006726-32.			
3085		9/30/1992	Notes on Meeting with Professor F Pooley, Cardiff, 9/30/92; JNJ000035507-509.			
3086		5/9/1958	Progress Report on Further Studies on the Measurement and Correlation of the Physical Properties of Talc to Johnson and Johnson, WL Smith, Battelle Memorial Inst, 5/9/58, 7/18/58; JNJ000087231-274.			
3087		12/9/1974	Letter to R Russell, Johnson & Johnson, from GR Grieger, McCrone; Re: Analysis of samples J and J 3390-66, 12/9/74; JOJO-MA2546-00509-11; Affidavit.			
3088		6/4/1973	Johnson & Johnson Memo to RF Rolle, from TH Shelley; Re: British Toilet Preparation Federation techniques, 6/4/73; JNJ000286971-972.			
3089		5/23/1989	Letter to J Schmidt, Johnson & Johnson, from GR Dunmyre, RJ Lee; Re: RJ Lee Job No AAH905450, JJ PO No 004854, Sample 731-116, 5/23/89; JNJ000223509.			
3090		2/18/1975	J&J Ltd Memo to FR Rolle, from IW Sloan; Re: UK work on analytical methods, 2/18/75; JNJNL61 000062953.			
3091		11/26/1990	Letter to MJ Keener, Cyprus Windsor, from EK Sprague, McCrone; Re: 3 talc samples, 11/26/90; Letter to JR Millette, from Cyprus Windsor; Re: CWM samples 90-28, 90-29, 90-30, 11/2/90; JNJMX68 000012851-12860.			
3092		10/8/1985	Letter to RN Miller, Windsor Minerals, from TR Gore and JR Millette, McCrone; Re: McCrone Project ME-1862, PO WS-17577, 10/8/85; JNJ000288584.			
3093		9/10/1985	Letter to I Stewart, McCrone, from RN Miller, Windsor Minerals; Re: Methodology and Reports, 9/10/85; JNJ000064652.			
3094		8/22/1985	Letter to AJ LaPierre, Windsor Minerals, from TJ Gore; Re: Analysis of Seven Talc Samples for Asbestos Mineral Content by Transmission Electron Microscopy, ME-1862, 8/22/85; JNJ000063206-7.			
3095		12/4/1997	Luzenac Float Feed Sample to Bain Environmental from West Windsor Laboratory, LAI 97-10, LAI 97-11, October-November 1997, 12/4/97; JNJ000280762-764.			
3096		7/9/1971	Meeting with Dr Langer on July 9 Concerning Analytical Analysis of Talc, 7/9/71; JNJAZ55 000005743-5748.			
3097		9/9/1975	Johnson & Johnson Memo from G Lee; Re: AM Langer Analysis of Talcum Powder Products - Edinburgh Meeting, 9/9/75; JNJ000253056-57.			
3098		8/24/1972	Johnson & Johnson Memo to RA Fuller, from W Nashed; Re: Talc/Asbestos, Shower to Shower Talc, 8/24/72; JNJTALC000289185-186.			
3099		11/10/1971	Letter to G Hildick-Smith, Johnson & Johnson, from AM Langer, Mt Sinai; Re: Tenovous sample, 11/10/71; JNJ000259771-773.			

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3100		3/11/2004	Luzenac Technical Report to RJ Zazenski, from JW Pier; Re: Summary of TEM Asbestos Results: Grade 66/96 USP Product Composites, 3/11/04; IMERYS342777-779.			
3101		2/26/2004	Luzenac Product Certification Report to R Corder, from J Pler; Re: AO3098, AAO3372 and AO3499, Summary Report, 2003, 2/26/04; IMERYS077643.			
3102		2/27/2004	Luzenac Product Certification Report to R Corder, from J Pler; Re: AO2224, AO2400, AO2524 and AO3038, Summary Report 2002, 2/27/04; IMERYS342782.			
3103		2/26/2004	Luzenac Product Certification Report to R Corder, from J Pler; Re: AO3098, AAO3372 and AO3499, Summary Report, 2001, 2/26/04; IMERYS354089.			
3104		12/23/1974	Letter to Honorable L Mechler, House of Representatives, from RC Metherell; Re: Comment on a letter from JP Tribe regarding asbestos in talc, 12/23/74.			
3105		9/28/1981	Canadian Talc Report to PT Barnes, from DG Ogden; Re: Mineralogy of Canada Talc Industries Limited Talc Ore as Mined and Processed at Madoc, Ontario, 9/28/81; WCD-McBride(IN)-004289-4295.			
3106		6/1/1983	List of Products Produced at Clark Minerals Corporation, 6/1/83.			
3107		1/30/1973	Letter to AM Harvey, RT Vanderbilt, from WH Ashton, Johnson & Johnson; Re: Definition of talc and your call for a meeting, 1/30/73; WCD-McBride(IN)-004296.			
3108		7/18/2022	Letter to D Egilman, Alpert School of Medicine, Brown University, from HC Frey, USEPA; Re: Your request regarding the definition of asbestos in EPA/600/R-93/116, 7/18/22.			
3109		11/15/1984	FDA Memo Re: Request for Quantitative Analysis of Risk from Potential Exposure to Asbestos from Cosmetic Talc Use, Citizen Petition 83P-0404, Philip Douillet, LL Taylor, 11/15/84; JNJ000016604-16628.			
3110		8/15/1974	FDA Memorandum; Re: An Estimate of a Safe Detection Level of Asbestos Fiber in Baby Powder Talc, 8/15/74.			
3111		8/23/1976	Johnson & Johnson Memo to G Lee, from RS Russell; Re: Special Talc Studies, Respirable Particle Measurements, Project NO 0503.01, 8/23/76; JNJ000061176-61183.			
3112		8/13/1971	Johnson & Johnson Confidential Memo to RA Fuller, from TH Shelley; Re: Talc, 8/13/71; JNJAZ55 000004904-4906.			
3113		5/15/1971	Johnson & Johnson Research and Development Bi-Monthly Project Status Report, Project #101 - Alternate Sources of Talc, RS Russell, 5/15/71; JNJ000280275-276.			
3114		7/13/1966	Johnson & Johnson Memo to WH Ashton, from NA Poirier; Re: Johnson's Baby Powder Historical Survey, 7/13/66; JNJ000085374-375.			
3115		4/11/1979	Englehard Memo to EJ Triglia, from PN Gale; Re: Talc Investigation - Review and Update, 4/11/79; BASF02534-2536.			
3116		3/18/1976	Memo from DR Petterson; Re: The Mt Sinai samples are old, 3/18/76; JNJMX68 000009855-56.			
3117		5/23/2002	Luzenac Technical Report to D Crouse, from J Pier; Re: Analysis of Fibrous Material from Argonaut Waste Rock, Proj No A01709, 5/23/02; IMERYS422289-90.			
3118		1/1/2022	"The Definition of Asbestos - A Manufactured Defense to Avoid Regulation and Victim Compensation," TH Tran, DS Egilman, et al, European Society of Medicine, 2022.			
3119		4/25/1972	Johns-Manville Minutes of the President's Executive Staff Meeting, 4/25/72; CRMC-Talc-Micro-001455-1463.			

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3120		8/10/1988	Colgate Memo to Easylink, from MC Martin; Re: Della Lana/M Balotin, C-P Brazil, 8/10/88; QE-CPC00004535-4536.			
3121		12/22/1976	Letter to LD Murino, Cyprus Industrial Minerals, from CY Haas, Englehard; Re: Several articles published in Vermont newspapers, 12/22/76; IMERYS061757-784.			
3122		5/4/1976	Johnson & Johnson Memo to Talc Advisory Group, from FR Rolle; Re: Report of the Examination of American Consumer Talc Samples, 5/4/76; JNJNL61 000035497-35562.			
3123		8/31/1973	Staff Directory, FDA, 8/31/73; CRMC-Talc-Micro-001325-1347.			
3124		1/1/2021	"Asbestos and Ovarian Cancer," B Slomovitz, et al, Int J Gynecol Cancer, 2021.			
3125		12/12/1973	Johnson & Johnson Memo to G Kaplan to FR Rolle, from PD Carpe; Re: Chrysotile Asbestos in Talc - Concentration by Method of Dr F Pooley, 12/12/73; JNJ000236137-138.			
3126		1/14/1975	Windsor Minerals Memo to RN Miller, from V Zeitz; Re: Concerning a 6 month ore study on asbestiform content, 1/14/75; JNJ000222849-222850.			
3127		10/27/1972	Examination of Johnson's Baby Powder, Dr AJ Goudie, McCrone, Copy 2 of 4, 10/27/72; JNJ000260840.			
3128		1972-1973	Investigation of Possible Asbestos Contaminations in Talc Samples, Hutchinson, University of Minnesota Space Science Center, 1972-73; JOJO-MA2546-01282-1314; 00138-146; Affidavit.			
3129		1/1/1991	"Amphibole Content of Cosmetic and Pharmaceutical Talcs," AM Blount, Environmental Health Perspectives, Last page of handwritten identification of samples, 1991; JNJ000241177-83.			
3130		2/10/1992	Letter to M Refregier, Talc de Luzenac, from AM Blount, The Newark Museum; Re: Call from Slim Thompson re my paper in Environmental Health Perspectives, 2/10/92; JNJNL61 000095944-946.			
3131		Undated	Worldwide Talc Deposits; JNJ000333712-722.			
3132		10/27/1972	Letter to AJ Goudie, from WT Caneer, CSMRI; Re: XRD scans of Baby Powder Talc Samples 108T and 109T, Project C10704, 10/27/72.			
3133		12/12/1973	FDA Memorandum to RM Schaffner, from HJ Eiermann; Re: Letter by Dr W Nashed of Johnson & Johnson to Dr R Schaffner dated 11-20-73, 12/12/73; AV_STD_006916-6919.			
3134		4/2/1973	Letter to WH Ashton, from WP Reid, Colorado School of Mines; Re: Mineralogical Examination of Four Samples for tremolite and chrysotile, Project C10704, 4/2/73; JNJ000274668-674.			
3135		1/1/2018	"Chrysotile and chrysophosphate chemical modification of the chrysotile surface and its effect on biological behavior," AM Langer and RP Nolan, Toxicology and Applied Pharmacology, 2018.			
3136		9/23/1991	Cyprus Industrial Minerals, Western Source, BHC-2 Talc, Project No 91-308, T Landels, 9/23/91; ITA-Alfaro000186-197.			
3137		2/22/1983	Cyprus laboratory Report 81-0237, P Colville; Re: Samples of hand picked particles logged as talc at the rig and under binocular microscope were sent for examination, 2/22/83; ITA-Alfaro000365-85.			

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3138		2/8/1991	Thorpe, Reed & Armstrong Memo to Montana Talc File, from BV Hicks; Re: Summary of Tremolite Testing of Montana Talc, 2/8/91; PFZ01162 05753-5755.			
3139		8/28/1979	Talc Supply Agreement between Cyprus Georesearch Company and Whittaker, Clark & Daniels, 8/28/79; ITA 294-301.			
3140		11/27/2000	Comments of Ann Wylie on Document entitled, "Talc, Asbestiform and Non-asbestiform: Result of the NIEHS Report on Carcinogens Group Review, 11/27/00; IMERYS 240262.			
3141		11/27/2000	Email to R Zazenski, from JR Coughlin; Re: Winning Argument, 11/27/00; IMERYS-A 0024001.			
3142		12/20/2000	Email to R Zazenski, Luzenac America, from E Turner; Re: Talc & Asbestos - Broughton Project and NTP, 12/20/00; IMERYS467525-528.			
3143		4/4/2002	Cyprus/Imerys Email to B Ducasse, from J Pier; Re: Clivage (sic) Fragments, 4/4/02; IMERYS446794-96.			
3144		3/3/2004	Luzenac North America Email to J Pier, et al, from R Zazenski; Re: It's Clean, 3/3/04; IMERYS299320.			
3145		3/22/2004	Email to R Pier, from J Pier; Re: Backlog on TEM, 3/22/04; IMERYS299277.			
3146		3/25/2004	Email to J Millette, MVA, from J Pier, Luzenac North America; Re: TEM asbestos analysis in bulk talc (drilling samples), 3/25/04; IMERYS442352-353.			
3147		8/19/2006	Rio Tinto Powerpoint, Talc: Asbestos Issues and Management, J Pier, 2006, IMERYS410499.			
3148		1/8/2007	Summary of Asbestos Analysis Options for Talc, JW Pier, Luzenac, 1/8/07; IMERYS430406-409.			
3149		10/22/2007	Luzenac Email to J Pier, et al, from R Zazenski; Re: Analytical support for global asbestos policy, 10/22/07; IMERYS441780-781.			
3150		1/31/2008	Luzenac Email to R Zazenski, et al, from M Refregier; Re: Article in IM - Asbestos, 1/31/08; IMERYS442002-5.			
3151		5/13/2011	Luzenac Email to J Pier, from E McCarthy; Re: JJ, with Handwritten Notes, 5/13/11; IMERYS095086-89.			
3152		9/13/2011	PPT - Fiber Management Overview, Presentation, J Pier, Imerys, 9/13/11; IMERYS459941.			
3153		Undated	Cyprus Product Sheet, Undated; CAMC-Ratcliff-000056.			
3154		7/6/2017	Imerys Talc America, Inc's and Cyprus Amax Mineral Company's Responses to Plaintiffs' First Supplemental Interrogatories and Document Requests, Teuscher v Brenntag North America Inc, et al. 7/6/17.			
3155		Undated	Luzenac: The World of Talc			
3156		12/4/1978	Letter to G Gill, Cyprus, from A Greife, NIOSH; Re: Analysis of Beaverhead Mine facility, 12/4/78; CAMC-Abeyta-000004-7.			
3157		Undated	Sierra Brands, Bag Identification, Undated; CAMC-Abeyta-000062-67.			
3158		Undated	Cyprus Labels for Talc, Undated; CAMC-Abeyta-000068-71.			
3159		10/10/1988	Cyprus Minerals Letter to Whom It May Concern, from DE Huffman; Re: Confidential lists of closed and pending talc cases, 10/10/88; CAMC-Abeyta-002754-56.			
3160		8/24/1979	Letter to WA Curran, Hanson, Cuuran & Parks, from DR Ferry, Metropolitan Talc; Re: Booklet on Italian talc, 8/24/79; CAMC-Abeyta-002752-53.			
3161		Undated	Color Photographs of Metropolitan Talc South Plainfield Mill, Undated; ITA-Abeyta-000520-553.			

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3162		Undated	Talco e Grafite Val Chisone Material Safety Data Sheet (MSDS) for Talc, Undated; RATCLIFF EL-CL000067.			
3163		1/13/1981	Letter to McCrone, from KB Lehman; Re: Sample of monoblend talc for asbestos testing, 1/13/81; COL 00679-80; McCRONE 0204-5.			
3164		12/23/2011	Imerys Talc Rodoretto H6/11 High Capacity Sample, 12/23/11; AB-Polakow-000524-27.			
3165		2/29/2012	Imerys Talc, R01/12 Campione Solido Della Fronte, 2/29/12; AB-Polakow-000537-38; 1797-826.			
3166		2/16/2004	"Controllo dell'eventuale presenza di fibre di amianto nell'atmosfera e nel minerale abbattuto della miniera di Rodoretto," Relazione Sulle Indagini Effettuate Nell'Ambito Del Contratto Di Ricerca N, 107/2004, Stipulato Con La Soc, Luzenac Val Chisone N Data 2/16/04			
3167		4/7/2016	Declaration of Patrick J Downey In Support of Imerys Talc America, Inc's Motion for Summary Judgment, Or in the Alternative, Summary Adjudication, Alfaro v American Talc Co, 4/7/16.			
3168		6/1/2009	Talc and Asbestos, Rio Tinto Minerals, June 2009; AB-ITA-19-000017-26.			
3169		4/29/1988	Agreement between Vermont Talc, Inc and Green Mountain Talc Corporation, 4/29/88; AB-ITA-20-000002-55.			
3170		1/3/1991	Letter to FF Beyl, Cyprus, from DR Ferry, Charles Mathieu; Re: Termination of contract with Val Chisone, 1/3/91; AB-ITA-20-001331-32.			
3171		1/1/2010	Talc, EF McCarthy, NA Genco, EH Reade, Industrial Minerals and Rocks, Vol 7, 2010; IMERYS072882-897.			
3172		Undated	The Italian Cohort, Unita di Epidemiologia, Undated; IMERYS063442-45.			
3173		Undated	Luzenac PPT - Identifying/ Managing Product Stewardship Issues, "License to Market," Undated; LUZ001298-1303.			
3174		9/1/1978	Letter to WW Gaskins, Cyprus Industrial Minerals, from KM Wallingford, NIOSH; Re: Bulk talc samples from 24 Talc Mines and Mills, Cyprus Industrial Minerals, Three Forks, Montana, 9/1/78; CAMC-Greco-000191-193.			
3175		9/1/1978	Letter to WW Gaskins, Cyprus Industrial Minerals, from KM Wallingford, NIOSH; Re: Bulk talc samples from 24 Talc Mines and Mills, Cyprus Industrial Minerals, Van Horn, Texas, 9/1/78; CAMC-Greco-000194-196.			
3176		12/4/1978	Letter to G Gill, from A Greife, NIOSH; Re: Analysis of Grand Island, Nebraska Mine facility, 12/4/78; CAMC-Greco-000260-263.			
3177		12/4/1978	Letter to G Gill, from A Greife, NIOSH; Re: Analysis of Three Forks, Montana, Mine facility, 12/4/78; CAMC-Greco-000264-267.			
3178		12/4/1978	Letter to G Gill, from A Greife, NIOSH; Re: Analysis of Yellowstone Mine facility, 12/4/78; CAMC-Greco-000268-271.			
3179		2/3/1999	Alpine and Grand Island Plant Shutdown, Cosmetic Sales Plan, 2/3/99; IMERYS090787-800.			
3180		9/30/2000	Evaluation of the Market for Talc in Cosmetic Applications, Chemical Contract Marketing, 9/30/00; IMERYS147287-306.			
3181		1/12/1972	Memo to DR Clare, from RJ Mortimer; Re: Sales of Windsor talc to Outside Customers, 1/12/72; JNJ000257584-585.			
3182		9/21/2021	Declaration of William E Longo with Attached Summary Chart of the Testing of 146 Containers of Johnson & Johnson Baby Powder, 9/21/21.			

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3183		2/24/1973	Newspaper Article - Asbestos Will Kill 1 Million, Senators Told, Oakland Saturday Tribune, 2/24/73.			
3184		8/1/2017	Talc, USP 40, United States Pharmacopeial Convention, 8/1/17.			
3185		1/1/1981	Mineralogy of the Residual Soils Which Overlie a Talc Deposit in the State Line Serpentine, Pennsylvania, T Spohn, A Thesis Submitted to Rutgers University, January 1981; Blount0113-114.			
3186		7/20/2010	Newspaper Article - Lobbyists push use of deadly asbestos in developing nations, International Consortium of Investigative Journalists, The Sacramento Bee, 7/20/10; Blount0121-0124.			
3187		7/7/1971-9/7/1971	FDA Talc Submissions, Volume I, July 7, 1971 to September 7, 1971; JNJNL61 000013350-62.			
3188		7/21/1971	Memo to RA Fuller, from W Nashed; Re: Special Talc Project No 503, FDA Meeting, July 20, 1971, 7/21/71; JNJMX68_000003965-68.			
3189		9/21/1971	Letter to R Schaffner, FDA, from W Nashed; Re: Johnson's Baby Powder, 9/21/71; JNJMX68 000005215-18.			
3190		3/23/1972	Addendum: Phone Call from Mr Barnard, W Nashed, 3/23/72; JNJAZ55 000004069-4070.			
3191		4/17/1972	X-Ray Study of Johnson & Johnson's Baby Powder Retain 108T, GE Brown, Princeton, 4/17/72; HHS00000030-54; JNJ000317621-646.			
3192		8/29/1972	Johnson & Johnson Memo to RA Fuller, from W Nashed; Re: Talc/Asbestos, Shower to Shower Brand Body Powder, 8/29/72; JNJITLC000437374-375.			
3193		10/31/1972	Johnson & Johnson Memo from JP Schelz; Re: Analysis of Johnson's baby Powder for Chrysotile Asbestos, Project No 503, 10/31/72.			
3194		11/29/1972	Letter to R Schaffner, FDA, from W Nashed, Johnson & Johnson; Re: Lewin's report on Lots 108T and 109T of Johnson's Baby Powder, 11/29/72; JNJNL61 000019573-75.			
3195		12/13/1972	Johnson & Johnson Memo to Talc File, from RA Fuller; Re: Meeting, November 1, 1972 with RM Schaffner, FDA, 12/13/72; JNJ000268964-68.			
3196		2/26/1973	Letter to WH Ashton, Johnson & Johnson, from WP Reid and WT Caneer, Colorado School of Mines; Re: Mineralogical Examination of Five Talc Samples, Project No C10704, 2/26/73; JNJNL61 000008084-89.			
3197		3/30/1973	Letter to R Schaffner, FDA, from W Nashed, Johnson & Johnson; Re: Lewin's Letter to the Editor, Wall Street Journal, March 12, 1973, 3/30/73; JNJ000232297-98.			
3198		4/18/1973	Letter to J Callaghan, Pfizer, from GJ Dippold, Whittaker, Clark & Daniels; Re: Notes taken by Rex Smith during Talc Group Meeting, 4/18/73.			
3199		5/25/1973	Letter to R Schaffner, FDA, from W Nashed, Johnson & Johnson; Re: Reports on Lots 108T and 109T, 5/25/73; JNJAZ55 000004509.			
3200		6/7/1973	Johnson & Johnson Memo to DD Johnston, from W Nashed; Re: Talc/Asbestos, 6/7/73; JNJAZ55 000004511.			
3201		6/6/1973	Johnson & Johnson Memo to RJ Mortimer, et al, from DR Petterson; Re: Concentration techniques, 6/6/73; JNJ000231416.			
3202		11/7/1973	Johnson & Johnson Memo to DD Johnston, et al, from DR Petterson; Re: Material sent to FDA released from confidential disclosure, 11/7/73; JNJAZ55 000004627.			

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3203		Undated	I. Historical Review, Johnson & Johnson, Undated; JNJNL61_000020827-39.			
3204		3/11/1974	Johnson & Johnson Memo to FR Rolle, from JP Schelz; Re: Methods of Concentration of Asbestos in Talc-Project #0503-00, 3/11/74; JNJ000250919-920.			
3205		5/14/1974	FDA Memorandum to DH Hamer, from AE Schulze, Associate Referee on Asbestos Fibers; Re: Collaborative Study on the Detection and Analysis of Asbestos Mineral Fibers in Talc, 5/14/74; JNJNL61_000030041-42.			
3206		7/1/1974	Johnson's Baby Powder Formula No 499, Fact Book Supplement, July 1974; IMERY5209320-387.			
3207		2/28/1975	Johnson & Johnson Memo to I Sloan, from FR Rolle; Re: Review of CTFA Methodology for the Detection of Asbestos in Talc, as well as, Comments on TPF Methodology, 2/28/75; JNJ000300436-438.			
3208		3/12/1976	CTFA Memo to NF Estrin, from AS Curry; Re: Current talc analyses, 3/12/76.			
3209		11/24/1976	Johnson & Johnson Memo to G Lee, from WH Ashton; Re: Disturbing proposal request, 11/24/76; JNJMX68_000004346.			
3210		1/4/1984	Johnson & Johnson Memo to FDA Call File, from RG Kohler; Re: Talc, 1/4/84; JNJ000234995.			
3211		12/21/1995	Johnson & Johnson Memo to C Taylor, from J Hopkins; Re: CTPA Talc Monograph, 12/21/95; JNJ000288481-539.			
3212		1968-1969	Johns-Manville Research and Engineering Center Reports - Report No 404-39, Body Talcum Powders - Petrographic Examination, 10-31/68; Report No 404-39-81, Body Talcum Powders and Three High Grade Cosmetic Type Talcs Supplied by Johnson & Johnson - Petrographic Examination, 1/21/69; CRMC-Colgate-Micro-000001-26; Affidavit.			
3213		12/20/2005	Email to M Ellis, IMA-Europe, from R Zazenski, Luzenac America; Re: OEM Paper; Attachment: BaanltrfromCRE 122005, 12/20/05; IMERY5271234-240.			
3214		11/2/2000	Email to R Zazenski, Luzenac America, from E Turner, Luzenac Group; Re: Update - The Weinberg Group, 11/2/00; IMERY5240340.			
3215		5/22/2001	Product/ Service Non-conformance, Document # W01-11E, Customer: Johnson & Johnson, C Lambert, Windsor Minerals, 5/22/01; IMERY5216498-216514.			
3216		11/29/2000	Letter to MS Wolfe, RoC Subcommittee of the NTP, NIEHS, from WG Kelly, CRE; Re: Written comments for the 10th Report on Carcinogens, 11/29/00; IMERY5100151-162.			
3217		12/1/2000	Email to R Zazenski, Luzenac America, from JR Coughlin; Re: PR Firm, 12/1/00; IMERY5303839-840.			
3218		1/4/2001	Email to R Zazenski, from R Bernstein; Re: Summary of CRE Meeting - Dec 15, 1/4/01; IMERY5303828.			
3219		10/29/2001	Email to E Turner, et al, from C Stenneler; Re: Confidential - NTP Update and Issues, 10/29/01; IMERY5239725.			
3220		9/7/1972	Letter to Hearing, Clerk, FDA, from HT Mulryan, Cyprus Industrial Minerals; Re: Proposed Regulations for Asbestos Containing Talcs as Food Additives, 9/7/72; CPC-DALISTRSCPT00000354.			
3221		9/13/1972	United Sierra Letter to Customers; Re: United Sierra and Asbestos-Form Talc, 9/13/72; CPC-DALISTRSCPT00000355.			
3222		6/1/1983	Amoco/ Cyprus Industrial Minerals Laboratory Report 83-SP-1; Re: Seventeen sample packets of talc, 6/1/83; CPC-DALISTRSCPT00000361.			

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3223		8/14/1975	Walk Through Industrial Hygiene Survey, The Hitchcock Corporation, Murphy, North Carolina, JM Dement, NIOSH, 8/14/75.			
3224		Undated	Curriculum Vitae of Alice M Blount.			
3225		Undated	Blount Optical Microscope Photograph			
3226		Undated	Blount Optical Microscope Photograph			
3227		Undated	Blount Microscope Photograph			
3228		Undated	Blount Optical Microscope Photograph			
3229		Undated	Blount Optical Microscope Photograph			
3230		10/21/1992	Polarized Light Microscopy of Asbestos, OSHA Inorganic Method #191, 10/21/92.			
3231		2/24/2016	The Facts About Talc Safety, 2/24/16. www.blognj.com			
3232		Undated	Handwritten Demonstrative Notes for Direct Examination of Alice Blount, Mark Lanier			
3233		4/23/1998	Letter to R Hatcher, Mehaffy & Weber, from AM Blount; Re: Up-to-date scientific view on asbestos, amphiboles and intermediate fibers, 4/23/98; "Detection and Quantification of Asbestos and Other Trace Minerals in Powdered Industrial-Mineral Samples," AM Blount, Process Mineralogy IX, 1990; JNJNL61_000052427-449			
3234		4/9/2018	Letter to RD Meadow, Lanier Law Firm, from RT Bernardo, Skadden, Arps, Slate, Meagher & Flom; Re: In Re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices, and Products Liability Litigation. 4/9/18.			
3235		Undated	Bottle of Johnson & Johnson's baby powder supplied by Alice M Blount			
3236		9/27/2017	Email to AM Blount, from JR Cooper, Tucker Ellis; Re: As we discussed, 9/27/17.			
3237		5/21/1987	Letter to DM Benninger, Armstrong World Industries, from IM Stewart; Re: Monitoring Windsor talcs, 5/21/87; JNJ000314361.			
3238		8/6/1971	Abstract of Articles on Asbestos, Including Merewether, Cralley and Harries, W Nashed, 8/6/71; JNJNL61_000058245-248.			
3239		6/17/1966	Memo to G Hildick-Smith, from WH Steinberg; Re: Johnson's Baby Powder Talc Aspiration, 6/17/66; JNJNL61_000009898.			
3240		3/22/1976	Memo to DR Petterson, from B Semple; Re: Phone Dialogue with DH Groth, MD, NIOSH, 3/22/76; JNJNL61_000018722-23.			
3241		4/11/2018	Testing Charts - C Panatier			
3242		10/28/1972	Johnson & Johnson Memo to Dr Goudie, from W Nashed; Re: Tremolite in baby powder, 10/28/72; JNJ000260836-837.			
3243		1/1/1991	"Amphibole Content of Cosmetic and Pharmaceutical Talcs," AM Blount, Environmental Health Perspectives, 1991; Letter to M Refregier, Talc de Luzenac, from AM Blount, The Newark Museum; Re: Call from Slim Thompson re my paper in Environmental Health Perspectives, 2/10/92; Typed list of sample identification; JNJ000379224-229.			
3244		6/17/1972	Johnson & Johnson Memo to File, from W Nashed; Re: Talc/Asbestos, 6/17/72; JNJNL61_000001123-25.			
3245		2/21/2002	Johnson & Johnson Email to S Mann, from L Telofski; Re: Talc, 2/21/02; JNJNL61_000103086.			
3246		6/10/1976	Talc: A Basic Review, Professional Information for Physicians and Nurses, JL Shapiro Assoc, 6/10/76; JNJ000025132-180.			

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3247		8/14/1972	Johnson & Johnson Memo from RA Fuller; Re: Talc/Asbestos Summary of FDA Meeting, August 11, 1972, 8/14/72; JNJAZ55_000003548-52.			
3248		9/6/1974	Letter to RM Schaffner, FDA, from W Nashed, Johnson & Johnson; Re: Cooperation with the CTFA on Asbestos in Talc, 9/6/74; JNJNL61_000013575-76.			
3249		12/17/1974	Memo to NF Estrin, CTFA and Menkart, Clairol, from WH Steinberg, Johnson & Johnson; Re: Talc, 12/17/74; JNJMX68_000009139.			
3250		10/15/1974	Johnson & Johnson Memo from G Lee; Re: Talc/Powder Safety Studies, Review Meeting, September 27, 1974, 10/15/74; JNJAZ55_000004628-32.			
3251		4/13/2012	J&J Consumer Products Worldwide Contract Manufacturing Audit Report, RJ Lee, March 2012, 4/13/12; JNJNL61_000005496-5502.			
3252		Undated	Attachment B - Abestiform Depression through the use of New Floation Reagent Systems, Undated; JNJ000246850-854.			
3253		10/11/1972	Letter to FDA Hearing Clerk, from W Nashed, Johnson & Johnson; Re: Comment on the Proposal entitled, "Food Additives – Proposal Regarding Regulation of Prior-Sanctioned Food Ingredients," Fed Reg of 8/12/72, 10/11/72; JNJAZ55_000003635-37.			
3254		11/27/1974	Letter to R Husten, from J Infante, Johnson & Johnson; Re: Recent letter concerning Johnson's Baby Powder, 11/27/74; JNJAZ55_000015519-20.			
3255		10/26/1973	Johnson & Johnson Memo to G Hildick-Smith, from DR Petterson; Re: Epidemiological Study of Workers in Italian Talc Mines, 10/26/73; JNJAZ55_000002042.			
3256		Undated	Draft Copy of "An Epidemiological and Prospective Clinical Study of Talc Millers of the Talco and Grafite Val Chisone Company, GF Rubino, Undated; JNJAZ55_000004573-77.			
3257		10/30/1974	Memo to Dr G Hildick-Smith, from WH Ashton; Re: Italian Talc Studies, Visit to Professor Rubino, Instituto Di Medicina Del Lavoro, Dell Universita Di Torino, Turin, Italy, Project No 0503.00, 10/30/74; JNJAZ55_000001096-98.			
3258		11/3/1977	Letter to U Stefano, Talco E Grafite, from G Hildick-Smith, Johnson & Johnson; Re: Preparation of Rubino's transcript for meeting in Washington, 11/3/77; JNJAZ55_000009127-28.			
3259		3/31/1975	Johnson & Johnson Memo to G Lee, from G Hildick-Smith; Re: Talc - Rubino Manuscript, 3/31/75; JNJAZ55_000009265.			
3260		1/16/2007	Deposition of Roger Miller, Windsor Minerals, 1/16/07.			
3261		Undated	Johnson & Johnson Memo; Re: Worldwide Study, Undated; JNJAZ55_000004644-45.			
3262		10/23/1984	Johnson & Johnson Memo to B Semple, et al, from Ashton; Re: Airborne Dust Activities, ASTM & ISO Meetings, Montreal 10/14-10/18/84, 10/23/84; JNJNL61_00000126-28.			
3263		Undated	Talc Alternatives, Johnson & Johnson, Undated; JNJAZ55_000001282.			
3264		4/9/1969	Johnson & Johnson Memo to G Hildick-Smith, from WH Ashton; Re: Alternate Domestic Talc Sources File No 101, 4/9/69; JNJLAZ55_00001073-74.			
3265		4/15/1969	Johnson & Johnson Memo to WH Ashton, from TM Thompson; Re: Alternate Domestic Talc Sources, Project Code #101, 4/15/69; JNJNL61_000001534-35.			

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3266		1/18/1974	Memo to File, from G Hildick-Smith; Re: Talc/Asbestos Meeting with Commissioner Schmidt, FDA, Jan 16, 1974, 1/18/74; JNJMX68_000017147-17150.			
3267		4/10/2018	Johnson & Johnson Credo, 2018, www.jnj.com, 4/10/18.			
3268		Undated	Process to Ensure No Asbestos in Talc, Johnson & Johnson, Undated.			
3269		Undated	The Cosmetic Talc Mines, Johnson & Johnson, Undated.			
3270		7/29/1971	Memo to L Foster, from W Nashed; Re: Talc/ Asbestos, Your memo of July 26, 1971, 7/29/71; JNJ000244833-834.			
3271		9/28/1972	Letter to TH Shelley, Johnson & Johnson, from FD Pooley, University of Cardiff; Re: Examination of Italian Mine Samples, 9/28/72; JNJTALC000289268-269.			
3272		9/8/1972	Geological Report – An Examination of Italian Mine Samples and Relevant Powders, Pooley, 9/8/72; JNJTALC000359836; JNJTALC000359710-834.			
3273		Undated	Prepublication Copy of Mortality and Morbidity among Talc Miners and Millers in Italy," GF Rubino, G Scansetti, Undated; JNJAZ55_000009059-96.			
3274		1/1/1972	Report of the Examination of Rock Samples from the Vermont Mine, FD Pooley, University of Cardiff, 1972; JNJ000303042-92.			
3275		9/29/1983	Letter to WH Ashton, Johnson & Johnson, from M Ross, US Dept of the Interior; Re: EMV Reports, 9/29/83; JNJ000224459.			
3276		4/12/2018	Microscopes - Demonstrative			
3277		4/12/2018	Langer 344L Testing - Demonstrative			
3278		8/6/1971	Letter to WH Ashton, Johnson & Johnson, from MG Pattengill, Colorado School of Mines; Re: Vermont Talc Samples, Project 310704, 8/6/71; JNJTALC000091746.			
3279		8/10/1971	Letter to TH Shelley, Johnson & Johnson, from FD Pooley, University of Cardiff; Re: Report of Investigation of Talc Samples Supplied by Johnson and Johnson, 8/10/71; JNJ000274547-556.			
3280		8/19/1971	Technical Report MA-2330-2, Examination of Baby Powder for Johnson and Johnson GR Grieger, IM Stewart, McCrone, 8/19/71; JNJ000260473-480.			
3281		4/12/2018	Langer Test Results, 1976 - Demonstrative			
3282		11/29/1972	Johnson's Baby Powder, Submission to FDA, Vol 5, W Nashed, Johnson & Johnson, 11/29/72; JNJH29W_000009932-9990.			
3283		4/12/2018	Lewin 108T & 109T Testing - Demonstrative			
3284		11/15/1972	Letter to AJ Goudie, Johnson & Johnson, from IM Stewart, McCrone; Re: Modified thinking on the baby powder samples 108T and 109T, 11/15/72; JOJO-MA2546-01484-499.			
3285		4/12/2018	Letters to the Editor: Asbestos Report, SZ Lewin, 3/12/73 - Demonstrative			
3286		10/17/1972	Letter to R Schaffner, FDA, from W Nashed; Re: Shower-to-Shower Brand Body Powder, 10/17/72; JNJAZ55_000017552-53.			
3287		4/12/2018	Lewin: FDA (1976) - Demonstrative			
3288		4/12/2018	Walter and Lucy McCrone - Demonstrative			
3289		2/23/1978	Letter to RN Miller, Windsor Minerals, from G Lee, Johnson & Johnson; Re: Windsor 66 Talc Specification, 2/23/78; JNJ000237200-201.			
3290		1974-1986	McCrone Correspondence Re Testing, 1974-1986; JNJ000276515 and various bates.			

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3291		11/14/1978	Memo to R Miller, from HJG; Re: Reducing the number of ore samples collected for analysis by McCrone Associates, 11/14/78; JNJ000314315-16.			
3292		12/8/1978	Memo to R Miller, Windsor Minerals; Re: Asbestiform Mineral Analysis - Sampling Procedure for Hammondsville Cosmetic Ore, 12/8/78: JNJMX68_000015709-10.			
3293		1/6/1989	Talc Supply Agreement between Cyprus Mines and Johnson and Johnson Baby Products Co, 1/6/89; JNJNL61_000118283-118602.			
3294		1971-1996	TEM Timeline for Johnson & Johnson, McCrone, 9/1971 to 1996			
3295		Undated	Map of Ludlow Mines, Undated; ITA-Sabatelli-000563.			
3296		1/15/1974	Windsor Minerals Memo to RN Miller, from L Rodizza; Re: Salable ore - Argonaut Mine, 1/15/74; WTALC00010373-75.			
3297		3/14/1979	Ludlow Mines Operating Schedule, 1979-1981, 3/14/79; WTALC00010137-10138.			
3298		10/19/1988	Due Diligence of Windsor Minerals, MJ Keener, et al, 10/19/88; ITA-Sabatelli-000548-62.			
3299		10/17/1994	Letter to JC O'Shaughnessy, from JR Guay, Luzenac America; Re: Mines used to supply talc for roofing industry, 10/17/94; JNJ00063581-82; Luzenac West Windsor Lab Procedure QA-042 for Asbestos- Transmission Electron Microscopy, 7/9/93; JN1684156.			
3300		8/8/1974	Letter to V Zeitz, Windsor Minerals, from GR Grieger, McCrone; Re: 6 samples of talc, 8/8/74; JNJMX68_000002661.			
3301		4/26/1976	Letter to V Zeitz, Windsor Minerals, from GR Grieger, McCrone; Re: Analysis of 21 samples of industrial grade talc, 4/26/76; JNJ000063178.			
3302		1/18/1983	Letter to H Cohen, Johnson & Johnson Baby Products Co, from DP Palenik, McCrone; Re: TEM analysis of Talc Sample 1, 1/18/83; JNJ000237347-237637.			
3303		4/30/1971	Johnson & Johnson Memo to RA Fuller, from G Hildick-Smith; Re: Meeting with Professor IJ Selikoff, Professor of Community Medicine, Mount Sinai of Medicine, 4/30/71; JN1A755_000005725-28.			
3304		4/5/1977	Standard Test Method No 7019; Subject: Detection of Serpentine Minerals in Windsor 66 Talc by Differential Thermal Analysis, 4/5/77; JNJMX68_000011557-60.			
3305		1/1/1983	Johnson's Baby Powder Support to Baby Products Company Departments, Report for Third Quarter 1983; JNJNL61_000020012; Various bates.			
3306		1/1/1975	Johnson & Johnson Worldwide Talc Monitoring Program, 1975-1995; JNJNL61_000032876 and various bates. (168 pp)			
3307		2/22/1955	Talc Specs File; Italian Talc Spec 1946-55; J&J Raw Material Specification 712-044 for Talc, Powdered, 2/22/55; JNJ000370144-50.			
3308		4/21/1964	Material Specification 01-011 for Windsor Talc, 4/21/64, Revised 1/20/71; JNJMC 000028491-28493.			
3309		8/7/2014	Johnson & Johnson Raw Material Spec RM-008967, Talc Powder, 8/7/14; JNJMC000120267-280			
3310		1997-2009	Handwritten TEM Timeline of Suppliers, 1997-2009.			
3311		1990-2010	Material Analysis Report, RM08-006, Rosyton, 1-0039, 1990-2010; Certificate of Analyses, JNJMX68_000000434			

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3312		5/22/2009	Johnson & Johnson Email to S Jiwrajka, from D Hicks; Re: Update on Talc Testing from RJ Lee, 5/22/09; Attachments: RJ Lee Testing Reports; JNJ14T5_000000692 and various bates. (314 pp)			
3313		5/24/1976	Letter to I Stewart, McCrone, from RN Miller, Windsor Minerals; Re: Answer to your request of March 26, 1976, 5/24/76; JNJ000314226.			
3314		3/3/1975	Johnson & Johnson Memo to DR Petterson, from G Lee; Re: Management Authorization for Additional Talc Safety Studies, 3/3/75; JNJNL61 000016437-38.			
3315		Undated	JBP Misc Background: Johnson's Baby Powder and Johnson's Baby Powder Cornstarch, Undated; JNJ000227834-49.			
3316		3/10/1936	United States Patent 2,033,894 - Padding Protection for Flatwork Ironers, Johnson & Johnson, 3/10/36.			
3317		12/23/1947	United States Patent 2,433,056 - Method of Producing Sterile Packages, JN Masci, Johnson & Johnson, 12/23/47.			
3318		8/14/1962	United States Patent 3,049,000 - Apparatus for Determining the Sediment in Cold Milk, Johnson & Johnson, 8/14/62.			
3319		6/2/1964	United States Patent 3,135,023 - Method and Apparatus for Making Strand Yarns, and the Like, F Kalwaites, Johnson & Johnson, 6/2/64.			
3320		6/26/1974	Letter to GF Rubino, University of Turin, from G Hildick-Smith; Re: Epidemiological Studies, Val Chisone, Pinerolo, 6/26/74; JNJAZ55 000009378-79.			
3321		3/20/1978	Letter to U Stefano, from G Hildick-Smith; Re: Your letter of March 3, 3/20/78; JNJAZ55 000009050.			
3322		1/1/1974	NIOSH Sponsored Talc Study, V Zeitz, Windsor Minerals, 1974; with attachments; JNJ000346335-376.			
3323		7/17/2015	Letter to GM Williams, Shook, Hardy & Bacon, from Innovant Research, UK; Re: Report for case Blaes v J&J, et al, 7/17/15.			
3324		3/13/1974	Memo to FR Rolle from JP Schelz; Re: Asbestos and Quartz in Talc, 3/13/74; JNJAZ55 000005914.			
3325		2/24/1975	Cyprus Laboratory Report 1790-79; Subject: Electron Microscopy of Windsor Minerals Talc Samples, 2/24/75; CAMC-Sabatelli-000677-80.			
3326		3/7/2017	Translation of the Italian article - Practical Guide to the Impurities of Talc, Societa Talco e Grafite Val Chisone, English Translation, 3/7/17; Affidavit.			
3327		10/27/1972	McCrone Study Being Redone – New one is in Master File; Letter from McCrone; Re: Baby powder samples, 10/27/72; JNJ000286691-692.			
3328		4/1/1977	Consultant Report to Johnson & Johnson, 9 Talc Samples, EMV Associates, 4/1/77; JNJ000061131-54.			
3329		7/11/1985	Windsor Minerals Samples to McCrone, 7/11/85; JNJ000065647.			
3330		1/21/1992	Luzenac Product Certification Protocol, 1/21/92; IMERYSO13723-725.			
3331		4/10/1975	Letter to R Miller, from MJ Sheahan, Illinois EPA; Re: Samples of talc from manufacturing plants, 4/10/75; JNJ000265133-34.			
3332		8/30/1972	Letter to TE Hutchinson, Space Science Center, University of Minnesota, from GR Grieger, McCrone; Re: Two samples for SEM, Lewin sample and chrysotile, 8/30/72; JOJO-MA2546-01263-276.			

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3333		10/5/1972	Letter to Dr TE Hutchinson, University of Minnesota Space Science Center, from IM Stewart, McCrone; Re: Micrographs, 10/5/72; JOJO-MA2546-01482.			
3334		4/12/2018	List of Testing Entities - Demonstrative			
3335		8/9/1971	Memo from TH Shelley; Re: Dr RL Sundberg to W Ashton; Re: Removal of fines, 8/9/71; JNJ000087959.			
3336		2/8/1973	Letter to WH Ashton, from EB Smith, Desert Minerals; Re: Proposed FDA regulations for food and food packaging materials, 2/8/73; JNJN161 000016536.			
3337		4/12/2018	Positive Asbestos Timeline - Demonstrative			
3338		10/22/2018	Johnson's, The Brand Trusted by Pediatricians and Parents Worldwide, Now Gentler Than Ever, 10/22/18. www.multivu.com			
3339		5/30/2018	Marketing: J&J Revamps baby products and message to appeal to millennial moms, BS Bulik, 5/30/18. www.fiercepharma.com/marketing			
3340		10/22/2018	Diaper Rash, Baby Center, 10/22/18. www.babycenter.com/0_diaper-rash_81			
3341		1/7/2013	J&J Powerpoint - Project "Future": Global Cosmetic Regulations/Policy, Progressing Top Priorities in 2012, Update December 12, 2012, Y Qi, 1/7/13.			
3342		4/1/2009	Johnson & Johnson Email to CG Le, from T McCarthy; Re: URGENT! Request by KFDA on dosage of baby powder, 4/1/09; JNJ000391410-411.			
3343		1/12/1973	Dose Calculations on Folder Back Memo from January 12, 1973.			
3344		Undated	Draft Report on Asbestos in Talc Powder Products, J&J International (Singapore), FAQs, Undated; JNJ000458009-13.			
3345		10/8/1972	Letter to TE Hutchinson, University of Minnesota, from IM Stewart, McCrone; Re: Micrographs, 10/8/72; JOJO-MA2546-01482.			
3346		1964-2018	Map - Cosmetic Talc Mining Sources for Johnson & Johnson, 1964-2018.			
3347		11/4/1971	Examination of Grantham Ore Body Samples, 11/4/71; JNJTALC000294515-522.			
3348		Undated	Slide 23 - Steps in Talc Processing, Undated.			
3349		3/20/1996	Luzenac Certificate of Analysis for Grade 66, J&J Royston, 3/20/96; IMERYS010267.			
3350		1/19/2017	Imerys Talc Certificate of Analysis, 1/19/17; PHA 000002777-2778.			
3351		11/29/1972	Memo to DD Johnston, from G Hildick-Smith; Re: Antagonistic Personalities in the Talc Story in the USA, 11/29/72; JNJAZ55 000005015-17.			
3352		12/4/2015	Documents Provided by the FDA Pursuant to a FOIA Request, 12/4/15; Wright Affidavit 12/4/15.			
3353		3/24/1987	Summary of Results, TEM Analytical Data, Project ME-3762, Johnson & Johnson KK, Japan, Sample 912-158, McCrone Standard Operating Procedure, 3/24/87; JNJTALC000165854-858.			
3354		2/27/2012	Email to S Nettenheim, from D Hicks; Re: Excipients e-Newsletter Talc, Povidone, New USP General Chapters for Excipients, 2/27/12.			
3355		1/13/1981	Windsor Minerals Memo to RN Miller, from HJ Grayson; Re: Talc samples for routine asbestiform analysis, 1/13/81; JNJ000314252; Hammondsville Cosmetic Grade Ore, May-October 1977; JNJITLC000387697.			

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3356		1/5/1996	Letter to C Wilkes, from T Hicks, Luzenac America; Re: Grade 66 Silo #4, 1/5/96; Argonaut Ore Sources; J&J Vermont Ore Sources - A Brief Review, 1968-1995; History of Argonaut Mine, 1973-1994; Letter to D Baker, Luzenac America, from D LaTourette; Re: J&J's conversion to Argonaut talc, 7/17/95.			
3357		5/17/2018	Johnson & Johnson Workers Compensation Executive Summary, J&J New Brunswick, NJ, 5/17/18. https://broadspireinview.com/ClaimReport.aspx			
3358		Undated	Drawing of Hammondsville Ore, Cosmetic and Industrial, Johnson & Johnson, Undated.			
3359		10/11/2018	Excerpt of Testimony from Patrick Downey, 10/11/18.			
3360		7/19/1995	Memo to WH Ashton, from J Hopkins; Re: Defensive data, 7/19/95; JNJ TALC0000075192.			
3361		10/23/2018	Handwritten Exposure Estimation			
3362		Undated	Johnson & Johnson Testing Charts			
3363		12/21/2005	Luzenac Certificate of Analysis for Grade 25 USP, 12/21/05; IMERYS-A 0018985.			
3364		1971-1976	FDA Talc Submissions, Volumes 1-9, 1971-1976; JNJNL61_000013350-13362.			
3365		3/31/1976	Johnson & Johnson Memo for the Record, from G Hildick-Smith; Re: Meeting with Johnson & Johnson Personnel and the Mt Sinai School of Medicine, 3/31/76; JNJ-000304421-22.			
3366		2/13/2017	Cumulative Review of Cases Reporting Mesothelioma With the Use of Johnson's Baby Powder, Office of Consumer Medical Safety, 2/13/17; JNJ000803201-222.			
3367		2/16/2017	Johnson & Johnson Email to S Cordero-Soriano, from P De Guzman; Re: Talc - Mesothelioma, 2/16/17; JNJ000801383.			
3368		1/1/1982	Pre-Publication Copy of "Biological Effects of Tremolite," JC Wagner, et al, British Journal of Industrial Medicine, 1982 with Handwritten Note dated 11/2/81; JNJNL61_000076099-122.			
3369		3/1/1979	Summary of Plant Observation Reports and Evaluation, TALC, RS Baloyi, NIOSH, SRI International Report, March 1979; JNJMX68_000008189-8205.			
3370		9/26/1972	Johnson & Johnson Memo to WH Ashton, from FR Rolle; Re: Meeting with FDA (9-21-72) to discuss Chrysotile asbestos in Shower to Shower powder - Project No 503, 9/26/72; JNJAZ55_000003585-3587.			
3371		6/21/1973	Letter to AJ Goudie, Johnson & Johnson, from IM Stewart, McCrone; Re: Shower to Shower report, 6/21/73; JOJOMA2546-00163-184.			
3372		11/19/1973	Section 1-1: Quantitative Fibre Analysis in Vermont and Italian Talc, FD Pooley; Memo; Re: Pooley's Response to the Proposed Optical Method for Detection of Asbestos in Talc - Project No 0503.00. 11/19/73; JNJMX68_000008235-48.			
3373		11/26/1974	Johnson & Johnson Memo to FR Rolle, from JP Schelz; Re: Review of Experimental Techniques for the Concentration of Asbestos Minerals in Talc - Project 0503.00, 11/26/74; JNJNL61_000062964-65.			
3374		5/14/1971	Johnson & Johnson Memo to G Hildick-Smith, from WH Ashton; Re: Assay of Talc in Baby Powder, 5/14/71; JNJ000294462.			
3375		10/3/1974	Johnson & Johnson Memo to JP Schelz, from RA Gallagher; Re: Examination of Vermont 66 Talc by X-Ray Diffractometry and Differential Thermal Analysis - Project No 0503-00, 10/3/74; JNJMX68_000002989.			

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3376		9/19/1973	Johnson & Johnson Memo from RS Russell; Re: Major Points Discussed by Pooley on his visit here September 12, 1973, 9/19/73; JNJAZ55_000010715-717.			
3377		5/9/1974	Examination of Talc Ores and Products from the Argonaut Ore Body, Windsor Minerals Company, McCrone, MA3295, 5/9/74; JNJ000274273-277.			
3378		2/1/1972	Petrographic Identification of Asbestos Silicates in Val Chisone (SVC) Talc, Mining Institute of the Polytechnic School of Torino, February 1972; JNJTALC000289411-412.			
3379		11/10/1971	Letter to University College, Cardiff, from WR Dean; Re: Johnson and Johnson Limited Research Programme - University College, Cardiff, Pooley Contract, 11/10/71; JNJ000260873-74.			
3380		8/9/1971	Johnson & Johnson Memo to H Kramer, from TH Shelley; Re: Baby Powder – Talc, 8/9/71; JNJTALC000290215.			
3381		7/23/1971	Letter to WH Ashton, Johnson & Johnson, from MG Pattengill, Colorado School of Mines; Re: X-ray and microscopic analyses of Vermont talcs, Proj 310704, 7/23/71; JNJTALC000297477-480.			
3382		6/28/1977	Johnson & Johnson Memo to G Lee, from A Frank; Re: Audit Testing of Windsor 66 Talc for Asbestos, 6/28/77; JNJMX68_000018545-46.			
3383		1/5/1978	Johnson & Johnson Memo to G Lee, from G Hildick-Smith; Re: Talc Study - Professor Rubino, 1/5/78; JNJAZ55_000009057.			
3384		11/3/1977	Letter to G Rubino, from G Hildick-Smith, Johnson & Johnson; Re: Selevan transcript and the Selikoff meeting, 11/3/77; JNJAZ55_000009126.			
3385		Undated	Argonaut Fact Sheet, Cyprus Industrial Minerals, Undated; IMERYS117598-117600.			
3386		10/13/1995	Letter to WH Ashton, Johnson & Johnson, from WH Powers RJ Lee; Re: RJ Lee Group Inc Job No AOH510299, 10/13/95; JNJ000063951.			
3387		10/13/1962	"Experimental Production of Mesothelial Tumours of the Pleura by Implantation of Dusts in Laboratory Animals," JC Wagner, Nature, 10/13/62.			
3388		8/27/1973	Letter to E Stewart, J&J International, from JCP Homan, J&J Benelux NV; Re: Asbestos talcum powder- Analysis by Dutch Consumer Organization, 8/27/73; JNJTALC000169495-169496.			
3389		11/9/1990	McCrone EPA Level II TEM Analysis, ME #90009-3, CWM 90-30, 11/9/90; JNJ000577928-577929.			
3390		5/14/1974	Johnson & Johnson Memo to Dr G Hildick-Smith, from WH Ashton; Re: Italian Talc Epidemiological Studies, Val Chisone, Pinerolo, University of Turin, Turino, Italy, 5/14/74; JNJAZ55_000009380.			
3391		10/16/1997	Memo to D Wiles and J Shipp, from L McKenna; Re: Coker v Johnson & Johnson, 54.2121, Mesothelioma/Talc Medical Research, 10/16/97; JNJ000319333-337.			
3392		5/8/1973	Johnson & Johnson Memo to DR Petterson, from WH Ashton; Re: Lewin assay timing related to actinolite, 5/8/73; JNJ000301719.			
3393		10/12/1971	Letter to A Goudie, Johnson & Johnson, from G Grieger, McCrone; Re: Sample 228-P and other samples, 10/12/71; McCrone Copy of Letter and Report, 11/11/71; JOJO-MA2546-00805-811.			

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3394		1972-1973	Graphs from Hutchinson's Investigation of Possible Asbestos Contaminations in Talc Samples, McCrone, 1972-73; JOJO-MA2546-000138-148.			
3395		3/17/2016	Letter to T Michele, FDA, from J Ekuta; Re: Response to FDA Request for Information on Talc, 3/17/16; JNJ000489313-9818.			
3396		11/3/2008	Rio Tinto Memo to M Zamek, from C Bernard; Re: Meeting w J&J, 11/3/08; IMERY5250192-193.			
3397		12/15/2009	Powerpoint - Talc - FDA's Perspective, J Gasper, 12/15/09.			
3398		3/5/1984	Burston Marsteller Memo to K O'Callaghan, from W Pines; Re: Johnson & Johnson Asbestos in Talc, 3/5/84; JNJ000268461-462.			
3399		Undated	Demonstrative - McCrone & J&J Response to the FDA Re: Shower to Shower			
3400		3/1/1971	"Talc and Carcinoma of the Ovary and Cervix," WJ Henderson, et al, Journal of Obstetrics & Gynecology of the British Commonwealth, March 1971.			
3401		7/26/1971	Johnson & Johnson Memo to JE Burke, et al, from LG Foster; Re: Direct confrontation avoided, 7/26/71; National Observer Article "Report from Mr Kretchmer: Watchman, What of Environment? It's Beset - and So Is the Watchman, N Totenberg, 7/12/71; JNJ000436983-984			
3402		12/14/1971	Letter to AM Langer, Mt Sinai, from G Hildick-Smith, Johnson & Johnson; Re: Tenovous samples, 12/14/71.			
3403		10/27/1972	Examination of Johnson's Baby Powder, Dr AJ Goudie, McCrone, Copy ? of 4, with Editing Marks, 10/27/72; JNJ000346841-843.			
3404		11/15/2018	Marked Live Testing Chart, Ex 28 to Deposition of John Hopkins, 11/5/18.			
3405		10/27/1972	Slides showing Alteration of McCrone report on 10/27/72; JNJ000260833 & JNJ000239837.			
3406		Undated	Nicholson Hopkins MDL Chart			
3407		4/16/2019	Musco-2, Additional Documents Reviewed by Dr Nicholson, Johnson & Johnson, 4/16/19.			
3408		11/2/2018	Email to J Ekuta, Johnson & Johnson, from K O'Connor, Orrick; Re: Response to FDA Request for Recommendations Regarding Talc Testing Experts, 11/2/18; JNJ000917195-197.			
3409		6/20/2018	Letter to LM Katz, FDA, from J Ekuta; Re: Recommendations for Talc Testing Experts, 6/20/18; JNJ000917165-167.			
3410		Undated	Excerpt of Deposition of Ann Wylie, Undated.			
3411		8/8/1972	Confidential Johnson & Johnson Memo to File, from W Nashed; Re: Talc/Asbestos Meeting of August 8, 1972, 8/8/72; JNJ000425128.			
3412		2/14/1984	Johnson & Johnson Memo to FDA Call File, from RG Kohler; Re: Talc Citizen Petition, 2/14/84; JNJ000258465.			
3413		6/20/1977	Johnson & Johnson Memo to FDA Call File, from WC Waggoner; Re: FOI and Johnson's Baby Powder, 6/20/77; JNJ000250453.			
3414		6/5/1991	J&J Authorization for Interim Specification IS76906 D; Subject: Cyprus Windsor Minerals Corp Grade 66 Talc, 6/5/91; Not Valid after 1/1/1992; JNJAZ55_000013621-22/ JNJMX68_000000439-42.			
3415		11/10/2017	Event Report #30000365572, J&J Consumer, 11/10/17; JNJ000124868-125867.			
3416		8/30/1991	Cyprus Hamm Mine, 8/30/91; IMERY5416192-222.			

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3417		12/14/2018	"Baby Powder's Possible Asbestos Link Worried Johnson & Johnson for Years, RC Rabin, T Hsu, New York Times, 12/14/18.			
3418		3/2/1978	Johnson & Johnson Memo to JR Marshall, from AM Marks; Re: Johnson's Baby Powder Worldwide Survey Status as of February 28, 1978, Project No 2500.01, 3/2/78; JNJ000244013-17.			
3419		1975-2004	Testing - J&J's Internal Documentation, 1975-2004.			
3420		1974-1975	Testing - J&J's Internal Documentation, 1974-1975.			
3421		1973-1974	Testing - J&J's Internal Documentation, 1973-1974.			
3422		1968-1972	Testing - J&J's Internal Documentation, 1968-1972.			
3423		1957-1967	Testing - J&J's Internal Documentation, 1957-1967.			
3424		7/23/1987	Letter to WC Egan, Johnson & Johnson, from RN Miller, Windsor Minerals; Re: Process Modifications, 7/23/87; JNJ000223536-537.			
3425		5/7/1965	Letter to DR Clare and RJ Mortimer, Johnson & Johnson, from McKinsey & Co; Re: Report entitled "Evaluating the Market Outlook for Eastern Magnesia Talc Company, 5/7/65; BASE WILLIAMS000031694-31718.			
3426		12/4/1978	Letter to VE Rose, NIOSH, from G Lee, Johnson & Johnson; Re: Review of AIHA working draft, "Criteria for a Recommended Standard," 12/4/78; JNJALC000911421-435.			
3427		6/17/1985	Memo to B Semple, from PJ Mills; Re: Ingestions and Inhalations Requiring Medical Attention, Johnson's Baby Powder, January 1982- January 1985, 6/17/85; JNJ000312759-761.			
3428		10/30/1986	Johnson & Johnson Memo to B Semple, from P Love, J&J Ltd; Re: Wells Report regarding discussions with Wagner and Pooley, 10/30/86; Memo to AB Wells, from IM Phillipson; Re: Visit on 8.10.86 with delegates from CTPA Talc Subcommittee, 10/10/86; JNJ1161_000047375-47379			
3429		1/1/1973	Translation Article in "Consumentengids", monthly magazine of the Dutch Consumer Organization, 1973; JNJAZ55_000006534-6536.			
3430		1/1/2009	Luzenac Time and Results Summary, 2009.			
3431		Undated	Video - Mine site blast in Western Australia, Undated.			
3432		3/15/2002	Luzenac Standard Operating Procedure 1.3 TC - Polarizing Light Microscopy (PLM), JW Pier, 11/30/98; Revised 3/15/02; IMERY5422512-524.			
3433		6/10/1987	Windsor Minerals Standard Operating Procedure QA-045, Frequency of Analysis - Cosmetic, 6/10/87; IMERY5118220-221.			
3434		3/1/1991	Cyprus Mine Dept Operating Procedure, Ore Grading and Control, March 1991; IMERY5117589-592.			
3435		1/1/2000	"High-Resolution Transmission Electron Microscopy of Tremolite-to-Talc Reaction at the Dongyang Talc Deposit," JH Ahn, I Lee, J Kim, J Miner Soc Korea, 2000.			
3436		1/1/1977	Johnson & Johnson Protocol #2636.01/6429.12, Evaluation Form, Subject #3, Final, January 1977; JNJ000088176-77.			
3437		8/1/1979	Talcum Powder Usage Study, Females - Volume I, A Report to Johnson & Johnson, P810, Market-Facts, NY, August 1979; JNJ000225684-697.			
3438		2/9/2012	Imerys Powerpoint - Fiber Management at Imerys, J Pier, S Sharma, 2/9/12.			
3439		12/14/2018	Johnson & Johnson knew for decades for decades that asbestos lurked in its Baby Powder, A Reuters Investigation, 12/14/18.			

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3440		12/17/2018	The Facts on Talcum Powder Safety, Johnson & Johnson, 12/17/18. www.factsabouttalc.com			
3441		Undated	Report of Two Simple Laboratory Tests for the Indication and Concentration of Chrysotile Asbestos from Toilet Talc, FD Pooley, Undated: JNJI61 000008217-8240.			
3442		3/8/1973	Johnson & Johnson Memo to WR Dean, from TH Shelley; Re: Pooley's process to remove chrysotile from talc, 3/8/73; JNJ000327832.			
3443		6/1/2009	Rio Tinto Powerpoint - Analytical Capabilities and Test Methods, June 2009; JNJALC000793112-135.			
3444		11/28/2018	Handwritten Note marked as Exh 1 from Cross of Nancy Musco, 11/28/18.			
3445		3/16/1983	Deposition of Roger N Miller, Westfall v Whittaker, Clark & Daniels, et al, United States District Court for the District of Rhode Island. 10/29/82; JNJ000064796-891.			
3446		11/2/1976	Newspaper Article - Exposure to Talc Dust May Be Related to Death of Workers, Health Unit Says, G Bronson, Wall Street Journal, 11/2/76.			
3447		2/24/2004	Email to S Mann, from J Hopkins, Johnson & Johnson; Re: Talc, 2/24/04; Handwritten Note to Bill, from Steve; Re: CTFA; JNJ000089418.			
3448		12/18/2012	Safety Assessment of Talc as Used in Cosmetics, Tentative Report for Public Comment, 12/18/12.			
3449		6/4/1980	Letter to WD Kelley, ACGIH, from AM Harvey, RT Vanderbilt; Re: Information submitted to substantiate reverting to 1969 mineral Dust table. 6/4/80; JNJ000236506-507.			
3450		6/20/1980	Letter to W Kelley, ACGIH, from WH Ashton, Johnson & Johnson; Re: Intended changes relating to exposure limits for talc, 6/20/80; JNJ000236504.			
3451		10/23/1972	Exclusion of Tremolite from Definition Requested, Food Chemical News, FDA, 10/23/72; JNJ000232955-960.			
3452		2/5/1973	Fiber Definition, Vanderbilt Meeting 2/5/73; JNJ000232949-950.			
3453		2/7/1973	Letter to AJ Eickhoff, from AM Harvey, RT Vanderbilt; Re: Task Force for Defining Asbestos, ASTM 2/7/73; JNJ000232947-948.			
3454		Undated	Medical Aspects of Talc, RM Spiegel, NIOSH, Undated; JNJ000232489-494.			
3455		Undated	Asbestos Definition for Asbestiform (Fibrous) and Fiber, Comparison between CTFA and Langer, Undated; JNJ000330542.			
3456		10/18/1988	Cyprus Industrial Minerals Test Method STM-01 Asbestiform Amphibole Minerals in Talc, 10/18/88; CAMC-Depoian-000480-486.			
3457		6/5/1992	Stock Purchase Agreement Among Cyprus Mines Corporation, Cyprus Minerals Company and RTZ America, 6/5/92; CAMC-Logiudice-003822-88.			
3458		Undated	Affidavit of Julie Pier, Howell v American Standard, Undated; IMERYS270565-569.			
3459		5/24/2010	TEM Analysis of Argonaut Product Composites, 5/24/10; IMERYS409689-699.			
3460		Undated	A02224-1, Luzenac Sample Parameters, Count Sheets, 2/27/04; IMERYS340795-796.			
3461		12/2/2009	Email to F Lamoriello, from J Pier, Rio Tinto; Re: Corrected Version, Comments on SFDA asbestos procedure 11-09 version, 12/2/09; JNJS1R 000000577-587.			
3462		8/13/2009	TEM Analysis of May 09 Ludlow Composites, A09271, Rio Tinto, 8/13/09; IMERYS479129-139.			

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3463		1/1/2012	Development of a New Method for the Analysis of Cosmetic and Pharmaceutical Talc for Asbestos, J Pier, 2012.			
3464		2/14/2005	Email to R Pier, from J Pier; Re: Presentations and Meeting at USGypsum, Libertyville, IL, 2/14/05; IMERYS442535-537.			
3465		2/19/1974	Johnson & Johnson Memo to W Nashed, from JN Sivertson; Re: An Estimated Upper Limit for Talc Dust Exposure of Infants Compared with the OSHA Threshold Limit Value for Talc Miners, 2/19/74: HHS00000094-96.			
3466		2/11/1978	"Contamination of Surgical Gloves," WJ Henderson, et al, British Medical Journal, 2/11/78.			
3467		3/5/1992	Luzenac Memo to G Lawson, et al, from M Lebrun; Re: Cyprus Talc Eastern Division Mining Aspects, 3/5/92; IMERYS416218-222.			
3468		3/1/1990	Cyprus Industrial Minerals Resources, Products & Technology, EF McCarthy, March 1990; LUZ00000002-23.			
3469		4/5/2016	Opinion, Williams v BASF Catalysts LLC, et al, US District Court, New Jersey, 4/5/16.			
3470		Undated	Maps of the Val Germanasca and Val Chisone, Provincia Di Torino, Undated.			
3471		Undated	Color Brochure - La Val Germanasca, Undated.			
3472		1/1/1950	Post Card, Pinerolo, Talco e Grafite Val Chisone, 1950.			
3473		Undated	Color Brochure - La Miniera, Comunita Montana Valli Chisone E Germanasca, Undated.			
3474		12/5/2011	Email to S Sharma, from E McCarthy; Re: J&J, 12/5/11; IMERYS147942-943.			
3475		10/1/2009	Talc Issues Matrix, October 2009; IMERYS306387-391.			
3476		3/2/2011	RTM Email to E McCarthy, from M Zamek; Re: Johnson and Johnson, 3/2/11; IMERYS245772-773.			
3477		5/4/2012	Email to J Pier, et al, from A Miller, NIH; Re: Revisiting Talc Expert Panel Priorities, 5/4/12; IMERYS444355 001-8.			
3478		1/29/2008	Imerys Email to R Zazenski, from M Refregier; Re: article in IM - asbestos, 1/29/08; IMERYS443554-555.			
3479		1/1/1979	"An Animal Model for Inhalation Exposure to Talc," JC Wagner, FD Pooley, et al, Dusts and Disease, 1979.			
3480		10/29/2019	Press Release - 15 New Tests from the Same Bottle of Johnson's Baby Powder Previously Tested by FDA Find No Asbestos, 10/29/19.			
3481		10/18/2019	Press Release - Johnson & Johnson Consumer Inc to Voluntarily Recall a Single Lot of Johnson's Baby Powder in the United States, 10/18/19.			
3482		1/25/1972	Johnson & Johnson Memo to RL Sundberg, from RS Russell; Re: Special Talc Project # 503 Fines Removal, 1/25/72; JNJ000290143-145.			
3483		3/18/1957	Johnson & Johnson Memo to RL Sundberg, from W Nashed; Re: Monthly Report - January-February 1957, 3/18/57; JNJ000283109.			
3484		4/6/2018	Excerpt of the Deposition of Julie Pier, Anderson v Borg-Warner Corporation, et al, 4/6/18; Attachments: Email to J Pier, from E McCarthy; Re: JJ, 5/13/11; Email to E McCarthy, from J Pier; Re: USP Method, 6/15/11; Copy of 5/13/11 Email with handwritten note; IMERYS308446-447; IMERYS251675-676; IMERYS095086-87			
3485		Undated	Biography of Thomas Hutchinson			
3486		3/29/2021	Declaration of Matthew S Sanchez, Hirshberg v Johnson & Johnson, et al, In the Superior Court of the State of Washington for King County, 3/29/21.			
3487		2/26/2002	Litigation Issues, Luzenac, 2/26/02; LUZ01394-01395.			

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3488		3/11/2004	Luzenac North America Email to J Pier, from R Zazenski; Re: Final Results, 3/11/04; IMERYS299318.			
3489		10/3/2011	Liberty Mutual Analysis Results, Imerys Talc Vermont, Sample Set 1110202, 10/3/11; IMERYS470097-470098.			
3490		9/24/2001	Luzenac America Email to R Zazenski, et al, from M Hayes; Re: TEM Analysis of Windsor Float Feed and Finished Product, Attachments: Guide to Inspections of Lab, 9/24/01; IMERYS271163-64.			
3491		5/17/2011	Open Audit Findings, Houston Mill - All Audit Types, As of 5/17/11; IMERYS283645-710.			
3492		10/18/2011	Imerys Talc America Material Safety Data Sheet (MSDS), 10/18/11; IMERYS027193-199.			
3493		Undated	Curriculum Vitae for Frederick David Pooley			
3494		Undated	Report of Italian Mine Samples, J&J, FD Pooley, Undated; FDP000000495-618.			
3495		Undated	Report of the Analysis of J&J International Talc Samples, Undated; FD Pooley, FDP000000459-494.			
3496		Undated	Photo of Italian Mine			
3497		2/3/1972	Report of Examination of International Samples of Talc Supplied by Johnson and Johnson, FD Pooley, 2/3/72; JNJAZ55_000002931-2936.			
3498		4/7/1975	Letter to G Lee, from FD Pooley, University College, Cardiff; Re: Extensive study of samples of cosmetic talc from around the world, 4/7/75; JNJNL61_000009765-9767.			
3499		5/20/1975	Letter to FR Rolle, from FD Pooley, University College, Cardiff; Re: Number of talc specimens examined, 5/20/75; JNJMX68_000009127.			
3500		7/26/1984	Letter to TP Hall, OSHA, from KF Julin, Amoco/ Cyprus Industrial Minerals; Re: Late comments pertaining to OSHA Proposed Regulations, 7/26/84; CAMC-Greco-000364-366.			
3501		8/4/1993	Proposed Outline for Talc Technical Presentation at the FDA Talc Symposium, Luzenac America, 8/4/93; Handwritten Memo re Pooley, 8/26/93; PCPC000419-421.			
3502		2/1/2018	Demonstrative - What Did Testing Reveal? M Lanier, 2/1/18.			
3503		1971-1976	Timeline of Talc Testing - Dr Pooley, 1971-1976.			
3504		Undated	Definition of Asbestos, Undated; JNJAZ55_000009029-9041.			
3505		3/6/2007	Excerpt of the Deposition of John Hopkins, Durham v Metropolitan Life Insurance Co, et al, 3/6/07.			
3506		7/9/2005	TEM Asbestos Analysis of January 2003 Guangxi #2/#1 Shipment to Houston, AO3199, 7/9/05; IMERYS467248-001-006.			
3507		7/20/2010	Imerys PPT - Review and Update of Global Talc Markets and Assessment of Chinese Supply, 7/20/10; IMERYS168520.			
3508		2/1/2018	Excerpt of the Deposition of Frederick Pooley, 2/1/18.			
3509		8/15/2017	Excerpt of the Deposition of John Hopkins, Herford v AT&T Corp, et al, 8/15/17.			
3510		2/14/2019	Excerpt of Trial Testimony of James Webber, Olson v Brenntag North America, et al, 3/14/19. (p 519)			
3511		Undated	Rio Tinto Slide - RTM Strategy for testing external ore, Undated; IMERYS203749.			
3512		10/10/2001	West Windsor Internal Nonconformance Summary, 1999-2001, 10/10/01; IMERYS010602.			
3513		Undated	Asbestos Analysis Issues, Undated; IMERYS446867-868.			
3514		5/25/2010	Rio Tinto Email to J Pier, from W Ball; Re: Asbestos and ovarian cancer, 5/25/10; IMERYS246210.			

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3515		1/2/1996	Fax to J Hopkins, from I Phillipson, CTPA; Re: CTPA Talc Monograph, 1/2/96; JNJ000065187-88.			
3516		Undated	Imerys PPT - Imerys - J&J Meeting, Our Differentiated Offering, Undated; IMERYS089960.			
3517		8/29/1991	Cyprus Memo to J Scott, from JM Radcliffe; Re: Float Feed Composites - June and July, 8/29/91; IMERYS439927-946.			
3518		5/8/2002	Luzenac Email to M Hayes, from R Zazenski; Re: Monthly composite samples, 5/8/02; IMERYS299325-327.			
3519		8/7/2002	Email to E Turner, from R Zazenski, Luzenac America; Re: Urgent - Luzenac Product MSDS Wording in Asia/ Australia, 8/7/02; IMERYS430454.			
3520		1/21/1998	Letter to M Hayes, Luzenac America, from JR Roth, Bain Environmental; Re: TEM Analysis of LAI 97-12 and Reanalysis of LAI 97-10 for Asbestos Minerals, Bain Project No BE-980113257, 1/21/98; INJMX68 000011045-49.			
3521		3/30/2004	Email to P Few, from J Pier, Luzenac America; Re: Talc question, 3/30/04; IMERYS442340.			
3522		Undated	Rio Tinto Slide - Asbestos as a possible trace contaminant in talc, Undated; IMERYS203737.			
3523		10/11/2017	A17487-4 Graph, Data and Photographs, 10/11/17; IMERYS491157-60.			
3524		Undated	Photographic Images; IMERYS491299-300.			
3525		Undated	Photographic Images; IMERYS488374.			
3526		Undated	Photographic Images; IMERYS488375.			
3527		8/24/2016	A16208-3 Graph and Data, 8/24/16; IMERYS488376.			
3528		9/1/2016	A16208-3 ARB Images, Graph and Data, 9/1/16; IMERYS488377-379.			
3529		Undated	Photographic Image; IMERYS488367.			
3530		Undated	Photographic Image; IMERYS487214.			
3531		Undated	Photographic Image; IMERYS491150.			
3532		Undated	Photographic Image; IMERYS491470.			
3533		Undated	Photographic Image; IMERYS491471.			
3534		Undated	ASTM D5756 Count Sheet, Project No A17561, Undated; IMERYA491472.			
3535		Undated	Photographic Images; IMERYS491468.			
3536		3/2/2011	Luzenac America Email to D Crouse, from L Mahoney; Re: Proctor & Gamble certification of Guangxi products, 3/2/11; IMERYS467508.			
3537		2/11/2008	Rio Tinto Email to P Argust, et al, from J Pier; Re: Article in IM - asbestos, 2/11/08; IMERYS430362-363.			
3538		10/13/2000	Email to R Zazenski, LNA, from E Turner; Re: NTP Draft, 10/13/00; LUZ023843-845.			
3539		12/3/2019	JJCI Summary of Investigation - Recall of Johnson's Baby Powder Lot 22318RB, 12/3/19.			
3540		6/11/1979	Windsor Minerals Memo to W Dezaine, et al, from HJ Grayson; Re: Environmental Air Sampling Program - Dust Exposure Report, 6/11/79; JNJALC000905885-898.			
3541		9/22/1976	Memo to SP Falk, et al, from G Lee; Re: Revised manuscript in Nov 1976 issue of JOETH, 9/22/76; JNJ 000273664-66.			
3542		4/29/2011	Email Chain between D Hicks, Johnson & Johnson, and D Van Orden, RJ Lee; Re: Additional Magnesita Report Questions, 4/29/11; JNJALC000576244-576246.			
3543		5/24/2011	Email to D Hicks, Johnson & Johnson, and D Van Orden, RJ Lee; Re: Brazil Talc Samples - Report Question, 5/24/11; JNJALC000154217-154218.			
3544		Undated	Magnesita Open Pit Map, Cabeceiras, Brumado, Brazil; JNJALC000576217-576221.			

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3545		10/22/2007	Imerys Email to J Pier and E Turner, from R Zazenski; Re: Analytical support for global asbestos policy, 10/22/07; IMERYS441780-782.			
3546		2/25/2004	Email to D Harris and K Cutler, from M Lorang; Re: J&J News Report, 2/25/04; IMERYS 299323-24.			
3547		1/21/1993	Luzenac America Product Certification Report to M Keener, from JM Radcliffe and JD Harlan; Re: Monthly Composite, Grade 36, 1/21/93; ITA-Ratcliff-001193.			
3548		7/15/1975	Letter to JC Wagner, MRC, from G Hildick-Smith, Johnson & Johnson; Re: Presenting data to the FDA re animal inhalation studies, 7/15/75; JNJ000248422-423.			
3549		11/13/1972	Johnson & Johnson Report on Meeting with Mr Francis Roe on Monday, November 13, 1972, 11/13/72; JNJTALC000290381-382.			
3550		6/3/2000	PA Asbestos-Talc, 1st Ld-Writethru, 0485, 6/3/00; No 2 crayon maker says it had quit using talc; tests find no asbestos, Seattle Post-Intelligencer, 6/3/00; JNJ 000019616-18.			
3551		8/24/1982	DCST Sampling at Talc Properties, MSHA, Personal Exposure Samples, 1/1/74 through 8/19/82, 8/24/82.			
3552		8/19/2006	Rio Tinto Powerpoint - Talc: Asbestos Issues and Management, 8/19/06; IMERYS410499.			
3553		1/1/1991	Cyprus Ore Reserve Evaluation, Preliminary Summary, RC Munro, 1991; IMERYS425354-425392.			
3554		1/21/2001	Luzenac America Technical Report to D Crouse, from J Pier; Re: Microscopy Analysis of Serpentine Minerals in Broughton Ore, 1/21/01; IMERYS467736-750.			
3555		4/29/2008	Rio Tinto Technical Report A07371 to E Ronald, from J Pier; Re: Analysis of Fibrous Material from Argonaut, 4/29/08; IMERYS492536-492540.			
3556		10/20/2011	Liberty Mutual Analysis Results, Imerys Talc Vermont, Sample Set 1110202, 10/20/11; IMERYS470099-470100.			
3557		8/3/1971	Memo to MG Pattengill, CMSRI, from JJ Finney; Re: X-ray Investigations of Standard Materials, Project No 310704, 8/3/71; JNJ000294513-14.			
3558		9/8/2004	TEM Asbestos Analysis of Argonaut Ore Composites, Summary Report, 9/8/04; IMERYS442401-001-008.			
3559		8/1/1984	Letter to CS Thompson, RT Vanderbilt, from AG Wylie, University of Maryland; Re: Stanton Sample Numbers, 8/1/84; Memo to AJ Goudie, from FR Rolle; Re: Characterization of Tremolite-Talc, FD-14 (Dr W Smith, Farleigh Dickinson University), 5/25/72.			
3560		3/2/2018	TEM Asbestos Analysis of Argonaut Product Composites, Summary Report, 3/2/18; IMERYS462269-01-13.			
3561		3/15/2005	Email to N Bonnell, Congoleum, from E McCarthy, Luzenac America; Re: Analysis of Vertal 97 and Vertal MB, 3/15/05; IMERYS005145.			
3562		3/2/2018	TEM Asbestos Analysis of Argonaut Drilling Composites, Summary Report, 3/2/18; IMERYS422073-001-011.			
3563		3/2/2018	TEM Asbestos Analysis of Chinese Ore Composites, Summary Report, 3/2/18; IMERYS443162-001-008.			
3564		Undated	Time and Results Summary, Undated.			
3565		8/17/2006	Rio Tinto Memo to K Ray and K Cutler, from E McCarthy; Re: North American Talc Market, 8/17/06; IMERYS090918-922.			
3566		6/23/2009	RTM Email to S Shripal, et al, from J Pier; Re: Presentation - Johnson & Johnson Updated PPT, 6/23/09; IMERYS300643-644.			

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3567		12/5/1996	Imerys Memorandum to T Hicks, from J Pier; Re: Explanation of "detection limit" on J&J TEM analysis of Grade 66, 12/5/96; IMERYS 253366.			
3568		1/1/2011	Proposed Presentations for 2011 Johnson Conference on Asbestos, 2011; IMERYS 247238-239.			
3569		3/26/2014	Email to M LaPerna, from J Pier, Imerys; Re: Global Pharma Standards for Talc, 3/26/14; IMERYS035334.			
3570		Undated	Color Photographs of Metropolitan Talc South Plainfield Mill, Undated; ITA-Abeyta-000520-553.			
3571		10/6/2004	Fax to B Glenn, Crowell & Moring, from M Huncharek, St Michaels Hospital; Re: Talc Projects - Letter of Agreement, 10/6/04; IMERYS324700-708.			
3572		11/19/1975	Memo to G Lee, from WH Ashton; Re: Talc Discussions with Prof Rubino, Turin, Italy, November 5, 1975, Project No 0503.01, 11/19/75; JNJAZ55 000009160-62.			
3573		6/11/1972	Characterization of Johnson's Baby Powder, Lot 228P, 6/11/72; Memo to FR Rolle, from BL Farber, 10/27/71; Memo to FR Rolle, from DL Miller, 10/7/71; Memo to Rolle, from HG Conrad, 10/27/71; International Testing Laboratories Report of Assay, 10/13/71; Technical Report, 11/9/71; McCrone Report; CSM Report, 10/22/71; JNJ000245268-294.			
3574		12/1/2021	Appendices to White Paper: IWGACP Scientific Opinions on Testing Methods for Asbestos in Cosmetic Products Containing Talc, Interagency Working Group on Asbestos in Consumer Products, December 2021.			
3575		Undated	Cyprus Talc Product Labels and Warnings, Undated; CAMC-Logiudice-001197-1201.			
3576		10/1/1985	Material Safety Data Sheets (MSDS) for Altalc 200 USP and Altalc 400, October 1985, October 1986; CAMC-Logiudice-001210-20.			
3577		1/1/1985	Health Effects of Talc Exposure, AL Frank, 1985; CAMC-Logiudice-001261-85.			
3578		Undated	Cyprus Industrial Minerals Product Brochure, Undated; CAMC-Logiudice-002596-615.			
3579		6/22/1976	United States Patent 3,965,241 - Leaching Tremolite Impurity from Talc, Cyprus Mines Corp, 6/22/76.			
3580		9/24/1974	United States Patent 3,837,582 - Beneficiation of New York State Talc, Cyprus Mines Corporation, 9/24/74.			
3581		12/3/1968	United States Patent 3,414,201 - Talc Beneficiation Method, PH Bixby, Resource Processors, 12/3/68.			
3582		11/30/2004	United States Patent 6,824,651 - Talc Composition and Use in Paper Products, Luzenac America, 11/30/04.			
3583		7/22/1976	Industrial Hygiene Walk-Through Report, Cyprus Industrial Minerals Company, Bay Street Mill, Los Angeles, California, HR Ludwig and TE Sandusky, NIOSH, 7/22/76.			
3584		6/11/2001	Letter to Dr B Schwetz, FDA, from RJ Zazenski, Luzenac America; Re: Concern over assumption of asbestos in cosmetic talc, 6/11/01.			
3585		7/20/1976	Industrial Hygiene Walk Through Report, Cyprus Industrial Minerals, Keeler Mill, Keeler, California, HR Ludwig, TE Sandusky, NIOSH, 7/20/76.			
3586		2/3/1987	Letter from RJ Zazenski; Re: Cyprus Talc Products and Asbestos Regulations, 2/3/87; CAMC-Abeyta-000219-20.			
3587		4/15/1988	Vermont Due Diligence: Product Quality and Quality Control, RJ Zazenski, KW Olson, ML Clark, 4/15/88; ITA-Sabatelli-000524-27.			

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3588		Undated	Sierra Talc for Cosmetic and Pharmaceutical Uses, Undated; CAMC-Abeyta-002604-9.			
3589		2/20/1992	Cyprus Industrial Minerals Memo to J Scott, from JM Radcliffe; Re: Flotation System Mineralogy, December 1991 Composites, 2/20/92: ITA-Ratcliff-001169.			
3590		7/28/2009	Rio Tinto-Luzenac America Material Safety Data Sheet (MSDS) for Grade 25 USP, Imperial 250 USP, Imperial 500 USP, Imperial 1890 USP/BC, Suprafino HP USP, Supreme H USP, Imperial 180 USP, Imperial 400 USP, Imperial 1885L USP/BC, Imperial 1892L USP/BP/EP/BC, Supra H USP, Imperial 200 USP, Imperial 400Y USP, Imperial 1889L, Olympic H USP, Olympic HY USP, 7/28/09; IMERYSO49952-956.			
3591		6/5/2018	Deposition of Patrick Downey, 6/5/18.			
3592		1/1/1987	IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans, Silica and Some Silicates, Volume 42, 1987.			
3593		11/26/1978	Newspaper Article - Cahill vs Chesapeake Pumps New Force Into the Asbestos Flap, Los Angeles Times, 11/26/78.			
3594		3/1/1968	"Source and Identification of Respirable Fibers," LJ Cralley, et al, March-April 1968; WCD-NYCAL-006542-6548.			
3595		1/1/1976	Confidential Pre-Publication Copy of "Consumer Talcums and Powders: Mineral and Chemical Characterization," AN Rohl, AM Langer, IJ Selikoff, A Tordini, R Klimentidis, Journal of Tox and Enviro Health, 1976; WCD-NYCAL-006627-6675.			
3596		8/14/1972	Johnson & Johnson Memo to File, from W Nashed; Re: Talc/Asbestos, FDA Meeting, August 11, 1972, 8/14/72; JNJAZ55 000003553-3557.			
3597		11/4/1964	Johnson & Johnson Memo to WH Ashton, from MR Stalker; Re: Beneficiated Talc, Charles Mathieu, Inc, 11/4/64; JNJAZ55 000011210-11.			
3598		6/12/1972	Talc Analysis (Asbestos) Product Number 128, Montana, WCD 6/72-1, ES Laboratories, 6/12/72; WCD Caine 001514-1517.			
3599		6/12/1972	ES Laboratories Talc Analysis (Asbestos) for 2755 Montana Talc, Analysis of Three Talc Samples Labelled #2755, #4609 and #4615, Whittaker, Clark & Daniels, 6/12/72; WCD004011-4013.			
3600		6/12/1972	ES Laboratories Talc Analysis (Asbestos) for 399 Montana Talc, Analysis of Three Talc Samples Labelled #2755, #4609 and #4615, Whittaker, Clark & Daniels, 6/12/72; Booker WCD 001038-1040.			
3601		6/12/1972	ES Laboratories Talc Analysis (Asbestos) for 1745 Montana Talc, Analysis of Three Talc Samples Labelled #2755, #4609 and #4615, Whittaker, Clark & Daniels, 6/12/72; WCD Alderice Disc Docs 005471-5473.			
3602		1/1/1976	Report of the Examination of American Consumer Talc Samples, Bowes, 1976; JNJTALC000102293-102313.			
3603		1/6/1976	Memo to G Lee, from FR Rolle; Re: Telephone Conversation with FD Pooley on 1/5/76 Project #0503.01, 1/6/76; JNJ000026932.			
3604		3/30/1976	Memo to G Lee, from FR Rolle; Re: Telephone Conversation with FD Pooley - Project #0503.01, 3/30/76; JNJ000329729.			
3605		5/3/1982	ES Laboratories Talc Analysis (Asbestos), 141 Talc, Alabama, Lab Report No ES 5971, Code ID 297 S27 (WO627), 5/3/82; WCD-McBride(IN)-022235.			

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3606		1/1/2000	"The Habit of Asbestiform Amphiboles: Implications for the Analysis of Bulk Samples, AG Wylie, Advances in Environmental Measurement Methods for Asbestos, ASTM STP 1342, 2000.			
3607		6/30/2000	Letter to L Kirk, Maxim Technologies, from WH Powers, RJ Lee; Re: PLM Point Count Analysis, RJ Lee Group Job AOH005990, Maxim Project No 27153, 6/30/00; MDEQ-000941-944.			
3608		9/1/2000	Letter to L Kirk, Maxim Technologies, from WH Powers, RJ Lee; Re: PLM Point Count Analysis, RJ Lee Group Job AOH008699, Client Job No 9902295, 9/1/00; MDEQ-000941-944.			
3609		12/6/2011	Luzenac America, Inc's Response to Plaintiff's Master Discovery, Sanders v Bill Vann Company, et al, Mobile County, Alabama, 12/6/11; Verified; Attachment: Luzenac America Material Safety Data Sheet (MSDS), 9/1/99; IMERYS 162603-162700.			
3610		6/23/2015	Deposition and Exhibits of Patrick Downey, Moore v Antonio's Barber, et al, 6/23/15.			
3611		8/16/2021	Barretts Minerals, Inc's Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production, Woods v Kolmar Laboratories, Inc, et al, 8/16/21; Verified.			
3612		2/24/2021	Motion Hearing, Zimmerman v Autozone, Inc, et al, 2/24/21.			
3613		4/22/2021	Trial Transcript, 402 Hearing, Zimmerman v Autozone, Inc, et al, 4/22/21.			
3614		Undated	Luzenac America Talc for Decorative Cosmetics, Undated; IMERYS231141-44.			
3615		Undated	MAS Italian Master Chart			
3616		Undated	American Consumer Talcs, Langer, FD Pooley, University of Cardiff, Undated; FDP00000002-49.			
3617		1/1/2022	Curriculum Vitae of R Mark Bailey, PG, Asbestos TEM Laboratories, 2022.			
3618		6/9/1983	Pfizer Lab Report of Testing of Canadian Talc, Cantal 325, 6/9/83; PRE92TEM-000436.			
3619		2/12/1974	Letter to FR Rolle, Johnson & Johnson, from HD Stanley, Pfizer; Re: Cookbook Methods, 2/12/74; PFI_SEL_00010529-10531.			
3620		8/8/2022	Excerpt of the Deposition of Mary L Leech, 8/8/22. (pp 22-25, 42-65, 86-89, 154-161, 170-173, 190-193, and 246)			
3621		2/1/2022	Excerpt of the Deposition of Alan Segrave, 2/1/22. (pp 78-97)			
3622		12/2/1975	Pfizer Memo to GR Parikh, from HD Stanley; Re: Routine Examination of CP Talcs for the Third Quarter 1975, 12/2/75; PFI_FINC_00007530-7531.			
3623		7/26/1976	Pfizer Memo to DS Young, from HD Stanley; Re: TS-5222 Addendum - Section 4, 7/26/76; PFI_SEL_00005853-5854.			
3624		6/27/1983	Fibrous Tremolite Analysis of Talc: An Update, DW Holstein, Pfizer, 6/27/83; PFI_FINC_00004711-4768.			
3625		12/14/2017	Supplemental Expert Report of R Mark Bailey, PG, Gibbons v Axia Acquisition Corporation, et al, 12/14/17.			
3626		10/26/1982	Pfizer Memo to A Wentzel, from DW Holstein; Re: Fiber Analysis, 10/26/82; PFI_FINC_00004763.			
3627		4/29/1982	Pfizer Memo to KR Hancock, from DW Holstein; Re: Equipment to Determine Asbestos from Minerals in Victorville Talc, 4/29/82; PFI_FINC_00005208-5209.			
3628		6/18/1991	Pfizer Test Report, Grid ID B-A2, 4230- 341.47, 6/18/91; PRE92TEM-003354.			

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3629		7/29/1988	Pfizer Memo to G Vaplon, from J Haack; Re: Standard Operating Procedure for the handling of Tremolite & Chrysotile Concerns at the Treasure Mine Site, 7/29/88; PFI_TIPP_00003403-3406.			
3630		10/24/1990	Pfizer Memo to KJ Haack, from J Taipale; Re: Chest Pit Final Phase Tremolite Procedures, 10/24/90; PFI_TIPP_00008957-8958.			
3631		11/20/1990	Pfizer Memo to J Taipale, et al, from J Haack; Re: Tremolite Procedures, 11/20/90; PFI_TIPP_00008954-8958.			
3632		Undated	Pfizer Account Numbers and Business Units.			
3633		9/8/2022	Account Codes and talc codes in Appendix C on Montana Talc, Appendix B (Exhibit 25) to the Affidavit of R Mark Bailey, McBride v American International Industries, et al, 9/8/22.			
3634		4/13/1983	Pfizer Test Report - Montana Talcs: First Quarter 1983 Composites, 4/13/83; PFZ01162_019805.			
3635		1/5/1984	Pfizer Test Report - Montana Talcs: First Quarter 1983 Composites, Budget Code 4P101, Log No 6747, 1/5/84; PFI_TIPP_00000512.			
3636		1/10/1985	Pfizer Test Report - Montana Talcs: 3rd and 4th Quarter 1985, Budget Code 4P101, 1/10/85; PFZ01162_019820.			
3637		1/27/1986	Pfizer Test Report - Montana Talcs: 3rd and 4th Quarter 1985, Budget Code 4P101, Log No M-8628, 1/27/86; PFZ01162_019819.			
3638		1/7/1988	Pfizer Test Reports for Barretts Mine Face Talc, B2262, 1/7/88; PRE92TEM-002262.			
3639		3/2/2016	Excerpt of the Deposition of Theodore Hubbard, 3/2/16. (pp 10-13 and 170-173)			
3640		4/5/2016	Excerpt of the Deposition of Donald R Ferry, 4/5/16. (pp 74-89, 98-101)			
3641		11/23/2021	Excerpt of the Deposition of Michael Burke, 11/23/21. (pp 6-13, 114-121)			
3642		1/12/2022	Excerpt of the Deposition of Michael Burke, 1/12/22. (pp 210-213, 274-277, and 294-297)			
3643		6/5/1989	Letter to FW Mebus, Pfizer Pigments, from JR Schlaegle, RJ Lee; Re: Sample 4101-658.01, 6/5/89; PFI_BOOK_00009470-9472.			
3644		12/1/1966	Pfizer Sales Dept Bulletin 66-77, New Nomenclature for Talcs, 12/1/66; PFI_SEL_00010429-10441.			
3645		9/8/2022	Appendix C: Montana Talc Testing and Results (Appendix C to the Affidavit of R Mark Bailey, 9/8/22)			
3646		Undated	Imerys Bags and Labels, Supra H USP, Undated; IMERYS398031-36.			
3647		4/10/2007	Rio Tinto Email to G Hauser, et al, from R Zazenski; Re: License to Market, 4/10/07; Luzenac Powerpoint - Identifying/Managing Product Stewardship Issues: License to Market; IMERYS322241; IMERYS-A_0001298-1303.			
3648		7/28/1992	Cyprus Windsor Certificate of Amendment of Articles of Association, 7/28/92.			
3649		11/16/2016	New Jersey Secretary of State Records for Charles Mathieu, 11/16/16.			
3650		1/1/1979	Cyprus Mines Acquisition of Assets of Charles Mathieu, Inc and Subsidiaries, GD Lessner, 1979; ITA 102-182.			
3651		5/4/1973	Cyprus Minerals Memo to T Baak, from JD Mulryan; Re: Tremolite Study, 5/4/73.			
3652		6/19/2015	New Jersey Business Gateway Status Report for Metropolitan Talc, 6/19/15.			

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3653		6/18/2015	Alabama Secretary of State Business Entity Details - American Talc Company, Inc, 12//5/59; 6/18/15.			
3654		6/19/2015	Georgia Secretary of State Report - Resource Processors, Inc, 6/19/15.			
3655		10/4/1984	Photograph of South Plainfield Plant, 10/4/84; LEHMAN 02252.			
3656		5/18/1954	United States Trademark 589,928 for Yellowstone Talc, Luzenac America, 5/18/54.			
3657		7/1/1991	Cyprus Material Safety Data Sheet (MSDS) for Talc, Beaverhead Talc Ore, July 1991; LUZ00000051-55.			
3658		Undated	Plant Listing for the Talc and Soapstone Industry, Undated.			
3659		7/1/2006	Material Safety Data Sheet (MSDS) for Talc, Rio Tinto/Luzenac America, 7/1/06.			
3660		2/1/1988	Supra A, Talc Product #1707, Cyprus Industrial Minerals, February 1988; LUZ00000050.			
3661		12/26/1973	Letter to FDA, from NF Estrin, CTFA; Re: Proposed Order Method for Asbestos in Talc Published in the Fed Register (38 FR, No 188, pgs 27076-27081), September 28, 1973, 12/26/73; ITA-Polakow-000100-10.			
3662		3/1/1985	Talc Product Specifications, Altalco 200 USP, Mistrion Vapor, Monoblend, Olympic, and Supra, Revision #6, March 1985; ITA-LG 00317-19.			
3663		Undated	Cyprus Cosmetic Talcs, Undated; ITA-LG 00320-21.			
3664		9/29/2000	Letter to J Pier, Luzenac America, from LR Bain; Re: TEM Analysis of Sample A00420 for Asbestos Mineral Content, 9/29/00; IMERY5441335-338.			
3665		Undated	Chinese Testing Records			
3666		1/15/2009	RJ Lee PPT - What is Asbestos? The Challenges of Defining and Characterizing Asbestos in a Changing Regulatory World, Session 2: Analysis for Asbestos, C Lopano and MS Sanchez, 1/15/09.			
3667		6/1/2015	List of Approved External Fiber Testing Laboratories, Imerys, June 2015; IMERY5369317-319.			
3668		10/6/1948	Letter to HE Ashe, State of Vermont Dept of Public Health, from DH Byers, US Public Health Service; Re: Mineral samples, 10/6/48; JNJ MX68 000017827.			
3669		6/24/1977	CIMC Memo to MF Warner, from GJ Gill; Re: Pfizer Company - Asbestos in Talc Analysis, 6/24/77.			
3670		3/14/1975	Windsor Minerals Memo to H Stolzer and SA Christie, from RN Miller; Re: Cosmetic Talc - Trade Sales, 3/14/75; IMERY5117961-966.			
3671		5/1/1989	The Grind Sheet from the CIM Technical Center, Vol 1, Number 3, May-June 1989; IMERY5417827-849.			
3672		2000-2003	Luzenac America Memos and Emails; Re: Analytical Monthly Reports, November 2000 to April 2003; IMERY5417067-309.			
3673		6/30/2003	Email to S Mann, from L Telofski; Re: JB Powder w China Talc, 6/30/03; JNJ000389261-63.			
3674		11/23/1993	Johnson & Johnson Memo to W Ashton and D Jones, from R Denton; Re: Trip Report, Talc Validation Team Meeting - November 16, 1993, Windsor, Vermont, 11/23/93; JNJ000240739-742.			
3675		7/17/1971	Johnson & Johnson Memo to JC Walcott, from W Nashed; Re: Special Talc project No 503, CTFA Phone Call, 7/17/71; JNJ000258113.			
3676		3/2/2018	7402 Analysis, M67341 012, J Callan, MAS, 3/2/18.			
3677		9/16/2021	MAS Chart of J&J Testing (current as of September 16, 2021)			
3678		6/14/2021	MAS Chart of Cashmere Bouquet Testing, 6/14/21.			

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3679		Undated	MAS Chart of Chanel Testing			
3680		5/18/2022	MAS Chart of Coty Loose Airspun Face Powder Testing, Updated 5/18/22.			
3681		6/23/2022	MAS Chart of Gold Bond Testing, 6/23/22.			
3682		1/1/2019	Analysis of Avon Night Magic Talsum Powder, M68319, WE Longo and MW Rigler, MAS, January 2019.			
3683		3/15/2022	MAS Project M71373, Talcum Powder Analysis for Brian Gref's Pinaud Clubman Talc Container, WE Longo, MAS, 3/15/22.			
3684		5/26/2022	MAS Project M71377, Talcum Powder Analysis for Sheldon Spiegelman's Mennen Shave Talc Container, WE Longo, 5/26/22.			
3685		6/3/2022	MAS Project M71542, Talcum Powder Analysis Mennen Baby Magic Container, WE Longo, MAS, 6/3/22.			
3686		10/30/1973	National Paint & Coatings Association (NPCA) Safety & Health Bulletin No 15, Asbestos Handling Guidelines, 10/30/73.			
3687		9/8/1989	Cyprus-Vermont Talc Operations, 9/8/89; IMERYS072739-72757.			
3688		Undated	Asbestos Presentation, Mineralogy and Optical Mineralogy: Talc, Elongate Minerals & Mineral (Mis)identification, Mickey Gunter; CHATTEM-GOLDBOND-020406-020421.			
3689		5/3/1972	Cyprus Memo to Management Committee, from HY Mulyran; Re: Illinois Pollution Control Board Regulations, 5/3/72; CAMC-Abbott-000727-729.			
3690		9/24/1974	Confidential Johnson & Johnson Memo to G Lee, from WH Ashton; Re: Damaging editorial reference re Italian talc, 9/24/74; JNJTALC000294275-276.			
3691		6/14/2013	List of Products Compiled by Dr Langer with Product Name, Study Number and Total Fiber Content Weight (Ex 9 to Langer 6/14/13); Excerpt of the Deposition of Arthur Langer, 6/14/13.			
3692		1/1/2023	"Exposure to cosmetic talc and mesothelioma," J Moline, K Patel and AL Frank, Journal of Occupational Medicine and Toxicology, 2023.			
3693		2/1/1974	The Scientific Basis for FDA Regulatory Activities in Cosmetics, A Weissler, Presented May 4, 1973, J Soc Cosmet Chem, February 1974.			
3694		12/10/1971	Avon Memo to RM Casciano, from Y Gressel; Re: Asbestos and Talc, 12/10/71; AV STD 002249-2259.			
3695		6/8/1992	OSHA Preambles to Final Rules, Section 5: Health Effects, Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, OSHA, 6/8/92.			
3696		12/31/1981	Cyprus Industrial Minerals Sales Analysis by State, 12/31/81; IMERYS234031-234177.			
3697		12/31/1983	Cyprus Industrial Minerals Sales Analysis by State, 12/31/83; IMERYS234910-234994.			
3698		12/31/1986	Cyprus Industrial Minerals Sales Report, 12/31/86; IMERYS100937-101023.			
3699		1987-1993	Cyprus Industrial Minerals and Luzenac Monthly Reports, 1987-1993; IMERYS228847-228966.			
3700		1980s	Cyprus Customer Specification Sheets, 1980s; LEHMAN01589-1695.			
3701		12/31/1986	Cyprus Industrial Minerals Sales Report, 12/31/87; IMERYS233293-233431.			
3702		6/1/1989	Cyprus Mines Corporation Active Customers: Ranked by Tonnage, June 1989; IMERYS106488-106511.			

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3703		10/16/1989	Cyprus Industrial Mineral Industry Z Sales, Sales Second Half 1988, 10/16/89; IMERYS105785-105830.			
3704		12/5/1991	Cyprus Report RPT1063M, Cosmetics Industry Sales by Ship-Location by Industry by Customer by Product, 12/5/91; IMERYS105776-105777.			
3705		12/5/1991	Cyprus Report RPT1063M, Cosmetics Industry Sales by Ship-Location by Industry by Customer by Product, 12/5/91; IMERYS140797-140821.			
3706		5/6/1992	Cyprus Customer Sales by Shipping Location, Figures as of 04-92, 5/6/92; IMERYS052354-052359.			
3707		1/4/1995	Cyprus Industry Sales by Customer by Product, December 1994, 1/4/95; IMERYS213786-214112.			
3708		2/20/1998	1997 Domestic Specialty Customers Ranked by Total Exworks Revenue Grouped by Corporate Name, Luzenac America, 2/20/98; IMERYS053954-53974.			
3709		7/6/1998	Luzenac America Domestic Talc Usage in TX, OK, AR, MS, LA from 1998 Competition Database, 7/6/98; IMERYS219749-219801.			
3710		12/31/1984	Cyprus Industrial Minerals Sales Analysis by Industry, 12/31/84; IMERYS233284-233292.			
3711		10/2/1978	MSHA Memorandum to RV Wilson, from TJ Shepich; Re: NIOSH Study on Talc Deposits in the United States, 10/2/78.			
3712		Undated	Legal Identity Reports for Montana Mines and Mills, Rocky Mountain District - Denver, MSHA			
3713		6/19/2000	Industrial Hygiene Report, Minerals Technologies, Barretts Minerals, NATLSCO, June 19 & 21, 2000; MDEQ-000803-842.			
3714		7/27/2000	Barretts Regal Mine Non-Ore Rock Management Plan, Barretts Minerals, Dillon, Montana, Maxim Technologies, 7/27/00; MDEQ-002751-3060.			
3715		9/28/2000	Letter to L Kirk, Maxim Technologies, from KA Allison, RJ Lee Group; Re: Asbestos Results for Samples as Shown on Table I, RJ Lee Job No ATH009021, Client Purchase Order 9902285-310 Yellowstone Mine S40 Pit. 9/28/00.			
3716		1/9/2003	Letter to M Cerino, Luzenac, from S Matolyak, Maxim Technologies; Re: Luzenac Yellowstone Mine 2002 Geochemical Monitoring, 1/9/03; ITA-Greco-000474-486.			
3717		1/1/2016	2016 Yellowstone IH Sampling Plan, Imerys Talc America; ITA-Greco-000241-282.			
3718		5/1/2001	Waste Rock Geochemical Evaluation, Yellowstone Mine, Luzenac America, Maxim Technologies, May 2001; MDEQ-001439-1574.			
3719		10/22/2018	About Us, Montana Department of Environmental Quality, 10/22/18; http://deq.mt.gov			
3720		Undated	Luzenac Product Chart, Undated; LUZ00000057-60.			
3721		8/8/2016	Deposition of Henry Mulryan, 8/18/16.			
3722		11/16/1976	Johnson & Johnson Memo to G Lee, from U Stefano; Re: Talc Producers meeting in Paris, Val Chisone booklet, 11/16/76; JNJITLC000062463-62464.			
3723		2/14/1974	Memo to DR Petterson, from G Hildick-Smith; Re: Epidemiological Study of the Cause of Death in Italian Talc Miners, 2/14/74; JNJAZ55 000001607-8.			
3724		8/28/1974	Letter to WH Ashton, Johnson & Johnson, from DR Ferry, Chas Mathieu; Re: Epidemiological study conducted by Prof Rubino, 8/28/74; JNJAZ55 000001588.			

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3725		10/31/1974	Johnson & Johnson Memo to G Lee, from WH Ashton; Re: Italian Talc Source, Societa Talco e Grafite Val Chisone, Talc Publication Matters, Project No 0503.00, 10/31/74; JNJ 000270495-496.			
3726		10/8/1974	Johnson & Johnson Memo; Re: Problems Created by Val Chisone Talc Publication, 10/8/74; JNJ 000085815-16.			
3727		10/2/1974	Johnson & Johnson Memo to WH Ashton, from G Lee; Re: Ashton-Ferry Visit to Societa Talco e Grafite Val Chisone, 10/2/74; JNJ000252591.			
3728		6/20/1974	Johnson & Johnson Memo to DR Petterson, from B Semple; Re: Status – New Flotation Methods Project No 1133.02, 6/20/74; JNJMX68 000005051-52.			
3729		5/11/1955	Summary Report on A Review and Appraisal of the Literature on Talc Deposits of the United States to Johnson and Johnson, CB Sclar, et al, Battelle Memorial Institute, 5/11/55; JNIIH29W 000000030-57.			
3730		5/25/1955	Letter to Dr WH Lycan, from OF Tangel, Battelle Memorial Inst; Re: Report "A Review and Appraisal of the Literature on Talc Deposits of the United States, 5/25/55; JNJS71R_000000222-296.			
3731		6/5/1956	United States Patent 2,748,935 - Process for Separating Talc and Asbestos, Eternit-Werke, Austria, 6/5/56.			
3732		1983-1995	McCrone Correspondence Re Testing, 1983-1995; JNJ000237347 and various bates.			
3733		2/17/1959	Johnson & Johnson Memo to OF Tangel, from WL Smith; Re: Trip to Rome, Italy, March 5, 1969, Project No K-3262-1, 2/17/59; JNJAZ55 000001114-1120.			
3734		1/31/1960	Phase Report on The Physical Concentration of Italian No 2 Talc by Flotation - Investigation of Flotation Reagents, Battelle Memorial Institute. 1/31/60; JNJ00086861-76.			
3735		6/16/1960	Report of Air-Borne Dust Survey Plant No 4, Eastern Magnesia Talc Company, RD Graham, June 16-17, 1960; JNJ000327559-574.			
3736		9/1/1960	Asbestosis, Carcinoma of the Lung, National Safety News, National Safety Council (NSC), September 1960.			
3737		1/1/1961	Manual L-1, Guide to Precautionary Labeling of Hazardous Chemicals, Manufacturing Chemists Association, 1961.			
3738		1/1/1964	EMTAL Talcs for Cosmetics, Vermont Mines, Eastern Magnesia, 1964; JNJH29W 000003708-12.			
3739		12/1/1964	New Vermont Talc Plant Makes High-Grade Flotation Product for Special Uses, WE Trauffer, Pit and Quarry, December 1964; JNJS71R 000000660-665.			
3740		7/13/1966	Johnson & Johnson Memo to WH Ashton, from RS Russell; Re: Microscopic Examination, Museum Baby Powder Samples, 7/13/66; JNJ000085374.			
3741		7/15/1966	Johnson & Johnson Memo to JE Burke, from JN Masci and RN Miller; Re: Review of the Italian Talc Source Societa Talco e Grafite Val Chisone, 7/15/66; JNJAZ55_000001104-12.			
3742		11/1/1967	Johnson & Johnson Memo to TH Shelley, from WH Ashton; Re: Metropolitan Talc, Alternate Talc Sources Project #101, 11/1/67; JNJITALC000588518.			
3743		1/1/1971	Talc (fibrous) - Tremolite, Documentation of the Threshold Limit Values for Substances in Workroom Air, ACGIH, 1971; JNJITALC000294093-95.			
3744		6/7/1971	Johnson & Johnson Memo to TH Shelley and G Hildick-Smith, from JC Walcott; Re: Talc Program, 6/7/71; JNJ000257518.			

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3745		6/19/1971	Johnson & Johnson Memo from Claudia; Re: Dr Langer of Mt Sinai called, 6/19/71; JNJMX68 000015772.			
3746		7/6/1971	Johnson & Johnson Memo to W Nashed, from W Ashton; Re: Johnson's Baby Powder Lot #344L, Identity of Samples, 7/6/71; JNJ 000339320-21.			
3747		7/9/1971	Johnson & Johnson Memo to JC Walcott, from W Nashed; Re: Asbestos in Talc, FDA Meeting, July 8, 1971, 7/9/71; JNJMX68 000008782-84.			
3748		7/20/1971	Confidential Supplement to Report on Visit to Dr Pooley, 7/20/71; JNJMX68 000006301.			
3749		7/30/1971	Johnson & Johnson Memo to RA Fuller, from Hildick-Smith; Re: Conversation with Dr Clark Cooper, School of Public Health, University of California, 7/30/71; JNJNL61_000008624-25.			
3750		8/10/1971	Technical Report MA-2330-1, Methodology for the Determination of Asbestos in Talc, GR Grieger, IM Stewart, McCrone, Copy 1 of 3, 8/10/71; HHS00000188-193.			
3751		8/10/1971	Technical Report MA-2330-1, Methodology for the Determination of Asbestos in Talc, GR Grieger, IM Stewart, McCrone, Copy 3 of 3, 8/10/71; JNJH29W 000004051-58.			
3752		9/1/1971	J&J England Strategy, Physical Testing, Talc Product Safety and Purity Project: Strategy Document, IW Sloan, September 1971; JNJ000232852-868.			
3753		9/21/1971	Identity of Samples submitted to FD Pooley, University College, Cardiff, August 1971 Report, 9/21/71; JNJ000299802-847.			
3754		9/29/1971	Identification of Samples submitted to FD Pooley, University College, Cardiff, 9/29/71; JNJ000325709-22.			
3755		9/30/1971	Talc Product Safety and Purity Project: 1. Talc Ore Sampling, Fontane Mine, Italy, FD Pooley, WR Dean, IW Sloan, J&J Ltd, 9/30/71; JNJ000299793-801.			
3756		12/3/1971	Johnson & Johnson Memo to W Nashed, from RS Russell; Re: Examination of Johnson & Johnson Italian Talcs, 12/3/71; JNJAZ55 000010677.			
3757		6/20/1972	Johnson & Johnson Memo to WR Dean, JJ Portsmouth,, from W Nashed; Re: New York Times revised article on 6/17, 6/20/72; JNJMX68 000004624.			
3758		11/29/1972	Handwritten Note to I Stewart, McCrone, from Tom, University of Minnesota; Re: Enclosed reports- Investigation of Possible Asbestos Contamination in Talc Samples, University of Minnesota Space Science Center, 11/29/72; JOJO-MA2546-01365			
3759		6/7/1973	Johnson & Johnson Memo to G Hildick-Smith, from U Stefano; Re: Rubino studies, 6/7/73; JNJAZ55 000002037.			
3760		6/2/2011	Confidential Memo; Re: detection of chrysotile fiber by TEM in Magnesita talc, 6/2/11; JNJTALC000324172.			
3761		6/18/1973	Johnson & Johnson Memo to DR Petterson, from W Ashton; Re: Talc/Asbestos, Bowling Green, 6/18/73; JNJAZ55_000001866-67.			
3762		6/21/1973	Letter to U Stefano, Talco E Grafite, from G Hildick-Smith, Johnson & Johnson; Re: Rubino's epidemiological study, 6/21/73; JNJTALC000061222-223.			
3763		10/18/1973	Johnson & Johnson Memo to DR Petterson, from G Hildick-Smith; Re: Epidemiological Study of Workers in Italian Talc Mines, 10/18/73; JNJAZ55 000002038-41.			
3764		Undated	Personal and Confidential Memo from WH Ashton; Re: Background of SVC Publication, Undated; JNJAZ55_000001101-3.			

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3765		11/26/1974	Letter to JH Miller, Zach Cartwright Ltd, from WR Dean, Johnson & Johnson; Re: Your letters of the 14th and 21st of November confirming that the Val Chisone publication is no longer being distributed. 11/26/74: JNJ 000270485.			
3766		Undated	Guida Pratica Al Riconoscimento Delle Impurita Nel Talco, Societa Talco e Grafite Val Chisone, Undated; JNJ 000264110-145.			
3767		Undated	Physical Guide to the Recognition of Impurities in Talc, Societa Talco e Grafite Val Chisone, Undated; JNJ000270519-549.			
3768		10/29/1973	Letter to WT Caneer, CSMRI, from VE Wolkodoff, Johns-Manville; Re: Heavy liquid separation, 10/29/73; JNJAZ55_000002057-58.			
3769		11/23/1973	A Preliminary Study on the Feasibility of Hydrothermal Decomposition of Chrysotile and Tremolite to Talc," CMSRI Project No C10704, 11/23/73.			
3770		12/12/1973	Johnson & Johnson Memo to D Petterson, from G Hildick-Smith; Re: Epidemiological Study of Italian Talc Mine, Meeting with Prof Rubino, 12/12/73; JNJAZ55_000001583-84.			
3771		1/1/1974	"The Detection of Chrysotile Asbestos at Low Levels in Talc by Differential Thermal Analysis," JP Schelz, Thermochimica Acta, 1974.			
3772		1/29/2010	Attendance List, European Chamber Asbestos Seminar hosted by CAFCI, 1/29/10; IMERYS271554-271556.			
3773		12/8/2009	Rio Tinto Email to J Pier, from S Sharma; Re: Confirmation of Registration for EUCCC AmCham Asbestos Test Method Seminar on 11 Dec, 12/8/09; Email to J Bailey, et al, from J Cai, Johnson & Johnson; Re: Update on Asbestos Seminar, 1/22/10; IMERYS246355-356- IMERYS269518-520			
3774		1980-1981	Pfizer Lab Testing for Talc RCT1004, 4/7/80 to 9/17/81; PFI ROY 00001374 and various bates. (5 pp)			
3775		4/6/1973	Avon Analytical Research Laboratory Requisition & Report No 13822 for 2 Avon Coded Talcs and J&J Baby Powder Talcs and Mennen Bath Talc, 4/6/73; AV_JENKINS_S-0002464-2465; AV_LEBRECHT-0010391-92.			
3776		9/14/1973	Avon Memo to JC Anderson, from JJ Travers; Re: Talc, 9/14/73; AV_JENKINS_S-0006043-6047; AV_LEBRECHT-0029286-29290.			
3777		6/9/1978	Avon Products, Canada Invoice to D Zirpoli, Analytical, New York for Asbestos testing of Italian Talc AGI, Code 0747, and MTR-2 Talc, Code 0815, 6/9/78; AV STD 002838.			
3778		4/20/2017	Imerys Talc America Safety Data Sheet, ImerCare, 4/20/17; Color T000471-477.			
3779		Undated	Cyprus Product Chart, Exhibit O, Undated; AB-CYP-17-000005.			
3780		12/21/1973	Letter to FDA, from HT Mulryan, United Sierra; Re: Asbestos particles in Food and Drugs, the subject of proposed rulemaking of the FDA, Federal register Vol 38, No 168, 9/28/73 (21 CFR Parts 121, 128 and 133), 12/21/73; AB-CYP-22-000113-116.			
3781		10/11/2000	Luzenac America Email to J Gauntt and R Zazenski, from R Bernstein; Re: NTP draft, 10/11/00; LUZ023834-835.			
3782		12/20/1979	Johnson & Johnson Memo to G Lee, et al, from WH Ashton; Re: Italian Talc for Johnson's Baby Powder, Initial Shipments/ Specifications, 12/20/79; JNJAZ55_000000024-25.			

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3783		Undated	Identity of Talc Deposits in Western Europe and Business Factors Related to Societa Talco e Grafite Val Chisone, Undated; JNJ000333710-722.			
3784		6/1/1971	Production of Talc for Johnson's Baby Powder, B Barker, Johnson & Johnson Medical Dept, June 1971; JNJTALC000437407-437428.			
3785		1971-1982	Whittaker, Clark & Daniels Talc Analysis Reports for 141 Talc, SZ Lewin, NYU, 8/25/71 to 11/1/82; WCD001942-2233.			
3786		1/15/1988	Cyprus Memo from GD Lessner; Re: Supra Talc, 1/15/88; IMERYS134890-134891.			
3787		5/26/1993	Cosmetics, Pharmaceuticals and Food Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			
3788		Undated	"Poisoning of the Month: Dusting Powder Inhalation," MQ Jenkins, Journal of the South Carolina Medical Association, Undated.			
3789		1/1/2023	Appendix C (Exhibit 44) to the Declaration of R Mark Bailey, Tests of Talc (ore, processed talc, finished products) from Montana, 114 exhibits, Chapman v Avon products, Inc, et al, 2023. (chart only)			
3790		1/1/2023	Appendix C (Exhibit 44) to the Declaration of R Mark Bailey, Tests of Talc (ore, processed talc, finished products) from Montana, 114 exhibits, Chapman v Avon products, Inc, et al, 2023. (chart and exhibits)			
3791		12/9/1966	Membership List of the Society of Cosmetic Chemists, 12/9/66.			
3792		6/1/2018	A Study of Talc-Containing Cosmetics and Their Potential Asbestos Contamination, J Donahue, Honors Senior Theses/Projects. Western Oregon University. 6/1/18.			
3793		12/9/1966	Journal of the Society of Cosmetic Chemists, 12/9/66.			
3794		8/25/2022	Bailey's Declaration in the Chapman case dated 8/25/2022, including all exhibits attached thereto (including, but not limited to, his reports on talc from Italy, Vermont, North Carolina, Madoc, Penhorwood and his Appendices B and C on Montana talc, along with all exhibits to such appendices)			
3795		1/11/2023	Bailey's Affidavit in the Tippin case dated 1/11/2023, including all exhibits attached thereto (including, but not limited to, his reports on talc from Italy, Vermont, North Carolina, Madoc, Penhorwood and his Appendices B and C on Montana talc, along with all exhibits to such appendices)			
3796		1/1/2023	Bailey's January 2023 reliance list			
3797			The materials produced to defendants in advance of Bailey's deposition			
3798		7/22/2022	Longo's declaration in the Woods case dated 7/22/2022 (and all exhibits attached thereto)			
3799		9/22/2022	Longo's affidavit in the McBride case dated 9/22/2022 (and all exhibits attached thereto);			
3800		9/29/2022	Longo's affidavit in the Anderson/Graham case dated 9/29/2022 (and all exhibits attached thereto);			
3801			Longo's affidavit in the Tippin case dated 12/22/2022 (and all exhibits attached thereto)			
3802			Longo's Reliance List			
3803			The materials produced to defendants in advance of Longo's deposition			

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3804		2/9/2023	Summary of MAS Testing Results of Talc from Italy, Vermont, Montana, South Korea, Brazil and China, M Buha, 2/9/23.			
3805		9/16/2021	MAS Chart of J&J Testing, WE Longo, MAS (current as of September 16, 2021)			
3806		9/21/2021	Declaration and Testing Summary regarding Testing of 146 Containers of Johnson & Johnson talc products, 9/21/21.			
3807		10/1/2018	Analysis of Johnson's Baby Powder Historical Samples: Asian, M69248, WE Longo, MW Rigler, MAS, October 2018.			
3808		5/25/2021	MAS Project #M71228 Off-The-Shelf JBP Containers: Purchased in Argentina, Talcum Powder Analysis, WE Longo, MAS, 5/25/21.			
3809		9/2/2022	Longo's report dated 9/2/22.			
3810			All the underlying reports referenced in the MAS Chart of J&J Testing, WE Longo, MAS (current as of September 16, 2021)			
3811			All the underlying reports referenced in the Declaration and Testing Summary regarding Testing of 146 Containers of Johnson & Johnson talc products, 9/21/21.			
3812		11/23/2022	Declaration of Edward Gramling dated 11/23/22 with Exhibit A (including all 234 tests of Talc 1615 and Supra by TEM with SAED)			
3813		7/11/2022	Dr. Webber's report from the Tippin case dated 7/11/22, including his summary of the Pfizer testing in Appendix B			
3814			Compilation of 51 tests of Talc 643 by Pfizer by TEM with SAED			
3815			Demonstrative table of 43 tests of Talc 643 by Pfizer that were positive for 1 or more asbestos fibers			
3816			Compilation of 24 tests of Talc 141 by Pfizer by TEM with SAED			
3817			Demonstrative table of tests of Talc 141 by Pfizer that were positive for 1 or more asbestos fibers			
3818			Documents produced by Pfizer in the Tippin and Payne Matters and Bates Labeled "PRE92TEM"			
3819			Deposition of Don Hicks dated July 29, 2020 and all exhibits thereto			
3820			Deposition of Don Hicks dated August 3, 2020 and all exhibits thereto			
3821			RJ Lee Report to J&J on Magnesita talc, 8/12/11.			
3822		7/7/2022	Excerpt of the Deposition of Gary Tomaino in the Woods case dated 7/7/22 at pages 180-188 and 361-368			
3823		12/19/1974	Meeting Notes of CTFA Talc Subcommittee Meeting of December 4, 1974, 12/19/74.			
3824		5/17/1977	Agenda and Minutes of the CTFA Talc Task Force on Round Robin Testing of Consumer Talcum Products for Asbestiform Amphibole Minerals, 5/17/77.			
3825		10/7/1976	CTFA Method J 4-1 for Asbestiform Amphibole Minerals in Cosmetic Talc, 10/7/76; 3/23/82 Revision; WCD000028-38.			
3826		11/2/1976	CTFA Memo to the CTFA Talc Subcommittee, from NF Estrin; Re: CTFA Talc Methodology, 11/2/76; Attachment: Letter to NF Estrin, from WC McCrone; Re: CTFA procedures, 9/3/76.			
3827		2/1/1977	Minutes of the CTFA Technical Administration Committee, 2/1/77; Attachment: "The Biology of Talc," G Hildick-Smith, Brit J Ind Med, 1976; JNJ000026623-37.			
3828		6/10/1977	Letter to CTFA Task Force Member, from JP Schelz, Johnson & Johnson; Re: Coded samples for Round Robin Retest, 6/10/77; JNJ000250596-598.			

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3829		Undated	J&J Optical Microscopy, Position I (no), CTFA Round Robin, Undated; JNJ000267827.			
3830		Undated	J&J Optical Microscopy, Position II (yea), CTFA Round Robin, Undated; JNJ000267828.			
3831		2/19/1974	Minutes of the Meeting of the CTFA Task Force on Methodology for the Detection of Asbestos in Talc, 2/19/74.			
3832		3/12/1976	Letter to N Estrin, from JJ Travers, Avon; Re: Willingness to disclose analysis results to FDA, 3/12/76.			
3833		3/11/1976	Memorandum of Meeting Between Industry Representatives of CTFA Committee on Asbestos in Talc and FDA Division of Cosmetics Technology; Subject: Meeting with CTFA Talc Committee for the Purpose of Discussing the Results of the Testing of Talcum Powder Products Using a CTFA Proposed Method, 3/11/76.			
3834		3/15/1976	Memorandum of Meeting Between FDA Representatives and Industry Representatives; Re: Asbestos in Talc, 3/15/76.			
3835		9/23/1975	Letter to R Schaffner, FDA, from NF Estrin, CTFA; Re: Update on work of CTFA subcommittee, 9/23/75; Letter to R Schaffner, FDA, from GW Sandland; Re: Chrysotile, 9/17/75.			
3836		10/7/1976	Letter with attached J 4-1 Method for Asbestiform Amphibole Minerals in Cosmetic Talc, 10/7/76.			
3837		1/1/1976	Instructions for Insertion of "Cosmetic Talc" Standard Into CTFA Standards, 1976.			
3838		Undated	Memo to G Sandland, from FR Rolle; Re: Corrected Results of Round Robin (#3) Using the CTFA Proposed Optical Microscope Procedure for Detection of Chrysotile in Talc, Undated.			
3839		2/22/1977	Letter to JP Schelz, CTFA Task Force on Round Robin, from CH Wilson, FDA; Re: Results of FDA Analysis of Samples (Set J) for Round Robin, 2/22/77.			
3840		9/25/1975	FDA Memo Record to Eiermann, from Schaffner; Re: CTFA Letter of 9/23/75 re cosmetic talc standard, 9/25/75.			
3841		1/1/2012	Personal Care Products Council Tax Returns, 2012.			
3842		10/18/1976	CTFA Memo to CTFA Talc Subcommittee, from N Estrin; Re: Round-Robin Test on Talc Samples, 10/18/76.			
3843		9/5/1975	Memo to Members of the Standards Committee, from GW Sandland; Re: Final version of Cosmetic Talc Standard, 9/5/75.			
3844		12/17/1974	Letter to NF Estrin, from WH Steinberg, Johnson & Johnson; Re: Talc, 12/17/74; JNJMX68 000009139-40..			
3845		9/6/1974	Meeting Notes of CTFA Talc Subcommittee Meeting of August 14, 1974, 9/6/74.			
3846		12/5/1974	WCD Memo to FF Roesch, from RR Krammes; Re: Meeting Minutes of CTFA Subcommittee Meeting on Asbestos in Talc, 12/5/74; WCD000139-140.			
3847		4/29/1975	Letter to G Sandland, Talc Subcommittee, CTFA, from G Lee, Johnson & Johnson; Re: Numerous studies show no chrysotile, 4/29/75.			
3848		7/27/1976	Memo to RE Norwood, from HD Stanley; Re: Minutes of the CTFA Talc Subcommittee Meeting, 7/27/76; PFI_KA_00000784-791.			
3849		7/8/1976	Minutes of the CTFA Talc Subcommittee, 7/8/76.			
3850		12/6/1977	Minutes of the Talc Task Force on Round Robin Testing, 12/6/77; JNJNL61 000020414-415.			
3851		4/26/1976	Pfizer Memo to RE Norwood, from HD Stanley; Re: CTFA Talc Subcommittee Meeting - March 31, 1976, 4/26/76; PFI_MO 00001783-84.			

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3852		12/10/1973	Report of CTFA Talc Subcommittee on Method to Detect Chrysotile and Tremolite in Talc, 12/10/73; PFI_KA_00000851-858.			
3853		12/26/1973	Letter to Hearing Clerk, FDA, from NF Estrin; Re: Proposed Order Method for Asbestos in Talc Published in the Federal Register, September 28, 1973, 12/26/73.			
3854		7/19/1971	FDA to Convene Ad Hoc Committee on Talc, FDA Reports, 7/19/71; PFZ001162 00064.			
3855		12/11/1973	Membership List - CTFA Talc Subcommittee, 12/11/73.			
3856		3/12/1976	Letter to N Estrin, from IM Stewart, McCrone; Re: Our recent conversation on talc analyses for asbestos, 3/12/76.			
3857		3/17/1976	Memorandum of Telephone Conversation Between N Estrin, CTFA, and HJ Eiermann, FDA; Re: Asbestos in Talc, 3/17/76.			
3858		3/18/1976	Summary Report of CTFA Talc Subcommittee, March 11, 1976 Meeting, 3/18/76; WCD000240-241.			
3859		3/30/1976	Draft Memo from DR Petterson, Johnson & Johnson; Re: Comments to the SAC-CTFA on March 24, 1976, 3/30/76.			
3860		5/10/1976	Talc Summary for CTFA Scientific Advisory Committee, DR Petterson, Johnson & Johnson, 5/10/76; JNJ000298996.			
3861		6/1/1995	Comments of the Cosmetic, Toiletry and Fragrance Association In Response to A Citizen's Petition Filed with the FDA on November 17, 1994 Which Would Require Carcinogenic Labelling on All Cosmetic Talc Products, June 1995; JNJ000000044-80.			
3862		3/31/1976	Talc Subcommittee Meeting Minutes, 3/31/76; WCD000254-255.			
3863		3/23/1979	CTFA Executive Newsletter, 3/23/79; CP-MENNEN-00002423-28.			
3864		10/25/1979	CTFA Executive Newsletter, 10/25/79; CP-MENNEN-00002435-46.			
3865		5/17/1977	CTFA Method J 4-1 for Asbestiform Amphibole Minerals in Cosmetic Talc, Part II: Microscopy and Dispersion-Staining Method, Tentative Revision, 5/17/77.			
3866		1971-1977	CTFA Cosmetic Journal - CTFA-FDA Scientific-Liaison Report, H Schwartz, Vol 3, No 4, 1971; 1972-1973 Committee Report, Vol 5, No 2, 1973; CTFA Talc Subcommittee, Vol 6, No 1, Jan/March 1976; Standards, Vol 9, No 1, Jan/March 1977; QE-CPC00001182-1191			
3867		12/10/1973	Memo to Members of the CTFA Talc Subcommittee & Scientific Advisory Committee, from GW Sandland; Re: Report of CTFA Talc Subcommittee on Method to Detect Chrysotile and Tremolite in Talc. 12/10/73.			
3868		3/11/1976	Minutes of the CTFA Talc Task Force Meeting, 3/11/76.			
3869		3/31/1976	Minutes of the Talc Subcommittee of the CTFA, 3/31/76; PFI MO 00001785-1786..			
3870		2/2/1993	Draft Minutes of the Talc Interested Party Task Force, 2/2/93; PCPC000222-24.			
3871		Undated	CTFA Talc Subcommittee Meeting Minutes, GW Sandland, Undated.			
3872		3/11/1975	CTFA Specification for Talc, Issued 6/1/42; Revised 5/30/71; with Handwritten Note from GW Sandland to Talc Subcommittee; Re: Request for comments. 3/11/75.			
3873		8/14/1974	Meeting Notes of CTFA Talc Subcommittee, 8/14/74, Released 9/6/74; PFI KA 00000879-85.			
3874		6/21/1974	Memo to Members of the CTFA Task Force on Methodology for the Detection of Asbestos in Talc, from FR Rolle; Re: Meeting to review methodology. 6/21/74; JNJ000258056.			

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3875		9/1/1974	Report of Ad Hoc Methodology Committee, GW Sandland, CTFA, September 1974; JNJ000267165-167.			
3876		12/4/1974	Meeting Notes of the CTFA Talc Subcommittee, 12/4/74; JNJMX68 000009140-44.			
3877		2/7/1975	CTFA Talc Task Force Meeting Minutes, 2/7/75; WCD000083-85.			
3878		11/18/1974	Letter to CTFA Talc Subcommittee Members, from GW Sandland; Re: Meeting on December 4, 1974, 11/18/74; Memo to GW Sandland, from FR Rolle; Re: Results of Round Robin Analysis (#2) Using Proposed CTFA "Cookbook" Procedures for the Detection of Asbestos in Talc; JNJ000308053-56.			
3879		2/26/1975	Meeting Notes of CTFA Talc Subcommittee, February 4, 1975, 2/26/75; JNJ000308264-267.			
3880		Undated	Talcum Powders to be Purchased for CTFA - Mt Sinai Round Robin (1976 Production Samples - Tentative List), Undated; JNJ000267876.			
3881		10/7/1976	Asbestiform Amphibole Minerals in Cosmetic Talc, Part I: X-Ray Diffraction Method, Part II: Optical Microscopy and Dispersion Staining Method, CTFA Method J 4-1, 10/7/76; with CTFA Cover Letter			
3882		3/30/1976	Draft Memo from DR Petterson; Re: Comments to the SAC-CTFA on March 24, 1976, 3/30/76.			
3883		3/26/1976	Talc Subcommittee Agenda, 3/26/76; Goodhue WCD 000146.			
3884		10/10/2000	Memo to Talc Interested Party Task Force, from LJ Loretz; Re: NTP Background Document - Non-Asbestiform Talc. 10/10/00; IMERYS-A 0012865-66.			
3885		4/3/1979	Minutes of the CTFA Talc Subcommittee, 4/3/79; WCD000834-840.			
3886		1/20/1977	Johnson & Johnson Memo to DR Petterson, from JP Schelz, CTFA Talc Task Force; Re: Progress Report to the CTFA Scientific Advisory Committee Concerning the Task Force on Round Robin Testing of Consumer Talcum Products, Project No 0503.01, 1/20/77; INJNL61 000021796-97			
3887		3/1/1977	CTFA Minutes of the Pharmacology & Toxicology/Inter-Industry Aerosol Safety Committees, 3/1/77; JNJ000038514-38522.			
3888		1/1/1976	CTFA Task Force Round Robin Testing of Consumer Talcum Products (1976 Production) Participating Laboratory, 1976; JNJNL61 000020471.			
3889		7/11/2016	About Us, Cosmeticsinfo.org, 7/11/16.			
3890		Undated	Council Committees, Personal Care Products Council, Undated.			
3891		10/26/2016	Quality Assurance Workshop "The Journey to Quality Excellence," Preliminary Program, 10/26/16.			
3892		7/1/2016	Talc Information, PCPC, 7/1/16. www.cosmeticinfo.org			
3893		7/10/2016	The Personal Care Products Council Consumer Commitment Code, 7/10/16. www.personalcarecouncil.org			
3894		3/2/1994	Memo to Talc Interested Party Task Force, from P Dennis; Re: Enclosures, 3/2/94; PCPC000037-40.			
3895		6/9/2016	PCPC Member Briefing, 6/9/16.			
3896		Undated	PCPC Benefits of Membership, Undated.			
3897		Undated	Look Good, Feel Better Brochure, PCPC, Undated.			
3898		10/18/1976	Memo to CTFA Talc Subcommittee, from N Estrin; Re: Round-Robin Test on Talc Samples, 10/18/76; WCD000203.			
3899		1/1/2012	Form 990, Personal Care Products Council, Return of Organization Exempt from Income Tax, 2012.			

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3900		1/1/2004	Form 990, CTFA, Return of Organization Exempt from Income Tax, 2004.			
3901		4/24/2001	Letter to CW Jameson, NTP, from GN McEwen; Re: Call for Public Comments on 8 Nominations, Proposed for Listing in or Delisting From the Report on Carcinogens, Tenth Edition (66 Federal Register 13334): Talc Not Containing Asbestos Fibers, 4/24/01.			
3902		4/11/2002	Letter to the FDA, from EE Kavanaugh; Re: Citizen Petition: Docket No 78N-0064, 4/11/02.			
3903		6/3/2000	PA Asbestos-Talc, 1st Ld-Writethru, 0485, 6/3/00; No 2 crayon maker says it had quit using talc; tests find no asbestos, Seattle Post-Intelligencer, 6/3/00; JNJ 000019616-18.			
3904		8/5/2009	Email to M Crottogini, et al, from F Lumen, IMA-Europe; Re: Petition to FDA re: Talc - PCPC Comments and Expected FDA Follow-Up, 8/5/09; IMERY5273052-101.			
3905		9/12/1975	Letter to R Schaffner, FDA, from GW Sandland, CTFA Talc Subcommittee; Re: Realistic Cosmetic Talc Standard, 9/12/75; JNJ TALC000439376-378.			
3906		7/17/1992	Memorandum to Scientific Advisory Committee, from GN McEwen; Re: Talc Safety Interested Party, 7/17/92; JNJ000021035.			
3907		6/4/1994	Agreement with Johnson & Johnson- Guarantee to Support Talc Interested Party Task Force Activities, 6/4/94; JNJ000240311.			
3908		10/11/1973	Minutes of the CTFA Subcommittee of SAC on Asbestos in Talc Meeting dated October 4, 1973, 10/11/73; WCD000078-80.			
3909		3/15/1976	CTFA Talc Subcommittee Meeting Minutes, 3/15/76; JNJNL61 000021692-94.			
3910		8/11/1972	Memorandum of Meeting between FDA Representatives and CTFA, Johnson & Johnson, et al; Re: Asbestos in Cosmetics Containing Talc, Such as Dusting Powders and Face Powders, 8/11/72.			
3911		12/29/1975	Letter to G Sandland, CTFA Committee on Asbestos in Talc, from FR Rolle, Johnson & Johnson; Re: Lewin samples, 12/29/75; HHS00000061-64.			
3912		12/13/1973	Memo to RE Norwood, from HD Stanley; Re: Meeting of the CTFA Talc Subcommittee on a Method to Detect Chrysotile and Tremolite in Talc, 12/13/73; PFI KA 00000849-850.			
3913		7/15/1992	Attendees for the CTFA Talc Interested Parties Meeting, 7/15/92; CPC-NYCALTRSCPT00004482.			
3914		8/7/1992	Memo to B Kong, from L MacEachen; Re: CTFA's Talc Interested Party Meeting July 15, 1992, 8/7/92; CPC-NYCALTRSCPT00004479--81.			
3915		6/16/1995	Letter to the FDA, from EE Kavanaugh, CTFA; Re: CPC Petition is without merit, 6/16/95; Attachment: Comments of The Cosmetic, Toiletry, and Fragrance Association in Response to A Citizen's Petition Filed With The Food and Drug Administration on November 17, 1994 Which Would Require Carcinogenic Labeling on All Cosmetic Products, FDA Docket No 94P-0420/CP 1, June 1995; FDA00000246-84.			
3916		7/21/2009	Letter to FDA, from JE Bailey, Personal Care Products Council; Re: Comments on Citizens Petition to the Commissioner of the Food and Drug Administration Seeking a Cancer Warning on Talc Products, Docket FDA-2008-P-0309, 7/21/09; FDA000001339-77.			

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3917		7/1/1979	"Cosmetic Talc," KS Plotkin, CTFA Cosmetic Journal, Vol 11, No 3, July/ September 1979; QE-CPC00002086-91.			
3918		9/5/1973	Letter to NF Estrin, CTFA, from RJ Eierman, FDA; Re: Discussion concerning methods of determination of asbestos in cosmetic talc products, 9/5/73; WCD000054..			
3919		5/14/2010	Letter to A Raphael, Levy Phillips, from RM Levine; Re: Personal Care Products Council Response to Subpoena Duces Tecum Case No 001853-10, 5/14/10; Attachments: PCPC000001-1411.			
3920		1971-1977	Excerpts from CTFA Cosmetic Journal, Vols 3-9, 1971-1977; CPC-NYCALTRSCPT00010665-74.			
3921		1/1/1976	CTFA Talc Subcommittee, CTFA Cosmetic Journal, Vol 8, No 1, January/March 1976; QE-CPC00001186-87..			
3922		9/21/1992	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Analysis of Materials Used in NTP Study, 9/21/92; Attachment: Luzenac Report: Analyses of NTP Study Samples, Project No 92-299, 9/4/92; PCPC000425-48.			
3923		7/23/1992	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Test Material (Inhalation Study), 7/23/92; PCPC000422-24.			
3924		9/1/1993	Fax to CJ Carr and S Carr and SD Gettings, CTFA, from International Society of Regulatory Toxicology and Pharmacology; Re: Talc Meeting, 9/1/93; Attachment: Outline of Talc Symposium Program, 8/31/93; PCPC000414-18.			
3925		9/2/1993	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: IS RTP Meeting Draft Program, 9/2/93; PCPC000413.			
3926		9/3/1993	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Enclosures, 9/3/93; PCPC000412.			
3927		7/3/1984	CTFA Memo to Talc Subcommittee, from J Whelan; Re: Attached Article, 7/3/84; PCPC000578.			
3928		12/1/1992	"Talc and ovarian-cancer risk, Glamour Magazine, December 1992; Attachment: CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Enclosures, 2/12/93; PCPC000379 and 362.			
3929		2/1/1993	A Review of Talc Dust Dose, Cancer of the Respiratory System and the NTP Technical Report on the Toxicology and Carcinogenesis Studies of Talc in F344/N Rats and B6C3F Mice (NIH Publication No 92-3152), Submitted to the CTFA, JW Kelse, RT Vanderbilt February 1993; PCPC000245-60			
3930		2/23/1993	Memo to CFTA Committee/ Talc Task Force Members, from JW Kelse, RT Vanderbilt; Re: Follow-up on February, 1993 Meeting Commitments, 2/23/93; PCPC000244.			
3931		3/5/1993	CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Enclosures, 3/5/93; PCPC000243.			
3932		2/9/1995	Letter to Dr D Heller, Columbia University, from SD Gettings, CTFA; Re: Copy of recent review on the biological effects of cosmetic talc in Food & Chemical Toxicology, 2/9/95; PCPC000241-42.			
3933		9/20/1995	Letter to GA Boorman, National Institutes of Environmental Health Sciences, from SD Gettings, CTFA; Re: Detection of talc in ovarian tissue, 9/20/95; Attachment: "Asbestos Contamination in Paraffin Tissue Blocks," RJ Lee, RG Florida, IM Stewart, Arch Pathol Lab Med, 1995; PCPC000235-40.			

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3934		2/2/1993	CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Enclosures: Draft Minutes, 2/2/93; 4/5/93 Bailey Letter to FDA; Hobbs Abstract, 7/6/93; PCPC000243.			
3935		1/26/1994	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Manuscript/Presentation, 1/26/94; Attachment: "Talc: Occurrence, Characterization and Consumer Applications, R Zazenski, MA Nordhauser, WH Ashton, D Briggs, M Chudkowski, JW Kelse, L MacEachern, MT Roddy, SD Gettings, Presented at the International Society of Regulatory Toxicology and Pharmacology/ US FDA Workshop on Talc: Consumer Uses and Health Perspectives, NIH, January 31- February 1, 1994; PCPC000190-220.			
3936		9/9/1994	Letter to DC Havery, FDA, from SD Gettings, CTFA; Re: Inquiry dated June 7, 1994, 9/9/94; PCPC000164-66.			
3937		7/25/1994	CTFA Draft Minutes of the Talc Interested Party Task Force, 7/25/94; PCPC000160-63.			
3938		9/13/1994	CTFA Memorandum to Talc Interested Party Task Force, from SD Gettings; Re: (Relatively) Good News!, 9/13/94; Attachment: Fax to CTFA, from CJ Carr; Re: Talc Meeting - Boorman's MS, 9/12/94; Report - The lack of an ovarian effect of lifetime talc exposure in F344/N rats and B6C3F1 mice, GA Boorman, JC Seely. Updated: PCPC000155-59			
3939		5/17/2000	CTFA Memo to Talc Interested Party Task Force, from LJ Loretz; Re: Updated Talc Document from Dr Wehner, 5/17/00; Attachment: Presentation - Cosmetic Talc is NOT a Carcinogen, prepared fro the CTFA, AP Wehner, May 2000; PCPC000093-153.			
3940		3/1/1994	Letter to J Carr, Int Society of Regulatory Toxicology and Pharmacology, from GA Boorman, NIH; Re: Invitation to talc meeting and plans for further anaylsis on the NTP specimens, 3/1/94; PCPC000043.			
3941		2/7/1994	Letter to SD Gettings, CTFA, from CJ Carr, Int Society of Regulatory Toxicology and Pharmacology; Re: Contribution of \$20,000 to CTFA/FDA workshop, 2/7/94; PCPC000038.			
3942		3/2/1994	CTFA Memo to Talc Interested Party Task Force, from P Dennis; Re: Enclosures: 2/7/94 Gettings Letter to Carr; 2/2/94 Letter to Dr Brown; Harlow and Hartze Paper, 3/2/94.			
3943		3/1/1994	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Symposium Transcript, 3/1/94; Attachment: Letter to Dr WE Gilbertson, FDA, from Dr AP Wehner; Re: Chronic talc inhalation studies with hamsters, 2/2/94; PCPC000033-36.			
3944		12/1/1994	Safety/ Efficacy: Warning Labels on Talc Products Requested in Citizen Petition, CTFA/TRN, Vol 8, No 9, December 1994; PCPC000001-32.			
3945		3/8/1976	CTFA News Release, Asbestos in Talc, 3/8/76; WCD-McBride(IN)-004181-4183.			
3946		8/15/1974	Memo to G Sandland, CTFA Subcommittee on Asbestos in Talc, from JN Siverston; Re: An Estimate of a Safe Detection Level of Asbestos Fiber in Baby Powder Talc, 8/15/74.			
3947		3/11/1976	Letter to N Estrin, from FF Roesch, Whittaker, Clark & Daniels; Re: August 1971 Test Program, 3/11/76; WCD000012.			
3948		3/15/1976	Letter to HJ Eiermann, FDA, from NF Estrin; Re: Current status of talc, 3/15/76; WCD000004.			

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3949		8/21/1975	Minutes of the CTFA Standards Committee Meeting, 8/21/75; JNJALC000169056-169059.			
3950		11/30/1978	Annual Scientific Meeting, Advance Registration, November 30 - December 1, 1978.			
3951		9/28/1974	Minutes of the CTFA Scientific Advisory Committee, 9/28/74; JNJALC000071013-71016.			
3952		5/7/2001	Minutes of the Scientific-Advisory Executive Committee, 5/7/01; PCPC000005501-5510.			
3953		12/28/1973	President's Message, 12/28/73; WCD000060-63.			
3954		8/18/1976	Letter to NF Estrin, CTFA, from HD Stanley, Pfizer; Re: Your Letter of August 9 and No detectable asbestos minerals, 8/18/76; PFI KA 00000814-815.			
3955		1/8/1974	Letter to G Sandland, Bristol-Myers, from NF Estrin; Re: Meeting on Jan 4 with FDA, 1/8/74.			
3956		Undated	CTFA Brochure, Undated; CAMC-Herford-000056-82.			
3957		6/18/2021	Cosmetics Trade Group Escapes J&J Asbestos-In-Yalc MDL, B Wichert, Law360, 6/18/21.			
3958		5/31/2011	Press Release - John Bailey, PhD, to Retire After Nine Years as Scientist for the Personal Care Products Council, 5/31/11.			
3959		2/2/2001	Luzenac America Email to R Zazenski, from R Bernstein; Re: NTP Activity Update, 2/2/01; IMERY288588.			
3960		Undated	CTFA Task Force Memo to G Sandland, from FR Rolle; Re: Results of Round Robin Analysis Using Proposed CTFA "Cookbook" Procedures for the Detection of Asbestos in Talc, Undated; JNJ000308074-76.			
3961		3/17/1997	Letter to J Hopkins, J&J Consumer Products Worldwide, from AP Wehner; Re: Comments faxed to you on March 16, 3/17/97; JNJ000015538.			
3962		4/26/2000	Memo to Talc Interested Party Task Force, from LJ Loretz; Re: Talc Document - Response to NTP Review, 4/26/00; Attachment: "Cosmetic Talc is NOT a Carcinogen," AP Wehner, April 2000.			
3963		12/18/2000	CTFA News Flash - NTP Board Votes Against Listing Talc, 12/18/00.			
3964		11/3/1985	Final Registration, CTFA Scientific Conference, November 3-6, 1985.			
3965		1/1/1976	CTFA By-Laws, 1976.			
3966		10/24/1976	Advance Registration List, CTFA Scientific Conference, October 24-27, 1976.			
3967		10/22/1975	Program, CTFA Scientific Conference, October 19-22, 1975.			
3968		8/3/1971	CTFA Report on Asbestos and Talc Meeting, 8/3/71; JOJO-MA2330-0070-80.			
3969		8/15/2012	Scientific Literature Review, Talc as Used in Cosmetics, Cosmetic Ingredient Review (CIR), 8/15/12.			
3970		11/12/2018	About the Cosmetic Ingredient Review (CIR), 11/12/18. www.cir-safety.org			
3971		7/9/2012	FDA Regulation of Cosmetics and Personal Care Products, AK Corby-Edwards, Congressional Research Service, 7/9/12.			
3972		3/6/2014	Letter to the Personal Care Products Council and Independent Cosmetics Manufacturers and Distributors Concerning the Proposed Draft Legislation, from the FDA; 3/6/14.			
3973		7/21/1993	Draft Minutes of the Talc Interested Party Task Force, 7/21/93; JNJ000011704-11708.			
3974		1/1/1977	CTFA Cosmetic Ingredient Dictionary, Second Edition, NF Estrin, Ed, CTFA, 1973, 1977.			

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3975		12/15/2009	2009 Regulatory Science Summit, December 15-16, 2009; PCPC0060136-60413.			
3976		12/17/1979	Letter to the CPSC Office of the Secretary, from EE Bachrach, PCPC; Re: Asbestos, 12/17/79.			
3977		7/8/1976	Pfizer Memo to RE Norwood, from HD Stanley; Re: Minutes of the CTFA Talc Subcommittee Meeting, 7/27/76; Minutes of the CTFA Talc Subcommittee, 7/8/76; PFZ01162_017811-017820.			
3978		2/26/2018	About Us, A Centennial History of the Personal Care Products Council, 2/26/18. www.personalcarecouncil.com			
3979		9/11/2015	Innovation, PCPC News & Info, Twitter, 9/11/15.			
3980		Undated	PCPC Statement - As Science Advances... Undated.			
3981		3/24/1976	Letter to HJ Eiermann, FDA, from NF Estrin; Two letters to supplement our March 15th submission, 3/24/76; WCD000104-106.			
3982		11/30/2000	Letter to Dr MS Wolfe, NTP, from G McEwen; Re: Review of Nominations for Listing in the 10th Report on Carcinogens (65 Fed Reg 65352): Non-Asbestiform Talc, 11/30/00.			
3983		10/18/1993	Letter to AP Wehner, from SD Gettings; Re: Review by Dr Gross on the epidemiology of talc and ovarian cancer, 10/18/93; PCPC0080613-8616.			
3984		10/1/1977	Microbiology, F Wertalik, Schering-Plough, CTFA Cosmetic Journal, October/December 1977; CTFA NRLF 00269-270.			
3985		9/17/1974	Pfizer Memo to RE Norwood, from HD Stanley; Re: Meeting Notes of CTFA Talc Subcommittee, 9/17/74; PFZ_01162-016060-72.			
3986		6/27/1974	Minutes of the CTFA Task Force on Methodology for the Detection of Asbestos in Talc, June 21, 1974, 6/27/74; PFZ01162_016055-56.			
3987		5/11/2009	Email to SST and L Loretz, from J Bailey; Re: Notes from Meeting with FDA on Talc, 5/11/09; PCPC0005505-5507.			
3988		11/17/1994	CTFA Response Statement - Talc, 11/17/94; LUZ000250.			
3989		10/27/2000	Confidential Memo to I Malbin, from E Dezenhall and E Solovyov; Re: Proposal: Defendaing Cosmetic Talc, 10/27/00; JNJ000010808-10812.			
3990		8/17/2018	Personal Care Products Council Membership Listing, 8/17/18. www.personalcarecouncil.com			
3991		6/6/1995	Memo to Talc Interested Party Task Force, from SD Gettings; Re: CTFA Response to Citizen's Petition, 6/6/95; QE-CPC00000870-907.			
3992		Undated	How Legislation Potentially Affects Harmful Chemicals in Your Beauty Products, A Westervelt, Tenn Vogue, Undated.			
3993		10/30/2012	CIR Email to M Fiume and I Boyer, from B Heldreth; Re: Talc, 10/30/12; PCPC0002613-2614.			
3994		8/9/2012	CIR Email to I Boyer, et al, from A Andersen; Re: Talc - coming down the home stretch, 8/9/12; PCPC0002601.			
3995		10/27/1982	Ad Hoc Talc Task Force Committee Meeting Attendance, 10/27/82; JNJTALC000473476-473477.			
3996		3/1/1978	Letter to C Haynes, from JP Schelz, CTFA; Re: Round Robin Codes, 3/1/78; JNJNL61_000062534-62535.			
3997		Undated	Powerpoint Presentation - CTFA, Undated; PCPC0052415-52426.			
3998		1/1/2008	Personal Care Products Council Public Affairs Issues Messaging Guide, 2008; PCPC0017629-17696.			
3999		Undated	PCPC On-Line Infobase, Undated. www.personalcarecouncil.org			
4000		Undated	International Regulatory Database (IRDB), PCPC, Undated. www.personalcarecouncil.org			

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4001		Undated	Council Global Issues Management, Undated.			
4002		5/8/2009	Memorandum of Meeting, Subject: Talc, 5/8/09; IMERY5266294-266295.			
4003		Undated	Powerpoint Presentation - CTFA, Undated; PCPC0052415-52426.			
4004		Undated	Powerpoint Presentation - CTFA Consumer Web Page, J Hurson, Undated.			
4005		9/15/2006	Powerpoint Presentation - CTFA Scientific Advisory Committee, 9/15/06.			
4006		5/25/1999	Talc Timeline, 1961-1999, 5/25/99; PCPC0018533-18554.			
4007		6/21/1979	Letter to A Romero, NIOSH, from NF Estrin; Re: Comments on the SRI Talc Report, 6/21/79; ING000005-327.			
4008		6/30/2009	Letter to LM Katz, FDA, from J Bailey; Re: Responses to Questions Concerning Talc, 6/30/09; AB-ITA-21-000033-40.			
4009		10/4/2017	Defendant Personal Care Product Council's Responses and Objections to Plaintiffs' First Set of Interrogatories, In Re Johnson and Johnson Talcum Powder Products Marketing, Sales Practices, and Products Liability Litigation, US District Court, New Jersey, 10/4/17. Verified			
4010		Undated	Powerpoint - Overview of Cosmetis and Talc, J Cai, PCPC Talc Task Force, Undated.			
4011		2/10/2009	Powerpoint - Key Summary of Asbestos Meeting, Beijing, China, J Cai, 2/10/09.			
4012		10/2/2006	CTFA Consumer Information Website, Procedure for Development of Web Site Messages, 10/2/06; PCPC000005455-5461.			
4013		12/12/2000	Minutes of the Safety and Regulatory Toxicology Committee, 12/12/00; PCPC001398-1411.			
4014		3/12/1997	Pharmacology & Toxicology Committee and Alternatives Testing Task Force Minutes, 3/12/97; PCPC001383-1386.			
4015		2/13/1997	Pharmacology & Toxicology Committee Meeting Minutes, 2/13/97; PCPC001378-1382.			
4016		1/31/1996	Pharmacology & Toxicology Committee Meeting Minutes, 1/31/96; PCPC001372-1377.			
4017		6/13/1977	Minutes of the CTFA Task Force on Round Robin Testing of Consumer Talcum Products for Asbestiform Amphibole Minerals, May 17, 1977, M Westman, 6/13/77; Goodhue WCD0000164-66.			
4018		1/27/1978	Letter to NF Estrin, CTFA, from PS Kay, Dupont; Re: Your letter of December 27 to Mr AH Lawrence re an advertisement, 1/12/78; Letter to G Lawrence, Dupont, from NF Estrin; Re: Attached booklet, 12/27/77; Goodhue WCD000796-97.			
4019		7/17/1971	J&J Memo to JC Walcott, from W Nashed; Re: Special Talc Project No 503, CTFA Phone Call, 7/17/71; JNJ 000258113.			
4020		2/22/1974	Pfizer Memo to RE Norwood, from HD Stanley; Re: CFTA Sub-Committee; Talc Analytical Methodology Meeting, 2/22/74; PFI KA 00000603-611.			
4021		3/8/1976	Johnson & Johnson Memo for CTFA Talc Meeting on March 11, 1976, Cosmetic Talc Status, 3/8/76.			
4022		3/15/1976	Letter to NF Estrin, CTFA, from G Lee, Johnson and Johnson; Re: Examinations for Asbestos in Talc, 3/15/76; WCD000009.			
4023		3/12/1976	Letter to N Estrin, CTFA, from RA Mundy, Sterling Drug; Re: Testing of ZBT Baby Powder, 3/12/76.			
4024		1972-1973	CTFA-FDA Scientific Liaison Report, H Schwartz, CTFA Cosmetic Journal, 1972-1973; QE-CPC00001182-91.			
4025		1/1/1977	CTFA Annual Report, 1977; LoGiudice/WCD/0480-0495.			

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4026		3/12/1976	CTFA Correspondence with FDA, Industry and Testing Labs regarding Talc Analyses, 3/12/76 to 3/15/76; FISHBAINWCD-000000001-9.			
4027		5/21/1997	Memo to Talc Interested Party Task Force, from SD GettingsRe: Attached Fax from C Sinnex; Re: Talc, 5/21/97; AV_RODRIGUEZN-0001078-1080.			
4028		11/10/1976	CTFA Talc Subcommittee Meeting Minutes, 11/10/76; JNJNL61 000035190-35191.			
4029		2/5/1993	CTFA Memo to Talc Interested Party Task Force, from SD Gettings; Re: Talc Exposure Assessment, 2/5/93; PCPC000456.			
4030		Undated	Talc-free Face Powder, Undated; PCPC000364.			
4031		12/2/2010	Personal Care Products Council Board of Directors Meeting, 12/2/10; JNJTALC000441239-441321.			
4032		4/19/2006	Draft Minutes of the Safety and Regulatory Toxicology Committee, 4/19/06; JNJTALC000107149-107156.			
4033		1/1/1972	Who's Who in the Cosmetics Industry, CTFA, 1972; LoGiudice/WCD/0006-83.			
4034		3/31/1977	Letter to NF Estrin, CTFA, from J Schelz, Johnson & Johnson; Re: Tables representing the initial work-up of data from Task Force Labs, 3/31/77; JNJNL61 000020469-70.			
4035		11/30/1993	Draft Minutes of Talc Interested Party Task Force, 11/30/93; IMERYS095244-24679.			
4036		2/7/1994	Letter to S Gettings, from EF McCarthy, Luzenac; Re: Talc seminar, 2/7/94; IMERYS095245-095247.			
4037		2/11/1994	Luzenac Memo to RD Baker, from B Ducasse; Re: Workshop on Talc: Consumer Uses and Health Perspectives, 2/11/94; IMERYS095356-095369.			
4038		4/4/2001	CTFA Memo to Talc Interested Party Task Force, from LJ Loretz; Re: Summary Table - Talc, 4/4/01; IMERYS061702-061710.			
4039		8/2/1993	Letter to S Gettings, from WH Ashton, Johnson & Johnson; Re: Talc - Dr Cramer, 8/2/93; PCPC000496-511.			
4040		3/25/1983	CTFA Memo to Talc Subcommittee, from J Whelan; Re: NIOSH Paper, 3/25/83; PCPC000543-562.			
4041		6/7/1994	Letter to SD Gettings, from DC Havery, FDA; Re: Questions about talc, 6/7/94; AV STD 002101-2102.			
4042		7/22/1992	Letter to S Gettings, from N Genco, Pfizer; Re: Pfizer Microtalc MP 10-52 used in NTP inhalation study, 7/22/92; AV STD 024431-24434.			
4043		1/2/1985	The Cosmetic Industry: Scientific and Regulatory Foundations, NF Estrin, Ed, 1/2/85; AV STD 002996-3008.			
4044		2/2/1993	Talc Interested Parties Agenda and Attendance List, 2/2/93; with handwritten notes; AV STD 000978-979.			
4045		8/5/1974	Letter to FR Rolle, Johnson & Johnson, from W Luckewicz, Avon; Re: Results of Eleven Roun Robin talc samples given to members on June 21, 1974, 8/5/74; AV STD 025330.			
4046		1/10/1974	Letter to G Sandland, Bristol-Myers, from NF Estrin; Re: Need for industry to supply data on talc concentrations in breathing area, 1/10/74; AV STD 027357.			
4047		8/29/1980	Letter to GW Sandland, Bristol-Myers, from CR Haynes; Re: Letter of resignation, 8/29/80; WCD-McBride(IN)-002479-2480.			
4048		4/27/1981	Memo to Talc Subcommittee, from M Young; Re: Information Packet, 4/27/81; WCD-McBride(IN)-002756-2758.			
4049		1/1/1971	By-Laws of the CTFA, 1971; WCD-McBride(IN)-002768-2771.			

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4050		3/13/1976	Industry & FDA studies Show Talc Purity, Trade & Govt Memos, 3/13/76; WCD-McBride(IN)-003121.			
4051		12/18/2000	NTP Board Votes Against Listing Talc, CTFA News Flash, 12/18/00; WCD-McBride(IN)-003125.			
4052		1/23/1974	WCD Memo to FF Roeschand G Dippold, from RR Krammes; Re: CTFA Subcommittee Meeting on Talc, 1/23/74; WCD-McBride(IN)-004040-4081.			
4053		2/19/1976	Bristol-Myers Memo to Members of CTFA Talc Subcommittee, from GW Sandland; Re: Meeting of subcommittee on March 11, 1976, 2/19/76; WCD-McBride(IN)-004121-4123.			
4054		3/15/1976	Handwritten Notes on Meeting between FDA and CTFA; Re: Asbestos/Talc, 3/15/76; WCD-McBride(IN)-004159.			
4055		3/15/1976	Handwritten Notes on Johnson & Johnson Contact; Re: Asbestos/Talc, 3/15/76; WCD-McBride(IN)-004166.			
4056		3/11/1976	Summary Report of CTFA Talc Subcommittee, March 11, 1976 Meeting, 3/18/76; WCD-McBride(IN)-004170-4175.			
4057		5/27/2004	Email from L Loretz; Re: Talc RoC Nomination - Background Info, 5/27/04; with attachments; IMERY5286697-286712.			
4058		8/12/1982	Study Claims Talc Possible Carcinogen, Inside News from CTFA, 8/12/82; NOXELL-CG-000708-709.			
4059		3/12/1976	Letter to N Estrin, from HT Mulryan, Cyprus Minerals; Re: program to test Montana talc, 3/12/76; WCD000105.			
4060		3/22/1976	Letter to N Estrin, from R Suffis, Mennen; Re: WCD and Mennen Testing of talcs used by Mennen, 3/22/76; WCD000106-107.			
4061		8/27/1975	Minutes of the CTFA Standards Committee Meeting on August 21, 1975, 8/27/75; Goodhue WCD0000142-45.			
4062		12/21/1973	Minutes of the CTFA Talc Subcommittee, December 7, 1973, 12/21/73; Goodhue WCD000227-31.			
4063		6/22/1979	CTFA Executive Newsletter, 6/22/79; MENNEN-00002336-2341.			
4064		4/21/1977	Letter to Round Robin Participant, from P Schelz; Re: Comparative Work-up of data, 4/21/77; JNJNL61_000020544-45			
4065		11/22/1977	Memo to N Estrin, CTFA, from G Lee; Re: Dupont Instrument Products Division Literature on DTA Unit, 11/22/77; JNJNL61_000020439-40.			
4066		5/10/1976	Talc Summary for CTFA Scientific Advisory Committee, DR Petterson, 5/10/76; JNJ000298996.			
4067		8/26/1975	Memo to Talc Advisory Group, from G Lee; Re: CTFA Cosmetic Talc Specification, 8/26/75; JNJNL61_000020289-91.			
4068		6/27/1995	Memo from DF Jones, Johnson & Johnson; Re: CTFA Response to Cancer Prevention Coalition Citizen's Petition, 6/27/95; Comments of the CTFA in Response to A Citizen's Petition Filed with the FDA on November 17, 1994, June 1995; JNJ000021285-322			
4069		11/28/1977	Letter to R Krammes, Whittaker, Clark & Daniels, from JR Schelz, Johnson & Johnson; Re: Results of CTFA Round Robin Retest, 11/28/77; CTFA Talc Subcommittee Task Force on Round Robin Testing of Major Consumer Products for Asbestiform Amphibole Minerals, 12/6/77; Summary Report, 3/11/76.			
4070		1/1/1976	Letter to Round Robin Participant, from P Schelz, Johnson & Johnson; Re: Coded Samples, 1976; JNJ000250524-525.			
4071		3/21/1973	Meeting of Talc Group, 3/21/73; WCD000178-82.			

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4072		3/15/1976	Letter to HJ Eierman, FDA, from NF Estrin; Re: Current status of talc, 3/15/76; CTFA Memo to NF Estrin, from AS Curry; Re: Current talc analyses. 3/12/76: WCD000004.			
4073		9/16/1975	Letter to GW Sandland, Bristol Myers, CTFA Talc Subcommittee, from FF Roesch, Whittaker, Clark & Daniel; Re: Asbestos testing program, 9/16/75: CK-HAPPY-23.			
4074		11/1/1982	Cyprus Memo from D Van Peenen; Re: Attendance at Meeting of Interested Parties to Address Issues of Talc and Ovarian Cancer; CTFA, Washington DC, October 1982, 11/1/82; AB-CYP-21-000019-20.			
4075		3/15/1976	Letter to HJ Eiermann, FDA, from NF Estrin; Re: Current status of talc, 3/15/76; With attached Member Letters.			
4076		12/19/1973	Givernment Relations Committee, Tentative Agenda and Committee Worksheet, 12/19/73; Mennen-00000843-845.			
4077		6/26/1995	CTFA Questions Scientific Basis of Talc Ovarian Cancer Warning, FDA Reports - "The Rose Sheet", 6/26/95; LUZ000225-228.			
4078		5/1/2000	Luzenac Memo to E Turner, from RS Bernstein; Re: NTP Nomination of Talc, 5/1/00; LUZ02207-2208.			
4079		5/26/1993	Cosmetics, Pharmaceuticals and Food Market Analysis, Luzenac America, 5/26/93; IMERYS204511-204555.			
4080		3/24/1997	Talc Usage by Industry from 1997 Competition Database, Luzenac America, 3/24/97; IMERYS231100.			
4081		7/9/2010	Defendant Chattem, Inc's Objections and Responses to Plaintiffs' Supplemental Requests for Admission, Interrogatories and Requests for Production of Defendant, Chattem, Inc, Cavallero v Agway, Inc. et al. 7/9/10.			
4082		4/27/1999	Luzenac America Memo to B Beck, et al, from J Gauntt; Re: Cosmetic Accounts, 4/27/99; IMERYS056132-056141.			
4083		6/1/1997	Cosmetics, Food and Pharmaceutical Market Analysis, GE Gauntt, Luzenac America, June 1997; IMERYS231083-231106.			
4084		1/1/2015	Chattem, About Us, 2015. www.chattem.com			
4085		7/6/2017	Imerys Talc America, Inc's and Cyprus Amax Mineral Company's Responses to Plaintiffs' First Supplemental Interrogatories and Document Requests, Teuscher v Brenntag North America, Inc, et al. 7/6/17.			
4086		1/1/1979	Evaluation of the Health Aspects of Certain Silicates as Food Ingredients, Prepared for the FDA, Life Sciences Research Office, 1979.			
4087		3/6/2014	Letter to the Personal Care Products Council and Independent Cosmetics Manufacturers and Distributors Concerning the Proposed Draft Legislation, FDA, 3/6/14.			
4088		10/17/2017	Cosmetics Q&A: Why are cosmetics not FDA-approved? 10/17/17. www.fda.gov			
4089		10/18/2012	Ingredient Evaluation Submission Form, Talc USP, Imerys Talc America, Project No RMI 12-050, 10/18/12; CHATTEMGB-WOODS-000005-112.			
4090		1/1/2017	USP Monographs: Talc, 2017. www.uspnf.com			
4091		1/1/2014	Stimuli to the Revision Process: Modernization of Asbestos Testing in USP Talc, LH Block, D Beckers, K Moore, et al, 2014; CHATTEM-GOLDBOND-005678-5687.			
4092		11/16/2021	Chattem: Index to Notebook, Woods Case			
4093		11/8/2004	Third Party Manufacturer Lab Specifications, Gold Bond Extra Strength Powder, Formula 201-65, Supplier: Pharma Tech, 11/8/04; CHATTEMGB-WOODS-000893-894.			
4094		2002-2014	Approved Labeling for Gold Bond Body Powder, 2002-2014; CHATTEMGB-WOODS-004550-4705.			

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4095		10/31/2015	Chattem Safety Data Sheet, Gold Bond Foot Powder, 10/31/15; CHATTEMGB-WOODS-001432-1438.			
4096		10/31/2015	Chattem Safety Data Sheet, Gold Bond Extra Strength Powder, 10/31/15; CHATTEMGB-WOODS-000903-909.			
4097		1/9/1997	R&D Memo to File, from G Hughey; Re: Product Release for Baby Gold Bond Powder - Formula #201-73, 1/9/97; CHATTEMGB-WOODS-000325-408.			
4098		5/20/1996	Chattem Material Specification, Talc USP, No 1745 & WEMP 60-30, Specialty Minerals/WCD, Stock Number 0024459, 5/20/96; Whittaker Clark & Daniels Material Safety Data Sheets; CHATTEMGB-WOODS-000393-398.			
4099		Undated	Blending Control Checklist, Baby Gold Bond, Pharma Tech Industries, Undated; CHATTEMGB-WOODS-000361.			
4100		10/15/1996	Formula for Baby Gold Bond (New & Improved), Formula 201-73, 10/15/96; CHATTEMGB-WOODS-000362-364.			
4101		10/2/2009	Letter to D Schilling, from JC Parks, Minerals Technologies/Barrett Minerals; Re: Response to your inquiry concerning the regulatory status of talc products, 10/2/09; CHATTEM-GOLDBOND-006258.			
4102		4/13/2021	MAS Project #M71216, Two JBP, one Gold Bond Off-the-Shelf Talcum Powder Containers: Purchased from Lucky's, Talcum Powder Analysis, WE Longo, MAS, 4/13/21.			
4103		9/8/2021	MAS Project M71381, M71382, M71383 & M71385, Talcum Powder Analysis of Gold Bond Medicated Powder, WE Longo, MAS, 9/8/21.			
4104		9/10/2021	MAS Project M71134 & M71376 Talcum Powder Analysis of Gold Bond Medicated Powder, WE Longo, MAS, 9/10/21.			
4105		6/12/1972	Talc Analysis (Asbestos), Product No 399, Montana, WCD 6/72-1, ES Laboratories, 6/12/72; Booker WCD 001038-1040.			
4106		6/12/1972	Talc Analysis (Asbestos), Product No 1731, Montana, WCD 6/72-1, ES Laboratories, 6/12/72; WCD Greco 000722-725.			
4107		8/16/2021	Barretts Minerals, Inc's Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production, In Re: Seventh Judicial District Asbestos Litigation, Woods v Kolmar Laboratories, Inc. et al. 8/16/21: Verified.			
4108		10/29/1973	Johns-Manville Report 414-3, Discussion, 10/29/73; MTC 000563-591; Affidavit.			
4109		9/28/2000	Letter to L Kirk, Maxim Technologies, from KA Allison, RJ Lee; Re: Asbestos Results for Samples as Shown on Table I, RJ Lee Grp Inc Job No ATH009021, Client Purchase Order: 9902295-310 Yellowstone Mine S40 Pit. 9/28/00.			
4110		7/17/2000	Letter to J Parks, Barretts Minerals, from L Kirk, Maxim Technologies; Re: Transmittal of Personal Air Monitoring Results, Treasure Mine, Dillon, Montana, 7/17/00.			
4111		9/1/2000	Letter to L Kirk, Maxim Technologies, from WH Powers, RJ Lee; Re: PLM Point-Count Analysis for Samples, Job: AOH008699, Client Job No 9902295, 9/1/00.			
4112		6/30/2000	Letter to L Kirk, Maxim Technologies, from WH Powers, RJ Lee; Re: PLM Point-Count Analysis, Job: AOH005990, Maxim Project No 27153, 6/30/00.			
4113		1/9/2003	Maxim Technologies Memo to M Cerino, Luzenac, from S Matolyak and L Kirk; Re: Luzenac Yellowstone Mine 2002 Geochemical Monitoring, 1/9/03; ITA-Greco-000474-486.			
4114		8/1/2011	Imerys Talc Technical Report to N Sauvageau, from A Zamurs; Re: TEM Asbestos Analysis of Yellowstone Product Samples, Q2 2011, Project No A11366, 8/1/11; ITA-Greco-001008-1010.			

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4115		2/27/2017	TEM Asbestos Analysis of Yellowstone Ore Composites, Summary Report, 2/27/17.			
4116		3/9/2006	Consumer Incident Report, Incident No 084756, Gold Bond Medicated Powder, 3/9/06; CHATTEM-GOLDBOND-006017-6020.			
4117		9/5/2002	Consumer Incident Report, Incident No 062091, Gold Bond Baby Medicated Powder, 9/5/02; CHATTEM-GOLDBOND-006098-6099.			
4118		6/10/2008	Consumer Incident Report, Incident No 108434, Gold Bond Ex St Medicated Powder, 6/10/08; CHATTEM-GOLDBOND-006021-6108.			
4119		Undated	16858-4 2Q05, MP 60-30 USP, Barretts Minerals, Undated; BMI WOODS 000469.			
4120		Undated	Inactive Mines, Prospects and Occurrences, Montana			
4121		1/23/1996	Barretts Minerals Talc Warning Label, 1/23/96.			
4122		12/21/2010	Minerals Technologies/Barretts Minerals Material Safety Data Sheet (MSDS) for Microtalc, 12/21/10.			
4123		4/8/1993	Letter from RA Miller, State of Montana; Re: Barretts Minerals expansion of mine permit area, 4/8/93.			
4124		2/1/2001	Final Environmental Impact Statement Amending and Adopting the Draft Environmental Statement, Barretts Minerals Regal Life-of-Mine Expansion Plan, February 2001.			
4125		10/1/2009	Specialty Minerals Mine to Market Powerpoint - Body Talc, V Joshi, October 2009; JNJTALC000076981-77026.			
4126		6/23/2022	Declaration of William E Longo re Testing of 21 Gold Bond Containers, 6/23/22.			
4127		11/2/2022	Affidavit of Steven M. Weisman, Ph. D, 11/2/22.			
4128		Undated	Photographs of Gold Bond Body Powder.			
4129		11/30/1996	Chattem, Inc Annual Report for the Fiscal Year, Securities and Exchange Commission, 11/30/96.			
4130		3/4/2015	Approved Label Claims Form, Product Name: Gold Bond Ultimate Comfort Powder, Ingredient Listing No: 245-055, Version No: 1, Prepared by K Moore, 3/4/15; CHATTEM-GOLDBOND-076951-76952.			
4131		12/1/1994	Luzenac America Sales Report, Cosmetics/ Pharmaceuticals, Industry Sales by Customer by Product, December 1994; IMERY5213926-213965.			
4132		7/6/1998	Luzenac America Domestic Talc Usage in TX, OK, AR, MS, LA from 1998 Competition Database, 7/6/98; IMERY5219749-219801.			
4133		1975-2004	WCD Sales Report to Chattem, 1975-2004; WCD Chamberlain(PA) 000160-171.			
4134		9/1/2014	Imerys Powerpoint Presentation - MTI Profile, L Blackstone, September 2014; IMERY5089787.			
4135		12/31/1980	Luzenac America Sales to Gold Bond, 12/31/80; IMERY5233696.			
4136		Undated	Rio Tinto Powerpoint Presentation - Territory Review - Southeast United States, MJ Keener, Undated; IMERY5125188.			
4137		10/14/2021	MAS Project M71379 Talsum Powder Analysis of Gold Bond Medicated Powder, WE Longo, MAS, 10/14/21.			
4138		6/23/2022	Talc and Asbestos - Gold Bond General Report, D Madigan, 6/23/22.			
4139		7/23/2002	Luzenac Call Report at Pharmatech Industries, MJ Keener, 7/23/02; IMERY5337465.			
4140		1/30/2001	Luzenac Call Report at Pharmatech Industries, MJ Keener, 1/30/01; IMERY5337470.			

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4141		10/10/2001	Luzenac Call Report at Pharmatech Industries, MJ Keener, 10/10/01; IMERY5337467-468.			
4142		1/13/2000	Luzenac Call Report at Pharmatech Industries, MJ Keener, 1/13/00; IMERY5337473-474.			
4143		1/26/1999	Luzenac Call Report at Pharmatech Industries, RR Beck, 1/26/99; IMERY5337489-337490.			
4144		2/2/1998	Luzenac Call Report at Pharmatech Industries, RR Beck, 2/2/98; IMERY5337497-337498.			
4145		10/15/2021	Supplement, MAS Project M71379 Talcum Powder Analysis of Gold Bond Medicated Powder, WE Longo, MAS, 10/15/21.			
4146		3/1/2022	MAS Project M71120 Talcum Powder Analysis of Gold Bond Medicated Powder, WE Longo, MAS, 3/1/22.			
4147		3/7/2022	MAS Project M71376 Talcum Powder Analysis of Sheldon and Sandra Spiegelman's Gold Bond Container, WE Longo, MAS, 3/7/22.			
4148		3/10/2022	Supplemental MAS Project M71376 Talcum Powder Analysis of Sheldon and Sandra Spiegelman's Gold Bond Container, WE Longo, MAS, 3/10/22.			
4149		4/4/2022	MAS Project M23945 Talcum Powder Analysis of Gold Bond Powder, WE Longo, MAS, 4/4/22.			
4150		5/4/2022	MAS Project M71134 Supplement Report Talcum Powder Analysis of Kim Gray's Gold Bond Body Powder Container, WE Longo, MAS, 5/4/22.			
4151		6/10/2022	MAS Project M71535 Talcum Powder Analysis of Gold Bond Containers, WE Longo, MAS, 6/10/22.			
4152		6/22/2022	MAS Project M71534 Talcum Powder Analysis Krista Teigland-Gold Bond Container, WE Longo, MAS, 6/22/22.			
4153		6/22/2022	MAS Project M71536 Talcum Powder Analysis, Jorge Garza - Gold Bond Powder, WE Longo, MAS, 6/22/22.			
4154		6/22/2022	MAS Project M71537 Talcum Powder Analysis, Aubrey Brinneman - Gold Bond Powder, WE Longo, MAS, 6/22/22.			
4155		1990-1996	WCD Sales Report to Stephan Co (Gold Bond), 1990-1996; WCD (NY) Tippin-000031-36.			
4156		1996-2004	WCD Sales Report to Chattem (Gold Bond), 1996-2004; WCD (NY) Tippin-000037-42.			
4157		1/13/1997	Chattem Master Formula 201-132 for Gold Bond Foot Powder, Rev #2, 1/13/97; CHATTEM-GOLDBOND-001715.			
4158		7/17/1998	Luzenac America Call Report at Pharmatech Industries, RR Beck, 7/17/98; IMERY5337492-337493.			
4159		7/23/2002	Luzenac Call Report at Pharmatech Industries, MJ Keener, 7/23/02; IMERY5337466.			
4160		1/24/2022	Excerpt of Defendant Chattem, Inc's Response to Plaintiff's Standard Talc Liability Interrogatories to Chattem, Inc, Tippin v 3M Company, et al, 1/24/22.			
4161		8/27/2012	Chattem Advertising Claims Review for Gold Bond Ultimate Men's Essentials Lotion, 8/27/12; CHATTEM-GOLDBOND-020092.			
4162		3/7/2016	Talc Product Verdict Could Spur Talc-Free Powder Market Growth, R Nelson, The Tan Sheet, 3/7/16; CHATTEM-GOLDBOND-006131.			
4163		8/18/2014	Chattem Approved Labeling Claims Form, Ingredient Listing No 309-170, Gold Bond Ultimate Men's Essentials Body Powder, 10 oz, 8/18/14; CHATTEM-GOLDBOND-020096-20097.			

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4164		8/25/2001	Accelerated Stability Protocol for Gold Bond Medicated Powder, Extra Strength Powder, Baby Powder, Baby Plus Powder, Foot Powder, 8/25/01; CHATTEM-GOLDBOND-001721-1722.			
4165		1/1/1996	MHI COOP Programs, January Through April 1996; CHATTEM-GOLDBOND-005273-5279.			
4166		Undated	Customer Formula No 201-65, Blending, Gold Bond Extra Strength Powder, Change #14U-130, Undated; CHATTEM-GOLDBOND-000765-768.			
4167		10/8/2015	Label Proof, Extra Strength Gold Bond Body Powder, Pharma Tech Industries, 10/8/15; CHATTEM-GOLDBOND-007322.			
4168		12/5/1966	Letter to Customers, from RW Linnett, Pfizer; Re: New coding system for talcs, 12/5/66; AS Wauregan 00461-465,			
4169		6/12/1972	Talc Analysis (Asbestos), Product No 1736, Montana, Code 1731, WCD 6/72-1, ES Laboratories, 6/12/72; AS Wauregan 00353-355.			
4170		6/12/1972	Talc Analysis (Asbestos), Product No 1745, Montana, Code 1745, WCD 6/72-1, ES Laboratories, 6/12/72; WCD Alderice Disc Docs 005471-5473.			
4171		8/28/1973	Johns-Manville Memo to RS Lamar, from VE Wolkodoff; Re: Determination of Chrysotile by TEM in Commercial Talcs, 8/28/73; CRMC-Talc-Micro-001371-1389; Affidavit.			
4172		10/19/1973	Letter to F Roesch, Whittaker, Clark & Daniels, from GW Sandland, Bristol Myers; Re: Six samples of talc, 10/19/73; WCD000141.			
4173		10/29/1973	Johns-Manville Report No 414-3, Rev 10/29/73; MTC 00563-591; Affidavit.			
4174		11/20/1973	Letter to RR Karmmes, Whittaker, Clark & Daniels, from RE Stevens, EF Fullam; Re: Purchase Order No NJ12268, EF Fullam Report No 1621, Analysis of Six Samples of Talc, 11/20/73; WCD-Anderton (NJ) 0328-335.			
4175		10/14/1976	Pfizer Routine Analysis of Montana Talcs - Sept 1976, TS-5222L, 10/14/76; PFZ 01162 003261.			
4176		10/6/1977	Pfizer Memo to WL Hockersmith, from RW Linnett; Re: Talc - California SB 1678, 10/6/77; PFZ001162_05207; PFI_BOOK 00008905.			
4177		10/2/1978	MSHA Memorandum to RV Wilson, from TJ Shepich; Re: NIOSH Study on Talc Deposits in the United States, 10/2/78.			
4178		9/23/1991	Cyprus Industrial Minerals, Western Source, BHC-2 Talc, Project No 91-308, T Landels, 9/23/91; ITA-Alfaro000186-197.			
4179		3/12/2021	Chattem, Inc's Responses to Plaintiff's Supplemental Interrogatories and requests for Production, Woods vs Kolmar Laboratories, Inc, et al, Supreme Court of the State of New York, 3/12/21; Verified.			
4180		6/10/2021	Affidavit of Paul Eichholz, PTI Union, 6/10/21.			
4181		8/13/2021	Specialty Minerals, Inc's Responses to Plaintiffs' Supplemental Interrogatories and Requests for Production, Woods v Kolmar Laboratories, Inc, et al, 8/13/21; Verified.			
4182		11/16/2021	Deposition of Matthew Lochstampfor, Woods v Kolmar Laboratories, Inc, et al, 11/16/21.			
4183		1/1/1898	"Annual Report of the Chief Inspector of Factories and Workshops for the Year, Chief Inspector of Factories," London: His Majesty's Stationery Office, 1898.			
4184		1/1/1916	Diseases of Occupation and Vocational Hygiene, GM Kober and WC Hanson, Eds, 1916.			

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4185		3/1/1918	"A Roentgenologic Study of the Effects of Dust Inhalation Upon the Lungs," HK Pancoast, TG Miller, HRM. Landis, The American Journal of Roentgenology, March 1918.			
4186		6/1/1918	Asbestos, Mortality from Respiratory Diseases in Dusty Trades, FL Hoffman, American Journal of Roentgenology, June 1918.			
4187		7/26/1924	"Fibrosis of the Lungs Due to the Inhalation of Asbestos Dust," WE Cooke, The British Medical Journal, 7/26/24.			
4188		12/3/1927	"Pulmonary Asbestosis," WE Cooke, The British Medical Journal, 12/3/27.			
4189		1/1/1927	"Pulmonary Asbestosis in Its Clinical Aspects," Sir Thomas Oliver, The Journal of Industrial Hygiene, 1927.			
4190		2/4/1928	Abstract of Cooke's 1927 article entitled, "Pulmonary Asbestosis," British Medical Journal and JAMA, 2/4/28.			
4191		1/1/1930	"Report on Effects of Asbestos Dust on the Lungs & Dust Suppression in Asbestos Industry," ERA Merewether & CW Price, HM Stationery Office, UK, 1930.			
4192		1/1/1930	"The Occurrence of Pulmonary Fibrosis and Other Pulmonary Affections in Asbestos Workers," ERA Merewether, The Journal of Industrial Hygiene, 1930.			
4193		1/1/1930	"Asbestos," Occupation and Health – Encyclopedia of Hygiene, Pathology and Social Welfare, Vol. I A-H, International Labor Office, 1930.			
4194		1/1/1930	"Primary Neoplasms of the Pleura: A Report of Five Cases," P Klemperer, CB Rabin, Archives of Pathology, 1930.			
4195		11/1/1931	"The Very Least an Employer Should Know about Dust and Fume Diseases," F Willson, Safety Engineering, November 1931.			
4196		7/24/1931	Workmen's Compensation Act of 1930, The Engineer, Vol. CLI, January to June 1931, 7/24/31.			
4197		1/1/1932	"Memorandum on the Industrial Diseases of Silicosis and Asbestosis," HM Stationery Office, UK, 1932.			
4198		6/1/1932	"Pulmonary Asbestosis," B Gordon, The Pennsylvania Medical Journal, June 1932.			
4199		1/22/1932	"The Marine Engine," Engineering, 1/22/32.			
4200		7/1/1933	"Pulmonary Asbestosis: Its Clinical, Radiological, and Pathological Features, and Associated Risk of Tuberculosis Infection," P Ellman, Journal of Industrial Hygiene, July 1933.			
4201		12/1/1933	"A Memorandum on Asbestosis," ERA Merewether, Tubercle, December 1933.			
4202		1/1/1934	Chapter XI: Dust in Pathology and Physiology: Pneumoconiosis, Dust, S Cyril Blacktin, The Sherwood Press, 1934. (Property of Tennessee Valley Authority Fertilizer Works Library)			
4203		1/1/1934	"Asbestosis," Attorney's Textbook of Medicine; Gray, RN; 1934.			
4204		1/1/1934	Excerpt on Asbestosis, Industrial Maladies, T Legge, 1934.			
4205		1/1/1935	"Memorandum on the Industrial Diseases of Silicosis and Asbestosis," HM Stationery Office, UK, 1935.			
4206		1/1/1935	"Pulmonary Asbestosis III: Carcinoma of Lung in Asbesto-Silicosis," KM Lynch, WA Smith, The American Journal of Cancer, 1935.			
4207		1/1/1935	Excerpt on Dust and Section XIV: Industrial Hygiene and Disease of Occupation, Preventive Medicine and Hygiene, MJ Rosenau, Sixth Edition, 1935.			

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4208		1/1/1935	"The Hazards of Industry," CP McCord, Modern Home Medical Adviser: Your Health and How to Preserve It, M Fischbein, 1935.			
4209		1/4/1935	"Effects of the Inhalation of Asbestos Dust on the Lungs of Asbestos Workers: A Preliminary Study," AJ Lanza, JW Fehnel, Reprint No. 1665 from the Public Health Reports, Vol. 50, No 1, 1/4/35.			
4210		1/1/1935	Industrial Medicine, WI Clark, P Drinker, and M Fishbein, Eds, National Medical Monograph, 1935.			
4211		2/27/1935	Response to Deposition by Written Questions; Re: Exhibit A – Memo from A. J. Lanza to Dr. Armstrong, Met Life; Re: Present status of the dust question in industry, 02/27/35, 8/2/06.			
4212		1/1/1936	Industrial Dust: Hygienic Significance, Measurement and Control, P. Drinker, T. Hatch, First Edition, McGraw-Hill Book Company, 1936.			
4213		1/1/1936	"Pulmonary Asbestosis and Carcinoma: Report of a Case with Necropsy Findings," DS Egbert, AJ Geiger, 1936.			
4214		2/1/1936	"Engineering Control of Occupational-Disease Hazard," WA Cook, Mechanical Engineering, Vol 58, No. 2, February 1936.			
4215		1/1/1937	"The Hazards of Industry," CP McCord, Modern Home Medical Advisor, Chapter XXIV, 1937.			
4216		7/1/1937	"Dust Producing Operations in the Production of Petroleum Products and Associated Activities, A Medico-Safety Survey," RS Bonsib, Standard Oil Company, July 1937.			
4217		1/5/1937	Alton Railroad Company Memo; Re: Protecting workers from Asbestosis and Silicosis, 1/5/37.			
4218		11/26/1937	"A Study of Dust Control Methods in an Asbestos Fabricating Plant," RT Page, JJ Bloomfield, Public Health Report 52, 11/26/37.			
4219		8/1/1938	"A Study of Asbestosis in The Asbestos Textile Industry," WC Dreesen, JM Dallavalle, RR Sayers, Public Health Bulletin No 241, August 1938.			
4220		1/1/1938	Preface and Excerpt on Asbestosis, Cause and Prevention of Disease, WH Perkins, 1938.			
4221		1/1/1938	Abstract of Article entitled, "Occupational Cancer in Asbestos Workers," M Nordmann, Abstract of the Literature of Industrial Hygiene, 1938.			
4222		1/1/1939	"Asbestos" and "Asbestosis," Encyclopedia Americana, 1939.			
4223		1/1/1940	Chapter 51: Asbestosis, Attorney's Textbook of Medicine, Gray, RN, 1940.			
4224		1/1/1940	"Industrial Welfare and Medicine" and "Industrial Workers of the World," Encyclopedia Britannica, 14th Edition, Vol. 12, 1940.			
4225		1/1/1941	Occupation Hazards and Diagnostic Signs: A Guide to Impairments to be Looked for in Hazardous Occupations, Bulletin No 41, LI Dublin, RJ Vane, OSHA, 1941.			
4226		1/1/1942	Excerpt on Cancers of the Respiratory System, Occupational Tumors and Allied Diseases, WC Hueper, 1942.			
4227		4/1/1942	"The Occupational Disease Hazard," WA Cook, Industrial Medicine, April 1942.			
4228		1/1/1942	"Bronchiogenic Carcinoma In Association with Asbestosis: Report of Two Cases," HB Holleb, A Angrist, American Journal of Pathology, 1942.			
4229		1/1/1942	"Asbestos," Britannica Book of the Year, 1942.			

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4230		1/1/1942	Chapter 24: The Hazards of Industry," CP McCord, Modern Home Medical Adviser: Your Health and How to Preserve It, M Fischbein, 1942.			
4231		1/1/1942	"Asbestos," The Simplified Medical Dictionary for Lawyers, B Maloy, Callaghan and Company, 1942.			
4232		5/1/1943	"Cancer in Its Relation to Occupation and Environment," WC Hueper, Bulletin of the American Society for the Control of Cancer, May 1943.			
4233		1/1/1943	Asbestosis, The Principles and Practice of Industrial Medicine, FJ Wampler, Ed, 1943.			
4234		2/28/1943	"Wartime Operations Emphasize Industrial Hygiene Problems of Asbestos Industry," Illinois Department of Labor Bulletin, 2/28/43.			
4235		3/20/1943	"Lung Cancer in Asbestosis Patients," HW Wedler, Dtsch. Arch. Klin. Med. 191, pp. 189-209, 3/20/43. (German to English translation)			
4236		1/1/1943	"Asbestosis and Lung Cancer," HW Wedler, German Medical weekly, Duetsche Medizinische Wochenschrift, 1943. (German to English Translation)			
4237		1/1/1943	1021 Answers to Industrial Health and Safety Problems, JE Weiss, Ed, Occupational Hazards, First Printing 1943; Affidavit.			
4238		1/1/1943	Part II: Prevention and Control of Disease In Industry, Chapter 9: The Problem of Occupational Disease, WC Dreesen, Manual of Industrial Hygiene and Medical Service in War Industries, WM Gafaer, 1943.			
4239		1/1/1943	"Cancer in Its Relation to Occupation and Environment," WC Hueper, The Bulletin of the American Society for the Control of Cancer, January 1943.			
4240		1/1/1943	The Pneumokonioses, Excerpt from The Pathology of Internal Diseases, W Boyd, 4th Ed, 1943.			
4241		1/1/1944	Abstract of Article entitled, "Asbestosis and Pulmonary Care," HW Wedler, Bulletin of Hygiene, January 1944.			
4242		6/1/1944	"Dust as an Industrial Health Hazard," FW Hutchinson, Heating and Ventilating, June 1944.			
4243		9/1/1945	"Safety- It Must Be Planned," L Brady, Southern Power and Industry, September 1945; Affidavit.			
4244		12/1/1945	"Industrial Hygiene," NV Hendricks, Southern Power and Industry, December 1945; Affidavit.			
4245		1/1/1946	"Industrial Hygiene," NV Hendricks, Southern Power and Industry, January 1946; Affidavit.			
4246		11/1/1946	"Hygienic Importance of Dust," NV Hendricks, Southern Power and Industry, November 1946; Affidavit.			
4247		1/1/1946	"A Health Survey of Pipe Covering Operations in Constructing Naval Vessels," WE Fleischer, P Drinker, Journal of Industrial Hygiene and Toxicology, January 1946.			
4248		4/1/1946	Part I, Manual L-1 – A Guide for the Preparation of Warning Labels for Hazardous Chemicals, Manufacturing Chemists Association of the United States, Adopted 1945, Revised April 1946.			
4249		1/1/1947	Excerpt from Industrial Health Engineering, AD Brandt, 1947.			
4250		4/12/1949	Report on "Summary of the Plant Industrial Hygiene Problems," C Berry, JW Hammond, RS Bonsib, NV Hendricks, 4/12/49.			
4251		8/13/1949	"Asbestosis and Cancer of the Lung," JAMA, 8/13/49.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4252		1/1/1949	Annual Report of the Chief Inspector of Factories for the Year 1947, London: His Majesty's Stationery Office, January 1949.			
4253		1/1/1949	"Cancer and Environment," G Conklin, Scientific American, January 1949.			
4254		6/24/1949	"Pleural Mesothelioma," WN Campbell, Submitted to the Faculty of the School of Medicine of Temple University, 6/24/49.			
4255		1/1/1950	Asbestosis, Excerpt from The Merck Manual of Diagnosis and Therapy, 1950.			
4256		5/15/1950	"Small Studies," Newsweek, 5/15/50.			
4257		1/1/1950	Chapter 24: The Hazards of Industry," CP McCord, Modern Home Medical Adviser: Your Health and How to Preserve It, M Fischbein, 1950.			
4258		10/18/1950	"Survey of Some Current British and European Studies of Occupational Tumor Problems," WE Smith, Presented at the Cancer Prevention Committee in New York, 10/18/50.			
4259		1/1/1951	Excerpt from Chapter 97: Pulmonary Disorders Due to Inhalation of Noxious Agents, JS Chapman, Principles of Internal Medicine TR Harrison, Ed, 1951.			
4260		1/1/1951	"Asbestosis," The Simplified Medical Dictionary for Lawyers, BS Maloy, 1951.			
4261		1/1/1952	Cancer, Excerpt from The Encyclopedia Britannica, Vol 4, 1952.			
4262		1/1/1953	Chapter 24: Occupational Health, CP McCord, EE Dart, Modern Home Medical Adviser: Your Health and How to Preserve It, M Fischbein, Ed, 1953.			
4263		1/1/1953	Respiratory System Diseases, Encyclopedia Britannica, 1953.			
4264		1/1/1953	"Some Clinical Observations of Asbestosis in Mine and Mill Workers," P Cartier, Symposium on Occupational Diseases of the Lungs, Mass Medical Society and Institute of Industrial Medicine, 1953.			
4265		1/1/1953	Chapter 16: The Chemical and Genetic Mechanisms of Carcinogenesis and Chapter 26: Environmental Cancer, The Physiopathology of Cancer; A Treatise for Investigators, Physicians, and Students, F Homburger, Ed, 1st Edition, 1953.			
4266		1/1/1955	"Mortality from Lung Cancer in Asbestos Workers," Richard Doll, British Journal of Industrial Medicine, 1955.			
4267		1/1/1955	The Pneumoconioses, Excerpt from The Diseases of Occupation, D Hunter, 1955.			
4268		9/1/1956	Prepared Discussion, HE Stokinger, Industrial Hygiene Association Quarterly, September 1956.			
4269		1/1/1956	Industrial Medicine and Hygiene, Vol 3, ERA Merewether, 1956.			
4270		1/1/1956	"Chapter 24: Occupation and Health," CP McCord, EE Dart, Modern Home Medical Adviser: Your Health and How to Preserve It, M Fischbein, Ed, 1956.			
4271		1/1/1956	"Occupation and Cancer," The Truth About Cancer, CS Cameron, 1956.			
4272		1/1/1956	Excerpt from Safety Management, Accident Cost and Control, RH Sidmonds, JV Grimaldi, 1956.			
4273		4/1/1956	"A Survey of a Group of Employees Exposed to Asbestos Dust," S McPheeters, Journal of Industrial Hygiene and Toxicology, April 1956.			
4274		6/1/1956	American Industrial Hygiene Association Quarterly, June 1956.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4275		11/1/1956	"Asbestosis with Pleural Calcification Among Insulation Workers," Danish Medical Bulletin, November 1956.			
4276		3/7/1956	Minutes of the Asbestos Textile Institute Air Hygiene Committee Meeting, 3/7/56.			
4277		1/1/1957	"Chapter 12: Asbestosis," Pneumoconiosis: Industrial Diseases of the Lung Caused by Dust, PF Holt, 1957.			
4278		2/1/1958	Hygienic Standards for Asbestos, American Industrial Hygiene Association Journal, February 1958.			
4279		4/1/1958	Hygienic Standards for Asbestos, American Industrial Hygiene Association Journal, April 1958.			
4280		1/1/1958	Chapter 1: Industrial Hygiene – Retrospect and Prospect, FA Patty, Ed, Industrial Hygiene and Toxicology, Vol I: General Principles, Second Revised Edition, 1948, 1958.			
4281		1/1/1958	Chapter 2: Industrial Hygiene Records and Reports, FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4282		1/1/1958	Chapter 3: The Industrial Hygiene Survey and Personnel, FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4283		1/1/1958	Chapter 6: The Mode of Entry and Action of Toxic Materials, FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4284		1/1/1958	"Dusts, Fumes and Smokes," FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4285		1/1/1958	"Industrial Process Ventilation," FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4286		1/1/1958	Chapter 11: Respirators and Respiratory Protective Devices, FA Patty, Ed, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4287		1/1/1958	Chapter 12: The Pulmonary Dust Diseases, OA Sander, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958.			
4288		1/1/1958	Chapter 21: Heat Control in the Hot Industries, TF Hatch, Industrial Hygiene and Toxicology, Vol. I: General Principles, Second Revised Edition, 1948, 1958			
4289		6/7/1958	"Asbestosis and Pleural Tumors," HCM Van Der Schoot, Netherlands Journal of Medicine, 6/7/58.			
4290		1/1/1959	"Health in Industry," D Hunter, 1959.			
4291		1/1/1959	Accident Prevention Manual for Industrial Operations, National Safety Council, 4th Edition, 1959.			
4292		1/1/1959	Chapter 24: Environmental Cancer, WC Hueper, The Pathology of Cancer, Second Edition, 1959.			
4293		1/1/1959	Chapter 13, The Chemical and Genetic Mechanisms of Carcinogenesis and Chapter 24 Environmental Cancer, The Physiopathology of Cancer, by 32 Authors, 2nd Edition, 1959.			
4294		1/1/1960	Modern Occupational Medicine, AJ Fleming, CA D'Alonzo, Eds, 1960.			
4295		1/1/1960	Occupational Chest Diseases, Excerpt from Modern Occupational Medicine, AJ Fleming, CA D'Alonzo, Eds, 1960.			
4296		1/1/1960	"Diffuse Pleural Mesothelioma and Asbestos Exposure in the North Western Cape Province," JC Wagner, CA Sleggs, P Marchand, Brit J Industrial Medicine, 1960.			
4297		1/1/1960	"Pneumoconiosis," Encyclopedia Britannica, Vol 18, 1960.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4298		11/1/1960	"Primary Malignant Mesothelioma of the Pleura," HB Eisenstadt, FW Wilson, The Lancet, November 1960.			
4299		10/12/1961	"Case Records of the Massachusetts General Hospital," B Castleman, NEJM, 10/12/61.			
4300		3/1/1961	"Cancer in the Human Environment," WC Hueper, Archives of Pathology, March 1961.			
4301		1/14/1961	"Diffuse Pleural Mesotheliomas in South Africa," CA Sleggs, P Marchand, JC Wagner, SA Medical Journal, 1/14/61.			
4302		1/1/1963	Section I: Toxicology, LJ Goldwater, Dangerous Properties of Industrial Materials, IN Sax, 1963.			
4303		1/1/1963	Plant and Process Ventilation, WCL Hemeon, Industrial Press Inc, 1963.			
4304		1/1/1963	Safety Management: Accident Cost and Control, RH Simonds, JV Grimaldi, 1963.			
4305		4/6/1964	"Asbestos Exposure and Neoplasia," IJ Selikoff, EC Hammond, JAMA, 4/6/64.			
4306		5/18/1965	"Relation Between Exposure to Asbestos and Mesothelioma," IJ Selikoff, J Churg, EC Hammond, NEJM, 5/18/65.			
4307		10/1/1965	"Mesothelioma of Pleura and Peritoneum following Exposure to Asbestos in the London Area," ML Newhouse, H Thompson, Brit J Industrial Medicine, October 1965.			
4308		9/1/1965	Asbestos Study - Procedures and Findings, JR Lynch, US Public Health Service, September 1965.			
4309		12/31/1965	"Occupational and Nonoccupational Exposures to Asbestos," WC Hueper, Biological Effects of Asbestos, Annals of the New York Academy of Sciences, 12/31/65.			
4310		12/31/1965	Biological Effects of Asbestos, Annals of the New York Academy of Sciences, Selikoff and Churg, Vol 132, Art 1, Part I, 12/31/65.			
4311		12/31/1965	Biological Effects of Asbestos, Annals of the New York Academy of Sciences, Selikoff and Churg, Vol 132, Art 1, Part II, 12/31/65.			
4312		12/31/1965	Biological Effects of Asbestos, Annals of the New York Academy of Sciences, Selikoff and Churg, Vol 132, Art 1, Part II, 12/31/65.			
4313		3/2/1966	Newspaper Article - Asbestos Dust Called a Hazard To At Least One-Fourth of US, JE Brody, New York Times, 3/2/66.			
4314		9/12/1966	"Asbestos: Awaiting Trial," Chemical Week, 9/12/66.			
4315		1/1/1966	"Industrial Hygiene," Encyclopedia Americana International Edition, 1966.			
4316		8/10/1967	Minutes of the Special Meeting of the Quebec Asbestos Mining Association (QAMA), 8/10/67.			
4317		8/21/1967	"Mesothelioma and Its Association with Asbestosis," M Borow, et al, JAMA, 8/21/67.			
4318		4/1/1967	"Editorial: Asbestos and Neoplasia," IJ Selikoff, RA Bader, EC Hammond, et al, The American Journal of Medicine, April 1967.			
4319		1/1/1967	"Problems Arising from the Use of Asbestos: Memorandum of the Senior Medical Inspector's Advisory Panel," Her Majesty's Stationary Office, 1967			
4320		9/1/1967	"The Medical Risks of Exposure to Asbestos," ML Newhouse, The Practitioner, September 1967.			
4321		4/8/1968	"Asbestos Exposure, Smoking and Neoplasia," JAMA, 4/8/68.			
4322		7/1/1968	"The Pulmonary Response to Coalinga Asbestos Dust: A Preliminary Investigation," P Gross and RTP deTreville, July 1968.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4323		7/1/1969	"Current Problems of Setting Occupational Exposure Standards," HE Stokinger, Archives of Environmental Health, July-December 1969.			
4324		1/1/1974	Asbestos Workers Handbook, GA Davis, 1974.			
4325		1/1/1976	"Asbestos Disease in the United States, 1918-1975," IJ Selikoff, Rev fr Mal Resp, Supplement 1, 1976.			
4326		5/24/1977	CONSAD Research Report to OSHA, 5/24/77.			
4327		1/1/1979	"Historical Background to the Asbestos Problem," DHK Lee, IJ Selikoff, Environmental Research, 1979.			
4328		10/8/1982	Asbestos-Associated Diseases, Special Issue of Archives of Pathology and Laboratory Medicine, The Pathology of Asbestos-Associated Diseases of the Lungs and Pleural Cavities: Diagnostic Criteria and Proposed Grading Schema, JE Craighead, et al, 10/08/82			
4329		1/1/1986	Chapter 14: Occupational Respiratory Diseases – Asbestos-Associated Disease, IJ Selikoff, Public Health and Preventive Medicine, Maxcy-Rosenau, 1986.			
4330		1/1/1991	"Dangerous and Cancer-Causing Properties of Products and Chemicals in the Oil-Refining and Petrochemical Industries, Part IX: Asbestos Exposure and Analysis of Exposure," MA Mehlman, The Third Wave of Asbestos Disease: Exposure to Asbestos in Place, Annals of the New York Academy of Sciences, Vol 643, 1991			
4331		1/1/1996	"Exposure Assessment in Community-Based Studies of Occupational Cancer," J Siemiatycki, Occupational Hygiene, 1996.			
4332		8/17/1994	Letter to H Siegel, Exxon, from JW Hammond; Re: Industrial Hygiene Problem, 8/17/94.			
4333		1/1/1997	"Asbestos, asbestosis and cancer: The Helsinki criteria for diagnosis and attribution – Consensus Report," Scand J Work Environ Health, 1997.			
4334		1/1/2001	"Statement on Malignant Mesothelioma in the United Kingdom," British Thoracic Society, Thorax, 2001.			
4335		1/1/2002	Chapter 2: History and Experience of Mesothelioma in Europe, J Bignon, Mesothelioma, B Robinson and A Chahinian, Eds, 2002.			
4336		1/1/2003	"Cancer Incidence Among Union Carpenters in New Jersey," J Dement, L Pompeii, IM Lipkus, GP Samsa, Journal of Occupational and Environmental Medicine, 45: 1059-67, 2003.			
4337		7/1/2005	Asbestos-Related Diseases, Department for Work and Pensions, Security Administration Act, 1992, July 2005.			
4338		1/1/2006	"Defining High Risk Individuals in a Population-Based Molecular-Epidemiological Study of Lung Cancer," A Cassidy, JP Myles, T Liloglou, et al, International Journal of Oncology, 2006.			
4339		1/1/2006	"Pathological recognition of diffuse malignant mesothelioma of the pleura: the significance of the historical perspective as regards this signal tumor," EJ Mark, RL Kradin, Seminars in Diagnostic Pathology, 2006.			
4340		1/1/2006	Worldwide Asbestos Supply and Consumption Trends from 1900 Through 2003, RL Virta, Circular 1298, US Geological Survey, 2006.			
4341		10/20/2006	Abstract - "Risk of Plueral Mesothelioma: A French Population-Based Case-Control Study (1998-2002)," Lung Cancer Journal, 10/20/06.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4342		1/1/2007	"Ecological association between asbestos-related diseases and historical asbestos consumption: an international analysis," R Lin, et al, <i>Lancet</i> , 2007.			
4343		1/1/2007	Chapter 2: The Occupational Medical History, JE Cone, J LaDou, Current Occupational & Environmental Medicine, Fourth Edition, J LaDou, Ed, 2007.			
4344		1/1/2011	"Rarity of Malignant Mesothelioma Prior to the Widespread Commercial Introduction of Asbestos: The Mount Sinai Autopsy Experience 1883-1910," JA Strauchen, <i>American Journal of Industrial Medicine</i> , 2011.			
4345		1/1/2011	Asbestos: Risk Assessment, Epidemiology, and Health Effects, 2nd Edition, RF Dodson and SP Hammar, Eds, 2011.			
4346		1/1/2013	"The World-Wide Pandemic of Asbestos-Related Diseases," L Stayner, LS Welch, R Lemen, <i>Am Rev Public Health</i> , 2013.			
4347		1/1/1965	"The Occurrence of Asbestosis Among Insulation Workers in the United States," IJ Selikoff, J Churg, EC Hammond, <i>Biological Effects of Asbestos</i> , NYAS, 1965.			
4348		1/1/2014	"Asbestos, Asbestosis and Cancer: Helsinki Criteria for Diagnosis and Attribution 2014," Finnish Institute of Occupational Health, 2014.			
4349		1/1/2014	"Consensus Report: Asbestos, Asbestosis and Cancer: Helsinki Criteria for Diagnosis and Attribution 2014: Recommendations," Scand J Work Environ Health, Finnish Institute of Occupational Health - online first, 2014.			
4350		12/31/1991	"Absence of Evidence for a Significant Background Incidence of Diffuse Malignant Mesothelioma apart from Asbestos Exposure," EJ Mark, T Yokoi, Part 8. The Neoplasms of Asbestos Exposure, <i>Annals of the New York Academy of Sciences</i> , 12/31/91.			
4351		10/1/1969	"Asbestos and Health in 1969," GW Wright, <i>American Review of Respiratory Disease</i> , October 1969.			
4352		5/6/1935	Transactions of the Medical Society of the State of North Carolina, 82nd Annual Session, May 6-8, 1935.			
4353		1/1/2022	"Asbestos Exposure in Patients with Malignant Pleural Mesothelioma included in the PRIMATE study, Lombardo, Italy," A Spinazze, et al, <i>International Journal of Environmental Research and Public Health</i> , 2022.			
4354		2/12/1935	Newspaper Article - Asbestosis case scheduled for Federal Court in Charleston, <i>The Times and Democrat</i> , 2/12/35.			
4355		12/29/1936	Newspaper Article - Asbestosis Cases Still Before Court, <i>The Item</i> , Sumter, South Carolina, 12/29/36.			
4356		11/29/1930	"Asbestosis Bodies in Sputum and Lung," KM Lynch, WA Smith, Charleston, SC, <i>JAMA</i> , 11/29/30.			
4357		1/1/1931	"Pulmonary Asbestosis II: Including the Report of a Pure Case," KM Lynch, WA Smith, <i>American Review of Tuberculosis</i> , 1931.			
4358		1/1/1935	"Pulmonary Asbestosis III: Icarcinoma of the Lung in Asbesto-Silicosis," KM Lynch, WA Smith, 1935.			
4359			Newspaper Article - 80 Persons Victors in Asbestosis Cases			
4360		12/29/1936	Newspaper Article - 80 Victims of Asbestosis Win Decision, 12/29/36.			
4361		10/15/1981	Asbestos a deadly time bomb, <i>Greenville News</i> , 10/15/81.			
4362		6/30/1936	Walsh Healey Act, Government Contracts, 6/30/36; 1952 Amendment.			
4363		3/2/1942	Safety and Health Requirements, Walsh Healey Public Contracts Act, 3/2/42.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4364		1/1/1952	Safety and Health Standards for Contractors performing Federal Supply Contracts under the Walsh-Healey Public Contracts Act, 1952.			
4365		12/28/1960	Title 41 - Public Contracts, Part 50-204 - Safety and Health Standards for Federal Supply Contracts, Walsh-Healey Public Contracts Act, Federal Register, Vol 25, No 251, Part II, 12/28/60.			
4366		12/1/1937	Occupational-Disease Legislation in the United States, 1936, Bulletin No 652, December 1937.			
4367		3/31/1971	List of Hazardous Air Pollutants, EPA Air Pollution Prevention and Control, Clean Air Act, 3/31/71.			
4368		12/7/1971	Title 29-Labor, Chapter XIII, Part 1518- Safety and Health Regulations for Construction, Standard for Exposure to Asbestos Dust, Federal Register Vol 36, No 234, 12/7/71.			
4369		1/12/1972	29 CFR Part 1910 - Standard for Exposure to Asbestos Dust: Notice of Proposed Rulemaking, Federal Register Vol 37, No 7, 1/12/72.			
4370		6/7/1972	30 CFR Part 1910 - Standard for Exposure to Asbestos Dust, Federal Register Vol 37, No 110, 6/7/72.			
4371		2/26/1974	Title 40, Chapter I, Subchapter N, Part 427- Asbestos Manufacturing Point Source Category, EPA, Federal Register Vol 39, No 39, 2/26/74.			
4372		10/25/1974	40 CFR, Part 61 - Asbestos and Mercury, Proposed Amendments to National Emission Standards for Hazardous Air Pollutants, EPA, Federal Register Vol 39, No 208, 10/25/74.			
4373		10/9/1975	29 CFR Part 1910 - Standard for Exposure to Asbestos Dust: Notice of Proposed Rulemaking, Federal Register Vol 40, No 197, 10/9/75.			
4374		3/2/1977	40 CFR, Part 61 - National Emission Standards for Hazardous Air Pollutants: Proposed Amendments to Asbestos Standard, EPA, Federal Register Vol 42, No 41, 3/2/77.			
4375		7/29/1977	16 CFR, Part 1145 - Respirable Free-Form Asbestos, Proposed Rules to Regulate Consumer Patching Compounds and Artificial Emberizing Materials Containing Respirable Free-Form Asbestos, Under the Consumer Product Safety Act, Federal Register Vol 42, No 146, 7/29/77.			
4376		12/15/1977	Title 16, Chapter II- Consumer Product Safety Commission, Subchapter B- Consumer Product Safety Act Regulations, Part 1145, Consumer Patching Compounds and Artificial Emberizing Materials Containing Respirable Free-Form Asbestos, Final Rules, Federal Register Vol 42, No 241, 12/15/77.			
4377		11/17/1978	Title 30- Mineral Resources, Chapter I- MSHA, Dept of Labor, Subchapter N- Metal and Nonmetallic Mine Safety, Health Standards; Miscellaneous Amendments, Final Rule, Federal Register Vol 43, No 223, 11/17/78, Effective 12/18/78..			
4378		11/4/1983	29 CFR, Part 1910- Occupational Exposure to Asbestos, Emergency Temporary Standard, Federal Register Vol 48, No 215, 11/4/83.			
4379		11/25/1983	30 CFR, Part 1910- Hazard Communication, Final Rule, Federal Register Vol 48, No 228, 11/25/83.			
4380		4/10/1984	29 CFR, Part 1910- Occupational Exposure to Asbestos, Proposed Rule and notice of hearing, Federal Register Vol 49, No 70, 4/10/84.			

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4381		6/20/1986	29 CFR, Parts 1910 and 1926- Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite, Final Rules, Federal Register Vol 51, No 119, 6/20/86.			
4382		7/12/1989	40 CFR, Part 763- Asbestos; Manufacture, Importation, Processing and Distribution in Commerce Prohibitions, Final Rule, EPA, Federal Register Vol 54, No 132, 7/12/89.			
4383		2/13/1990	Asbestos; Publication of Identifying Information; Notice, EPA, Federal Register Vol 55, No 30, 2/13/90.			
4384		6/8/1992	29 CFR, Parts 1910 and 1926- Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite, Final Rule, Federal Register Vol 57, No 110, 6/8/92.			
4385		8/10/1994	29 CFR, Parts 1910, 1015 and 1926- Occupational Exposure to Asbestos, Final Rule, Federal Register Vol 59, No 153, 8/10/94.			
4386		11/15/2000	40 CFR, Part 763- Asbestos Worker Protection, EPA, Federal Register Vol 65, 11/15/00.			
4387		5/1/1972	Target Health Hazards, Asbestos: Airborne Danger, Safety Standards, May-June 1972.			
4388		11/21/1974	OSHA Field Memorandum #74-92; Subject: Tremolite and Talc, 11/21/74.			
4389		1/1/1977	Employer Responsibilities and Courses of Action Following an OSHA Inspection, OSHA 3000, 1977.			
4390		1/1/1979	Health Hazards of Asbestos, Cancer Alert Series, OSHA 3040, 1979.			
4391		6/1/2000	A Guide for Ship Scrappers: Tips for Regulatory Compliance, EPA, Summer 2000.			
4392		1/1/2001	Toxicological Profile for Asbestos, ASTDR, 2001.			
4393		1/1/1973	IARC Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Man, Some inorganic and organometallic compounds. Vol 2, 1973.			
4394		1/1/1977	IARC Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Man, Asbestos, Vol 14, 1977.			
4395		1/1/1979	IARC Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Man, Asbestos, Vols 1-20, Chemical and Industrial Processes Associated with Cancer in Humans, IARC Monographs, Supplement 1, 1979.			
4396		1/1/1987	Asbestos (Chrysotile, Amosite, Crocidolite, Tremolite, Actinolite, and Anthophyllite), IARC Working Group, 1987.			
4397		1/1/1987	IARC Monographs, Supplement 7: Asbestos, 1987.			
4398		3/26/1998	IARC Monographs on the Evaluation of Carcinogenic Risk of Chemicals to Man, Asbestos, Vol 14, Summary of Data Reported and Evaluation, 3/26/98.			
4399		5/1/2009	Special Report: Policy, A review of human carcinogens- Part C: metals, arsenic, dusts and fibres, IARC, Lancet, May 2009.			
4400		1/1/2012	Arsenic, Metals, Fibres and Dusts, Volume 100C, A Review of Human Carcinogens, IARC Monographs, 2012.			
4401		1/1/1986	Environmental Health Criteria 53: Asbestos and Other Natural Mineral Fibres, International Programme on Chemical Safety, IPCS, 1986.			
4402		1/1/1998	Environmental Health Criteria 203: Chrysotile Asbestos, International Programme on Chemical Safety, IPCS, 1998.			
4403		9/16/1966	Federal Metal and Nonmetallic Mine Safety Act, Public Law 89-577, US Congress, 9/16/66.			
4404		12/30/1969	Federal Coal Mine Health and Safety Act of 1969, Public Law 91-173, US Congress, 12/30/69.			
4405		12/29/1970	Occupational Safety and Health Act of 1970, Public Law 91-596, US Congress, 12/29/70.			

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4406		10/11/1976	Toxic Substances Control Act, Public Law 94-469, 94th Congress, 10/11/76.			
4407		8/7/1977	Clean Air Act Amendments of 1977, Public Law 95-95, US Congress, 8/7/77.			
4408		11/9/1977	Federal Mine Safety and Health Act of 1977, US Congress, Public Law 95-164, 11/9/77.			
4409		10/31/1988	Asbestos Information Act of 1988, Public Law 100-577, US Congress, 10/31/88.			
4410		11/28/1990	Asbestos School Hazard Abatement Reauthorization Act, of 1990, Public Law 101-637, US Congress, 11/28/90.			
4411		1/1/1972	Criteria for a recommended standard... Occupational Exposure to Asbestos, NIOSH, 1972.			
4412		12/1/1976	Re-Examination and Update of Information on the Health Effects of Occupational Exposure to Asbestos, NIOSH, December 1976.			
4413		12/1/1976	Revised Recommended Asbestos Standard, NIOSH, December 1976.			
4414		4/1/1980	Workplace Exposure to Asbestos: Review and Recommendations, Asbestos Work Group, NIOSH-OSHA, April 1980.			
4415		7/17/1986	Comments of the National Institute for Occupational Safety and Health on The Occupational Safety and Health Administration's Final Rule on Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, 29 CFR Parts 1910 and 1926, NIOSH 7/17/86.			
4416		4/9/1990	Comments of the National Institute for Occupational Safety and Health on The Occupational Safety and Health Administration's Notice of Proposed Rulemaking on Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, 29 CFR Parts 1910 and 1926, NIOSH, 4/9/90.			
4417		1/24/1991	Comments of the National Institute for Occupational Safety and Health on The Occupational Safety and Health Administration's Proposed Rule on Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, 29 CFR Parts 1910 and 1926, NIOSH 1/24/91.			
4418		1/4/1993	Supplemental Comments of the National Institute for Occupational Safety and Health on The Occupational Safety and Health Administration's Proposed Rule on Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, 29 CFR Parts 1910 and 1926, NIOSH, 1/4/93.			
4419		9/1/1997	Asbestos Bibliography (Revised), NIOSH, September 1997.			
4420		4/1/2011	Current Intelligence Bulletin 62: Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research, Revised Edition, NIOSH, April 2011.			
4421		12/1/2002	Work-Related Lung Disease Surveillance Report, NIOSH, December 2002.			
4422		2/1/2007	Asbestos and Other Mineral Fibers: A Roadmap for Scientific Research, P Middendorf, R Zumwalde, R Castellan, NIOSH Mineral Fibers Work Group, February 2007.			
4423		8/15/1994	NIOSH 7400- Asbestos and Other Fibers by PCM, Issue 2, 8/15/94.			
4424		8/15/1994	NIOSH 7402- Asbestos by TEM, Issue 2, 8/15/94.			
4425		8/15/1994	NIOSH 9000 - Asbestos, Chrysotile by XRD, NIOSH, Issue 2, 8/15/94.			
4426		8/15/1994	NIOSH 9002 - Asbestos (bulk) by PLM, Issue 2, 8/15/94.			

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4427		1/1/1980	Occupational Mortality in the State of California, 1959-1961, NIOSH Research Report, GR Peterson, January 1980.			
4428		8/1/1998	Atlas of Respiratory Disease Mortality, United States: 1982-1993, NIOSH, August 1998.			
4429		6/1/1997	Mortality by Occupation, Industry, and Cause of Death, 24 Reporting States (1984-1988), June 1997.			
4430		4/10/1989	Occupational Exposure Limit for Asbestos, World Health Organization, April 10-11, 1989.			
4431		1/1/2006	Elimination of asbestos-related diseases, World Health Organization (WHO), 2006.			
4432		1/1/2014	Chrysotile Asbestos, World Health Organization (WHO), 2014.			
4433		11/3/2016	Asbestos, Report on Carcinogens, 14th Edition, National Toxicology Program (NTP), 11/3/16.			
4434		9/18/2000	European Communities- Measures Affecting Asbestos and Asbestos-Containing Products, Report of the WTO Panel, Part 1, WT/DS135/R, 9/18/00.			
4435		9/18/2000	European Communities- Measures Affecting Asbestos and Asbestos-Containing Products, Report of the WTO Panel, Part 2, WT/DS135/R, 9/18/00.			
4436		9/18/2000	European Communities- Measures Affecting Asbestos and Asbestos-Containing Products, Report of the WTO Panel, Part 3, WT/DS135/R, 9/18/00.			
4437		8/25/1978	Physician Advisory - Health Effects of Asbestos, Surgeon General, Dept of Health, Education and Welfare, 8/25/78.			
4438		1/1/1978	Asbestos: An Information Resource, RJ Levine, Ed, SRI International, NIH, 1978.			
4439		1/1/1913	Workmen's Compensation, Insurance and Safety Act, California Statute 279-321, 1913.			
4440		11/22/1939	Dusts, Fumes, Vapors and Gases Safety Orders, Dept of Industrial Relations, State of California, 12/28/36, Revised 11/22/39; Affidavit.			
4441		7/20/1945	Dusts, Fumes, Vapors and Gases Safety Orders, Dept of Industrial Relations, State of California, 12/28/36, Revised 7/20/45.			
4442		1/1/1941	Workmen's Compensation, Insurance and Safety Act, California Statute 279-321, 1941.			
4443		1/1/1934	Forty-Ninth Report of the State Dept of Health, Bureau of Occupational Diseases, Public Document No 25, State of Connecticut, 1934.			
4444		9/20/1935	The Workmen's Compensation Act as Amended in 1935, State of Connecticut, 9/20/35.			
4445		12/1/1936	"Control of Dust Exposures in Connecticut," AS Gray, Connecticut Health Bulletin, Vol 50, No 12, December 1936.			
4446		1/1/1936	Delaware Workmen's Compensation Act, 1936.			
4447		1/1/1945	Resolution Adopting Regulations for Control and Prevention of Occupational Diseases in Industry in the State of Florida, 1945.			
4448		1/1/1947	Resolution Adopting Regulations for Control and Prevention of Occupational Diseases in Industry in the State of Florida, 1947.			
4449		1/1/1957	Regulation for Control and Prevention of Occupational Diseases, Bureau of Workmen's Compensation State of Florida, 1957.			
4450		1/1/1946	Acts and Resolutions of the General Assembly of the State of Georgia, Workmen's Compensation Law, 1946.			
4451		3/6/1936	Health and Safety Act, Laws of Illinois, 3/6/36.			

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4452		12/28/1943	"Wartime Operations Emphasize Industrial Hygiene Problems of Asbestos Industry," The Illinois Labor Bulletin, Illinois Dept of Labor, Vol 3, No 8, 12/28/43.			
4453		9/1/1944	Part "G" Rules and Regulations Relating to Industrial Housekeeping and Sanitation, and Wash, Locker, Rest, Toilet and Lunch Room Requirements, State of Illinois, 9/1/44.			
4454		10/1/1947	Warning Labels for Hazardous Chemicals, WN Watson, Manufacturing Chemists Assn, What's New In Industrial Hygiene, State of Illinois, October-December 1947.			
4455		1/1/1951	Health and Safety Act and the Health and Safety Rules A-M, State of Illinois, 1951.			
4456		1/1/1960	Act 35: Uniform Hazardous Substances Act of Illinois, 1960.			
4457		1/1/1953	Industrial Health Rule No 8, State of Indiana, 1953.			
4458		1/1/1955	Threshold Limit Values for Toxic Materials in Industry, Indiana State Board of Health, Division of Industrial Hygiene, 1955.			
4459		9/21/1963	Kentucky Regulation OH-3-1; Re: Control of Occupational Environments and the Prevention of Occupational Diseases, KRS 211.180, 9/21/63.			
4460		Undated	Asbestos - Let's Get the Facts Straight, JR Dunn, National Council for Environmental Balance, Kentucky, Undated.			
4461		1/1/1952	Occupational Disease Act, State of Louisiana, 1952.			
4462		1/1/1958	Act No 39 - Occupational Disease Act, State of Louisiana, 1958.			
4463		1/1/1975	Act No 583 - Occupational Disease Act, State of Louisiana, 1975.			
4464		1/1/1939	Workmen's Compensation Act, State of Maryland, 1939.			
4465		1/1/1939	Workmen's Compensation Act, State of Massachusetts, 1939.			
4466		2/1/1949	Recommended Safe Practices for Asbestos, Mineral Data Sheet No 2, Massachusetts Dept of Labor & Industries, Division of Occupational Hygiene, Bulletin No 492, February 1949.			
4467		9/1/1976	The Health Effects of Asbestos Inhalation: A Review of the Literature, D Gilbert, Massachusetts Asbestos Commission and Science Resource Office, Mass General Court, September 1976.			
4468		3/1/1982	History of Massachusetts Asbestos Commission, Massachusetts Dept of Labor & Industries, Division of Occupational Hygiene, No 1338, March 1982.			
4469		1/1/1987	Asbestos Policy and Procedure Manual, Guidelines for Management and Maintenance Personnel, The Commonwealth of Massachusetts, 1987.			
4470		1935-1937	Amendments to the Workmen's Compensation Law, State of Michigan, 1935-1937.			
4471		1/1/1954	Membership List and By-Laws of the Michigan Industrial Hygiene Society, 1954.			
4472		1/1/1961	Revised Judicature Act of 1961 (Excerpt), Act 236, State of Michigan, 1961.			
4473		4/1/1963	Construction Health Hazards, Michigan's Occupational Health, Vol 8, No 3, Spring 1963.			
4474		1/1/1974	Michigan Occupational Safety and Health Act, Act 154, 1974.			
4475		1/1/1975	Occupational Health Guide No 6 - Asbestos, Michigan Dept of Public Health, Division of Occupational Health, January 1975.			

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4476		1/1/1973	An Act Prohibiting the Use of Powdered Asbestos in the Construction or Improvement of Buildings, Laws of Minnesota, 1973.			
4477		1/1/1939	Workmen's Compensation Law, Chapter 287, Missouri Revised Statutes, 1939.			
4478		3/2/1939	Industrial Hygiene Act, Laws, Resolutions and Memorials of the State of Montana, 3/2/39.			
4479		1/1/1939	Employers' Liability and Workmen's Compensation, Public Laws, Chapter 178, State of New Hampshire, 1939.			
4480		1/1/1998	Asbestos Environmental Fact Sheet ASB-3, Materials and Products That Contain Asbestos, New Hampshire Dept of Environmental Services, 1998.			
4481		1/1/1944	Chapter 88: Occupational Disease Act, State of New Jersey, 1944.			
4482		10/30/1958	Safety Regulation No 3- Establishing Threshold Limit Values for Dusts, Vapors, Fumes, Gases and Mists, New Jersey Dept of Labor & Industry, 10/30/58.			
4483		8/19/1963	Safety Regulation No 3- Establishing Threshold Limit Values for Dusts, Vapors, Fumes, Gases and Mists, New Jersey Dept of Labor & Industry, 8/19/63.			
4484		1/1/1945	Occupational Disease Act, State of New Mexico, 1945.			
4485		4/1/1934	Asbestos, The Industrial Bulletin, State of New York, April 1934.			
4486		1/1/1938	Silicosis and Its Prevention, AR Smith, Special Bulletin No 198, New York State Dept of Labor, 1938.			
4487		1/1/1944	New York's New Second-Injury Fund Law, M Donlon, New York, 1944.			
4488		8/1/1958	Industrial Code No 12, New York State Dept of State, 8/1/58, Effective 11/1/58.			
4489		7/1/1936	Workmen's Compensation Act, State of North Dakota, No 18, 7/1/36.			
4490		4/20/1937	"Is Dust a Problem?" PN Bushnell, Proceedings of All Ohio Safety Congress, Industrial Commission of Ohio, April 20-22, 1937.			
4491		5/10/1938	"Inhalation of Dust and Control of Dust Hazards," WC James, Proceedings of All Ohio Safety Congress, Industrial Commission of Ohio, May 10-12, 1938; Affidavit.			
4492		1/1/1946	Legal Requirements for the Prevention and Control of Industrial Public Health Hazards, Regulations for the Prevention and Control of Diseases Resulting from Exposure to Toxic Fumes, Vapors, Mists, Gases and Dusts In Order to Preserve and Protect the Public Health, Ohio Dept of Health, 1946.			
4493		1/1/1946	Legal Requirements for the Prevention and Control of Industrial Public Health Hazards, Ohio Dept of Health, 1946.			
4494		1/3/1955	Specific Requirements and General Safety Standards of the Industrial Commission of Ohio for Workshops and Factories, Bulletin No 203, State of Ohio, 1/3/55.			
4495		1/1/1951	Title 85: Workmen's Compensation, Oklahoma Statutes, 1951.			
4496		7/1/1937	Workmen's Compensation Law, State of Oregon, 7/1/37.			
4497		1/1/1945	Rules and Regulations for the Prevention and Control of Occupational Diseases, State of Oregon, 1945.			
4498		1/1/1919	Workmen's Compensation Act, Chapter 751, Acts of 1911, Amendments, State of Massachusetts, 1919.			
4499		1/1/1915	Workmen's Compensation Act No 338, Commonwealth of Pennsylvania, 1915.			

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4500		10/1/1934	Asbestosis, Part I, Special Bulletin No 37, Commonwealth of Pennsylvania, 10/1/34.			
4501		9/20/1935	Asbestosis, Parts II & III, Special Bulletin No 42, Commonwealth of Pennsylvania, 9/20/35.			
4502		1/1/1937	Workmens' Compensation Act No 552: A Supplement, Laws of Pennsylvania, 1937.			
4503		12/1/1937	Occupational Disease Compensation Law, Commonwealth of Pennsylvania, Labor & Industry Dept, December 1937.			
4504		1/1/1939	Text of the Occupational Disease Act No 284, Commonwealth of Pennsylvania, 1939, Revised 11/29/61.			
4505		1/1/1942	The Pennsylvania Occupational Disease Act, 6/12/41, Pennsylvania Labor & Industry Review, January 1942.			
4506		8/25/1952	Industrial Health, Annual Health Conference, Presented by Bureau of Industrial Hygiene, Comonwealth of Pennsylvania, August 25-28, 1952.			
4507		1/1/1952	Title 77: Workmen's Compensation and Occupational Disease Acts, Purdon's Pennsylvania Statutes Annotated, 1952.			
4508		1/1/1958	Pennsylvania Public Health Laws, 1958.			
4509		7/1/1964	Commonwealth of Pennsylvania Hygienic Information Guide No 7, Asbestos, July 1964.			
4510		9/1/1965	Malignancies in Asbestos Workers - A Preliminary Report, Occupational Health News & Views, Pennsylvania Dept of Health, Fall 1965.			
4511		1/1/2010	Occupational Health and Safety, South Carolina Code of Laws, 1933, Revised 2010.			
4512		3/11/1947	Workmen's Compensation Law of Tennessee, Chapter 139, Senate Bill 417, 3/11/47.			
4513		1/1/1947	Workmen's Compensation - Occupational Diseases, Chapter 113, SB No 40, State of Texas, 1947.			
4514		1/1/2008	Utah Occupational Safety and Health Act, 1997, Revised 2008.			
4515		1/1/1937	Compilation of Insurance and Medical Aid Acts, State of Washington, 1937.			
4516		9/18/1958	Safety Standards for Protection Against Occupationally Acquired Diseases, E Sorger, State of Washington, 9/18/58.			
4517		2/1/1964	Chapter Ind 20 - Dusts, Fumes, Vapors and Gases, State of Wisconsin, February 1964.			
4518		12/1/1972	Technical Data Note 35 - Control of Asbestos Dust, HM Factory Inspectorate, December 1972.			
4519		1/1/1974	WAC 296-62-07517 Title 296, Asbestos, State of Washington, 1974.			
4520		1/1/1984	Asbestiform Fibers: Nonoccupational Health Risks, National Research Council, 1984.			
4521		1/1/2002	Asbestos Standard for the Construction Industry, OSHA 3096, John L Henshaw, Revised 2002.			
4522		6/1/2006	Asbestos: What is it and why is it a concern? Missouri Dept of Natural Resources, June 2006.			
4523		2/29/2008	Federal Register 30 CFR Parts 56, 57 and 71, Mine Safety and Health Administration, Asbestos Exposure Limit; Final Rule, 2/29/08.			
4524		12/14/2011	Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health, Report No. 12-P-0125, EPA, 12/14/11.			
4525		1/8/2014	Asbestos, OSHA Safety and Health Topics, 1/8/14. www.osha.gov/SLTC/asbestos			

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4526		10/24/2013	OSHA News Release - OSHA releases new resources to better protect workers from hazardous chemicals, OSHA Statement 13-2026-NAT. 10/24/13.			
4527		1/1/2014	OSHA Fact Sheet - Asbestos, January 2014.			
4528		Undated	Asbestos Disease: An Overview for Clinicians, Asbestos Exposure, ASTDR, Undated.			
4529		1/1/1983	Federal Register, Title 29, 1910.1200, Subpart Z, Hazard Communication, 1983.			
4530		1/1/1988	Occupational Safety and Health Guideline for Asbestos, Potential Human Carcinogen, NIOSH-CDC, 1988.			
4531		9/15/2012	Asbestos Exposure and Cancer Risk, National Cancer Institute Fact Sheet, 9/15/12. www.cancer.gov/cancertopics/factsheet/risk/asbestos			
4532		9/15/2015	Asbestos and Cancer Risk, American Cancer Society, 9/15/15. www.cancer.org/cancer/cancer-causes/asbestos			
4533		9/15/2012	Asbestos Exposure and Cancer Risk, National Cancer Institute Fact Sheet, 6/7/17. www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet			
4534		1/5/2009	Chapter 49: Asbestos School Hazard Detection and Control, 3601. Congressional statement of findings and purposes, 6/14/80. Updated 1/5/09.			
4535		5/1/2009	Asbestos Exposure and Cancer Risk, National Cancer Institute Fact Sheet, 5/1/09.			
4536		3/6/2019	Asbestos, OSHA Safety and Health Topics, 3/6/19. www.osha.gov/SLTC/asbestos			
4537		3/11/2004	EPA Memorandum from Cate Jenkins; Re: Additional Documentation, EPA Inspector General Investigation into failure to prevent consultant conflicts of interest, 3/11/04.			
4538		5/30/2003	Report on the Peer Consultation Workshop to Discuss a Proposed Protocol to Assess Asbestos-Related Risk, Prepared for the EPA by Eastern Research Group, Final Report, 5/30/03.			
4539		10/4/1977	Fed Reg 29 CFR Part 1990 - Proposed Rules for the Identification, Classification and Regulation of Toxic Substances Posing a Potential Occupational Carcinogenic Risk, OSHA, 10/4/77.			
4540		6/8/1992	Section V. Health Effects, Preamble to Final Rules, Occupational Exposure to Asbestos, Tremolite, Anthophyllite and Actinolite, OSHA 57 FR 24310, 6/8/92.			
4541		7/29/2005	Asbestos Exposure Limit, Proposed Rule, Mine Safety and Health Administration, 30 CFR Parts 56, 57 and 71, Fed Reg, 7/29/05.			
4542		1/1/1937	Chapter 133A Workmen's Compensation Act, 1937 Supplement to the North Carolina Code of 1935.			
4543		4/1/1942	Safe Practice Bulletin No 93, Exhausting Asbestos Fiber and Dust in Wire Insulation Manufacture, Commonwealth of Pennsylvania, April 1942.			
4544		8/1/1947	Safety in Steel, Pennsylvania Labor & Industry Review, August 1947.			
4545		1/1/1949	Dust Control in Asbestos Industry, BW Luttenberger, Raybestos Manhattan, Pennsylvania Labor & Industry Review, January 1949.			
4546		1/1/1952	Practical Discussion of the Midget Impinger for Dust Sampling, RL Houtz, Safe Practice Bulletin No 17, Commonwealth of Pennsylvania, 1952.			
4547		1/1/1969	Pennsylvania Occupational Disease Act, 6/21/39, Amended 1968, Effective 1/1/1969.			

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4548		5/1/1961	Occupational Health, Report of a Study of Health Needs and Resources of Pennsylvania, Scholl of Hygiene and Public Health, Johns Hopkins University, May 1961.			
4549		12/1/1964	Pneumoconiosis (Anthraco-Silicosis), Commonwealth of Pennsylvania Dept of Health, December 1-2, 1964.			
4550		5/23/1984	Amendment No 4 to House Bill No 3174 As Amended, An Act to Amend Section 6 of the Toxic Substances Disclosure to Employees Act approved September 8, 1983, Commonwealth of Pennsylvania, 5/23/84.			
4551		12/4/2001	Section 5524 of Title 42 Amendment, Two Year Limitation, Commonwealth of Pennsylvania, Senate Bill No 216, 12/4/01.			
4552		4/1/1952	Pneumoconiosis, Commonwealth of Pennsylvania, Bureau of Industrial Hygiene, 4/1/52.			
4553		1/1/1979	Occupational Health Guide No 6R - Asbestos, Michigan Dept of Public Health, Division of Occupational Health, January 1979.			
4554		1/1/1935	Chapter 123: Workmen's Compensation Act, State of North Carolina Public Laws and Resolutions, 1935.			
4555		1/1/1914	Article CI - Workmen's Compensation Act, State of Maryland, 1914.			
4556		1/1/1951	Workmen's Compensation Act, The Annotated Code of the Public General Laws of Maryland, 1951.			
4557		1/1/1957	Article 101. Workmen's Compensation Act, The Annotated Code of the Public General Laws of Maryland, 1957.			
4558		7/1/1985	Asbestos in Buildings: Guidance for Service and Maintenance Personnel, EPA 560/5-85-018, July 1985.			
4559		1/1/1950	Safety Standards For All Places of Employment in Minnesota, Industrial Commission of Minnesota, 1950.			
4560		1/1/1961	State of Indiana Safety Code for the Construction Industry, 1961.			
4561		1/1/1933	Chapter 10: Safety and Sanitary Regulations 40-1001, State of Indiana, 1933. (Factory Act)			
4562		1/1/1962	44-1-140 Health, State of South Carolina, 1962; An Act to Amend the Code of Laws of South Carolina of 1976, 4/5/88.			
4563		1/1/1962	Pollution Control Act, State of South Carolina, 1962.			
4564		1/1/1970	Chapter 296-64 Safety Standards - Occupational Diseases, Washington Administrative Code, 1970.			
4565		5/28/1998	OSHA 1910.142, 1928.110 - Enforcement Exemptions and Limitations under the Appropriations Act, 5/28/98.			
4566		1/1/2001	OSHA 1904.1 - Recording and Reporting Occupational Injuries and Illnesses, Partial Exemption for Employers with 10 or fewer employees, 2001.			
4567		Undated	Chapter 5: Industrial Hygiene, Public Health Laws of West Virginia, Undated.			
4568		1/1/1951	Chapter 6: Industrial Hygiene, Supplement to Regulations of the West Virginia Board of Health, 1951-1952.			
4569		1/1/1961	Chapter 16: Public Health, Health Laws of West Virginia, 1961.			
4570		11/13/1950	Governor's Conference on Industrial Safety, West Virginia, November 13-15, 1950.			
4571		1/1/2015	Asbestos, Report on Carcinogens, 13th Edition, National Toxicology Program (NTP), 2015.			
4572		8/17/1965	Chapter 4, Article 432 Regulations Establishing Threshold Limits in Places of Employment, Rules and Regulations, Commonwealth of Pennsylvania Department of Health, Adopted 10/27/61, Revised 8/17/65.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4573		4/4/2022	"EPA moves to ban the most common type of cancer-causing asbestos, A Phillips, Washington Post, 4/4/22.			
4574		12/1/2020	Risk Evaluation for Asbestos, Part I: Chrysotile Asbestos, EPA Document #EPA-740-R1-8012, December 2020.			
4575		5/28/1998	OSHA Instruction CPL 02-00-051 Enforcement Exemptions and Limitations Under the Appropriations act, Standard 1910.142, 1928.110, 5/28/98.			
4576		1/10/2017	OSHA Memorandum from D Michaels; Re: Appropriations act: Replacement of Appendix A for CPL 02-00-051, Enforcement Exemptions and Limitations Under the Appropriations act, Standard 1910.142, 1928.110, 1/10/17.			
4577		1/19/2001	OSHA Part 1904 Subpart B - Recording and Reporting Occupational Injuries and Illness, Partial Exemption for employers with 10 or fewer employees, 4/1/94, Revised 1/19/01.			
4578		5/23/2001	OSHA Letter to DV Gigante, from RB Swanson; Re: CPL 2-0.124 Multi-Employer Citation Policy, Self-Employed Contractors, 5/23/01.			
4579		4/5/2022	RIN Data, EPA/OCSP, RIN: 2070-AK86; Title: Asbestos (Part 1: Chrysotile Asbestos); Rulemaking Under TSCA Section 6(a), Fall 2021, 4/5/22. www.reginfo.gov			
4580		4/5/2022	Pre-Publication Notice of Proposed Rule, Asbestos Part 1: Chrysotile Asbestos: Regulation of Certain Conditions of Use Under Section 6(a) of the Toxic Substances Control Act (TSCA), FRL# FRL-8332-02-OCSP, 4/5/22.			
4581		4/9/1942	Transactions of the Fifth Annual Meeting of the National Conference of Governmental Industrial Hygienists, April 9-10, 1942.			
4582		1/1/1942	Miscellaneous Hazards of Occupation with Chief Diagnostic Signs and Symptoms, Useful Criteria in the Identification of Certain Occupational Health Hazards, Division of Industrial Hygiene, Utah State Dept of Health, 1942.			
4583		1/1/1946	Legal Requirements for the Prevention and Control of Industrial Public Health Hazards, Regulation for the Prevention and Control of Diseases Resulting from Exposure to Toxic Fumes, Vapors, Mists, Gases and Dusts In Order to Preserve and Protect Public Health, Ohio Dept of Health, 1946; Affidavit.			
4584		11/28/1947	Revision of Order 2002, General Orders on Dusts, Fumes, Vapors and Gases, Wisconsin, 11/28/47.			
4585		2/1/1949	"The Significance of Maximum Allowable Concentrations, JE Silson, Monthly Review, New York Division of Industrial Hygiene and Safety Standards, February 1949.			
4586		9/1/1956	Prepared Discussion, HE Stokinger, American Industrial Hygiene Association Quarterly, September 1956.			
4587		1/1/1954	Maximum Allowable Concentrations, Tennessee Industrial Hygiene News, January 1954.			
4588		7/1/1958	Occupational Health Regulations No 3, Maximum Permissible Concentrations of Atmospheric Contaminants in Places of Employment, Texas Dept of Health, July 1958; Certified.			
4589		2/1/1958	Hygienic Standards for Asbestos, American Industrial Hygiene Association Journal, February 1958.			
4590		4/1/1958	Hygienic Standards for Asbestos, American Industrial Hygiene Association Journal, April 1958.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4591		1/1/1958	Report of Committee on Threshold Limit Values, ACGIH, 1958.			
4592		8/19/1963	Safety Regulation No 3 Establishing Threshold Limit Values for Dusts, Vapors, Fumes, Gases, and Mists, State of New Jersey Dept of Labor & Industry, 8/19/63.			
4593		1/1/1963	Threshold Limit Values, Occupational Health Bulletin, New Jersey Dept of Health, 1963.			
4594		1/1/1965	Threshold Limit Values (Recommended Revisions and Additions), Industrial Health Foundation (IHF), 1965.			
4595		1/1/1966	Threshold Limit Values for 1966, ACGIH, 1966.			
4596		1/1/1966	Threshold Limit Values (Recommended Revisions and Additions for 1967), Industrial Health Foundation (IHF), 1966.			
4597		1/1/1967	Threshold Limit Values: A report of progress in 1967 and Announcement of 1968 Workshop on Threshold Limit Values, Industrial Health Foundation (IHF), 1967.			
4598		5/12/1968	"The birth of the ACGIH Threshold Limit Values Committee and its influence on the development of industrial hygiene," WG Frederick, Transactions of the Thirtieth Annual Meeting of ACGIH, May 12-14, 1968.			
4599		1/1/1969	Suggested Principles and Procedures for Developing Data for Threshold Limit Values for Air, Experimental Animal Data, Data from Human Subjects, Industrial Health Foundation (IHF), Bulletin No 8-69, 1969.			
4600		1/1/1970	Threshold Limit Values of Airborne Contaminants, Occupational Health Regulation No 3, Texas State Dept of Health, 1970.			
4601		1/1/1971	Documentation of the Threshold Limit Values for Substances in Workroom Air, Third Edition, 1971.			
4602		1/1/1971	Thirty-Five Years of TLVs, ACGIH, 1971.			
4603		1/1/1973	TLVs Threshold Limit Values for Physical Agents Adopted by ACGIH for 1973.			
4604		1/1/1974	TLVs Threshold Limit Values for Physical Agents Adopted by ACGIH for 1974.			
4605		2/1/1975	Background Documentation on Evaluation of Occupational Exposure to Airborne Asbestos, Joint ACGIH-AIHA Aerosol Hazards Evaluation Committee, February 1975.			
4606		2/1/1975	Recommended Procedures for Sampling and Counting Asbestos Fibers, Joint ACGIH-AIHA Aerosol Hazards Evaluation Committee, February 1975.			
4607		1/1/1975	TLVs Threshold Limit Values for Chemical Substances and Physical Agents in the Workroom Environment with Intended Changes for 1975, ACGIH, 1975.			
4608		1/1/1980	Administrative Rules of Montana, Title 17, Chapter 74, Subchapter 1, 17.74.102 Occupational Air Contaminants, 1980.			
4609		5/1/1981	Threshold Limit Values, HE Stokinger, May-June 1981.			
4610		1/1/1984	Industrial air standards - theory and practice, HE Stokinger, 37th Annual Meeting of the Industrial Health Foundation, October 10-11, 1972; Ann Am Conf Ind Hyg, 1984.			
4611		1986-1987	TLVs Thresold Limit Values and Biological Exposure Indices for 1986-1987, ACGIH.			
4612		1/1/2001	Asbestos, All Forms, ACGIH, 2001.			
4613		1/1/2010	TLVs Thresold Limit Values and Biological Exposure Indices, ACGIH, 2010.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4614		12/5/1966	Guide to the Significance of Occupational Exposure Levels, American Medical Association Council on Occupational Health, Reprinted from JAMA, 12/5/66.			
4615		4/7/1966	Proceedings of the Eighth Annual Meeting of the American Conference of Governmental Industrial Hygienists, April 7-13, 1946.			
4616		1/1/1984	Thirty-Five Years of TLVs, 1946-1981; Index with Recommendations, Annals of the American Conference of Governmental Industrial Hygienists, Volume 9, 1984.			
4617		4/1/1966	Second Joint Technical Session - The Pennsylvania Regulations, J Lieben, Archives of Environmental Health, April 1966.			
4618		1/1/1995	"The Origin and Development of the Asbestos Threshold Limit Value: Scientific Indifference and Corporate Influence," DS Egilman, AA Reinert, International Journal of Health Services, 1995.			
4619		1/1/1996	"The Asbestos TLV: Early Evidence of Inadequacy," D Egilman, A Reinert, American Journal of Industrial Medicine, 1996.			
4620		8/8/1973	NIOSH Memorandum; Re: Identification of a Threshold of Response and Estimations of Safety Factors in the Present Recommended Standards for the Industrial Carcinogen, Asbestos, 8/8/73.			
4621		1/1/1948	1948 Report of the committee on threshold limits, Thirty-Five Year Index, Transactions of the Tenth Annual Meeting of ACGIH, March 27-30, 1948; Ann Am Conf Ind Hyg, 1948.			
4622		1/1/1968	"Editorial: Ambient Asbestos - Still Unsettled," Journal of Occupational Medicine, January 1968.			
4623		2/11/1972	Letter to OSHA, from IJ Selikoff; Re: Epidemiological Constraints in Development of A Standard for Asbestos Exposure, 2/11/72.			
4624		1/1/1950	Chapter 37: The Management Viewpoint, A Fletcher; Discussion, V Brown; Pneumoconiosis, Leroy U Gardner Memorial Volume, Sixth Saranac Symposium, 1950.			
4625		1/1/1946	Health in Industry, Bulletin No 8: Transactions of the Eleventh Annual Meeting of the Industrial Hygiene Foundation, 1946.			
4626		5/13/1999	Letter to DS Ellman, from RE Fairfax, OSHA; Re: OSHA's position on the risk associated with asbestos exposure at the current PEL, 5/13/99.			
4627		1/1/1962	Documentation of the Threshold Limit Values for Substances in Workroom Air, ACGIH, 1962.			
4628		1/1/1967	"The Mechanism of Production of Asbestos Bodies from Anthophyllite Fibers," PF Holt, DK Young, 1967.			
4629		1/1/1972	"Asbestos Body Formation in the Lungs of Rats and Guinea-Pigs After Inhalation of Anthophyllite," SK Botham, PF Holt, J Pathology, 1972.			
4630		1/1/1974	"Mortality and morbidity among the working population of anthophyllite asbestos miners in Finland," LO Meurman, R Kiviluoto, M Hakama, British Journal of Industrial Medicine, 1974.			
4631		1/1/1978	"Significance of Fiber Length in the Clearance of Asbestos Fibres from the Lung," A Morgan, RJ Talbot, A Holmes, British Journal of Industrial Medicine, 1978.			
4632		1/1/1981	"Asbestos and Other Ferruginous Bodies: Their Formation and Clinical Significance," AM Churg, ML Warnock, Am J Path, 1981.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4633		1/1/1989	"Mesothelioma and Asbestos Fiber Type: Evidence from Lung Tissue Analyses," JC McDonald, B Armstrong, P Sebastien, et al, <u>Cancer</u> , 1989.			
4634		1/1/1989	"Mineral Fiber Concentration in Lung Tissue of Mesothelioma Patients in Finland," T Tuomi, A Tossavainen, et al, <u>American Journal of Industrial Medicine</u> , 1989.			
4635		1/1/1990	"Mineral fibres, fibrosis, and asbestos bodies in lung tissue from deceased asbestos cement workers," M Albin, FD Pooley, R Mitha, et al, <u>British Journal of Industrial Medicine</u> , 1990.			
4636		1/1/1990	"Human Epidemiology: A Review of Fiber Type and Characteristics in the Development of Malignant and Nonmalignant Disease," JA Merchant, <u>Environmental Health Perspectives</u> , 1990.			
4637		1/1/1994	"Incidence of cancer among anthophyllite asbestos miners in Finland," LO Meurman, E Pukkala, M Hakama, <u>Occupational and Environmental Medicine</u> , 1994.			
4638		1/1/1994	"Past exposure to asbestos and combustion products and incidence of cancer among Finnish Locomotive Drivers," P Nokso-Koivisto, E Pukkala, <u>Occupational and Environmental Medicine</u> , 1994.			
4639		1/1/1994	"Retention of Asbestos Fibers in the Human Body," A Tossavainen, A Karjalainen, PJ Karhunen, <u>Environ Health Perspect</u> , 1994.			
4640		1/1/1997	"Analysis of Asbestos Fiber Burden in Lung Tissue from Mesothelioma Patients," RF Dodson, M O'Sullivan, CJ Corn, <u>Ultrastructural Pathology</u> , 1997.			
4641		1/1/2001	"An Unusual Case of Mixed-Dust Exposure Involving a "Noncommercial" Asbestos," RF Dodson, JL Levin, <u>Grand Rounds in Environmental Medicine</u> , <u>Environmental Health Perspectives</u> , 2001.			
4642		1/1/2001	"Case Report: Malignant Mesothelioma From Neighborhood Exposure to Anthophyllite Asbestos," WN Rom, SP Hammar, S Hoffman, et al, <u>American Journal of Industrial Medicine</u> , 2001.			
4643		1/1/2001	"Amphibole Fibers in Chinese Chrysotile Asbestos," A Tossavainen, et al, <u>Ann Occup Hyg</u> , 2001.			
4644		1/1/2005	"Asbestos Burden in Cases of Mesothelioma from Individuals from Various Regions of the United States," RF Dodson, R Graef, J Levin, et al, <u>Ultrastructural Pathology</u> , 2005.			
4645		Undated	USGS Reference Photograph 1867a, Anthophyllite, Undated.			
4646		1/1/2018	"How Inhaled Asbestos Causes Scarring and Cancer," AR Brody, <u>Current Respiratory Medicine Reviews</u> , 2018.			
4647		1/1/1972	"A study of the mortality of workers in an anthophyllite asbestos factory in Finland," M Nurminen, <u>Work-environ health</u> , 1972.			
4648		1/1/2010	"Malignant Mesothelioma in a Patient with Anthophyllite Asbestos Fibres in the Lungs," JI Phillips, J Murray, <u>Ann Occup Hyg</u> , 2010.			
4649		Undated	Slide picture, "Asbestos" - Anthophyllite Asbestos and Tremolite Asbestos			
4650		1/1/2019	"High frequency and severity of pleural changes in former workers exposed to anthophyllite associated with other contaminating amphibole asbestos in Brazil," RF Macedo, et al, <u>Am J Ind Med</u> , 2019.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4651		1/1/1994	"Four cases of mesothelioma among Finnish anthophyllite miners," A Karjalainen, LO Meurman, E Pukkala, Occup Environ Med, 1994.			
4652		5/11/2016	"Anthophyllite Asbestos: State of the Science Review," SH Gaffney, et al, 5/11/16.			
4653		1/1/1992	"Malignant Mesothelioma: Clinical Characteristics, Asbestos Mineralogy and Chromosomal Abnormalities of 41 Patients," L Tammilehto, T Tuomi, K Mattson, et al, Eur J Cancer, 1992.			
4654		1/1/1992	"Fibrous Minerals in the Lungs of Mesothelioma Patients: Comparison Between Data on SEM, TEM, and Personal Interview Information," T Tuomi, American Journal of Industrial Medicine, 1992.			
4655		1/1/2006	Chapter 6: Epidemiology of Asbestos-Related Diseases and the Knowledge That Led to What Is Known Today, RA Lemen, Excerpt from Asbestos: Risk Assessment, Epidemiology, and Health Effects, RF Dodson, SP Hammar, Eds, 2006.			
4656		1/1/2017	"Cancer Incidence in Asbestos-Exposed Workers: An Update on Four Finnish Cohorts," P Nynas, et al, Safety and Health at Work 8, 2017.			
4657		1/1/2021	"Anthophyllite asbestos from Staten Island, New York: Longitudinal fiber splitting," M Germine, JH Puffer, Archives of Environmental & Occupational Health, 2021.			
4658		1/1/1963	Anthophyllite Asbestos in North Carolina, SG Conrad, et al, North Carolina Division of Mineral Resources, 1963.			
4659		1/1/1974	"Electron Microscopical Investigation of Asbestos Fibers," AM Langer, AD Mackler, FD Pooley, Environmental Health Perspectives, 1974.			
4660		1/1/1982	"Pulmonary Asbestos Body Counts and Electron Probe Analysis of Asbestos Body Cores in Patients with Mesothelioma: A Study of 25 Cases," VL Roggli, et al, Cancer, 1982.			
4661		1/1/2019	"Empirical model of mesothelioma potency factors for different mineral fibers based on their chemical composition and dimensionality," A Korchevskiy, Inhalation Toxicology, 2019.			
4662		1/1/1980	"Pretumorous Lesions and Lung and Pleural Tumours Induced by Asbestos in Rats, Syrian Gold Hamsters and Macaca Mulatta (Rhesus Monkeys)," LN Lylev, Cancer Research Center, Moscow, USSR, 1980.			
4663		1/1/1965	"Occupational and Nonoccupational Exposures to Asbestos," WC Hueper, Biological Effects of Asbestos, Annals of the New York Academy of Sciences, 1965.			
4664		1/1/1966	"Asbestos, an extrinsic factor in the pathogenesis of bronchogenic carcinoma and mesothelioma," O'Donnell, et al, Cancer, 1966.			
4665		1/1/1966	"Mesothelioma associated with asbestosis: A report of 3 cases," Mann, et al, Cancer, 1966.			
4666		5/6/1969	Asbestos Floats; Source Phillip Carey 7RF-9 Floats, 5/6/69; SGP 0015906; Supersedes Formula No 9, 10/20/59.			
4667		1/1/1971	"Two Cases of Malignant Mesothelioma after Exposure to Asbestos," P Champion, American Review of Respiratory Disease, 1971.			
4668		1/1/1980	Asbestos, Substance Profiles, Report on Carcinogens, Eleventh Edition, 1980.			
4669		11/13/1982	"Letter to the Editor: Mesothelioma in a Brake Repair Worker," AM Langer, WTE McCaughey, The Lancet, 11/13/82.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4670		1/1/1982	"Mortality of two groups of women who manufactured gas masks from chrysotile and crocidolite asbestos: a 40-year follow-up," AD Acheson, MJ Gardner, LP Grime, British Journal of Industrial Medicine, 1982.			
4671		1/1/1983	"Mesothelioma Among Machinists in Railroad and Other Industries," TF Mancuso, American Journal of Industrial Medicine, 1983.			
4672		1/1/1985	"Occupational Risks for Pleural Mesothelioma in Sweden, 1961-1979," HSR Walker, JK McLaughlin, WJ Blot, et al, JNCI, January 1985.			
4673		1/1/1987	"Malignant Mesothelioma With Occupational and Environmental Asbestos Exposure in an Illinois Community Hospital," KM Wolf, ZH Piotrowski, KA Fisher, et al, Arch Internal Med, 1987.			
4674		1/1/1988	"Relative Risk of Mesothelioma Among Railroad Machinists Exposed to Chrysotile," TF Mancuso, American Journal of Industrial Medicine, 1988.			
4675		1/1/1989	"Mesothelioma and Asbestos Fiber Type: Evidence from Lung Tissue Analyses," JC McDonald, B Armstrong, P Sebastien, et al, Cancer, 1989.			
4676		1/1/1990	"An update of cancer mortality among chrysotile asbestos miners in Balangero, northern Italy," G Piolatto, E Negri, J Peto, et al, British Journal of Industrial Medicine, 1990.			
4677		8/23/1988	"Retrospective Mortality Study of Asbestos Workers in Laiyuan," Z Shiqu, W Yongxian, J Zhenhuan, et al, Proceedings of the VIth International Pneumoconioses Conference, Part II, August 23-26, 1988.			
4678		1/1/1991	"Chrysotile Asbestos and Health in Zimbabwe: I. Analysis of Miners and Millers Compensated for Asbestos-Related Diseases Since Independence (1980)," MR Cullen, RS Baloyi, American Journal of Industrial Medicine, 1991.			
4679		1/1/1991	"Relationship Between Lung Asbestos Fiber Type and Concentration and Relative Risk of Mesothelioma: A Case-Control Study," AJ Rogers, J Leigh, G Berry, et al, Cancer, 1991.			
4680		1/1/1993	"Study of occupational lung cancer in asbestos factories in China," Z Huilan, W Zhiming, British Journal of Industrial Medicine, 1993.			
4681		1/1/1994	"Asbestos-Related Diseases Associated with Exposure to Asbestiform Tremolite," SH Srebro, VL Roggli, American Journal of Industrial Medicine, 1994.			
4682		1/1/1994	"Lung Cancer Mortality Among Asbestos Textile Workers: A Review and Update," JM Dement, DP Brown, Ann Occup Hyg, 1994.			
4683		1/1/1994	"Follow-up Study of Chrysotile Asbestos Textile Workers: Cohort Mortality and Case-Control Analyses," JM Dement, DP Brown, A Okun, American Journal of Industrial Medicine, 1994.			
4684		1/1/1994	"Use of asbestos, health risks and induced occupational diseases in the former East Germany," W Sturm, B Menze, Toxicology Letters, 1994.			
4685		1/1/1995	"Fibers in Lung Tissues of Mesothelioma Cases Among Miners and Millers of the Township of Asbestos, Quebec," A Dufresne, M Harrigan, R Begin, American Journal of Industrial Medicine, 1995.			
4686		1/1/1995	"Mortality among workers at a plastic manufacturing and research and development facility: 1946-1988." L Dell, MJ Teta, Am J Ind Med, 1995.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4687		1/1/1995	"Occupational Exposure to Chrysotile Asbestos and Cancer Risk: A Review of the Amphibole Hypothesis," LT Stayner, DA Dankovic, RA Lemen, 1995.			
4688		1/1/1996	Chapter 18: Occupation, R Monson, Cancer Epidemiology and Prevention, 2nd Ed., D Schottenfeld and J Fraumeni, 1996.			
4689		1/1/1996	"Chrysotile Asbestos is the Main Cause of Pleural Mesothelioma," AH Smith, CC Wright, American Journal of Industrial Medicine, 1996.			
4690		1/1/1997	"Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution," Consensus report, Scand J Work Environ Health, 1997.			
4691		1/1/1997	"Mesothelioma in Quebec Chrysotile Miners and Millers: Epidemiology and Aetiology," AD McDonald, BW Case, A Churg, et al, Ann Occup Hygiene, 1997.			
4692		1/1/1997	"Chrysotile, Tremolite and Carcinogenicity," JC McDonald, AD McDonald, Ann Occup Hyg Vol 41, No 6, 1997.			
4693		1/1/1998	Environmental Health Criteria 203, Chrysotile Asbestos, World Health Organization, International Programme on Chemical Safety (IPCS), 1998.			
4694		1/1/1998	"Asbestos in the lungs of persons exposed in the USA," AM Langer, RP Nolan, Monaldi, 1998.			
4695		5/28/1998	"Asbestos-Still a Carcinogen," P Landrigan, NEJM, 5/28/98.			
4696		1/1/1998	"Carcinogenic Implications of the Lack of Tremolite in UICC Reference Chrysotile," A Frank, RF Dodson, et al, Am J Ind Med, 1998.			
4697		1/1/1999	"The Hazards of Chrysotile Asbestos: A Critical Review," P Landrigan, et al, Industrial Health, 1999.			
4698		1/1/2000	"The Quantitative Risks of Mesothelioma and Lung Cancer in Relation to Asbestos Exposure," J Hodgson, A Darnton, Ann Occup Hyg, Vol 44, No 8, 2000.			
4699		9/18/2000	European Communities: Measures Affecting Asbestos and Asbestos-Containing Products, Report of the Panel, World Trade Organization, 9/18/00.			
4700		1/1/2001	"Asbestos Tissue Burden Study on Human Malignant Mesothelioma," Y Suzuki, et al, Industrial Health, 2001.			
4701		1/1/2001	"Cancer Mortality among Workers Exposed to Amphibole-free Chrysotile Asbestos," E Yano, et al, Am J Epidemiol, 2001.			
4702		1/1/2001	"Epidemiology of occupational asbestos-related diseases in China," SX Cai, CH Zhang, K Morinaga, Industrial Health, 2001.			
4703		1/1/2001	"Retrospective View of Airborne Dust Levels in Workplace of a Chrysotile Mine in Ural, Russia," S Kashansky, et al, Industrial Health 39, 51-56, 2001.			
4704		1/1/2001	"The Health Effects of Mining and Milling Chrysotile: The Russian Experience," S Shcherbakov, et al, Can Mineral, Spec Publ 5, 2001.			
4705		1/1/2001	"The Carcinogenicity of Chrysotile Asbestos-A Review," WJ Nicholson, Industrial Health, 2001.			
4706		1/1/2002	"Malignant Mesothelioma in Australia, 1945-2000," J Leigh, et al, Am J Ind Med, 2002.			
4707		1/1/2002	"Risk of mesothelioma among women living near chrysotile mines versus USEPA asbestos risk model: Preliminary findings," M Camus, et al, Ann Occup Hyg, 2002.			
4708		1/1/2002	Chapter 1: The North American Experience with Malignant Mesothelioma, A Greenberg, et al, Robinson & Chahinian's Mesothelioma, 2002.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4709		1/1/2003	"Asbestos Fiber Length as Related to Potential Pathogenicity: A Critical Review," RF Dodson, et al, Am J Ind Med, 2003.			
4710		1/1/2003	"Exposing the "Myth" of ABC, "Anything But Chrysotile": A Critique of the Canadian Asbestos Mining Industry and McGill University Chrysotile Studies," D Egilman, C Fehnel, et al, Am J Ind Med, 2003.			
4711		1/1/2004	"Asbestos in Brakes: Exposure and Risk of Disease," RA Lemen, Am J Ind Med, 2004.			
4712		1/1/2004	"Cancer mortality and morbidity among Lithuanian asbestos-cement producing workers," G Smailyte, et al. Scand J Work Environ Health, 2004.			
4713		4/1/2004	"Chrysotile Asbestos as a Cause of Mesothelioma: Application of the Hill Causation Model," RA Lemen, Int J Occup Environ Health, April/June 2004.			
4714		1/1/2004	"Commentary: Dr T.K. Joshi and Asbestos in India: A Message from the Collegium Ramazzini," P Landrigan, Am J Ind Med, 2004.			
4715		11/19/2004	"Mortality experience in an historical cohort of chrysotile asbestos textile workers," C Mamo, G Costa, WS-E-03, Paper presented at the Global Asbestos Congress, Waseda University, Tokyo, Japan, November 19-21, 2004.			
4716		10/3/2005	"Advances in Malignant Mesothelioma," B Robinson, R Lake, NEJM, 10/3/05.			
4717		1/1/2006	Asbestos, Risk Assessment, Epidemiology, and Health Effects, RF Dodson, S Hammar, 2006.			
4718		1/1/2006	Asbestos, Selected Cancers, Institute of Medicine of the National Academies, 2006.			
4719		1/1/2005	"Measurements of Asbestos Burden in Tissues," RF Dodson, ML Atkinson, Annals of the New York Academy of Sciences, 2006.			
4720		1/31/2006	Asbestos - Prevention and Early Detection, American Cancer Society, 1/31/06.			
4721		9/1/2006	Elimination of asbestos-related diseases, World Health Organization, September 2006.			
4722		1/1/2007	"Occupational Asbestos Exposure Among Respiratory Cancer Patients in Lithuania," RP Everatt, et al, American Journal of Industrial Medicine, 2007.			
4723		1/1/2007	"Follow-up study of chrysotile textile workers: Cohort mortality and exposure-response." MJ Hein, LT Stayner, JM Dement, Occup Environ Med, 2007.			
4724		5/1/2007	NRDC comments on the "Short List" Candidates for the Asbestos Panel of the EPA Science Advisory Board (SAB), May 2007			
4725		1/1/2007	"Pleural mesothelioma in New Caledonia: An acute environmental concern," F Baumann, Y Rougier, JP Ambrosi, Cancer Detection and Prevention, 2007.			
4726		1/1/2007	Chapter 6: Neoplasia, Robbins Basic Pathology, 8th Ed, V Kumar, et al, 2007.			
4727		1/1/2008	"A Technical Comparison of Evaluating Asbestos Concentration by Phase-Contrast Microscopy (PCM), Scanning Electron Microscopy (SEM), and Analytical Transmission Electron Microscopy (ATEM) as Illustrated from Data Generated From a Case Report," RF Dodson, SP Hammar, L Poye. Inhalation Toxicology, 2008			
4728		1/10/2008	Asbestos, The Asbestos Informer, Region 4, US EPA, 1/10/08. www.epa.gov/Region4/air/asbestos/inform.htm			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4729		12/6/2008	"Editorial: Asbestos-related disease—a preventable burden," The Lancet, 12/6/08.			
4730		1/1/2008	Chapter 43: Neoplasms of the Pleura, SP Hammar, RF Dodson, et al, Dail and Hammar's Pulmonary Pathology, Vol II, Neoplastic Lung Disease, 3rd Ed, Tomashefski, Cagle, Farver, Fraire, Eds, 2008.			
4731		6/4/2008	"Excess of Mesotheliomas after Exposure to Chrysotile in Balangero, Italy," D Mirabelli, R Calisti, C Magnani, et al, Occup Environ Med. 6/4/08.			
4732		1/1/2009	"Case Report: Mesothelioma in a Worker Who Spun Chrysotile Asbestos at Home During Childhood," E Yano, Z Wang, Y Suzuki, et al, American Journal of Industrial Medicine, 2009.			
4733		1/1/2009	"Asbestos Fiber Burden Analysis of Lung and Lymph Nodes in 100 Cases of Mesothelioma," RE Gordon, S Dikman, Am J Respir Crit Care Med, 2009.			
4734		1/1/2009	"Chrysotile Biopersistence: The Misuse of Biased Studies," H Pezerat, Int J Occup Environ Health, January/March 2009.			
4735		1/1/2009	"Developments in Asbestos Cancer Risk Assessment," MA Silverstein, L Welch, R Lemen, American Journal of Industrial Medicine, 2009.			
4736		7/3/2009	Email exchange between Dr. Aliya N. Husain (Prof. of Pathology, University of Chicago) and C Panatier; Re: Robbins 8th Ed Textbook Question, 7/3/09; Affidavit.			
4737		1/1/2009	"Environmental exposure to asbestos and the exposure-response relationship with mesothelioma," MT Madkour, et al, Eastern Mediterranean Health Journal, 2009.			
4738		4/1/2009	"Fiber Types, Asbestos Potency, and Environmental Causation, A Peer Review of Published Work and Legal and Regulatory Scientific Testimony," D Egilman, Int J Environ Health, April/June 2009.			
4739		8/1/2009	"Lung cancer mortality and fibre exposures among North Carolina asbestos textile workers," D.Loomis, et al, Occup & Environ Med. August 2009.			
4740		1/1/2009	"Mortality from cancer and other causes in the Balangero cohort of chrysotile asbestos miners, E Pira, C Pelucchi, C La Vecchia, et al, Occup Environ Med, 2009.			
4741		5/1/2009	Asbestos Exposure and Cancer Risk, National Cancer Institute (NCI) FactSheet, 5/1/09.			
4742		1/1/2009	Asbestos, Known to be a human carcinogen, First listed in the First Annual Report on Carcinogens, 1980, Eleventh Edition, 2009.			
4743		5/1/2009	Special Report: Policy, A review of human carcinogens - Part C: metals, arsenic, dusts, and fibres, IARC, The Lancet, May 2009.			
4744		4/1/2009	Statement from Acting Surgeon General Steven K Galson about National Asbestos Week, 4/1/09.			
4745		1/1/2010	"A Case of Occupational Peritoneal Mesothelioma From Exposure to Tremolite-Free Chrysotile in Quebec, Canada: A Black Swan Case," D Egilman, LM Menendez, American Journal of Industrial Medicine, 2010.			
4746		1/1/2010	Chapter 76: Asbestos and asbestos-related diseases, D Weill, A. Cockcroft, Hunter's Diseases of Occupations, Tenth Edition, 2010.			
4747		1/1/2010	"Case-control study of pleural mesothelioma in workers with social security in Mexico," G Aguilar-Madrid, et al, American Journal of Industrial Medicine, 2010.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4748		1/1/2010	"Commentary: Asbestos Is Still With Us: Repeat Call," Collegium Ramazzini, Journal of Occup and Environ Hyg, 2010.			
4749		1/1/2010	"Asbestosis and Mesothelioma Among British Asbestos Workers (1971-2005)," A Harding, AJ Darnton, American Journal of Industrial Medicine, 2010.			
4750		1/1/2010	"Clinical Study on Mesothelioma in Japan: Relevance to Occupational Asbestos Exposure," T Kishimoto, et al, American Journal of Industrial Medicine, 2010.			
4751		1/1/2010	Chapter 77: Epidemiology of asbestos-related diseases, R Rudd, Hunter's Diseases of Occupations, Tenth Edition, 2010.			
4752		6/1/2010	"Letter: Mesothelioma risk from chrysotile," JT Hodgson, A. Darnton, Occup Environ Med, June 2010.			
4753		1/1/2010	"Malignant mesothelioma among employees of a Connecticut factory that manufactured friction materials using chrysotile asbestos," MM Finkelstein, C Meisenkothen, Ann Occup Hyg, 2010.			
4754		7/1/2010	"The Case for a Global Ban on Asbestos," J LaDou, B Castleman, A Frank, et al, Environ Health Perspectives, July 2010.			
4755		1/1/2011	"Commentary: Applying Quality Criteria to Exposure in Asbestos Epidemiology Increases the Estimated Risk," A Burdorf, D Heederik, Ann Occup Hyg, 2011.			
4756		4/1/2011	Current Intelligence Bulletin 62, Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research. Revised Edition. NIOSH. April 2011.			
4757		1/1/2011	"Mesothelioma from Chrysotile Asbestos: Update," MS Kanarek, Annals of Epidemiology, 2011.			
4758		1/1/2011	"Pleural mesothelioma in New Caledonia: Associations with environmental risk factors," F Baumann, et al, Environ Health Perspectives, 2011.			
4759		3/17/2011	Update of the scientific evidence on asbestos and cancer, Kurt Straif, IARC, WHO, 3/17/11.			
4760		1/1/2011	Report on Carcinogens, National Toxicology Program, Twelfth Edition, 2011.			
4761		9/5/2011	"Increasing incidence of malignant mesothelioma after exposure to asbestos during home maintenance and renovation," N Olsen, et al. MJA, 9/5/11.			
4762		6/4/2012	Position Statement on Asbestos, Joint Policy Committee of the Societies of Epidemiology (JPC-SE), 6/4/12.			
4763		9/4/2012	Union for the International Control of Cancer adopts Position Statement on Asbestos, K Ruff, RightOnCanada, 9/4/12.			
4764		7/1/2012	"Editorial: A call to action: epidemiologists assert themselves with scientific data," S Weiss, Int'l J of Occup and Environ Health, July-Sept 2012.			
4765		7/1/2012	"Editorial: China and the US: asbestos in common," A Frank, Int'l J of Occup and Environ Health, July-Sept 2012.			
4766		1/1/2013	"Assessing specific causation of mesothelioma following exposure to chrysotile asbestos containing brake dust," MD Freeman, SS Kohles, Int'l J of Environ Occup Health, 2013.			
4767		1/1/2012	Arsenic, Metals, Fibres, and Dusts - Volume 100 C - A review of human carcinogens, Volume 100C, IARC Monographs, 2012.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4768		1/1/2013	"The Worldwide Pandemic of Asbestos-Related Diseases," L Stayner, LS Welch, R Lemen, Annual Review of Public Health, 2013.			
4769		1/1/2013	"Mesothelioma and Employment in Massachusetts: Analysis of Cancer Registry Data 1988-2003," C Roelofs, et al, American Journal of Industrial Medicine. 2013.			
4770		1/1/2013	"Pulmonary disease asbestos mill workers," R Zurbriggen, L Capone. Medicina (Buenos Aires), 2013.			
4771		1/1/2014	"Occupational and non-occupational attributable risk of asbestos exposure for malignant pleural mesothelioma," A Lacourt, C Gramond, P Brochard, et al, Thorax, 2014.			
4772		1/1/2015	Excerpts from WHO Classification of Tumours of the Lung, Pleura, Thymus and Heart, WD Travis, et al Eds, 2015.			
4773		Undated	US Standard Sieve chart, Undated.			
4774		1/1/2002	Asbestos: Geology, Mineralogy, Mining, and Uses, RL Virta, US Department of the Interior, US Geological Survey, Open-File Report 02-149, 2002.			
4775		1/1/2017	"The asbestos fibre burden in human lungs: new insights into the chrysotile debate," IS Feder, I Tischoff, A Tannapfel, et al, Eur Respir J, 2017.			
4776		1/1/2015	"Malignant mesothelioma due to non-occupational asbestos exposure from the Italian national surveillance system (ReNaM): epidemiology and public health issues," A Marinaccio, A Binazzi, ReNaM Working Group. BMJ. 2015.			
4777		1/1/2015	The Global Health Dimensions of Asbestos and Asbestos-Related Diseases, Collegium Ramazzini, 2015.			
4778		1/1/2010	"Occupations and Industries in France at High Risk for Pleural Mesothelioma: A Population-Based Case-Control Study (1998-2002)," P Rolland, C Gramond, P Brochard, et al, American Journal of Industrial Medicine. 2010.			
4779		10/1/2011	"Asbestos Exposure and Survival in Malignant Mesothelioma: A Description of 122 Consecutive Cases at an Occupational Clinic," E Skammeritz, LH Omland, O Omland, et al, JOEM, October 2011.			
4780		1/1/2014	"Mesothelioma In a Wine Cellar Man: Detailed Description of Working Procedures and Past Asbestos Exposure Estimation," A Nemo, S Silvestri, Ann Occup Hyg. 2014.			
4781		1/1/2014	Chrysotile Asbestos, World Health Organization (WHO), 2014.			
4782		1/1/2015	"How conflicted authors undermine the World Health Organization (WHO) campaign to stop all use of asbestos: spotlight on studies showing that chrysotile is carcinogenic and facilitates other non-cancer asbestos-related diseases," X Baur, CL Soskolne, LT Budnik, et al, JOEM, 2015.			
4783		1/1/2015	"Short Fiber Tremolite Free Chrysotile Mesothelioma Cohort Revealed," D Egilman, T Bird, American Journal of Industrial Medicine. 2015.			
4784		1/1/2015	"Asbestos Textile Production Linked to Malignant Peritoneal and Pleural Mesothelioma in Women: Analysis of 28 Cases in Southeast China," Z Gao, K Hiroshima, K Morinaga, et al, American Journal of Industrial Medicine, 2015.			
4785		1/1/2016	"Commentary: Collegium Ramazzini: Comments on the 2014 Helsinki Consensus Report on Asbestos," X Baur, AL Frank, R Lemen, et al, American Journal of Industrial Medicine, 2016.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4786		1/1/2016	"Prevention of Asbestos-Related Disease in Countries Currently Using Asbestos," D Marsili, B Terracini, E Algranti, et al, International Journal of Environmental Research and Public Health. 2016.			
4787		1/1/2016	"Asbestos and product defence science," B Terracini, D Mirabelli, Int J Epidem, 2016.			
4788		1/1/2016	Collegium Ramazzini Statement - Asbestos is Still With Us: Repeat Call for a Universal Ban, 2016.			
4789		1/1/2015	"Asbestos-Related Lung Cancer and Malignant Mesothelioma of the Pleura: Selected Current Issues," S Markowitz, Occupational and Environmental Pulmonary and Bronchiolar Disorders, WN Rom and J Reibman, Eds, 2015.			
4790		1/1/2016	"Malignant mesothelioma in Australia 2015: Current incidence and asbestos exposure trends," MJ Soeberg, J Leigh, N van Zandwijk, Journal of Toxicology and Environmental Health, Part B. 2016.			
4791		1/1/2017	"Mesothelioma continues to increase even 40 years after exposure - Evidence from long-term epidemiological observation," B Swiatkowska, N Szeszenia-Dabrowska, Lung Cancer. 2017.			
4792		7/31/1973	Letter to J Wagoner, NIOSH, from IJ Selikoff; Re: Chrysotile as cause of disease in insulation workers, 7/31/73; Affidavit.			
4793		5/8/2019	Chrysotile Asbestos Fact Sheet, Australian Government, Asbestos Safety and Eradication Agency, 5/8/19.			
4794		1/1/2018	"Hand-spinning chrysotile exposure and risk of malignant mesothelioma: A case-control study in Southeastern China," Z Jiang, T Chen, X Zhang, et al, International Journal of Cancer, 2018.			
4795		1/1/2019	"Quantitative relationships of exposure to chrysotile asbestos and mesothelioma mortality," D Loomis, DB Richardson, L Elliott, Am J Ind Med, 2019.			
4796		6/1/1976	Chrysotile Miners Also at Risk of Asbestos Disease, Insulation Hygiene Progress Reports, Summer 1976.			
4797		1/1/2018	"How Inhaled Asbestos Causes Scarring and Cancer," AR Brody, Current Respiratory Medicine reviews, 2018.			
4798		2/1/1999	Chrysotile Asbestos Priority Existing Chemical No 9, Full Public Report, NICNAS, Commonwealth of Australia, February 1999.			
4799		12/17/2002	Opinion on Risk to Human Health from Chrysotile Asbestos and Organic Substitutes, Scientific Committee on Toxicity, Ecotoxicity and the Environment, European Commission, Asbestos 17122002/D(02). 12/17/02.			
4800		1/1/1980	"Asbestos Use and Carcinogenicity in Germany and a Comparison with Animal Studies," F Pott, Annals Occup Hyg, 1980.			
4801		1/1/2018	"Misleading "New Insights into the Chrysotile Debate," HJ Woitowitz, X Baur, Pneumologie, 2018.			
4802		10/11/2019	FDA Testing Results - Certificate of Analysis, Task 3, Analysis of Official Samples, 4th Group, 15 Samples, 30806-6, 6A, 6B, AMA Analytical Services, Revision #2, 10/11/19.			
4803		4/30/2019	FDA Testing Results - Certificate of Analysis, Task 3, Analysis of Official Samples, 1st Group, 8 Samples, 300396-1 to 300396-8B, AMA Analytical Services, Revision #1, 4/30/19.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4804		10/17/2019	FDA Email to L Szczepaniak, Johnson & Johnson, et al, from R Lanham; Re: Conference Call #2, Johnson's Baby Powder, Batch #22318RB/ Positive Sample found for chrysotile, a type of asbestos. 10/17/19: INITIAL C00128054-55.			
4805		1/1/2020	"Association between asbestos exposure and pericardial and tunica vaginalis testis malignant mesothelioma: a case-control study and epidemiological remarks," A Marinaccio, et al, Scand J Work Environ Health. 2020.			
4806		1/1/2020	"Author's Response: Mezei et al's "Comments on a recent case-control study of malignant mesothelioma of the pericardium and the tunica vaginalis testis," A Marinaccio, et al, Scand J Work Environ Health. 2020.			
4807		2/23/2019	Report of Evaluation of Cosmetics and Cosmetic Talc for FDA, DT Crane, OSHA, 2/23/19.			
4808		1/1/2017	Abstract - "Mesothelioma With No Evidence of Commercial Amphibole Exposure - 35 Cases With Chrysotile, Non-Commercial Amphibole or Asbestiform Talc By Lung Fiber Burden Analysis," S Sanyal, JL Abraham, JA Crawford, B58 Occupational Lung Disease: Case Studies, Epidemiology and Mechanisms, Thematic Poster Session, Am J Respir Crit Care Med, 2017.			
4809		1/1/2018	"Causal Understandings: Controversy, Social Context, and Mesothelioma Research," L Braun, H Kopinski, Biosocieties, 2018.			
4810		1/1/2019	"Mortality and mesothelioma incidence among chrysotile asbestos miners in Balangero, Italy: A cohort study," D Ferrante, et al. Am J Ind Med. 2019.			
4811		1/1/2017	"Diffuse peritoneal mesothelioma: A case series of 62 patients including paraoccupational exposures to chrysotile asbestos," RL Kradin, G Eng, DC Christiani, Am J Ind Med, 2017.			
4812		1/1/2020	"Malignant Mesothelioma Among Employees of a Connecticut Factory That Manufactured Friction Materials Using Chrysotile Asbestos: An Update," MM Finkelstein, C Meisenkothen, Annals of Work Exposures and Health, 2020.			
4813		1/1/2019	"Empirical model of mesothelioma potency factors for different mineral fibers based on their chemical composition and dimensionality," A Korchevskiy, JO Rasmuson, EJ Rasmuson, Inhalation Toxicology. 2019.			
4814		1/1/2020	"Asbestos Exposure of Chrysotile Miners and Millers in Balangero, Italy," S Silvestri, et al, Annals of Work Exposures and Health, 2020.			
4815		1/1/2020	"Asbestos-related Cancers: the 'Hidden Killer' remains a global threat," N van Zandwijk, G Reid, AL Frank, Expert Review of Anticancer Therapy. 2020.			
4816		1/1/2020	"Occupational cohort study of current and former workers exposed to chrysotile in mine and processing facilities in Asbest, the Russian Federation: Cohort profile of the Asbest Cohort Study." J Schuz. et al. PLoS ONE. 2020.			
4817		1/1/2004	"Cohort Studies on Cancer Mortality Among Workers Exposed Only to Chrysotile Asbestos: a Meta-analysis," L Li, et al, Biomedical and Environmental Sciences, 2004.			
4818		1/1/2021	"Ongoing downplaying of the carcinogenicity of chrysotile asbestos by vested interests," X Baur, AL Frank, Journal of Occupational Medicine and Toxicology. 2021.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4819		1/1/2022	"A Cohort Study on Cancer Incidence among Women Exposed to Environmental Asbestos in Childhood with a Focus on Female Cancers, including Breast Cancer," SB Dalsgaard, et al, International Journal of Environmental Research and Public Health, 2022.			
4820		4/15/1989	"Mesothelioma and Asbestos Fiber Type: Evidence From Lung Tissue Analyses," JC McDonald, et al, Cancer, 4/15/89.			
4821		1/1/1994	"Asbestos- Related Disease Associated With Exposure to Asbestiform Tremolite", SH Srebro, VL Roggli, American Journal of Industrial Medicine, 1994.			
4822		1/1/1995	"Fibers in Lung Tissues of Mesothelioma Cases Among Miners and Millers of the Township of Asbestos, Quebec," A Dufresne, et al, American Journal of Industrial Medicine, 1995.			
4823		1/1/1995	"Occupational Exposure to Chrysotile Asbestos and Cancer Risk: A Review of the Amphibole Hypothesis," L Stayner, R Lemen, et al, American Journal of Public Health, 1995.			
4824		1/1/1998	Environmental Health Criteria 203, Chrysotile Asbestos, World Health Organization, International Programme on Chemical Safety (IPCS), 1998.			
4825		1/1/1998	"Carcinogenic Implications of the Lack of Tremolite in UICC Reference Chrysotile," A Frank, R Dodson, et al, American Journal of Industrial Medicine, 1998.			
4826		9/1/2001	Chemical-Specific Health Consultation: Tremolite Asbestos and Other Related Types of Asbestos, ATSDR, September 2001.			
4827		1/1/2003	"Exposing the "Myth" of ABC, "Anything But Chrysotile": A Critique of the Canadian Asbestos Mining Industry and McGill University Chrysotile Studies," D Egilman, C Fehnel, et al, American Journal of Industrial Medicine, 2003.			
4828		1/1/2009	"Analysis of Amphibole Asbestos in Chrysotile-Containing Ores and a Manufactured Asbestos Product," JR Millette, et al, The Microscope, 2009.			
4829		1/1/1986	"Malignant Mesothelioma Caused by Childhood Exposure to Long-Fiber Low Aspect Ratio Tremolite," F Magee, JL Wright, A Churg, et al, American Journal of Industrial Medicine, 1986.			
4830		1/1/2002	"Tremolite and Mesothelioma," VL Roggli, RT Vollmer, TA Sporn, et al, Annals of Occupational Hygiene, 2002.			
4831		1/1/1982	"Biological Effects of Tremolite," JC Wagner, M Chamberlain, DM Griffiths, et al Br J Cancer, 1982.			
4832		1/1/1991	"Association of Tremolite Habit with Biological Potential: Preliminary Report," RP Nolan, AM Langer, DE Colflesh, et al, Mechanisms in Fibre Carcinogenesis, RC Brown, Ed, 1991.			
4833		7/5/2013	Tremolite Reference Photographs, 1304435, 7/5/13.			
4834		1/1/1985	"Inhalation Studies on the effects of tremolite and brucite dust in rats," JMG Davis, J Addison, BG Miller, et al, Carcinogenesis, 1985.			
4835		3/17/1986	The Morbidity and Mortality of Vermiculite Miners and Millers Exposed to Tremolite-Actinolite, H Amandus, NIOSH, 3/17/86.			
4836		1/1/1987	"Mesothelioma in Cyprus: The Role of Tremolite," K McConnochie, L Simonato, JC Wagner, et al, Thorax, 1987.			
4837		12/1/1988	"An Epidemiological Study in an Anatolian Village Environmentally Exposed to Tremolite Asbestos," YI Baris, N bilir, P Sebastien, et al, British Journal of Industrial Medicine, December 1988.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4838		2/29/1988	Letter to EPA, from HA Eschenbach, WR Grace; Re: Mortality, morbidity and sputum study of WR Grace workers at South Carolina Mine and Mill, 2/29/88; Attachment: Health of Vermiculite Miners Exposed to Trace Amounts of Fibrous Tremolite, JC McDonald, AD McDonald, P Sebastien, McGill University, 1988.			
4839		8/1/1990	"Human Disease Consequences of Fiber Exposures: A Review of Human Lung Pathology and Fiber Burden Data," VL Roggli, Environmental Health Perspectives, August 1990.			
4840		4/1/2007	"Vermiculite, Respiratory Disease, and Asbestos Exposure in Libby, Montana: Update of a Cohort Mortality Study," PA Sullivan, Environmental Health Perspectives, April 2007.			
4841		12/7/1984	Asbestos International Assn Memo to Asbestos Producers Advisory Panel/ Medical Advisory Panel, from Director General; Re: Tremolite in Chrysotile, 12/7/84.			
4842		7/31/2001	Testimony of Richard Lemen, Senate Hearing - Asbestos, 7/31/01.			
4843		2/1/1985	Exposure Assessment for Asbestos - Contaminated Vermiculite, EPA 560/5-85-013, GH Dixon, et al, February 1985.			
4844		4/1/2003	The Tremolite Asbestos Registry Expert Work Group Meeting, February 13-14, 2002, ASTDR, April 2003.			
4845		1/1/1997	"Mesothelioma in Quebec Chrysotile Miners and Millers: Epidemiology and Aetiology," AD McDonald, BW Case, JC McDonald, et al, Ann Occup Hyg, 1997.			
4846		1/1/1992	"Five Cases of Pleural Mesothelioma with Endemic Pleural Calcifications in a Rural Area in Greece," L Sichletidis, et al, La medicina del lavoro, 1992.			
4847		1/1/1989	"Mesothelioma in Cyprus," K McConnochie, L Simonato, JC Wagner, et al, IARC, 1989.			
4848		1/1/1988	"Mortality of Vermiculite Miners Exposed to Tremolite," HE Amandus, R Wheeler, P Sebastien, et al, Ann Occup Hyg, 1988.			
4849		1/1/1987	"The Morbidity and Mortality of Vermiculite Miners and Millers Exposed to Tremolite-Actinolite: Part II. Mortality," HE Amandus, R Wheeler, American Journal of Industrial Medicine, 1987.			
4850		1/1/1986	"Cohort study of mortality of vermiculite miners exposed to tremolite," JC McDonald, AD McDonald, P Sebastien, British Journal of Industrial Medicine, 1986.			
4851		1/1/1991	"Variations in the Carcinogenicity of Tremolite Dust Samples of Differing Morphology," JMG Davis, J Addison, K Niven, et al, Annals of the New York Academy of Sciences, 1991.			
4852		4/25/1987	"Association of Metsovo Lung and Pleural Mesothelioma with Exposure to Tremolite-Containing Whitewash," AM Langer, RP Nolan, et al, The Lancet, 4/25/87.			
4853		6/1/1990	Health Effects of Tremolite, American Thoracic Society, June 1990.			
4854		12/31/1991	"Health Effects of Tremolite: Now and In the Future," BW Case, The Third Wave of Asbestos Disease: Exposure to Asbestos in Place, Annals of the New York Academy of Sciences, Vol 643, 12/31/91.			
4855		1/1/1997	"Chrysotile, Tremolite and Carcinogenicity," JC McDonald, AD McDonald, Ann Occup Hyg, 1997.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4856		12/22/2005	"A Review of Carcinogenicity Studies of Asbestos and Non-Asbestos Tremolite and Other Amphiboles," J Addison, EE McConnell, International Symposium on the Health Hazard Evaluation of Fibrous Particles Associated with Taconite and the Adjacent Duluth Complex, St Paul, Minnesota, March 30-April 1, 2003. 12/22/05.			
4857		12/24/1994	"Malignant pleural mesothelioma associated with exposure to tremolite," D Luce, P Brochard, M Goldberg, et al, The Lancet, December 24/31, 1994.			
4858		1/1/2014	"Rat Model Demonstrates a High Risk of Tremolite but a Low Risk of Anthophyllite for Mesothelial Carcinogenesis," D Aierken, Y Okazaki, S Toyokuni, et al, Nagoya J Med Sci, 2014.			
4859		Undated	"Health Effects of Tremolite, Actinolite and Anthophyllite," DE Foliart, RW Morgan, Undated.			
4860		1/1/1980	"Pleural calcification, pleural mesotheliomas, and bronchial cancers caused by tremolite dust," S Yazicioglu, et al, Thorax, 1980.			
4861		3/1/1988	"Chrysotile, Tremolite and Malignant Mesothelioma in Man," A Churg, Chest, March 1988.			
4862		1/1/2008	"Environmental mesothelioma associated with tremolite asbestos: Lessons from the experiences of Turkey, Greece, Corsica, New Caledonia, and Cyprus," SH Constantopoulos, <u>Regulatory Toxicology and Pharmacology</u> , 2008.			
4863		1/1/2018	"How Inhaled Asbestos Causes Scarring and Cancer," AR Brody, <u>Current Respiratory Medicine Reviews</u> , 2018.			
4864		1/1/1990	"Health Effects of Tremolite," H Weill, et al, Am Rev Respir Diseases, American Thoracic Society, December 1990.			
4865		Undated	Slide picture, "Asbestos" - Anthophyllite Asbestos and Tremolite Asbestos			
4866		1/1/1991	Correspondence: On talc, tremolite and tergiversation, BW Case, British Journal of Industrial Medicine, 1991.			
4867		2/15/1983	Report #2/83/DP/R/99 Note: On the Pathogenecity of Tremolite Asbestos, JMG Davis, 2/15/83			
4868		10/1/2014	Asbestos: CAS No 1332-21-4, NTP Report on Carcinogens, Thirteenth Edition, October 2014.			
4869		1/1/2016	"Short Fiber Tremolite Free Chrysotile Mesothelioma Cohort Revealed," D Egilman, T Bird, American Journal of Industrial Medicine, 2016.			
4870		1/1/1958	Asbestos Excerpt from Monographs on Neoplastic Disease, Vol 1 Carcinoma of the Lung, DW Smithers , JR. Bignall, Eds, 1958.			
4871		1/1/2002	African Issues, Asbestos Blue, Labour, Capital, Physicians & the State in South Africa, J McCulloch, 2002.			
4872		1/1/2003	"Exposing the "Myth" of ABC, "Anything But Chrysotile": A Critique of the Canadian Asbestos Mining Industry and McGill University Chrysotile Studies," D Egilman, C Fehnel, et al, <u>American Journal of Industrial Medicine</u> , 2003.			
4873		6/1/2005	"Doubt Is Their Product," D Michaels, Scientific American, June 2005.			
4874		1/1/2005	"Abuse of Epidemiology: Automobile Manufacturers Manufacture a Defense to Asbestos Liability," D Egilman, et al, <u>Int J Occup Environ Health</u> , 2005.			
4875		1/1/2006	"Editorial: How to distort the scientific record without actually lying: truth, and the arts of science," JC. Bailar, Eur J Oncol, 2006.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4876		1/1/2007	"Against Anti-Health Epidemiology: Corporate Obstruction of Public Health via Manipulation of Epidemiology," D Egilman, et al, <i>Int J Occup Environ Health</i> , 2007.			
4877		1/1/2007	"Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court," LS Welch, <i>Int J Occup Environ Health</i> , 2007.			
4878		7/1/2007	"How Litigation Shapes the Scientific Literature: Asbestos and Disease Among Automobile Mechanics," D Michaels, 7/1/07.			
4879		5/22/2007	Comments submitted to Ms. Vivian Turner, Designated Federal Officer. Re: "Invitation for Comments on the "Short List" Candidates for the Asbestos Panel of the EPA Science Advisory Board (SAB)." D Michaels. 5/22/07.			
4880		1/1/2008	Doubt is Their Product: How Industry's Assault on Science Threatens Your Health," D Michaels, 2008.			
4881		1/1/2008	Defending the Indefensible: The Global Asbestos Industry and its Fight for Survival, J McCulloch, G Tweedale, 2008.			
4882		1/1/2008	Bending Science, How Special Interests Corrupt Public Health Research, McGarity & Wagner, 2008.			
4883		1/1/2009	"Chrysotile Biopersistence: The Misuse of Biased Studies," H Pezerat, <i>Int J Occup Environ Health</i> , January/March 2009.			
4884		12/11/2010	World Report: Canada accused of hypocrisy over asbestos exports, T Kirby, <i>The Lancet</i> , 1973-1974, 12/11/10.			
4885		12/16/2010	Asbestos scandal: Irresponsible policies could cause an epidemic of malignant lung disease, <i>Nature</i> , 12/16/10.			
4886		2/1/2012	Heads They Win, Tails We Lose, How Corporations Corrupt Science at the Public's Expense, The Scientific Integrity Program of the Union of Concerned Scientists, February 2012.			
4887		4/30/2012	Pro asbestos advocacy group shuts its doors, R Hiltz, canada.com , 4/30/12.			
4888		5/1/2012	International Call for Action to Stop Intimidation of Scientists by the Asbestos Industry, E Abi-Jaoude, et al, RightOn Canada, http://www.rightoncanada.ca/?p=1430 , May 2012.			
4889		7/1/2012	"Editorial: A call to action: epidemiologists assert themselves with scientific data," S Weiss, <i>Int'l J Occup Environ Health</i> , July-Sept 2012			
4890		1/1/2013	"Transparency and translation of science in a modern world," P Grandjean, D Ozonoff, <i>Environmental Health</i> , 2013.			
4891		12/20/2013	Lab Rats: The anatomy of deadly product defense campaigns - <i>Hazards Magazine</i> , 12/20/13; www.hazards.org/deadlybusiness/labrats			
4892		1/1/2013	"Editorial: Protecting Our Science," N Seixas, <i>Ann Occup Hyg</i> , 2013.			
4893		4/1/2014	"Dust diseases and the legacy of corporate manipulation of science and law," D Egilman, T Bird, C Lee, <i>Int J of Occup Environ Health</i> , April-June 2014.			
4894		1/1/2016	"Asbestos and Product Defence Science," B Terracini, D Mirabelli, <i>International Journal of Epidemiology</i> , 2016.			
4895		1/1/2018	"The Production of Corporate Research to Manufacture Doubt About the Health Hazards of Products: An Overview of the Exponent Bakelite Simulation Study," D Egilman, <i>New Solutions</i> , 2018.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4896		1/1/2015	"Short Fiber Tremolite Free Chrysotile Mesothelioma Cohort Revealed," D Egilman, T Bird, American Journal of Industrial Medicine, 2015.			
4897		1/1/2019	"Asbestos and insurance interests continue to use discredited scientific argument to sell asbestos and to deny justice to asbestos victims," K Ruff, E Joao de Souza, P Iselin, et al, Journal of Scientific Practice and Integrity, 2019.			
4898		6/12/2019	Letter to the Editor, Re: Comments on Egilman's Response to Hessel regardin the health hazards of brake dust and his reflections on corporate behavior, D Paustenbach, Am J Ind Med, 2019;1-9, 6/12/19.			
4899		6/12/2019	Letter to the Editor, Response to Paustenbach, D Egilman, Am J Ind Med, 2019;1-4, 6/12/19.			
4900		6/12/2019	Letter to the Editor, The editors respond to Dr Paustenbach, R Ehrlich, S Markowitz, Am J Ind Med, 2019;1-2, 6/12/19.			
4901		1/1/2019	"Letter to the Editor: Re: Comments on Egilman's Response to Hessel regarding the health hazards of brake dust and his reflections on corporate behavior," Paustenbach, American Journal of Industrial Medicine, 2019.			
4902		1/1/2019	Letter to the Editor: Response to Paustenbach," D Egilman, American Journal of Industrial Medicine, 2019.			
4903		1/1/2019	Letter to the Editor: The Editors Respond to Dr Paustenbach," R Ehrlich, S Markowitz, American Journal of Industrial Medicine, 2019.			
4904		1/1/1992	Chapter 5: Mesothelioma, Pathology of Asbestos-Associated Diseases, 1st Ed, Roggli, Greenberg, Pratt, Eds, 1992.			
4905		1/1/2003	"Sarcomatoid mesothelioma and its histological mimics: a comparative immunohistochemical study," Lucas, et al, Histopathology, 2003.			
4906		1/1/2004	Chapter 5: Mesothelioma, Pathology of Asbestos-Associated Diseases, 2nd Ed, Roggli, Oury, Sporn, Eds, 2004.			
4907		1/1/2004	Chapter 2: Tumours of the Pleura, WHO Classification of Tumours. Pathology & Genetics of Tumours of the Lung, Pleura, Thymus and Heart, W Travis, Ed, 2004.			
4908		1/1/2006	"The Pathologic Features of Asbestos-Induced Disease," Chapter 5 from Asbestos - Risk Assessment, Epidemiology, and Health Effects. Editors: Drs. Dodson, Hammar. Copyright 2006.			
4909		1/1/2006	"My approach to the diagnosis of mesothelial lesions," KJ Butnor, J Clin Pathol, 2006.			
4910		1/1/2008	Excerpt from Dail and Hammar's Pulmonary Patholgy, Volume II: Neoplastic Lung Disease, 3rd Ed, pp. 652-657, 2008.			
4911		8/1/2009	"Guidelines for Pathologic Diagnosis of Malignant Mesothelioma," A Husain, et al, Arch Pathol Lab Med, pp 1331, August 2009.			
4912		11/1/2010	"Sarcomatoid Neoplasms of the Lung and Pleura," W Travis, Arch Pathol Lab Med, November 2010.			
4913		1/1/2011	Chapter 7: Asbestos and Mesothelioma, Asbestos - Risk Assessment, Epidemiology, and Health Effects, 2nd Ed, Dodson, Hammar, Eds, 2011.			
4914		8/1/2012	"Diffuse Malignant Mesothelioma," S Oviedo, P Cagle, Arch Pathol Lab Med, August 2012.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4915		8/1/2018	"Cytopathologic Diagnosis of Epithelioid and Mixed-Type Malignant Mesothelioma," A Hjerpe, et al. Arch Pathol Lab Med, August 2018.			
4916		10/22/2009	Mesothelioma: Benchmark Levels of Asbestos Exposure, M Lees, HSE, 10/22/09.			
4917		1/1/2015	Chapter 1: Tumours of the Lung, WHO Classification of Tumours of the Lung, Pleura, Thymus and Heart, 2015.			
4918		1/1/1948	Threshold Limit Values Adopted at April 1948 Meeting of the ACGIH, Discussion and Thirty-Five Year Index with Recommendations, Annals of the American Conference of Governmental Industrial Hygienists, Volume 9, 1984.			
4919		12/31/1965	Discussion, CG Addingley, British Belting and Asbestos, Biological Effects of Asbestos, Annals of the New York Academy of Sciences, 12/31/65.			
4920		12/2/1971	"Effects of Low Concentrations of Asbestos: Clinical, Environmental, Radiologic and Epidemiologic Observations in Shipyard Pipe Coverers and Controls," RLH Murphy, et al, New England Journal of Medicine, 12/2/71.			
4921		12/15/1976	NIOSH Memorandum; Subject: Evaluation of Data on Health Effects of Asbestos Exposure and Revised Recommended Numerical and Environmental Limits, 12/15/76.			
4922		5/1/1978	"Malignant Mesothelioma With Minimal Asbestos Exposure," W Chen, NK Mottet, Human Pathology, May 1978.			
4923		1/1/1979	"Short-Term Asbestos Work Exposure and Long-Term Observation," H Seidman, IJ Selikoff, EC Hammond, NYAS, 1979.			
4924		10/17/1979	Commercial and Industrial Use of Asbestos Fibers and Consumer Products Containing Asbestos, CPSC/EPA, Fed Reg Vol 44, No 202, 10/17/79.			
4925		4/1/1980	Workplace Exposure to Asbestos, Review and Recommendations, NIOSH Publication No 81-103, NIOSH-OSHA Asbestos Work Group, April 1980.			
4926		4/17/1980	NIOSH Press Release - Remarks by NIOSH Director Anthony Robbins on The Need for a New Asbestos Standard, 4/17/80.			
4927		6/14/1980	Congressional Statement on findings and purposes, Chapter 49, Asbestos School Hazard Detection and Control, 6/14/80.			
4928		4/6/1984	American Cancer Society Letter to JE Wagoner, 4/6/84.			
4929		1/1/1984	Comparative Risk of Adverse Health Effects from Low Dose Exposures, Asbestiform Fibers, Nonoccupational Health Risks, 1984.			
4930		1/1/1989	Mesothelioma Threshold, EB Ilgren, Imperial Cancer Research Fund, NATO ASI Series, Effects of Mineral Dusts on Cells, 1989.			
4931		1/1/1991	"Part 7: Latency and Progression: Asbestos Disease at Low Exposures After Long Residence Times," GK Sluis-Cremer, The Third Wave of Asbestos Disease: Exposure to Asbestos in Place, NYAS, 1991.			
4932		1/1/1992	Chapter 5: Mesothelioma, VL Roggli, F Sanfilippo, JD Shelburne, Pathology of Asbestos-Associated Diseases, VL Roggli, SD Greenberg, Eds, 1992.			
4933		9/7/1993	No Level of Asbestos Exposure Is Safe for Children or Adults, LB Molloy, New York Times, 9/7/93.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4934		1/1/1995	"Malignant Mesothelioma Associated with Low Pulmonary Tissue Asbestos Burdens: A Light and Scanning Electron Microscopic Analysis of 18 Cases," SH Srebro, VL Roggli, GP Samsa, <u>Modern Pathology</u> , 1995.			
4935		1/1/1995	"The Long-lasting Legacy of Industrial Carcinogens: The Lesson of Asbestos," C Maltoni, IJ Selikoff Memorial Lecture, 1995.			
4936		1/1/1998	"Pleural Mesothelioma: Dose-Response Relation at Low Levels of Asbestos Exposure in a French Population-based Case-Control Study," Y Iwatsubo, JC Pairon, P Brochard, et al, <u>American Journal of Epidemiology</u> , 1998.			
4937		1/1/1998	Environmental Health Criteria 203, Chrysotile Asbestos, World Health Organization, International Programme on Chemical Safety (IPCS), 1998.			
4938		5/13/1999	Letter to DS Ellmann, from RE Fairfax, OSHA; Re: Response to your letter regarding PELs, 5/13/99.			
4939		8/1/1999	"Mesothelioma: Cases associated with non-occupational and low dose exposures", G Hillerdal, <u>Occup Environ Med</u> , August 1999.			
4940		6/1/2000	A Guide for Ship Scrappers, Tips for Regulatory Compliance, EPA 315-B-00-001, Summer 2000.			
4941		1/1/2000	"The Quantitative Risks of Mesothelioma and Lung Cancer in Relation to Asbestos Exposure," JT Hodgson, A Darnton, <u>Ann Occup Hyg.</u> , 2000.			
4942		6/1/2010	"Letter: Mesothelioma risk from chrysotile," JT Hodgson, A. Darnton. <u>Occup Environ Med</u> , June 2010.			
4943		9/18/2000	Report of the Panel, European Communities - Measures Affecting Asbestos and Asbestos-Containing Products, World Trade Organization, 9/18/00.			
4944		1/1/2000	Chapter 6.2 Asbestos, Air Quality Guidelines, 2nd Edition, WHO, 2000.			
4945		1/1/2001	"Asbestos and Man-Made Vitreous Fibers as Risk Factors Diffuse Malignant Mesothelioma: Results from a German Hospital-Based Case-Control Study," K Rodelsberger, <u>American Journal of Industrial Medicine</u> , 2001.			
4946		9/1/2001	Toxicological Profile for Asbestos, U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, September 2001.			
4947		4/1/2004	"Commentary: Chrysotile Asbestos as a Cause of Mesothelioma: Application of the Hill Causation Model," R Lemen, April/June 2004.			
4948		1/1/2005	"Can Exposure to Very Low Levels of Asbestos Induce Pleural Mesothelioma?" M Goldberg, D Luce, <u>Am J Respir Crit Care Med</u> , 2005.			
4949		1/1/2005	"Residential Proximity to Naturally Occurring Asbestos and Mesothelioma Risk in California," X Pan, et al, <u>Am J Respir Crit Care Med</u> , 2005.			
4950		12/28/2005	Frequently Asked Questions About Asbestos, A Homeowners Guide, Louisiana Dept of Environmental Quality, 12/28/05.			
4951		1/31/2006	Asbestos - Prevention and Early Detection, American Cancer Society, 1/31/06.			
4952		9/1/2006	Elimination of asbestos-related diseases, WHO, September 2006.			
4953		10/20/2006	"Risk of Pleural Mesothelioma: A French Population-Based Case-Control Study (1998-2006)," P Rolland, 10/20/06.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4954		5/5/2006	Letter to J LaDou, University of California School of Medicine, from S Weber-Mosdorf, WHO; Re: Response to your letter of 22 March 2006 regarding asbestos diseases, 5/5/06.			
4955		1/1/2008	Chapter 43: Neoplasms of the Pleura, SP Hammar, RF Dodson, et al, Dail and Hammar's Pulmonary Pathology, Vol. II, Neoplastic Lung Disease, 3rd Ed, Tomashefski, Cagle, Farver, Fraire, Eds, 2008.			
4956		1/10/2008	The Asbestos Informer, Region 4, EPA, 1/10/08.			
4957		1/1/2009	"Mesothelioma Risk and Environmental Exposure to Asbestos: Past and Future Trends in Japan," K Azuma, I Uchiyama, J Okumura, Int J Occup Environ Health, 2009.			
4958		1/1/2009	Statement from Acting Surgeon Steven K Galson about National Asbestos Week, 2009.			
4959		12/14/2011	Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health, Report No 12-P-0125, EPA, Office of Inspector General, 12/14/11.			
4960		1/1/2013	Statement on the Relative Vulnerability of Children to Asbestos Compared to Adults, Committee on Carcinogenicity, CC/13/S1, 2013.			
4961		10/14/2013	OSHA News Release - OSHA Statement 13-2026-NAT - OSHA releases new resources to better protect workers from hazardous chemicals, 10/24/13.			
4962		1/8/2014	Asbestos, Safety and Health Topics, OSHA, 1/8/14.			
4963		1/1/2014	"Occupational and non-occupational attributable risk of asbestos exposure for malignant pleural mesothelioma," A LaCourt, C Gramond, P Brochard, et al, Thorax, 2014.			
4964		1/1/2014	Chrysotile Asbestos, WHO, 2014.			
4965		Undated	Quick Tips for Job Health and Safety on Care of Asbestos-Containing Floor Material, AIHA-OSHA Alliance, Undated.			
4966		Undated	Low Dose, New York Rules, Undated.			
4967		Undated	Peritoneal Mesothelioma: Low Dose Exposure, Undated.			
4968		1/1/2014	12.3.7 No Safe Threshold Limit of Exposure, Excerpt from Pathology of Asbestos-Associated Diseases, TD Oury, TA Sporn, VL Roggli, 2014.			
4969		1/1/2015	Asbestos, OSHA Safety and Health Topics, 2015.			
4970		9/1/1973	High Dust Levels Found in Homes, NICA Outlook, September 1973.			
4971		1/1/2015	"Pleural mesothelioma and occupational and non-occupational asbestos exposure: a case-control study with quantitative risk assessment," D Ferrante, D Mirabelli, C Magnani, et al, BMJ, 2015.			
4972		1/1/1978	"Asbestos and Disease," IJ Selikoff, DHK Lee, 1978.			
4973		6/1/1986	Significant Risk Found for Low Asbestos Exposure, Table 6-2: Lifetime Risks, Airborne Asbestos Health Assessment Update, WJ Nicholson, June 1986.			
4974		1/1/1991	Part 7. Latency and Progression, "Asbestos Disease at Low Exposures After Long Residence Times," GK Sluis-Cremer, NYAS, 1991.			
4975		3/1/2014	Elimination of asbestos-related diseases, WHO, March 2014.			
4976		9/1/1972	Letter to VJ Meyers, Western Electric, from GF Scannell, OSHA; Re: Reply to you letter of July 13, 1972, 9/1/72.			
4977		9/15/2015	Asbestos and Cancer Risk: What is Asbestos? American Cancer Society, Revised 9/15/15, 9/5/19. www.cancer.org			
4978		6/6/1983	Letter to TG Auchter, OSHA, from RF Boggs, Organization Resources Counselors; Re: Comments on asbestos standard, 6/6/83.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
4979		6/1/1986	Airborne Asbestos Health Assessment Update, WJ Nicholson, June 1986.			
4980		6/24/2015	Press Release: 18th statement of the international academy affirms long standing position calling for a ban on all mining, manufacture and use of asbestos, Collegium Ramazzini, 6/24/15.			
4981		6/1/2015	Asbestos: Worker and Employer Guide to Hazards and Recommended Controls, CDC, EPA, NIH, OSHA, June 2015.			
4982		12/15/1977	Part 1304 - Ban of Consumer Patching Compounds Containing Respirable Free-Form Asbestos, CPSC, 12/15/77.			
4983		1/1/2016	Statement - The global dimensions of asbestos and asbestos-related diseases, Collegium Ramazzini, J Occup Health, 2016.			
4984		6/14/1980	3601. Congressional statement of findings and purposes, Chapter 49, Title 20, Pub L 96-270, 6/14/80.			
4985		3/26/1998	5. Summary of Data Reported and Evaluation, Asbestos, Vol 14, WHO/IARC, 1977, Updated 3/26/98.			
4986		9/7/1993	Letter to the Editor: No Level of Asbestos Exposure Is Safe for Children or Adults, LB Malloy, New York Times, 9/7/93.			
4987		Undated	NYCOSH Asbestos Fact Sheet #1, Asbestos, Undated.			
4988		5/1/2009	Asbestos Exposure and Cancer Risk, National Cancer Institute, 5/1/09, 7/11/16. www.cancer.gov			
4989		10/1/2004	"Letter to the Editor Re When Science Crosses Politics," JL Abraham, Journal of Environmental Health, October 2004.			
4990		12/14/2011	EPA Memorandum to LP Jackson, from AA Elkins; Re: Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health, Report No 12-P-0125, 12/14/11.			
4991		1/1/2001	"Statement on malignant mesothelioma in the United Kingdom," British Thoracic Society, Thorax, 2001.			
4992		6/8/1999	Commission Directive 1999/77/EC of 26 July 1999, Official Journal of European Communities, 6/8/99.			
4993		3/27/1987	Mesothelioma: Has Patient Had Contact With Even Small Amount of Asbestos?" K Garrahan, JAMA, 3/27/87.			
4994		12/1/2009	Right to Know Hazardous Substance Fact Sheet, Asbestos, New Jersey Dept of Health, December 2009.			
4995		1/1/1989	"Carcinogenicity Studies on Natural and Man-Made Fibres with the Intraperitoneal Test in Rats," F Pott, et al, IARC Scientific Publications, 1989.			
4996		10/17/2011	WHO rebukes would-be asbestos magnate, J Sher, Tuesday's Globe and Mail, 10/17/11.			
4997		6/20/1986	29 CFR Parts 1910 and 1926, Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and actinolite; Final Rules, 6/20/86.			
4998		4/16/2012	About Asbestos, Australian Information and Support Agency, 4/16/12.			
4999		4/28/2011	What is Asbestos? Canadian Union of Public Employees, CUPE, 4/28/11.			
5000		1/24/2007	The Only Safe Asbestos Exposure: None, D Michaels, The Pump Handle, 1/24/07.			
5001		3/23/2011	Toxic Substances, Agriculture - Asbestos, EPA, 3/23/11.			
5002		4/16/2012	Key Issues, Asbestos, European Agency for Safety and Health, 4/16/12.			
5003		2/29/2012	News Release: Asbestos Confirmed at Chiddix Junior High, Illinois Dept of Health, 2/29/12.			
5004		10/20/2011	Asbestos FAQ, Bay Area Air Quality Management District, 10/20/11.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5005		4/16/2012	Asbestos, Newcastle City Council, Australia, 4/16/12.			
5006		Undated	Facts About Rock and Soil in Lake County Containing Asbestos, Lake County Air Quality Management District and University of California, Undated.			
5007		1/1/2012	When is Asbestos Dangerous? Oregon State University, 2012.			
5008		9/9/2011	Listing and Packing Provisions: Asbestos, Committee of Experts on the Transport of Dangerous Goods, United Nations, 9/9/11.			
5009		2/14/2012	Asbestos, University of Minnesota, 2/14/12.			
5010		2/24/2012	Asbestos, University of Virginia, 2/24/12.			
5011		7/13/2007	Letter to Mobile Home Dismantlers in Wisconsin; Re: Asbestos Regulations and Guidance, State of Wisconsin, 7/13/07.			
5012		4/1/1979	Do You Work With Asbestos? E Bingham, OSHA, The Ironworker, April 1979.			
5013		4/23/2020	Asbestos, OSHA Safety and Health Topics, 4/23/20. www.osha.gov/SLTC/asbestos			
5014		3/10/2020	FDA in Brief: FDA Releases Final Report of Talc-Containing Cosmetic Products Tested for Asbestos, 3/10/20. www.fda.gov/news-events/fda-brief			
5015		1/1/1979	Health Hazards of Asbestos, Cancer Alert Series, OSHA 3040, 1979.			
5016		9/1/1970	Asbestos on the Job - Millions Affected, OSHA News, September 1970.			
5017		1/1/2022	"A Cohort Study on Cancer Incidence among Women Exposed to Environmental Asbestos in Childhood with a Focus on Female Cancers, including Breast Cancer," SB Dalsgaard, et al, International Journal of Environmental Research and Public Health, 2022			
5018		9/30/1989	Evaluation of Two Cleaning Methods for Removal of Asbestos Fibers from Carpet, JR Kominsky, RW Freyberg, PEI Associates, et al, EPA Contract No 68-03-4006, 9/30/89.			
5019		1/1/1994	Settled Asbestos Dust Sampling and Analysis, JR Millette, SM Hays, 1994.			
5020		7/31/1989	Asbestos Fiber Reentrainment During Dry Vacuuming and Wet Cleaning of Asbestos-Contaminated Carpet, JR Kominsky, RW Freyberg, PEI Associates, EPA Contract No 68-03-4006, 7/31/89.			
5021		9/1/1995	Report to Congress on Worker's Home Contamination Study Conducted Under the Workers' Family Protection Act (29 USC 671a), NIOSH, September 1995.			
5022		2/10/1986	Public Hearing to Consider the Adoption of a Regulatory Amendment Identifying Asbestos as a Toxic Air Contaminant, State of California Air Resources Board, 2/10/86.			
5023		1/1/1996	"A Study of Personal and Area Airborne Asbestos Concentrations During Asbestos Abatement: A Statistical Evaluation of Fibre Concentration Data," JH Lange, et al, Ann Occup Hyg, 1996.			
5024		7/1/1992	Appendix 8: Re-entrainment of Asbestos from Dust in a Building with Acoustical Plaster, DL Keyes, SM Hays, JR Millette, et al, Environmental Choices Technical Supplement, July/August 1992.			
5025		12/1/1974	"Tumorigenic Effect of Fibrous Dusts in Experimental Animals," F Pott, F Huth, KH Friedrichs, Environmental Health Perspectives, December 1974.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5026		1/1/1980	"Asbestos Retention in Human Respiratory Tissues: Comparative Measurements in Lung Parenchyma and in Parietal Pleura," P Sebastien, X Janson, A Gaudichet, IARC Scientific Publications, 1980.			
5027		1/1/1990	"Asbestos Content of Lung Tissue, Lymph Nodes, and Pleural Plaques from Former Shipyard Workers," RF Dodson, MG Williams, CJ Corn, et al, Am Rev Resp Dis, 1990.			
5028		1/1/1991	"Analysis of Asbestos Fibers in Lung Parenchyma, Pleural Plaques, and Mesothelioma Tissues of North American Insulation Workers," N Kohyama, Y Suzuki, 1991.			
5029		1/1/1996	"Black Spots Concentrate Oncogenic Asbestos Fibers in the Parietal Pleura: Thorascopic and Mineralogic Study," C Boutin, P Dumortier, F Rey, et al, Am J Resp Crit Care Med, 1996.			
5030		1/1/2001	"Asbestos Tissie Burden on Human Malignant Mesothelioma," Y Suzuki, SR Yuen, Industrial Health, 2001.			
5031		1/1/2002	"Asbestos Fibers Contributing to the Induction of Human Malignant Mesothelioma," Y Suzuki, SR Yuen, Ann NY Acad Sci, 2002.			
5032		1/1/2003	"Asbestos Fiber Length as Related to Potnetial Pathogenicity: A Critical review," RF Dodson, MAL Atkinson, JL Levin, American Journal of Industrial Medicine, 2003.			
5033		1/1/2011	"Morphological and Chemical Mechanisms of Elongated Mineral Particle Toxicities," AE Aust, PM Cook, RF Dodson, Journal of Toxicology and Environmental Health, Part B, 2011.			
5034		1/1/2015	"The So-called Short-Fiber Controversy: Literature Review and Critical Analysis," VL Roggli, Arch Pathol Lab Med, 2015.			
5035		1/1/1979	"Human and Experimental Data on Translocation of Asbestos Fibers Through the Respiratory System," J Bignon, G Monchaux, A Hirsch, NYAS, 1979.			
5036		3/30/2006	Affidavit of Ronald Dodson, In Re: New York City Asbestos Litigation, 3/30/06.			
5037		7/13/1976	Letter to RH Mereness, Asbestos Information Association, from HB Rhodes, Union Carbide; Re: Latest paper from Mt Sinai re short fibers, 7/13/76; UCC025660-700.			
5038		1/1/1969	"Characteristics of Respirable Asbestos Fibers," V Timbrell, FD Pooley, JC Wagner, Proceedings of the International Conference on Pneumoconiosis, 1969.			
5039		5/20/1974	Asbestos Information Association Memo for Mebers, from RH Mereness; Re: Answers to Questions addressed to Irving J Selikoff, Mt Sinai, 5/20/74; UCC014398-406.			
5040		1/1/1983	"Cytotoxicity of a Short-Fiber Chrysotile Asbestos for Human Alveolar Macrophages: Preliminary Observations," H Yeager, DA Russo, AM Langer, et al, Env Research, 1983.			
5041		8/15/1990	"Cytotoxicity of Long and Short Crocidolite Asbestos Fibers In Vitro and in Vivo," LA Goodlick, AB Kane, Cancer Research, 8/15/90.			
5042		1/1/1991	"Fiber Dimensions and Mesothelioma: A Reappraisal of the Stanton Hypothesis," AB Kane, Mechanisms in Fibre Carcinogenesis, RC Brown, et al, Eds, 1991.			
5043		1/1/2005	"Short, thin asbestos fibers contribute to the developmnt of human malignant mesothelioma: pathological evidence," Y Suzuki, SR Yuen, R Ashlev, Int J Hyg Environ Health, 2005.			
5044		Undated	"Biological Effects of Short Fibers," JC Wagner, Undated.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5045		9/1/2008	"Development of a fibre size-specific job-exposure matrix for airborne asbestos fibres," JM Dement, ED Kuempel, D Loomis, et al, <i>BMJ</i> , September 2008.			
5046		1/24/2008	"Translocation pathways for inhaled asbestos fibers," G Miserocchi, G Sancini, et al, <i>Env Health</i> , 1/24/08.			
5047		1/1/1998	"Transplacental Transfer of Asbestos in Pregnant Mice," Ak Haque, DM Vrazel, <i>Bull Environ Contam Toxicol</i> , 1998.			
5048		1/1/1996	"Is there Transplacental Transfer of Asbestos? A Study of 40 Stillborn Infants," AK Haque, DM Vrazel, et al, <i>Pediatric Pathology & Laboratory Medicine</i> , 1996.			
5049		1/1/2004	"Retrograde migration of glove powder in the human female genital tract," ACE Sjosten, H Ellis, GAB Edelstam, <i>Human Reproduction</i> , 2004.			
5050		1/1/1961	"The Transport of Carbon Particles in the Human Female Reproductive Tract," GE Egli, M Newton, <i>Fertility & Sterility</i> , 1961.			
5051		6/2/1979	"Migration of a Particulate Radioactive Tracer from the Vagina to the Peritoneal Cavity and Ovaries," PF Venter, M Iturralde, <i>SA Medical Journal</i> , 6/2/79.			
5052		1/1/1988	"Asbestos Fibers in Human Pulmonary and Extrapulmonary Tissues," J Huang, N Hisanaga, Y Takeuchi, et al, <i>American Journal of Industrial Medicine</i> , 1988.			
5053		1/1/2012	"Disruption of Iron Homeostasis in Mesothelial Cells after Talc Pleurodesis," AJ Ghio, VI Roggli, et al, 2012.			
5054		1/1/2001	"Case-Referent Survey of Young Adults with Mesothelioma: 1. Lung Fibre Analysis," JC McDonald, BG Armstrong, CW Edwards, et al, <i>Ann Occup Hyg</i> , 2001.			
5055		1/1/2017	"A dynamic model of the transport of asbestos fibres in the human body," A DeStefano, CF Martin, DI Wallace, <i>Journal of Biological Dynamics</i> , 2017.			
5056		9/1/1986	"Pleural Migration of Chrysotile Fibers After Intratracheal Injection in Rats," JR Viallat, et al, <i>Archives of Environmental Health</i> , September/October 1986.			
5057		1/1/1991	"Translocation of Inhaled Asbestos Fibers From the Lung to Other Tissues," Y Suzuki, N Kohyama, <i>American Journal of Industrial Medicine</i> , 1991.			
5058		1/1/2015	"Short Fiber Tremolite Free Chrysotile Mesothelioma Cohort Revealed," D Egilman, T Bird, <i>American Journal of Industrial Medicine</i> , 2015.			
5059		3/30/2006	Expert Affidavit of Arnold R Brody, In Re: New York City Asbestos Litigation, 3/30/06.			
5060		1/1/2016	"A Commentary on Roggli's 'The So-Called Short Fiber Controversy,'" D Egilman, T Tran, <i>IJOEH</i> , 2016.			
5061		1/1/2013	"Short, Fine and WHO Asbestos Fibers in the Lungs of Quebec Workers With an Asbestos-Related Disease," G Adib, et al, <i>American Journal of Industrial Medicine</i> , 2013.			
5062		4/8/2016	Short Asbestos Fibres, Presentation and Activities of the Agency, Anses, 4/8/16.			
5063		1/1/1980	"Asbestiform and/or Fibrous Minerals in Mines, Mills and Quarries," W Bank, <i>MSHA</i> , 1980.			
5064		11/1/2019	"Migration of Talc from the Perineum to Multiple Pelvic Organ Sites: Five Case Studies With Correlative Light and Scanning Electron Microscopy," SA McDonald, et al, <i>Am J Clin Pathol</i> , November 2019.			
5065		1/1/1986	"The Demonstration of the Migration of Talc from the Vagina and Posterior Uterus to the Ovary in the Rat," WJ Henderson, et al, <i>Environmental Research</i> , 1986.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5066		1/1/1997	"Tubal Sterilisation, Hysterectomy and Decreased Risk of Ovarian Cancer," A Green et al, Int J Cancer, 1997.			
5067		1/1/1988	"Personal and Environmental Characteristics Related to Epithelial Ovarian Cancer II. Exposures to Talcum Powder, Tobacco, Alcohol, and Coffee," AS Whittemore, et al, American Journal of Epidemiology, 1988.			
5068		1/1/2019	"Genetic Predisposition for malignant mesothelioma: A concise review," M Betti, A Aspesi, I Dianzani, et al, Mutation Research, 2019.			
5069		10/1/1991	"Genetic Alterations of the p53 Gene Are A Feature of Malignant Mesotheliomas," RJ Cote, SC Jhanwar, S Novick, Cancer Research, 10/1/91.			
5070		1/1/1991	Part 8: The Neoplasms of Asbestos Exposure, Absence of Evidence for a Significant Background Incidence of Diffuse Malignant Mesothelioma apart from Asbestos Exposure, EJ Mark, T Yokoi, NYAS, 1991.			
5071		1/1/2018	"How Inhaled Asbestos Causes Scarring and Cancer," AR Brody, Current Respiratory Medicine Reviews, 2018.			
5072		Undated	Slides - Development of Aneuploidy and Chrysotile Induced Aneuploidy			
5073		1/1/1986	"Role of Phagocytosis in Syrian Hamster Cell Transformation and Cytogenetic Effects Induced by Asbestos and Short and Long Glass Fibers," TW Hesterberg, CJ Butterick, AR Brody, et al, Cancer Research, 1986.			
5074		1/1/1993	"Induction of Metaphase and Anaphase/Telophase Abnormalities by Asbestos Fibers in Rat Pleural Mesothelial Cells In Vitro," M Yegles, et al, Am J Respir Cell Mol Biol, 1993.			
5075		1/1/1993	"Transfection of Human Mesothelial Cells Mediated by Different Asbestos Fiber Types," L Gan, et al, Environmental Research, 1993.			
5076		9/15/1991	"Crocidolite Asbestos Fibers Undergo Size-dependent Microtubule-mediated Transport after Endocytosis in Vertebrate Lung Epithelial Cells," RW Cole, et al, Cancer Research, 9/15/91.			
5077		1/1/1990	Hypotheses on the Mechanisms of Carcinogenesis and Cell Transformation by Asbestos and Other Mineral Dusts, JC Barrett, et al, Laboratory of Molecular Carcinogenesis, NIH, NATO ASI Series Vol G21, Health Related Effects of Phyllosilicates, J Bignon, Ed, 1990.			
5078		1/1/1978	"Phagocytosis of Chrysotile Fibers by Pleural Mesothelial Cells in Culture," M Jaurand, J Bignon, et al, American Journal of Pathology, 1978.			
5079		1/1/1983	"Studies on in Vitro Chrysotile-Pleural Mesothelial Cell Interaction: Morphological Aspects and Metabolism of Benzo-3,4-pyrene," MC Jaurand, J Bignon, et al, Environmental Health Perspectives, 1983.			
5080		1/1/1984	"In vitro biodegradation of chrysotile fibers by alveolar macrophages and mesothelial cells in culture: comparison with a pH effect," MC Jaurand, J Bignon, et al, British Journal of Industrial Medicine, 1984.			
5081		1/1/1987	"The Interactions Between Asbestos Fibers and Metaphase Chromosomes of Rat Pleural Mesothelial Cells in Culture: A Scanning and Transmission Electron Microscopic Study," NS Wang, MC Jaurand, J Bignon, et al, Am J Pathol, 1987.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5082		1/1/1999	"Pleuro-pulmonary tumours detected by clinical and chest x-ray analyses in rats transplanted with mesothelioma cells," FL Pimpec-Barthes, MC Jaurand, et al, British Journal of Cancer, 1999.			
5083		5/1/2009	Report - Special Report: Policy, A review of human carcinogens - Part C: metals, arsenic, dusts, and fibres, Vol 10, May 2009.			
5084		6/21/1988	"Asbestos fibers mediate transformation of monkey cells by exogenous plasmid DNA," JD Appel, et al, Proc Natl Acad Sci USA, Vol 85 pp 7670-7674, October 1988, 06/21/88.			
5085		1/21/2009	Health & Consumer Protection, Directorate General, Scientific Committee on Health and Environmental Risks, SCHER, Scientific Committee on Consumer Products, SCCP, Scientific Committee on Emerging and Newly Identified Health Risks, SCENIHR, Risk assessment methodologies and approaches for genotoxic and carcinogenic substances, 01/21/09.			
5086		1/1/1999	"A study of the effect of Chrysotile fiber surface composition on genotoxicity in vitro," MJ Keane, et al, 1999.			
5087		3/23/1995	"Effects of antioxidants on fiber mutagenesis," TK Hei, ZY He, and K Suzuki, Carcinogenesis, Vol 16 No 7, 3/23/95.			
5088		12/1/2011	"Asbestos surface provides a niche for oxidative modification," H Nagai, et al, Cancer Science, Vol 102 No 12, December 2011.			
5089		1/1/2003	Minireview, "Asbestos-induced pulmonary toxicity: role of DNA damage and apoptosis," D Upadhyay, and DW Kamp, Society for Experimental Biology and Medicine, 2003.			
5090		5/23/2000	"Vitronectin adsorption to chrysotile asbestos increases fiber phagocytosis and toxicity for mesothelial cells," J Wu, et al, Am J Physiol Lung Cell Mol Physiol, 279 L916-L923, 05/23/00.			
5091		6/27/2008	"Chrysotile Effects on human lung cell carcinoma in culture: 3-D reconstruction and DNA quantification by image analysis," BA Cortez, GM Machado-Santelli, BMC Cancer, 6/27/08.			
5092		Undated	Color Slide - Lymphatic Vessels and Fluid, John Wiley & Sons, Undated.			
5093		1/1/1998	"DNA rides along as asbestos enters cells," K Fackelmann, Science News, Vol 134, 1998.			
5094		10/5/2018	Characteristics of Cancer, 10/5/18.			
5095		Undated	PPT - Altered Cellular & Tissue Biology, E Pardi, 1/8/11.			
5096		1/1/2015	"Non-coding RNA repertoires in malignant pleural mesothelioma," L Quinn, SP Finn, SG Gray, Lung Cancer, 2015.			
5097		1/1/2018	"Global and gene-specific DNA methylation effects of different asbestos fibres on human bronchial epithelial cells," D Oner, M Ghosh, PHM Hoet, et al, Environment International, 2018.			
5098		1/1/2013	"Molecular Basis of Asbestos-Induced Lung Disease," G Liu, P Cheresch, DW Kamp, Annu Rev Pathol, January 2013.			
5099		1/1/2016	"Comprehensive genomic analysis of malignant pleural mesothelioma identifies recurrent mutations, gene fusions, and splicing alterations," R Bueno, et al, Nature Genetics, 2016.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5100		1/1/1992	"Oxygen radical-mediated mutagenic effect of asbestos on human lymphocytes: suppression by oxygen radical scavengers," LG Korkina, AD Durnev, et al, Mutation Research, 1992.			
5101		1/1/2000	"DNA breakage in asbestos-treated normal and transformed (TSV40) rat pleural mesothelial cells," V Levesse, A Renier, MC Jaurand, Mutagenesis, 2000.			
5102		1/1/1997	"Analysis of Cell Cycle Disruptions in Cultures of Rat Pleural Mesothelial Cells Exposed to Asbestos Fibers," V Levesse, A Renier, MC Jaurand, et al, Am J Respir Cell Mol Biol, 1997.			
5103		9/1/1980	"Asbestos-induced sister chromatid exchanges in cultured Chinese hamster ovarian fibroblast cells," GK Livingston, WN Rom, MV Morris, September 1980.			
5104		11/1/1984	"Correlation of Asbestos-Induced Cytogenetic Effects with Cell Transformation of Syrian Hamster Embryo Cells in Culture," M Oshimura, et al, Cancer Research, November 1984.			
5105		4/17/1995	"Mesothelioma: is asbestos exposure the only cause?" RT Gun, The Medical Journal of Australia, 4/17/95.			
5106		1/1/1994	"Malignant Mesothelioma: attributable risk of asbestos exposure," R Spirtas, et al, Occup Environ Med, 1994.			
5107		4/17/1995	"Non-asbestos-related mesothelioma: chance, bias or a real phenomenon?" P Glasziou, Medical Journal of Australia, 4/17/95.			
5108		1/1/1996	"Asbestos Exposure and Ovarian Fiber Burden," DS Heller, RE Gordon, et al, American Journal of Industrial Medicine, 1996.			
5109		1/1/2009	"Time trend of mesothelioma incidence in the United States and projection of future cases: An update based on SEER data for 1973 through 2005, B Pirce, A Ware, Critical Reviews in Toxicology, 2009.			
5110		1/1/2009	"Occupational, domestic and environmental mesothelioma risks in the British population: a case-control study," C Rake, et al, British Journal of Cancer, 2009.			
5111		1/1/2018	"Malignant Mesothelioma and Its Non-Asbestos Causes," RL Attanoos, A Churg, VL Roggli, Arch Pathol Lab Med, 2018.			
5112		1/1/2003	"Exposure to Brake Dust and Malignant Mesothelioma: A Study of 10 Cases with Mineral Fiber Analyses," KJ Butnor, TA Sporn, VL Roggli, Ann Occup Hyg, 2003.			
5113		1/1/1998	"Assessment of Asbestos Burden in the Placenta and Tissue Digests of Stillborn Infants in South Texas," AK Haque, DM Vrazel, T Uchida, Arch Environ Contam Toxicol, 1998.			
5114		1/1/1996	"Is there Transplacental Transfer of Asbestos? A Study of 40 Stillborn Infants," AK Haque, et al, Pediatric Pathology & Laboratory Medicine, 1996.			
5115		1/1/2017	"Hand-spinning chrysotile exposure and risk of malignant mesothelioma: A case-control study in Southeastern China," Z Jiang, et al, Int J Cancer, 2017.			
5116		1/1/2017	"Diffuse peritoneal mesothelioma: A case series of 62 patients including paraoccupational exposures to chrysotile asbestos," RL Kradin, et al, Am J Ind Med, 2017.			
5117		1/1/2008	"Malignant mesothelioma," AJ Moore, et al, Orphanet Journal of Rare Diseases, 2008.			
5118		12/1/2017	"Diagnostic Dilemma: Primary Peritoneal Mesothelioma With Para-Occupational Asbestos Exposure," KR Qin, D Dua, American Society of Clinical Oncology, December 2017.			

			PLAINTIFFS' TRIAL EXHIBIT LIST SARAH J. PLANT v. AVON PRODUCTS, INC., ET AL. C/A NO. 2022-CP-40-01265 IN THE COURT OF COMMON PLEAS FOR THE FIFTH JUDICIAL CIRCUIT, STATE OF SOUTH CAROLINA, COUNTY OF RICHLAND			
5119		1/1/2015	"Malignant Peritoneal Mesothelioma: Prognostic Factors and Oncologic Outcome Analysis," D Magge, et al, Ann Surg Oncol, 2015.			
5120		12/17/2002	Opinion on Risk to Human Health from Chrysotile Asbestos and Organic Substitutes, Scientific Committee on Toxicity, Ecotoxicity and the Environment, European Commission, Asbestos 17122002/D(02). 12/17/02.			
5121		1/1/1993	"In Vitro Response of Rat Pleural Mesothelial Cells to Talc Samples in Genotoxicity Assays (Sister Chromatid Exchanges and DNA Repair)," S Endo-Capron, MC Jaurand, et al, Toxic in Vitro, 1993.			
5122		1/1/2018	"Genomics and Epigenetics of Malignant Mesothelioma," AP Sage, et al, High-Throughput, 2018.			
5123		1/1/1999	"Mesothelioma: cases associated with non-occupational and low dose exposures," G Hillerdal, Occup Environ Med, 1999.			
5124		1/1/2021	"Mesothelioma in immigrants from Turkey: Genes have a minor role," S Metintas, et al, Respiratory Medicine, 2021.			
5125		8/30/2022	"Essay: The silent malignant mesothelioma epidemic: a call to action," N van Zandwijk, et al, The Lancet, 8/30/22.			
5126		9/1/1935	"No Half-Way Measures in Dust Control" AS Johnson, National Safety Council, September 1935.			
5127		6/1/1937	Occupational Disease Hazards - Asbestosis, The Employers' Group - Engineering Manual, 6/1/37.			
5128		7/20/1938	Industrial Medicine Symposium No. 3, 1938, Medical Press and Circular Supplement, 7/20/38.			
5129		4/1/1942	"The Occupational Disease Hazard - Evaluation in the Field," WA Cook, Industrial Medicine, Vol 3, Section 2, April 1942.			
5130		1/1/1955	Excerpt on Objectives of Ventilation, Plant and Process Ventilation, WCL Hemeon, 1955.			
5131		2/5/1969	Letter to RH Goodell, Johns-Manville Products Corp, from GE Archer, Pneumafil Corp; Re: Collector unit for spinning frame, 2/5/69.			
5132		4/6/1976	Union Carbide Memo to JF Ballew, from HH Frazier; Re: Personnel exposure while weighing dishes prepared for residual analysis, 4/6/76			
5133		8/17/1994	Exxon Memo to H Siegel, from JW Hammond; Re: Industrial Hygiene program, 8/17/94.			
5134		5/13/1999	Affidavit of Dr David Egilman, 5/13/99.			
5135		1/1/2014	12.3.7 No Safe Threshold Limit of Exposure, Excerpt from Pathology of Asbestos-Associated Diseases, TD Oury, TA Sporn, VL Roggli, 2014.			
5136		10/17/1979	Commercial and Industrial Use of Asbestos Fibers and Consumer Products Containing Asbestos, CPSC/EPA, Fed Reg, 10/17/79.			
5137		8/1/1933	"The Mechanical Control of Occupational Diseases," DS Beyer, National Safety News, August 1933.			
5138		3/21/1972	GAF Memo; Re: Recent article in Manville News, 3/21/72.			
5139		7/1/1937	Dust Producing Operations in the Production of Petroleum Products and Associated Activities, A Medico-Safety Survey, RS Bonsib, Standard Oil, July 1937.			
5140		1/1/2020	"Visible dust and asbestos: what does it suggest regarding asbestos exposures?" SE Petty, Journal of Scientific Practice and Integrity, 2020.			

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF RICHLAND	)	FOR THE FIFTH JUDICIAL CIRCUIT
	)	
SARAH J. PLANT and PARKER PLANT,	)	C/A NO. 2022-CP-40-1265
	)	
Plaintiffs,	)	<i>In Re:</i>
	)	Asbestos Personal Injury Litigation
v.	)	Coordinated Docket
	)	
AVON PRODUCTS, INC., et al.	)	
	)	
Defendants.	)	

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT WHITTAKER,
CLARK & DANIELS, INC.'S MOTION FOR SETOFF AND RELATED RELIEF**

Plaintiffs Sarah J. Plant and Parker Plant, by and through the undersigned counsel, hereby oppose the Motion for Setoff and Related Relief filed by Defendant Whittaker, Clark & Daniels, Inc. ("WCD"), and would respectfully show the Court that WCD is not entitled to all the relief it requests.

INTRODUCTION

WCD's motion for setoff goes too far. First, in arguing for a setoff of "all settlement proceeds," WCD ignores that the pre-trial settlements were not for the exact same causes of action that were tried to verdict. While the jury returned a verdict against WCD that awarded damages for Sarah Plant's personal injury damages and Parker Plant's loss of consortium damages, Plaintiffs' settlements were for personal injury, loss of consortium, and wrongful death. WCD may only receive a credit for the amount paid by another defendant who settles for the same cause of action.

In addition, WCD is not entitled to review the settlement agreements between Plaintiffs and other defendants. The aggregate amount of Plaintiff's settlements with all other defendants is

\$8,650,000. Such information is all that is required to calculate the setoff in this case. The agreements themselves are not relevant and disclosing them to WCD would violate the confidentiality provisions in the agreements. Plaintiffs will, however, submit the agreements to the Court for *in camera* review.

For these reasons, WCD's motion for setoff should be denied in large part.

ARGUMENT

I. WCD is not entitled to setoff as a matter of law and the allocation of the settlement funds will dictate the setoff amount.

WCD is not entitled to set-off as a matter of law. In *Ellis v. Oliver*, 335 S.C. 106, 112-13, 515 S.E.2d 268, 271-72 (Ct. App. 1999), the Court of Appeals held that “when a prior settlement involves compensation for the same injury for which the jury awarded damages, the right to setoff arises as an operation of law.” *Smith v. Widener*, 397 S.C. 468, 473, 724 S.E.2d 188, 191 (Ct. App. 2012). However, when the settlement involves compensation for an injury different from the one tried to verdict, there is no setoff as a matter of law. *Hawkins v. Pathology Assocs. of Greenville, P.A.*, 330 S.C. 92, 114-15, 498 S.E.2d 395, 407 (Ct. App. 1998). Further, when the settlement “is argued to involve two claims, one of which involves the same injury as the claim tried to verdict and one of which does not, the circuit court must make the factual determination of how to allocate the settlement between” the claims. *Smith*, 397 S.C. at 473, 724 S.E.2d at 191.

The settlement amount is relevant to this issue because Defendants are only entitled to “credit for the amount paid by another defendant *who settles for the same cause of action.*” *Rutland v. S.C. Dep’t of Transp.*, 400 S.C. 209, 216, 734 S.E.2d 142, 145 (2012) (emphasis added). The Court of Appeals later acknowledged the conflict created by the *Ellis* holding. In reference to the requirement that the trial court determine the allocation of the settlement funds when the settlement includes payment for claims tried to verdict and claims that were not, the *Smith* court stated:

This is what the circuit court did in *Rutland v. S.C. Dep't of Transp.*, 390 S.C. 78, 700 S.E.2d 451 (Ct. App. 2010), cert. granted, (Oct. 19, 2011).¹ This court affirmed the *Rutland* trial court's determination that the settlement that the settlement was not properly allocated between the different claims of wrongful death and survival because there was no evidence of conscious pain and suffering. 390 S.C. at 85–86, 700 S.E.2d at 455. In this respect, *Rutland* conflicts with *Ellis*. In *Ellis*, the court of appeals stated that wrongful death and survival are the same claim for the same injury. 335 S.C. at 112–13, 515 S.E.2d at 272. The conflict between *Rutland* and *Ellis* is resolved by reference to *Bennett v. Spartanburg Railway, Gas & Electric Co.*, 97 S.C. 27, 81 S.E. 189 (1914), in which the supreme court held that wrongful death and survival actions are different claims for different injuries. 97 S.C. at 29–30, 81 S.E. at 189–90. The court stated: “Necessarily, therefore, there must be separate verdicts and separate judgments, and hence there should be separate actions.” 97 S.C. at 31, 81 S.E. at 190.

Smith, 397 S.C. at 481, n.1, 724 S.E.2d at 195, n.1.

Here, the jury returned a verdict against WCD and awarded damages on two causes of actions: personal injury and loss of consortium. **Ex. 1**, Verdict Form, at 3. The jury awarded the following damages for Sarah Plant:

\$871,356 Past Medical Expenses

\$3,268,336 Future Medical Expenses

\$20,000,000 Other Damages (past & future)

The total damages award for Sarah Plant's personal injuries is \$24,139,692. The damages awarded to Parker Plant for loss of consortium are \$5,000,000.

On the other hand, the settlements received by Plaintiffs included compensation for three causes of action: personal injury, loss of consortium, and future wrongful death. One of these claims, future wrongful death, was not tried to verdict. As such, WCD's entitlement to a setoff does not arise as a matter of law, but is determined in relation to the allocation of settlement proceeds made by Plaintiffs.

¹ The Court of Appeals' holding was appealed to the Supreme Court of South Carolina in *Rutland v. S.C. Dep't of Transp.*, 400 S.C. 209, 734 S.E.2d 142 (2012). On this issue, the Supreme Court affirmed the trial court's equitable reallocation of the settlement received by the plaintiff.

Plaintiffs have chosen to allocate their settlement proceeds equally among their three claims, with one-third of the settlements going to each claim. Given the aggregate settlements of \$8,650,000, the setoff calculation should be as follows:

Cause of Action	Settlement Allocation	Jury Award	Settlement Credit	WCD's Portion of Damages
Personal Injury	33.3% - \$2,883,333	\$24,139,692	\$2,883,333	\$21,256,359
Loss of Consortium	33.3% - \$2,883,333	\$5,000,000	\$2,883,333	\$2,116,667
Wrongful Death	33.3% - \$2,883,333	\$0	\$0	\$0
TOTAL	\$8,650,000	\$29,139,692	\$5,766,666	\$23,373,026

Under settled precedent, WCD may only receive a setoff for the portion of the damages actually settled by other defendants for the same causes of action. Therefore, WCD may only receive a setoff for that portion of the personal injury and loss of consortium damages already settled by other defendants. As calculated above, WCD may only receive a setoff of \$5,766,666 and remains responsible for \$23,373,026 of the compensatory damages awarded by the jury.

Plaintiffs' personal injury and loss of consortium claims are separate and distinguishable from their potential wrongful death claim. Because this potential claim is different, factually and legally, from the claims tried to verdict in this matter, the amount that Plaintiffs received as compensation for their wrongful death claim should not be considered when determining the setoff amount. Instead, in accordance with *Rutland* and *Smith*, only the amounts received by Plaintiffs in settlement for the personal injury and loss of consortium claims should be considered by this Court when determining the setoff amount.

II. WCD has not demonstrated the relevance of the settlement documents beyond the information Plaintiffs have already provided.

WCD argues that it is entitled to disclosure of Plaintiffs' confidential settlement documents. It seeks to compel "[a]ll pertinent setoff information, including all settlement amounts,

settlement checks, and settlement documents that one or both Plaintiff(s) or their counsel possess related to her claims (and/or potential claims) asserted in this lawsuit against any person or entity” WCD Setoff Motion, p. 3. WCD fails to explain, however, why it would need anything other than the aggregate settlement amount already disclosed by Plaintiffs and their internal allocation between personal injury, loss of consortium, and future wrongful death claims. The disclosure of confidential settlement documents is completely unnecessary.

In fact, the Court should enter a protective order providing that Plaintiffs’ settlement agreements with other defendants are not discoverable. By their terms, these are confidential documents not permitted to be disclosed to outside parties. In most cases, the agreements state that part of the consideration for the releases is that Plaintiff agrees to treat the terms of the settlements as confidential.

Rule 26(c), SCRCF, provides that a protective order may be issued for good cause shown: “[u]pon motion by a party or by the person from whom discovery is sought, and for good cause shown, the court in which the action is pending . . . may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden by expense” Good cause is shown by describing “a particularized harm which will result if the challenged discovery is had.” *Hamm v. S.C. Pub. Serv. Comm’n*, 312 S.C. 238, 241, 439 S.E.2d 852, 854 (1994).

Here, the particularized harm is that Plaintiffs will be violating the confidentiality provisions of the releases if they produce these documents to WCD, and future settlements will be discouraged. Settlements are, of course, generally favored under the law. The South Carolina Supreme Court “encourages such compromise agreements because they avoid costly litigation and delay to an injured party.” *Poston v. Barnes*, 294 S.C. 261, 264, 363 S.E.2d 888, 890 (1987); *Rock*

Smith Chevrolet, Inc. v. Smith, 309 S.C. 91, 93, 419 S.E.2d 841, 842 (Ct. App. 1992) (“It has long been the policy of the court to encourage settlement in lieu of litigation, and courts have usually enforced settlement agreements.”).

The confidential nature of Plaintiffs’ releases is an integral part of the inducement—for both sides—to settle the case and avoid further costly litigation. “Parties are typically permitted, and often encouraged, to reach private settlements.” *Baker v. Dolgencorp, Inc.*, 818 F. Supp. 2d 940, 942-943 (E.D. Va. 2011). “In many cases, private or confidential settlements provide parties with incentives to reach amicable resolutions, especially where one party fears that publicity of a settlement could potentially encourage additional litigation.” *Id.* “An early and amicable settlement is certainly a desirable outcome, and for that reason courts regularly enforce confidentiality provisions in settlement agreements.” *Stephens v. County of Albemarle*, 422 F. Supp. 2d 640, 644 (W.D. Va. 2006).

If the confidentiality provisions of settlement agreements are disregarded, parties will be less likely to settle claims in the future or may do so on terms less favorable to plaintiffs. “Defendants in particular are reluctant to disclose the terms of settlement lest those terms encourage others to sue.” *Jessup v. Luther*, 277 F.3d 926, 928 (7th Cir. 2002).

Plaintiffs are obligated to protect the confidential nature of their settlement agreements with other defendants. In order to do so, Plaintiffs have disclosed the amount of the settlements in an aggregate manner that maintains the confidentiality of each individual settlement. WCD has not explained how this disclosure is insufficient, or provided any rationale for disregarding the confidentiality provisions of Plaintiffs’ private contracts with other defendants.

Similarly, Rule 408, SCRE, does not require Plaintiffs to disclose confidential settlement agreements. Rule 408 reads:

Evidence of (1) furnishing or offering or promising to furnish, or (2) accepting or offering or promising to accept, a valuable consideration in compromising or attempting to compromise a claim which was disputed as to either validity or amount, is not admissible to prove liability for or invalidity of the claim or its amount. Evidence of conduct or statements made in compromise negotiations is likewise not admissible. This rule does not require the exclusion of any evidence otherwise discoverable merely because it is presented in the course of compromise negotiations. This rule also does not require exclusion when the evidence is offered for another purpose, such as proving bias or prejudice of a witness, negating a contention of undue delay, or proving an effort to obstruct a criminal investigation or prosecution.

Nothing in Rule 408 supports WCD's contention that the confidential settlement agreements between Plaintiffs and other defendants are discoverable. The rule is clear that it does not convert discoverable information into undiscoverable information. WCD cannot demonstrate that Plaintiffs' confidential settlement agreements are discoverable.

Plaintiffs' settlement agreements should be protected from disclosure. Plaintiffs will, however, produce the agreements for the Court's *in camera* inspection for the Court to verify that personal injury, loss of consortium, and future wrongful death claims were released by Plaintiffs and that the releases were given in good faith.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully ask the Court to deny the full setoff requested by WCD and deny WCD's motion to compel production of Plaintiffs' settlement agreements.

Respectfully submitted,

DEAN OMAR BRANHAM SHIRLEY, LLP

s/ David C. Humen

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ATTORNEYS FOR PLAINTIFF

April 11, 2023
Dallas, Texas.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was served on counsel via Certified U.S. Mail Return Receipt, U.S. Mail Standard First Class, and/or electronic mail this on April 11, 2023.

s/ Monica Jojola
Paralegal for Plaintiff

EXHIBIT 1

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

SARAH J. PLANT and PARKER
PLANT,

Plaintiffs,

v.

WHITTAKER CLARK & DANIELS
AND IMI FABI et al.

Defendants.

IN THE COURT OF COMMON PLEAS

FOR THE FIFTH JUDICIAL CIRCUIT

C/A NO. 2022-CP-40-1265

In Re:

Asbestos Personal Injury Litigation
Coordinated Docket

RICHLAND COUNTY
FILED

2023 MAR - 7 PM 3:32

JEANETTE W. McBRIDE
Clerk, C.S., & E.C.

VERDICT FORM

NEGLIGENCE

1. We, the jury, find that Defendant Whittaker, Clark & Daniels, Inc. was negligent, and its negligence was a proximate cause of Plaintiff Sarah Plant's injuries:

☒ Yes

☐ No

2. We, the jury, find that Defendant IMI Fabi (Diana), LLC, was negligent, and its negligence was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

3. We, the jury, find that Defendant IMI Fabi, LLC, was negligent, and its negligence was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

STRICT LIABILITY

4. We, the jury, find that Defendant Whittaker, Clark & Daniels, Inc., is strictly liable for selling defective products that was a proximate cause of Plaintiff Sarah Plant's injuries:

☒ Yes

☐ No

5. We, the jury, find that Defendant IMI Fabi (Diana), LLC, is strictly liable for selling defective products that was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

6. We, the jury, find that Defendant IMI Fabi, LLC, is strictly liable for selling defective products that was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

IMPLIED WARRANTY

7. We, the jury, find that Defendant Whittaker, Clark & Daniels, Inc. breached an implied warranty in selling its products, and its breach was a proximate cause of Plaintiff Sarah Plant's injuries:

☒ Yes

☐ No

8. We, the jury, find that Defendant IMI Fabi (Diana), LLC, breached an implied warranty in selling its products, and its breach was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

9. We, the jury, find that Defendant IMI Fabi, LLC, breached an implied warranty in selling its products, and its breach was a proximate cause of Plaintiff Sarah Plant's injuries:

☐ Yes

☒ No

DAMAGES

10. If you answered "Yes" to any of Questions 1-9, please state the amount of actual damages that have been proven by the greater weight of the evidence:

\$ \$871,356 Sarah Plant's past Medical Expenses
 \$ \$3,268,336 Sarah Plant's future Medical Expenses/out of pocket expenses
 \$ \$20,000,000 Sarah Plant's other damages (past & future)
 \$ \$5,000,000 Parker Plant's loss of consortium damages (past & future)

WILLFUL, WANTON OR RECKLESS CONDUCT

11. If you answered "Yes" to Questions 1, 2, or 3, please answer this question as to any Defendant for which you answered "Yes." We, the jury, find by clear and convincing evidence that the conduct of the following Defendants was willful, wanton, or reckless:

a. Whittaker, Clark & Daniels, Inc.

 Yes
☒ No

b. IMI Fabi (Diana), LLC

 Yes
☒ No

c. IMI Fabi, LLC

 Yes
☒ No

 for person

3-3-2023

Date

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

Sarah J. Plant and Parker Plant,
Plaintiffs,

vs.

Avon Products, Inc., et al.,
Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT

C.A. No.: 2022-CP-40-01265

**DEFENDANT WHITTAKER,
CLARK & DANIELS, INC.'S
MOTION FOR NEW TRIAL ABSOLUTE
AND MEMORANDUM IN SUPPORT**

Pursuant to Rule 59(a) of the South Carolina Rules of Civil Procedure and the law of the State of South Carolina, Defendant Whittaker, Clark & Daniels, Inc. (“WCD”) moves, in the alternative *if* the Court denies its contemporaneously-filed Motion for Judgment Notwithstanding the Verdict (the “JNOV Motion”),¹ for a New Trial Absolute.

ARGUMENTS

“A new trial may be granted . . . on all or part of the issues . . . in an action in which there has been a trial by jury, for any of the reasons for which new trials have heretofore been granted in actions at law in the courts of the State.” Rule 59(a), SCRPC. In this case, there are multiple reasons why a New Trial Absolute is required, any one of which is independently sufficient to warrant this relief.

I. WCD Is Entitled To A New Trial Under The Cumulative Error Doctrine Because A Combination Of Errors Deprived WCD Of A Fair Trial.

As this Court has explained, “[t]he cumulative error doctrine ‘provides relief to a party when

¹ In addition to the separately-filed JNOV Motion, WCD has also filed a motion requesting setoff of the jury’s verdict by Plaintiffs’ settlements with joint tortfeasors and other related relief, in accordance with the Contribution Among Joint Tortfeasors Act, S.C. Code Ann. § 15-38-50 (Supp. 2020).

a combination of errors that are insignificant by themselves have the effect of preventing a party from receiving a fair trial, and it requires the cumulative effect of the errors to affect the outcome of the trial.” See Jean Hoefer Toal et al., *Appellate Practice in South Carolina* at 278-79 (3d ed. 2016) (quoting *State v. Johnson*, 334 S.C. 78, 512 S.E.2d 795 (1999)). The test for cumulative error is two-fold: (1) multiple errors committed during the course of the trial should be identified; and (2) those errors must have adversely affected the defendant’s right to a fair trial. *Id.*² Such is the case here.

It is axiomatic that “the sitting judge must conduct all adversarial proceedings with fairness and impartiality.” *State v. Hawkins*, 387 S.E.2d 251 (S.C. 1989). Moreover, it is an error of law – constituting an abuse of discretion – for the sitting judge to improperly shift the burden of proof to the defendant, *O’Neal v. Carolina Farm Supply of Johnston, Inc.*, 309 S.E.2d 776 (S.C. Ct. App. 1983). Furthermore, “it has been frequently held that a trial Judge should not by remarks in ruling upon testimony offered, indicate opinions or express views reasonably calculated to influence the jury in deciding a material issue of fact.” *State v. Simmons*, 209 S.C. 531, 535-36. 41 S.E.2d 217, 219 (1947); see also *State v. Dawkins*, 268 S.C. 110, 112, 232 S.E.2d 228, 229 (1977) (same).

A cascade of errors by this Court – all of which fell in Plaintiffs’ favor – deprived WCD of a fair trial. Such errors began at the hearing on pre-trial motions and continued throughout the trial. At the pre-trial hearing held on February 15, 2023, this Court ruled it would allow Plaintiffs’ experts to testify about general and specific causation while tying WCD’s hands behind its back – improperly excluding WCD’s primary medical expert purportedly on competency grounds (Dr.

² South Carolina courts have discussed application of the cumulative error doctrine both when trial counsel committed errors, *Green v. State*, 351 S.C. 184, 569 S.E.2d 318 (2002); *State v. Johnson*, 334 S.C. 78, 512 S.E.2d 795 (1999), and when – as here – the trial court committed errors, *Lynch v. Carolina Self Storage Centers, Inc.*, 409 S.C. 146, 163, 760 S.E.2d 111, 121 (Ct. App. 2014).

Attanoos) and then further prohibiting all other experts from offering specific causation opinions (Dr. Feingold, Dr. Diette, and Dr. Weill). The result was to shift impermissibly the burden of proof to WCD to prove that the cosmetic talc it allegedly distributed ***did not cause Mrs. Plant's disease***. Standing alone this error warrants reversal. However, this was compounded by additional errors outlined below that further hamstrung WCD's right to a fair trial.

Indeed, after WCD (with consent from other Defendants) exercised its constitutional right to remove this case to federal court – a removal which the federal court judge found to involve “tough substantive issues to decide” and was “unusually well-briefed and well argued on both sides”³ – this Court injected into the trial its own critical opinion of WCD, claiming that the removing defendant who “caused this problem” will “pay some penalty” for having exercised its constitutional right. (See Ex. E, Trial Tr., 2/23/23 PM Session at 146:11-12). It is apparent this Court believed (contrary to the federal judge's comments) that the removal was frivolous, “a bad faith removal” (see Ex. B, Trial Tr. 2/21/2023 AM Session, at 11:13-14), and a “sanctionable situation” (see *id.*, at 53:6-7). Indeed, after learning of the removal, the Court informed the parties that it was “very disappointed and upset about this” (see *id.*, at 36:5-6) and would “certainly deal with what needs to be dealt with here, when the cases come back, as I believe they will” (see *id.*, at 53:9-11). The Court also reiterated when the trial began that it “still ha[d] a lot of heartburn about how this all came down.” (See Ex. E, Trial Tr. 2/23/2023 PM Session, at 145:2-3).

Once the parties began presenting evidence to the jury, the Court's intended penalty became clear. As discussed *infra*, the Court improperly: (1) commented on the merits of WCD's expert

³ See 2/22/23 Transcript of Hearing on Motions, ECF No. 22 at 48:22-24; 50:12-16, in *Sarah J. Plant et al. v. Avon Prods., Inc. et al*, Civil Action No. 3:23-cv-691-JFA, attached hereto as Ex. Q. The Court may take judicial notice of matters of public record in court filings. See e.g., *Colonial Penn Ins. Co. v. Coil*, 887 F.2d 1236, 1239 (4th Cir. 1989) (common and appropriate use of judicial notice is for contents of court records).

opinions; (2) instructed the jury about opinions from WCD's experts solicited by Plaintiffs' cross-examination questions; and (3) even testified about the opinions of an expert Plaintiffs' counsel has used in other trials, but who did not testify at trial, to instruct the jury to disregard WCD's expert's opinions in this trial. (*See* detailed discussion of these errors, *infra*, Sections II and IV; *see also* Ex. O, Trial Tr., 3/2/2023 PM Session, at 121:11-22). In addition, the Court expressly overruled properly stated and timely objections made prior to the admission by Plaintiffs of certain exhibits on the stated grounds that the objections were (1) not timely by not having been made sometime even sooner, in writing, but, more significantly, because the Court declared that (2) WCD could not use a "lack of attention to proposed exhibits and couple it with your deliberate attempt to delay this trial with the removal and have me give any credibility to the objections you're now lodging. So, for those two reasons, overruled." (*See* Ex. F, Trial Tr. 2/24/2023 AM Session, at 75:16-96:2). The result was the admission of multiple lawyer-created charts not shown to be authenticated and not shown to be based on data that was independently admissible, as well as a document (referred to multiple times in Plaintiffs' Closing) that has been declared by the California Appellate Court as inadmissible hearsay. *See McNeal v. Whittaker, Clark & Daniels, Inc.*, 80 Cal. App. 5th 853, 296 Cal. Rptr. 3d 394 (2022), *reh'g denied* (July 22, 2022), *review denied* (Sept. 28, 2022). None of these are harmless errors in their own right, but in concert, there is no doubt that they far surpass the level required for cumulative error.

In fact, the Court's penchant to punish WCD continues even now: During the crunch for WCD to prepare and file timely post-trial motions, Plaintiffs boldly moved the Court to appoint a receiver in South Carolina over WCD, a viable corporation organized under New Jersey laws with its principal place of business in Connecticut (Answer ¶ 74), and unbelievably the Court issued a facially unconstitutional order granting the motion at close of business on a Friday afternoon, only

four (4) days after the motion was filed – without allowing WCD time to file a response despite WCD’s request to do so, and without even holding a hearing. WCD’s counsel clearly requested time to respond which the Court apparently disregarded completely:

Dear Justice Toal and all,

While I do not understand the urgency, I am not opposed to a briefing schedule. That said, I have unfortunately had a death in the family today that is going to require out-of-town travel and providing some assistance to my mother over the next week to two weeks, pending arrangements and other issues which are yet to be determined. With the post-trial motions requiring immediate attention, not to mention all of the other matters neglected during the trial, I would respectfully ask for some leniency and time to be able to address the complex issues that the Plaintiffs’ motion implicates, with deadlines at least 10 days beyond those that are already in play for post-trial motions. Yet additional time beyond that would be greatly appreciated.

(See email exchange with Court and counsel concerning Motion to Appoint Receiver, attached hereto as Exhibit R). The Court’s ongoing irritation with WCD for exercising its constitutional right to remove the case was apparent, and there can be no question that WCD was indeed penalized through the Court’s repeated errors in Plaintiffs’ favor. A new trial is required to ensure that WCD is given the fair trial to which is it constitutionally entitled.

II. WCD Is Entitled To A New Trial Absolute Because This Court Improperly Excluded Or Otherwise Improperly Limited Testimony From WCD’s Experts.

WCD’s defense in this trial was irreparably hobbled by the Court’s unfounded and complete exclusion of Dr. Richard Attanoos as an expert and the Court’s improper limitation on and interference with Dr. Feingold’s testimony.

A. The Court erred by Excluding Dr. Richard Attanoos from testifying completely.

i. Procedural History

On February 15, 2023, the Pre-Trial Hearing for the above-captioned cases was held. One of the motions addressed was Plaintiffs’ Motion *in Limine* to Exclude the Testimony of Dr. Richard Attanoos (“Dr. Attanoos”), a preeminent pathologist specializing in the diagnosis and causation of

mesothelioma who was offered by WCD and several other defendants.⁴ Notably, Plaintiffs' Motion *in Limine* did not seek complete exclusion of Dr. Attanoos, but rather a limitation to exclude several of his opinions regarding the contributing factors and causes of Mrs. Plant's mesothelioma, which was similar to other Motions *in Limine* before the Court regarding Dr. Diette, Dr. Feingold, and Dr. Weill's testimony. The Court granted Plaintiffs' Motion, ruling even further that Dr. Attanoos would be excluded from testifying *in his entirety*, despite permitting Drs. Diette, Feingold, and Weill to testify with limitations and permitting Dr. Attanoos to testify on three prior separate occasions before this Court. Notably, as discussed *supra*, of the aforementioned experts, Dr. Attanoos is the *only* one who has specifically published in the peer-reviewed literature and outside of the context of litigation on naturally occurring, spontaneous mesotheliomas, yet he was the only expert not permitted to testify on this very topic.

The Court summarized that its decision on Dr. Attanoos was different from her decision on other defense experts who addressed similar topics because it “*related to the inability to follow my directions, first*; and, second, his lack of any kind of foundation for being able to opine about the naturally occurring or idiopathic or any of those kind of causes as the cause of mesothelioma . . .”

⁴ Dr. Attanoos is a world-renowned pulmonary pathologist, researcher, and scientist and is likely one of the most qualified witnesses offered in this case on the subject of mesothelioma and its causes. He is an invited member of the U.S.-Canadian Mesothelioma Panel and the International Mesothelioma Panel; he was a Medical Advisor to the All-Party Parliamentary Committee of the British Government of the Health Effects of Asbestos; he was invited by the International Agency of Research on Cancer (IARC) to be a contributing author for the 4th Edition of the World Health Organization of Tumors of the Lung, Pleura, Thymus and Heart (contributing to the subsection on Malignant Mesothelioma); and he is the representative for the Genomics Committee of the Wales Thoracic Oncology Group. Dr. Attanoos has published over 190 peer-reviewed articles in the peer-reviewed literature, many of which are in the fields of occupational lung disease, asbestos, and mesothelioma. He also performed extensive research and published on inhaled particles of the lung, including asbestos and talc, asbestos-associated diseases and their causes, genetics, molecular biopsy, and carcinogenesis. Due to his preeminent qualifications, his testimony has been permitted before this Court and throughout the United States regarding the causes of mesothelioma, including the spontaneous development of mesothelioma. *See* Declaration of Richard L. Attanoos, B.Sc., MB BS, F.R.C. Path. dated February 28, 2023 (Ex. T).

(Ex. A, Pre-Trial Hearing, 2/15/2023, at 291:4-9) (emphasis added). Specifically, the Court stated that it recalled that Dr. Attanoos had previously testified in this Court conditionally under an order limiting his testimony and gave a detailed account of his conduct:

He got right up in this witness box, and he **tried to disobey my order**. And then when we had a jury dismissed and discussed this matter some more, and I cautioned the witness, and the jury came back, he then **defied me again** and was asked a question that he thought would be a platform to say this, “But I can’t say this” and then pointed up at me.

(*Id.* at 154:4-11). Accordingly, the Court decided, “I can’t have a witness testify in any case I try that cannot accept the rulings of the Court about constraints of testimony.” (*Id.* at 154:12-14).

As additional grounds for excluding Dr. Attanoos’ testimony in its entirety, the Court also mentioned his opinions relating to spontaneous or naturally-occurring mesothelioma as well as issues with “what he has and has not looked at in this case.” (*Id.* at 155:6-16, 156:1-6). During the Pre-Trial Hearing, WCD provided copies of its Responses to Plaintiffs’ Motion to the Court, which were timely filed on February 14, 2023 at 3:18 PM and 4:58 PM respectively, during business hours on the due date. (*Id.* at 176:6-178:17). The Court had not reviewed WCD’s Response prior to its initial ruling at the hearing (*id.* at 176:6-178:14) and stated that it would consider WCD’s briefing regarding Dr. Attanoos’ testimony (*id.* at 289:23-290:8), even though, “I don’t think there’s anything that will change my mind.” (*id.* at 290:7-10). The Court informed WCD it would notify counsel the following day in the unlikely event WCD’s Response affected her decision. (*Id.* at 290:10-13).

In fact, the Court did not change its mind, and on March 1, 2023, the Court filed its Order granting Plaintiffs’ Motion *in Limine* to Exclude the Testimony of Dr. Richard Attanoos. (See Order Granting Plaintiffs’ Motion in Limine to Exclude the Testimony of Dr. Richard Attanoos, entered on 3/1/2023). The Court opined that Dr. Attanoos should be excluded because: (1) he had not made an attempt to determine the products at issue contained asbestos, the fiber types of asbestos potentially

associated with any talc products at issue, had not reviewed any studies relating to the products at issue in this case either purporting to demonstrate the presence or lack of presence of asbestos in the products or for purposes of determining the amount of asbestos released from the normal and expected use of these products; (2) his opinion that the mesotheliomas arose unrelated to any asbestos or cosmetic talc exposures, as a naturally occurring cancer lacks foundation because he did not review any testing information about the asbestos content of any talc-based products, any exposure information about asbestos-containing talc products, without reviewing any corporate testing documents from the various defendants who retained him in these cases, and without considering the fiber type associated with any of those testing results and that for Ms. Plant specifically, there is no scientific basis for Dr. Attanoos to conclude that BRCA2 “caused” her mesothelioma absent a causal factor, such as asbestos exposure; and (3) he has a history of disobeying or disregarding orders limiting his testimony issued from this Court. (*Id.*)

With respect to portions of the first two propositions outlined by the Court, in his Report in this case, Dr. Attanoos cites multiple peer-reviewed publications and concludes that “there are no increased rates of mesothelioma reported in numerous epidemiological, or clinical human studies, or animal toxicological studies that evaluated the potential for cosmetic talc to induce cancer.” (Ex. U, Report at p. 40). He further relied on the expert reports of Dr. Sanchez and Mr. Segrave, who analyze the processes of talc formation in cosmetic talc locations used in various products, talc testing protocols and analytical methods for the characterization of asbestos and talc, as well as reviewing bulk analyses from various laboratories of talc mine samples and talcum powder end products, and of Dr. Sahmel and Dr. Barlow, who evaluated the potential significance of cosmetic talc exposures to various products alleged used by Ms. Plant. (*Id.* at pp. 40-52). In his report, Dr. Attanoos, relying on the peer-reviewed literature and the expert reports in this case, reiterated that

“even if the aforementioned talc products contained cosmetic talc from mining sources which in themselves contained trace levels of asbestiform mineral or non-asbestiform amphibole/cleavage fragments, the overall effect on human disease and specifically in mesothelioma induction is inconsequential and de minimis because consistently there is no increased risk of mesotheliomas observed in epidemiological or clinical studies of heavily exposed subjects, or indeed in high dose toxicological animal studies.” (*Id.* at p. 53). Dr. Attanoos further outlines the various asbestos fiber types, including those that are allegedly associated with cosmetic talc, and details his opinions related to their association, or lack thereof, with mesothelioma. (*Id.* at pp. 32-38). As discussed further *supra* in Section II.B.ii, Dr. Attanoos’ opinions related to naturally-occurring, spontaneous mesotheliomas and BRCA2 and mesothelioma are well-founded and supported by the peer-reviewed literature. These opinions are clearly laid out in Dr. Attanoos’ report, which was apparently disregarded by the Court.

As the Court did not change its ruling, WCD filed and circulated to the Court and all parties a Motion to Reconsider the Court’s Ruling on Plaintiffs’ Motion *in Limine* to Exclude the Testimony of Dr. Richard Attanoos on February 19, 2023. (See WCD’s Motion to Reconsider the Court’s Ruling on Plaintiffs’ Motion *in Limine* to Exclude the Testimony of Dr. Richard Attanoos (“Mot. to Recons.”)). As grounds for reconsideration, WCD first cited to the Court’s primary basis for disqualifying Dr. Attanoos which was its recollection of the prior conduct of Dr. Attanoos in a trial that did not involve WCD. WCD pointed out in its motion that these grounds, seemingly based on this Court’s personal opinions of Dr. Attanoos, were certainly not asserted in Plaintiffs’ Motion *in Limine* and therefore WCD had no notice or opportunity to respond and be heard on such assertions. Indeed, WCD was not a party to the trials to which the Court was referring regarding Dr. Attanoos’ alleged behavior. Further, upon looking into Dr. Attanoos’ prior testimony before this Court, WCD

believes the Court mistakenly attributed the conduct of a different witness to Dr. Attanoos. Upon information and belief⁵, those appearances were in the following three cases: (1) *Antoine Bostic, Individually and as Personal Representative of the Estate of Bertila Delora Boyd-Bostic v. Imerys Talc of America, et al.*, May 21, 2018, C.A. No. 2017-CP-16-0400 (Transcript attached as Ex. B to the Mot. to Recons.), (2) *Antoine Bostic, Individually and as Personal Representative of the Estate of Bertila Delora Boyd-Bostic v. Imerys Talc of America, et al.*, November 9, 2018, C.A. No. 2017-CP-16-0400 (Transcript attached as Ex. C to the Mot. to Recons.), and (3) *Beth-Anee F. Johnson and John W. Greenley, Jr. v. Johnson & Johnson, et al.*, May 20, 2019, C.A. No. 2018-CP-40-01781 (Transcript attached as Ex. D to the Mot. to Recons.). Nowhere in these transcripts is the conduct described by the Court above, particularly the Court's alleged cautioning of Dr. Attanoos about his violation of a limitation on his testimony. Moreover, Dr. Attanoos has already been qualified by this Court as an expert in comparable cases ***on three occasions, making his exclusion in this case inexplicable.***

As a second ground for reconsideration of the Court's exclusion of Dr. Attanoos, WCD incorporated the arguments from its Response to Plaintiffs' Motion *in Limine*, which had not been reviewed by the Court before its initial ruling. (See WCD's Resp. in Opp'n to Pls.' MIL to Exclude Dr. Attanoos). WCD argued that Plaintiffs' Motion *in Limine* was an attempt to preclude WCD from presenting any evidence refuting Plaintiffs' theory of the case. Plaintiffs intended to present their case to the jury in a vacuum and summarily adjudicate—by striking all of WCD's conflicting evidence—that (a) mesotheliomas cannot arise in the absence of asbestos exposure, and (b) Mrs. Plant's mesothelioma specifically was caused by asbestos. (See Pls.' Mot. *in Limine* at p. 2). WCD argued that such a ruling would be contrary to peer-reviewed publications published outside of the

⁵ To the best of WCD's knowledge, these are the only trials in South Carolina at which Dr. Attanoos testified. (See Prior Testimony List of Dr. Richard Attanoos, Ex. H to the Mot. to Recons.).

context of litigation, as well as the opinions of Plaintiffs' own experts about the existence of spontaneous, or idiopathic, or naturally occurring mesotheliomas that arise in the absence of asbestos exposure or other external agents. WCD argued that it was an attempt to summarily adjudicate the cause of Mrs. Plant's mesothelioma ahead of trial. As will be shown below, WCD's fears were not unfounded and the cause of Mrs. Plant's mesothelioma—a *crucial, foundational element of Plaintiffs' claims*—was determined by the Court before the trial even began. This burden should not have been shifted to Defendants or escaped through a Motion *in Limine*.

As a third ground for reconsideration, WCD requested that the Court conduct a *Daubert/Council* hearing relating to Dr. Attanoos before making the drastic decision to exclude his testimony completely. At the Pre-Trial Hearing, the Court cited to one of its Opinions for the South Carolina Supreme Court, *Watson v. Ford Motor Co.*, 389 S.C. 434, 699 S.E.2d 169 (2010) (Toal, C.J.) as an example of the Court's gatekeeping responsibility regarding experts.⁶ (Ex. A, Pre-Trial Hearing, 2/15/2023, at 151:23-152:6, 153:11-20, 156:19-157:11). In 2020, the South Carolina Supreme Court addressed a situation where the trial court failed to exercise its gatekeeping function relating to a scientific expert. *See State v. Phillips*, 430 S.C. 319, 334–35, 844 S.E.2d 651, 659 (2020). In *Phillips*, where a purported expert regarding DNA evidence was at issue, the Court held that:

[I]f an objection is made, the trial court *must* hold a *Daubert/Council* hearing, the proponent of the evidence must present the factual and scientific basis necessary to satisfy the foundational elements of Rule 702, and the trial court must conduct an on-the-record balancing of probative value against the applicable Rule 403 dangers. The trial court should make specific findings as to each contested element or issue. By not conducting a *Daubert/Council*

⁶ In South Carolina, the admissibility of expert testimony is generally governed by Rule 702 of the South Carolina Rules of Evidence. If the proffered testimony is scientific in nature, as it is here, the trial court must determine its reliability pursuant to the factors set forth in *State v. Council*, 335 S.C. 1, 19, 515 S.E.2d 508, 517 (1999). *See Graves v. CAS Medical Systems, Inc.*, 401 S.C. 63, 74, 735 S.E.2d 650, 655 (2012).

hearing, the trial court left itself without a meaningful opportunity to exercise its discretion.

Phillips, 430 S.C. 319 at 343, 844 S.E.2d at 663 (emphasis added). The *Phillips* Court contrasted the case with both *Watson* and *Graves*, where “the civil plaintiffs who sought to introduce the opinion testimony presented deposition testimony of their experts and/or live testimony outside the presence of a jury, and each expert explained in detail the factual and scientific basis for their opinions.” *Phillips*, 430 S.C. at 334–35, 844 S.E.2d at 659. Based on the factors above, and the fact that the Court’s initial ruling did not address each contested issue but relied primarily on the Court’s recollection of Dr. Attanoos’ prior testimony, WCD requested that a *Daubert/Council* hearing be conducted where WCD could present the factual and scientific basis to satisfy the necessary elements of Rule 702, SCRCP, and the Court could make findings specifically on each contested issue.

At trial, the Court ruled on WCD’s Motion to Reconsider and ultimately excluded Dr. Attanoos from testifying completely, with no *Daubert/Council* meeting even contemplated. (Ex. D, Trial Tr., 2/23/23 AM Session at 39:6-44:19). During its consideration, the Court stated that “Dr. Attanoos is on the edge of what I would consider admissible testimony,” but again referenced his prior trial appearances. (*Id.* at 42:8-25). The Court acknowledged that the behavior it referred to “**does not appear in the record**, but I have checked my trial notes, and it very much did occur.” (*Id.* at 42:8-15) (emphasis added). In fact, the record instead reflects the Court’s commendation of Dr. Attanoos’ testimony in his most recent trial appearance before this Court, noting that he gave a “very forceful presentation about what he considers to be the situation with regard to” the cause of the plaintiff’s mesothelioma. *Beth-Anee F. Johnson and John W. Greenley, Jr. v. Johnson & Johnson, et al.*, May 20, 2019, C.A. No. 2018-CP-40-001781, at p. 1756-1757 (attached as Ex. D to the Mot. to Recons.). In addition to the Court’s erroneous reasoning, WCD was further prejudiced due to its

lack of notice of this issue, which was not raised in Plaintiffs' Motion *in Limine*. With nothing appearing on the record in any prior trial, WCD had ***no reason*** to suspect, prior to the Pre-Trial hearing less than a week prior to the start of trial, that its key witness in its defense would be struck based on the Court's recollections and personal opinions. Dr. Attanoos had written a Report and appeared for a deposition in this case with nothing of the sort being raised as an issue.

On such short notice, WCD was unable to produce any comparable witness at the trial of this case and suffered greatly due to this fact. On Day 6 of trial, at the time Dr. Attanoos would have been called by WCD, WCD instead proffered an Affidavit of Dr. Attanoos along with his deposition taken in this case, and the materials that would have been used if he had been allowed to testify. (*See* Dr. Attanoos Proffer, made a Court Exhibit; *see also* Ex. O, Trial Tr., 3/2/23 PM Session at 221:23-223:13). Contrary to Plaintiffs' and the Courts' assertions, the Rough Transcript of Dr. Attanoos' testimony in this case was not introduced to the record in any prior submissions (*id.* at 224:25-225:10) and, therefore, was not considered by the Court in its exclusion of Dr. Attanoos.

WCD incorporates all of its arguments from its Response in Opposition to Plaintiffs' Motion *in Limine*, Motion to Reconsider, and at Trial and asserts that the Court erred in excluding Dr. Attanoos for the reasons articulated. The Court's exclusion based on a prior personal grudge, which was unsupported by the prior trial transcripts, is an insufficient ground for excluding an internationally recognized expert pathologist, who was thrice-qualified in this same Court for these very opinions. Further, the Court's findings related to Dr. Attanoos' lack of support for his opinions is demonstrably false, considering the sources cited to in his Report. While the Court may not like or agree with this expert's opinions, he is ultimately the scientist, and he is objectively qualified pursuant to the *Daubert/Council* factors. Limitation of the scope of his testimony and strict monitoring of his behavior in court could have quelled the Court's concerns without devastating

WCD's defense of this matter and effectively summarily determining Plaintiffs' element of causation. (*See supra* Section II.A(ii)(2)). Additionally, the Court's error was compounded by the following additional factors.

ii. Plaintiffs opened the door on Dr. Attanoos' testimony and Defendants' inability to respond was irreparably prejudicial

Despite the Court's ruling excluding Dr. Attanoos from testifying for Defendants before opening statements commenced, Plaintiffs did not refrain from peppering references to Dr. Attanoos throughout the trial. WCD argues that this rightly should have opened the door for Dr. Attanoos to ultimately testify.

First, in Plaintiffs' Opening Statement, Ms. Jessica Dean, counsel for Plaintiffs not only referenced Dr. Attanoos twice, but also *showed his photo* in her slideshow. Following a slide that bore the highlighted text: "The witnesses you will meet," (Ex. V, at Page 21), Plaintiffs' presentation featured a photo of Dr. Attanoos (*see id.*). Ms. Dean stated, "This is Dr. Attanoos. He's one of their experts. He's done hundreds of tissue digestions. Hundreds. They've never asked him to do one in this case. They have never asked him to look at Sarah's lungs to see what's there. They have never asked him to do it in any case." (Ex. E, Trial Tr., 2/23/23 PM Session at 44:15-19). She further stated, "Another thing that Dr. Attanoos and some of the other experts that are hired by these companies will say, You need to understand that there's a difference between men and women; that it's a signal tumor for men. If they have this cancer, yes, it signals that you're exposed to asbestos. But for women, over the last 60 years, we studied them, and we can't connect them to asbestos, not even through their husbands, not even through their dads." (*Id.* at 45:2-9).

On Day 2 of trial, Plaintiffs again referenced Dr. Attanoos' name during their redirect examination of Plaintiffs' expert experimental pathologist Dr. Arnold Brody, asking whether he knew who Attanoos was and whether he was asked to perform a "long [lung] fiber count." (Ex. F,

Trial Tr., 2/24/23 AM Session at 76:6-9). WCD objected, and the Court warned Plaintiffs during a bench conference, “I don't think you need to get into that or you're going to open the door to putting Attanoos up.” (*Id.* at page 76:9-17). The door was obviously already opened at that point, and the damage had been done.

Nothing could be done to escape the prejudice of the unfulfilled promise to the jury after Plaintiffs' affirmative statements to the jury that they would be meeting Dr. Attanoos as a witness for WCD, paired with additional questions about him. Once his name, occupation, photograph, and role in this case was introduced, an instruction to the jury would only have served to draw additional attention to his absence and raise questions about why he was excluded. Nothing could have remedied the jury questioning *why* Dr. Attanoos was no longer testifying for WCD, other than permitting him to appear and testify.⁷

B. The Court erred when it unfairly limited Dr. Allan Feingold's testimony and improperly instructed the jury regarding his testimony.

i. Procedural History

As previously noted, the entire trial was tinged with “penalties” against WCD following the removal, and subsequent remand, of the case. The Court stated on the first day of trial relating to the schedule, “They [the defendants] caused this problem. I get that. They're going to pay some penalty for that.” (Ex. E, Trial Tr., 2/23/2023 PM Session, at 146:11-12). One of these penalties was relegating less than two days of trial for Defendants to present their case, compared to over four days for Plaintiffs. Consequently, Defendants were forced to consolidate their expert witnesses to optimize their allotted time. On the night of February 27, 2023, after the expert witness list had been consolidated amongst Defendants and circulated to Plaintiffs and the Court, Defendant Mary Kay

⁷ At the Pre-Trial Hearing, in its Motion for Reconsideration, and during arguments at trial, WCD repeatedly raised the option of allowing Dr. Attanoos to testify with the same limiting instruction given to him as Drs. Diette, Weill, and Feingold. However, these requests were denied.

settled out of the case resulting in Mary Kay's experts being unavailable to WCD at trial. Accordingly, WCD scrambled to replace the now-missing experts. (*See, e.g.*, Ex. J, Trial Tr., 2/28/2023 AM Session, at 8:1-7). At the eleventh hour, WCD retained Dr. Feingold, an expert previously retained by co-Defendants in the case, flew him to town, and worked with him overnight to prepare his testimony for March 2, 2023.⁸

As with Dr. Attanoos, Plaintiffs had filed a Motion *in Limine* to Exclude the Testimony of Dr. Feingold that was addressed at the Pre-Trial Hearing on February 15, 2023. The Court ruled that the testimony of Dr. Feingold, along with Drs. Diette and Weill, was limited such that they:

[m]ay testify generally about cosmetic talc and about asbestos and cosmetic talc and about how that affects the contraction of mesothelioma. ***They will not be allowed to opine about the cause of the mesothelioma that has been contracted by Sarah Plant*** or Shelby Linville Payne. So they can be a part of the expert testimony about this subject.

(*Id.* at 196:23-197:6) (emphasis added). In this ruling the Court made abundantly clear its own opinions on causation stating during the Pre-Trial Hearing, “ And what Ms. Payne has, she may have the propensity for many other cancers, but mesothelioma is a signature cancer. **It's caused by asbestos.** And that's what she's got.” (Ex. A, Pre-Trial Hearing, 2/15/2023, at 156:2-6).

- ii. **In excluding WCD's expert testimony relating to Mrs. Plant's causation, the Court erred by shifting the burden to WCD to disprove that Mrs. Plant's mesothelioma was caused by asbestos and by preventing WCD from having a fair chance to dispute causation⁹**

⁸ To the extent any issue is raised as to why WCD did not object earlier relating to the scope of Dr. Feingold's testimony, the reason is because, as stated above, due to the exclusion of Dr. Attanoos and the politics of the trial, WCD only first retained Dr. Feingold on the tail end of the trial. Any such objections that WCD made relating to Dr. Attanoos, before Dr. Feingold was retained, should equally apply to Dr. Feingold, who was retained for a similar purpose.

⁹ This argument herein is centered around Dr. Feingold, as he was WCD's expert at trial. However, the argument pertains equally to Dr. Attanoos, who was intended to be WCD's expert relating to the cause of Mrs. Plant's mesothelioma.

At the trial, Plaintiffs' medical experts were permitted to testify directly as to the cause of Mrs. Plant's mesothelioma, but WCD's experts were not. Both Dr. Attanoos (*see* Ex. U, Attanoos Plant Report), who was preemptively excluded by the Court, and Dr. Feingold (*see* Ex. X, Feingold Plant Report and Supplement), who was subsequently retained by WCD (and as a direct result of Dr. Attanoos' exclusion), formed well-supported opinions, informed by their own experience and by many peer-reviewed articles, that Mrs. Plant's mesothelioma was caused not by asbestos or cosmetic talc, but instead was a naturally occurring, spontaneous mesothelioma, caused by intrinsic genetic errors. The exclusion and limitation of WCD's experts alone are prejudicial, yet the prejudice was compounded by the fact that consistently throughout the trial, Plaintiffs experts *were* permitted to testify about the causation. This made the error devastating to WCD's case, and the argument about the causation of Mrs. Plant's mesothelioma completely one-sided. By excluding all of WCD's expert opinions or evidence relating to any alternative causation *other* than asbestos-containing talc,¹⁰ the Court effectively granted summary judgment on Plaintiffs' causation element before this trial even began.

1. Preventing WCD's experts from testifying about the cause of Mrs. Plant's mesothelioma was erroneous and prejudicial

Causation is a critical, foundational element of Plaintiffs' claims, and Plaintiffs bear the burden to demonstrate that Mrs. Plant's mesothelioma was caused by exposure to asbestos. This burden may not be shifted to Defendants or escaped through a Motion *in Limine*. However, that is exactly what happened here. The Court created a presumption that Mrs. Plant's mesothelioma was caused by the alleged exposure to asbestos in the products of Defendants—which effectively

¹⁰ Notably, the Court also excluded any evidence of alternative exposures to asbestos to Mrs. Plant from the most likely source, based on the facts in the record—her father's plumbing work. Paired with the exclusion of the expert testimony above, this effectively eliminates *all* causation possibilities *other than asbestos-containing talc*.

allowed Plaintiffs to bypass a crucial part of the causation element of their case. This is especially important in this case, as talc cases are distinguishable from the traditional occupational exposure case in which “asbestos is generally a known, common and uniform ingredient of the defendant’s product;” in cosmetic talc cases, asbestos is *not* an intended ingredient. *See Hanson v. Colgate-Palmolive Co.*, 2018 U.S. Dist. LEXIS 168016, *11 (S.D. Ga. Sept. 28, 2018). Essentially, Plaintiffs were able to present their case to the jury in a vacuum having already summarily adjudicated—by striking or excluding all WCD’s conflicting evidence or opinions—that Mrs. Plant’s mesothelioma specifically was caused by asbestos in cosmetic talc.

This was harmful in this case even more so than in a traditional asbestos case because this is not a typical asbestos case. The typical asbestos case involves alleged exposure to products known to contain asbestos because asbestos was an intended ingredient of the product. Thus, in a typical asbestos case, proof of exposure to the product equates to proof of exposure to asbestos at known levels. But this case is not about a product formulated to contain asbestos.

Here, Plaintiffs claimed that cosmetic talcum powder products used by Mrs. Plant (including some allegedly containing cosmetic talc supplied by WCD) contained asbestos. Plaintiffs’ theory was not that these products were intended to contain asbestos; rather, Plaintiffs claimed that some of the cosmetic talc used in these products was contaminated with trace amounts of asbestos. Thus, unlike a traditional asbestos case, Plaintiffs had to establish not only the traditional element of *exposure* to the cosmetic talc for which WCD allegedly bears liability, but also that the cosmetic talc allegedly used by Mrs. Plant was actually contaminated with asbestos. *See Hanson*, 2018 U.S. Dist. LEXIS 168016, *11. Indeed, exposure to asbestos from a defendant’s asbestos-containing product is a threshold issue on which Plaintiffs bear the burden of proof. Without exposure, there can be no causation. *See In re Lipitor (Atorvastatin Calcium) Mktg., Sales Practices & Prod. Liab. Litig.*, 150

F. Supp. 3d 644, 648 (D.S.C. 2015) (“Under a preponderance-of-evidence burden, a plaintiff must show, more likely than not, *the substance* caused, or was a substantial contributing factor to, her particular injury.”) (emphasis added).

After establishing the threshold burden that Mrs. Plant used a product that contained cosmetic talc provided by WCD (which WCD maintains they failed to prove), Plaintiffs then needed to introduce admissible proof about the specific ways in which Mrs. Plant was exposed to asbestos, and admissible evidence that those exposures were substantial enough to cause or contribute to her development of mesothelioma.

There should be no question that evidence about *the cause* of Mrs. Plant’s mesothelioma was relevant and admissible. South Carolina Rule of Evidence 401 defines “relevant evidence” as that which has “any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” Put simply, “[r]elevancy is that quality of evidence which renders it properly applicable in determining the truth and falsity of matters in issue between the parties to a suit.” *Toole v. Salter*, 249 S.C. 354, 361 (1967). In a case in which Plaintiffs allege that WCD caused Mrs. Plant’s mesothelioma, it is paradoxical for the Court to rule that the cause of Mrs. Plant’s disease (whether it was asbestos-related or not) is not relevant or that a causation opinion contrary to Plaintiffs’ experts’ theory of the case somehow prejudices Plaintiffs in such a way as to make it excludable.

Plaintiffs had the burden in this case to establish causation, and specifically as to WCD, that cosmetic talc supplied by WCD caused Mrs. Plant’s mesothelioma. Mere *possibility* of causation alone is insufficient to establish Plaintiffs’ case. *See Pace v. Air & Liquid Sys. Corp.*, 642 F. App’x 244, 253 (4th Cir. 2016). Instead, “in order to carry the burden of proving a plaintiff’s injury was caused by exposure to a specified substance, a plaintiff must demonstrate general and specific

causation.” *In re Lipitor*, 150 F. Supp. 3d at 648 (internal quotation and citations omitted). “For specific causation, the plaintiff must ‘demonstrate[] that the substance actually caused injury in her particular case.’” *Id.* (quoting *Guinn v. AstraZeneca Pharm. LP*, 602 F.3d 1245, 1249 n.1 (11th Cir. 2010)). “Under a preponderance-of-evidence burden, a plaintiff must show, more likely than not, the substance caused, or was a substantial contributing factor to, her particular injury.” *Id.* Accordingly, the jury was entitled to hear the complete record of evidence on the causation of Mrs. Plant’s injuries, including the well-founded opinions of Dr. Attanoos and Dr. Feingold, that differed from that of Plaintiffs’ own experts.

By excluding Dr. Attanoos’ and Dr. Feingold’s opinions that Mrs. Plant’s mesothelioma was not the result of exposure to asbestos, the Court effectively adjudicated, without proof, that asbestos was the cause of Mrs. Plant’s mesothelioma and circumvented Plaintiffs’ burden of proving causation. However, Dr. Attanoos and Dr. Feingold are both respected experts whose opinion that mesotheliomas can and do occur naturally without any asbestos exposure are supported by substantial evidence, including peer-reviewed literature.

Indeed, it is generally accepted in the peer-reviewed literature that mesotheliomas can arise spontaneously, unrelated to any external agent, such as asbestos. In 2019, a major review article published with many of the world’s foremost experts on the subject details the current state-of-the-art knowledge on the development of mesothelioma. Among the co-authors of the publication are distinguished researchers and practitioners from the University of Hawaii Cancer Center, Memorial Sloan Kettering Cancer Center, Rutgers Robert Wood Johnson Medical School, Brigham and Women’s Hospital, Mayo Clinic, Icahn School of Medicine at Mt. Sinai, and MD Anderson Cancer Center. These authors conclude that “[c]ancer is caused by the accumulation of genetic damage. Genetic damage can be inherited, can develop spontaneously, can be caused by exposure to

carcinogens and oncogenic infectious agents, or can be caused by the interplay of a combination of these factors...As for any other cancer, irrespective of exposure and of inherited mutations, some mesotheliomas may occur because of the inevitable accumulation of spontaneous mutations, as observed in mesotheliomas developing in lions, cats, horses, dogs, birds, clams, sharks, etc.” *Id.* at p. 406-407. In fact, Dr. Attanoos relies on this article in his 2020 book chapter when he writes that “[f]or most subjects in which mesothelioma is not clearly asbestos-related, the tumor is most likely naturally-occurring or spontaneous, an important risk factor for these tumors is subject age secondary to endogenous DNA replication errors.” Attanoos, R.L., “Malignant Mesothelioma: Asbestos Exposure,” Chapter 20 in *Occupational Cancers*, edited by S. Anttila and P. Boffetta, 363-378. Switzerland: Springer, 2020. (Ex. F to Mot. to Recons.).

Numerous other peer reviewed publications throughout the world and outside of the context of litigation show the majority of mesotheliomas in women *are not* attributable to asbestos exposure. For example, in a peer-reviewed article with a co-author from the National Cancer Institute in the United States, Spirtas and others found that approximately 77% of mesotheliomas in women are not attributable to asbestos exposure. (See Ex. M to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Spirtas, R., *et al.*, “Malignant mesothelioma: attributable risk of asbestos exposure,” *Occup. Environ. Med.* 51:804-811 (1994); accord Dawson, A., et al., “Malignant mesothelioma in women,” *Thorax* 48:269-274 (1993)). In 2009, using the Surveillance, Epidemiology, and End Results (SEER) registries maintained by the National Cancer Institute in the United States, Price and Ware found that less than 10% of mesotheliomas in women are not attributable to asbestos exposure. (See Ex. O to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Price, B. & Ware, A., “Time trend of mesothelioma incidence in the United States and projection of future cases: An update based on SEER data for 1973 through 2005,” *Critical Rev. Toxicol.* 39(7):576-588 (2009)

(“However, as the age-adjusted SEER data for females indicate, there was no increases in mesothelioma incidence that followed the increases in exposure. . . . [T]he female cases must be attributed to another cause or to other causes, not asbestos.”); accord Ex. P to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Moolgavkar, S.H., et al., “Pleural and peritoneal mesotheliomas in SEER: age effects and temporal trends, 1973-2005,” *Cancer Causes and Control* 20(6):935-944, 941 (2009); Ex. AB, Moolgavkar, S.H., et al., “Epidemiology of Mesothelioma,” Chapter 3 in *Asbestos and Mesothelioma*, ed. Testa, J., Switzerland: Springer (2017) (extending the results reported in Moolgavkar, et al. (2009) to include SEER data through 2013 and reaffirming that the trend in mesothelioma incidence rates among women remain flat, “indicating that the commercial use of asbestos in the USA had little impact on these mesothelioma rates.”)).¹¹ In 2013, authors from the Center for Disease Control and Prevention and from the Agency for Toxic Substances and Disease Registry in the United States, using data from the National Program for Cancer Registries (NPRC) and SEER, confirmed that between 2003 and 2008, female pleural mesothelioma rates were flat. (See Ex. AC, Henley, S.J., et al., “Mesothelioma incidence in 50 states and the District of Columbia, United States, 2003-2008, *Int J Occup Environ Health*, 19(1): 1-10 (2013)). In the United Kingdom, Rake and others (including an author from the Health and Safety Executive) likewise found that approximately 62% of mesotheliomas in women are not attributable to asbestos exposure. (Ex. N to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Rake, C., et al., “Occupational, domestic and environmental mesothelioma risks in the British population: a case-control study,” *Br. J. Cancer* 100:1175-1183 (2009)). Peer-reviewed publications in the Netherlands, France, and Italy likewise report that a proportion of mesotheliomas in women are not

¹¹ The U.S. District Court for the Southern District of Georgia has previously found that Dr. Moolgavkar’s research and publication of his article is sufficient for his opinions. See Ex. U to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Order, *Hanson v. Colgate-Palmolive Co.*, Case 2:16-cv-00034-JRH-BKE, Doc. 201 (S.D. Ga. Sept. 24, 2018), at 40-42.

attributable to asbestos. (See Ex. AD, Offermans, N.S., et al., “Occupational asbestos exposure and risk of pleural mesothelioma, lung cancer, and laryngeal cancer in the prospective Netherlands cohort study,” *J Occup Environ Med*, 56(1):6-19 (2014); Ex. AE, Lacourt, A., et al., “Occupational and non-occupational attributable risk of asbestos exposure for malignant pleural mesothelioma, *Thorax*, 69(6):532-539 (2014); Ex. AF, Gennaro, V., et al., Incidence of pleural mesothelioma in Liguria Region, Italy (1996-2002), *Eur J Cancer*, 41(17):2709-14 (2005); Ex. AG, Marinaccio, A., et al., “Pleural malignant mesothelioma epidemic: incidence, modalities of asbestos exposure and occupations involved from the Italian National Register, *Int J Cancer*, 130(9):2146-54 (2012). In fact, WCD’s own expert, Dr. Attanoos has published in the peer-reviewed literature outside the context of litigation on these studies finding that “there is a definite and sometimes quite substantial fraction of mesotheliomas that have no identifiable external cause, and that, not surprisingly, this fraction is greater in women than men...” and that in “North America few mesotheliomas in women at any site are attributable to asbestos exposure.” (See Ex. AH, Attanoos, RL, et al., “Malignant Mesothelioma and Its Non-Asbestos Causes,” *Arch Pathol Lab Med*, 142:753-760 (2018)).

Additionally, health organizations and institutions similarly recognize that mesothelioma can arise without any exposure to asbestos. For example, Baylor College of Medicine, where Plaintiff’s treating physician, Dr. Ripley, works, reports on its website that “a significant percentage of mesothelioma patients have not been exposed to asbestos. This has led some experts to argue for a genetic predisposition.” (See Ex. AI, Baylor Medicine Healthcare: Mesothelioma). The Mayo Clinic also highlights risk factors for the public, including “inherit[ing] a predisposition to cancer or some other condition could increase your risk.” (See Ex. S to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Mayo Clinic Risk Factors). Furthermore, the National Organization for Rare Disorders expressly informs mesothelioma patients and organizations that serve them that

“[a]lthough asbestos is the major risk factor . . . asbestos exposure alone does not account for every affected individual [I]n rare cases, individuals develop mesothelioma without any obvious asbestos or erionite exposure. The cause in such cases is unknown (idiopathic or spontaneous mesothelioma).” (See Ex. T to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Rare Disease “Mesothelioma”). Moreover, Memorial Sloan Kettering, one of the world’s top cancer treating centers, explains on its public website that “[p]eople can also *develop mesothelioma without being exposed to asbestos*.” See Ex. V to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, MSKCC Malignant Mesothelioma (emphasis added). Lastly, the American Lung Association states that with respect to mesothelioma, “[s]ometimes, no cause can be identified at all.” (See Ex. W to WCD’s Resp. in Opp’n to Pls.’ MIL to Exclude Dr. Attanoos, Mesothelioma Symptoms, Causes, and Risk Factors). The number of reputable institutions and medical organizations that specialize in the research and education of this rare disease that have endorsed this view are countless and should not have been kept from the jury under South Carolina law.

Even experts utilized by Plaintiffs in this very trial did not refute the existence of spontaneous or idiopathic mesotheliomas. For example, Dr. Brody admitted during his examination that approximately 20% of mesotheliomas cannot be associated with asbestos. (Ex. F, Trial Tr., 2/24/2023 AM Session, at 64:2-22). He testified about the possibility of both “idiopathic” mesotheliomas, meaning, you do not know the cause, and “spontaneous” mesotheliomas, meaning that “they develop from that person’s own genetic background.”¹² *Id.* However, this explanation was not enough to remotely even the scales between Plaintiffs and Defendants for proving causation.

There is no justifiable reason for this opinion relating to spontaneous/idiopathic mesothelioma to

¹² Notably, Dr. Brody’s explanation of spontaneous and idiopathic mesothelioma is nearly identical to Dr. Attanoos’ opinion on the same topics, again begging the question why Dr. Brody was permitted to testify while Dr. Attanoos was excluded completely.

be admissible when it comes from Dr. Brody, but excludable when it comes from Drs. Attanoos or Feingold.

As the scientific literature emphasizes, the notion that mesothelioma can arise spontaneously without any asbestos exposure is not well-known outside the niche medical community that studies this rare disease. Because of that, it is even more critical in cases like this that the jury not be shielded from this expert testimony. Indeed, by excluding evidence regarding mesotheliomas occurring without asbestos exposure, effectively summarily adjudicating the cause of Mrs. Plant's mesothelioma, the Court blatantly ignored, or substantially minimized, and prevented the jury from properly considering a substantial body of medical evidence that has been well-documented in the literature, sanctioned by leading health organizations, and acknowledged by Plaintiffs' own expert in this case.

Had the opinions of Dr. Attanoos and/or Dr. Feingold been admitted relating to causation, Plaintiffs would have had every opportunity to challenge the opinions or the bases for them on cross-examination. Such issues go to the credibility and weight—not admissibility—of the testimony and should have been addressed during cross-examination. At trial, Plaintiffs were relieved the burden of proving the key element of causation and the jury was not fully educated about the legitimate possibilities. WCD was entitled to explain through its experts: (i) the potential causes of mesothelioma, (ii) the complexity of cancer, and (iii) how cancers develop; and Plaintiffs should have bore the burden to prove causation as part of their *prima facie* case.

2. The Court erred by permitting Plaintiffs' experts, who were no more qualified than WCD's experts, to testify about the cause of Mrs. Plant's mesothelioma

The Court's error in preventing WCD's experts from testifying as to the cause of Mrs. Plant's mesothelioma was compounded by the fact that Plaintiffs' experts, who were no more qualified than

Defendants' experts, were permitted to do just that. First, Dr. Attanoos' abundant qualifications have been addressed above and in prior briefing. As to Dr. Feingold, who was qualified as an expert in pulmonology and the diagnosis and treatment of diseases of the chest, the Court precluded his causation testimony, stating:

And I have ruled that Dr. Feingold, just like Dr. Attanoos, is not trained by way of -- without training, education or experience, is not qualified to give an opinion on the cause of her mesothelioma. She is contending that her mesothelioma was caused by asbestos in products she used. Her primary treating physician has testified to that. And Dr. Feingold has not got the training, education and experience to opine about asbestos not being the cause of her mesothelioma.

(Ex. N, Trial Tr., 3/2/23 AM Session, at 121:17-122:4). However, the Court's decision that WCD's expert, Dr. Feingold, is unqualified to render such opinions, but Plaintiffs' experts, Drs. Haber and Ripley, *are* qualified is unfair and prejudicial. Dr. Feingold's expertise included board certification in both pulmonology and internal medicine. (Ex. O, Trial Tr., 3/2/23 PM Session, at 22:13-23:2). He also has a NIOSH certification as a B-Reader, which includes radiology, the review of x-rays, as well as the review of slides of pathology. (Ex. N, Trial Tr., 3/2/23 AM Session at 122:9-18). One of his areas of expertise in pulmonary medicine and pathology is analyzing what causes pulmonary diseases and what the diagnosis is. (Ex. O, Trial Tr., 3/2/23 PM Session, at 20:12-25:25).

Plaintiffs' expert, Dr. Haber, like Dr. Feingold, is also a pulmonologist and B-reader, but was permitted by this Court to provide a specific causation opinion related to the cause of Mrs. Plant's mesothelioma. Just like Dr. Haber, Dr. Feingold reviewed the medical records of Mrs. Plant, reviewed the x-rays, and reviewed the tissue available in the pathology slides. (*Id.* at 127:8-12). In order to assess causation, Dr. Feingold reviewed Mrs. Plant's available pathology and, as a NIOSH certified B-Reader, reviewed x-rays, for biomarkers of asbestos exposure, such as pleural plaques, asbestosis, or asbestos bodies. Dr. Feingold was prepared to opine, from a medical standpoint,

whether Mrs. Plant's mesothelioma should be attributed to asbestos. (*Id.* at 126:15-127:21). If Dr. Haber was qualified to talk about the cause of Mrs. Plant's mesothelioma, Dr. Feingold undoubtedly was too. (*Id.* at 126:3-127:21).

Dr. Ripley is a thoracic surgeon who treated Mrs. Plant and testified as an expert in this case. (*Id.* at 126:11-14). His expertise was not in diagnosis, but in surgery. He testified that typically, when he sees a patient, they almost always already have an established diagnosis or suspected diagnosis. (Ex. G, Trial Tr., 2/24/2023 PM Session, at 125:12-14). "So, when I see a patient, I'm usually focused on, "Okay, you've got the disease. Where do we go from here?" (See *id.*, 2/24/2023 PM Session, at 125:15-16). When asked whether he views it as important to ask about all potential exposures to asbestos when treating a patient, he responded that, "Patients don't want me sitting in their room talking about their past. They want me to talk about how we're going to beat this disease and what are we going to do. So that is the vast majority of my efforts. So, do I go through all the [potential exposure] history and so forth? Not totally." (*Id.* at 125:15-22). Accordingly, while Dr. Ripley performed surgery on Mrs. Plant's chest, he was not the one that made her diagnosis of mesothelioma, and, by his own admission, did not focus on her past asbestos exposure. If Dr. Ripley was deemed qualified to talk about the causation of Mrs. Plant's mesothelioma, Dr. Feingold, who formerly practiced as a clinician, presently specializes in the diagnosis of pulmonary diseases, and reviewed the medical records and pathology materials of Mrs. Plant, should certainly have been qualified.

In sum, the result of the exclusions and limitations on WCD's experts—including the fact that Plaintiffs were able to opine about the cause of Mrs. Plant's mesothelioma and use Mrs. Plant's genetic information in their favor to bolster their case (as discussed *supra*), yet Defendants were prohibited from offering any alternative causes is blatantly unfair on its face and prejudicial to

WCD. The Court clearly erred in failing to exclude such evidence *equally on both sides* when such evidence was excluded for the defense experts. The Court failed again by ruling that Plaintiffs did not open the door when they boldly discussed Dr. Attanoos multiple times in front of the jury and had their own experts opine on spontaneous, naturally occurring or idiopathic mesotheliomas.

iii. The Court erred in its double-standard relating to BRCA2 by permitting Plaintiffs to include argument relating to Mrs. Plant's BRCA2 Genetic Mutation in their case but prohibiting Defendants from including a counter-argument in their case

The Court further erred by permitting Plaintiffs to reference and utilize Mrs. Plant's BRCA2 gene mutation in support of their case, but prohibiting and, in fact, punishing, Defendants for discussing Mrs. Plant's BRCA2 gene mutation in response.

The record in this case is full of references to the BRCA2 gene by Plaintiffs. Plaintiffs used Mrs. Plant's mutation as an egg-shell plaintiff argument, alleging that her BRCA2 mutation made her *more* susceptible to mesothelioma from *less* exposure to asbestos. For example:

- In Plaintiffs' Opening:
 - "[A]s it applies to Sarah in particular, y'all will learn that she has a gene called the BRCA2 gene, and what that means is that Sarah, her DNA has a harder time repairing cells that can ultimately lead to cancer. And what it means in terms of asbestos exposure is that Sarah is more vulnerable to lower level of asbestos exposure than someone who doesn't have the BRCA gene. That's it." (Ex. E, Trial Tr., 2/23/23 PM Session, at 22:6-12).
 - "And by 1960, they absolutely understand the specific cancer that Sarah had. Mesothelioma was caused almost exclusively because of this exposure to asbestos. And they also knew, while they didn't know to call it BRCA2 – they didn't know the specific gene -- they understood the individual's susceptibility." (*Id.* at 38:14-19).
- During Plaintiffs' direct examination of Plaintiffs' expert witness in thoracic surgery, Dr. Ripley.
 - "A: The mutation that Ms. Plant has is her ability to fix DNA is impaired, and that's what the BRCA2 mutation is. Q: Does that make her more susceptible to asbestos exposure? A: It makes her more susceptible because she's not able to fix an insult." (Ex. G, Trial Tr., 2/24/23 PM Session, at 121:19-123:3).

- Multiple times during Plaintiffs’ direct examination of Plaintiffs’ expert witness in pulmonology, Dr. Haber.
 - “[E]ach person has an individual susceptibility, and some can be more susceptible. So, for example, Ms. Plant would be – she would be the small glass because of the BRCA2 that certainly sets her up to being more sensitive because she doesn’t have some of the DNA repair that people that don’t have the BRCA2 mutations have.” (Ex. H, Trial Tr., 2/27/23 AM Session, at 77:24-78:5. *See also id.* at 73:3-10, 78:17-79:6).

However, at the same time, the Court prevented WCD from arguing that the BRCA2 mutation that Plaintiffs claim led Mrs. Plant to be more susceptible to mesothelioma *actually* may have played a causal role. The Court articulated its rationale for this ruling as follows:

I said [Dr. Feingold] could not assign genetics or BRCA2 as the reason for her mesothelioma, nor could he say that asbestos did not cause her mesothelioma, because he is not qualified to say that as a X-ray reader. He’s not someone who treats mesothelioma or has studied mesothelioma in any way.

(Ex. N, Trial Tr., 3/2/23 AM Session, at 123:14-20). However, similar to the discussion above, the Court’s decision that WCD’s expert, Dr. Feingold, who was qualified as an expert in pulmonology and the diagnosis and treatment of diseases of the chest, is unqualified to render such opinions, but Plaintiffs’ experts, Drs. Haber and Ripley, *are* qualified is unfair and prejudicial. Dr. Feingold and Dr. Haber are both pulmonologists and NIOSH certified B-Readers, but Dr. Haber was permitted by this Court to talk about Mrs. Plant’s BRCA2 mutation and its effect on her health, as quoted above, while Dr. Feingold was not. Just like Dr. Haber, Dr. Feingold reviewed the medical records of Mrs. Plant, reviewed the x-rays, and reviewed the tissue available in the pathology slides. (*Id.* at 127:8-12). If Dr. Haber was qualified to talk about BRCA2 and its relationship to Mrs. Plant’s mesothelioma, so was Dr. Feingold. (*Id.* at 126:3-127:21). There were no expert geneticists at the Plant trial. Simply put, Plaintiffs’ pulmonologist B-Reader was deemed qualified while Defendants’ pulmonologist B-Reader was deemed unqualified. Therein lies the double standard that prejudiced

Defendants. As an experienced board-certified pulmonologist, also board-certified in internal medicine, Dr. Feingold is every bit as qualified to discuss the medical effects of the BRCA2 mutation as Dr. Ripley, a thoracic surgeon. Admitting only the Plaintiffs' side was akin to tying WCD's hands behind its back, with no way to defend itself.

The testimony of Dr. Feingold or Dr. Attanoos relating to BRCA2 was entirely relevant to the jury's full understanding of the facts relating to the causation of Mrs. Plant's mesothelioma, which she developed at an unusually young age. Dr. Attanoos stated in his report:

The presence of an inherited pathogenic germline BRCA-2 mutation has placed Ms. Plant at substantially increased risk of a variety of cancers, including mesothelioma, which has eventuated at the age of 34 years. The inherited pathogenic germline mutation represents one known intrinsic risk factor **which has played a causal role in the induction of her pleural mesothelioma.**

(Ex. U, Dr. Attanoos' Report at p. 56).

Dr. Attanoos and Dr. Feingold's opinions that BRCA2 played a causal role in the development of Mrs. Plant's mesothelioma is supported by the peer-reviewed literature. Indeed, it is well-established that germline mutations can induce cancer, including mesothelioma, without asbestos exposure. (Ex. AH, Attanoos, RL, et al. "Malignant mesothelioma and its non-asbestos causes." *Arch Path Lab Med* 142(6):753-760 (2018); Ex. AJ, Panou, V., et al. "Frequency of germline mutations in cancer susceptibility genes in malignant mesothelioma." *J Clin Oncol*, 36(28): 2863 (2018); Ex. AK, Pastorino, A., et al., "A Subset of Mesotheliomas With Improved Survival Occurring in Carriers of BAP1 and Other Germline Mutations," *J Clin Oncol*, 36, 2018; Ex. AL, Pagliuca, F., et al., "Inherited predisposition to malignant mesothelioma: germline BAP1 mutations and beyond," *Eur Rev Med Pharmacol Sci*, 25:4236-46 (2021); Ex. AM, Carbone, M., et al. "Tumour predisposition and cancer syndromes as models to study gene-environment interactions." *Nature Reviews Cancer* 20.9 (2020): 533-549. Ex. AN, Carbone, M., et al. "Medical and surgical care of

mesothelioma patients and their relatives carrying germline BAP1 mutations." *Journal of Thoracic Oncology* (2022). For mesothelioma, multiple articles report that at least 12% of mesotheliomas occur in carriers of pathogenic germline genetic mutations. Ex. AJ, Panou, V., et al. "Frequency of germline mutations in cancer susceptibility genes in malignant mesothelioma." *J Clin Oncol*, 36(28): 2863 (2018); Ex. AK, Pastorino, A., et al., "A Subset of Mesotheliomas With Improved Survival Occurring in Carriers of BAP1 and Other Germline Mutations," *J Clin Oncol*, 36, 2018; Ex. AO, Hassan, R., et al., "Inherited predisposition to malignant mesothelioma and overall survival following platinum chemotherapy," *PNAS* 116 (18), 2019; Ex. K to WCD's Resp. in Opp'n to Pls.' MIL to Exclude Dr. Attanoos, Carbone, M., et al., "Mesothelioma: Scientific Clues for Prevention, Diagnosis, and Therapy," *CA Cancer J Clin* 0: 1-28, 2019; Ex. F to WCD's Resp. in Opp'n to Pls.' MIL to Exclude Dr. Attanoos, Attanoos, R.L., "Malignant Mesothelioma: Asbestos Exposure," Chapter 20 in *Occupational Cancers*, edited by S. Anttila and P. Boffetta, 363-378. Switzerland: Springer, 2020; Exhibit AL, Pagliuca, F., et al., "Inherited predisposition to malignant mesothelioma: germline BAP1 mutations and beyond," *Eur Rev Med Pharmacol Sci*, 25:4236-46 (2021); Ex. AN, Carbone, M., et al. "Medical and surgical care of mesothelioma patients and their relatives carrying germline BAP1 mutations." *Journal of Thoracic Oncology* (2022). In his book chapter, Dr. Attanoos reports this finding, emphasizing that "[i]n a small but significant number of subjects (~12%) there exist a variety of inherited germline mutations which when present significantly increase the risk of cancer." Ex. F to WCD's Resp. in Opp'n to Pls.' MIL to Exclude Dr. Attanoos, Attanoos, R.L., "Malignant Mesothelioma: Asbestos Exposure," Chapter 20 in *Occupational Cancers*, edited by S. Anttila and P. Boffetta, 363-378. Switzerland: Springer, 2020. Numerous peer-reviewed articles from various institutions including the University of Chicago and the National Institutes of Health report BRCA2 germline mutations in the mesotheliomas studied.

Ex. AP, Bertelsen, B., et al. "High frequency of pathogenic germline variants within homologous recombination repair in patients with advanced cancer." *NPJ genomic medicine* 4.1 (2019): 1-11; Ex. AJ, Panou, V., et al. "Frequency of germline mutations in cancer susceptibility genes in malignant mesothelioma." *J Clin Oncol*, 36(28): 2863 (2018); Ex. AO, Hassan, R., et al., "Inherited predisposition to malignant mesothelioma and overall survival following platinum chemotherapy," *PNAS* 116 (18), 2019; Ex. AQ, Guo, R., et al., "Novel germline mutations in DNA damage repair in patients with malignant pleural mesotheliomas," *J Thoracic Oncol*, 15(4):655-660 (2020); Ex. AR, Betti, M., et al. "CDKN2A and BAP1 germline mutations predispose to melanoma and mesothelioma." *Cancer letters* 378.2 (2016): 120-130. To exclude evidence relating to known genetic errors in a case in which it is undisputed that genetic errors lead to the disease at issue is a perversion of the legal system, unduly prejudicing the defendants by forcing this case to be tried in a vacuum, flipping the burden of proof to the defendants, and preventing the jury from hearing and weighing the available evidence necessary to make their decisions.

Moreover, the Court committed further error relating to the BRCA2 gene mutation by striking Dr. Feingold's testimony relating to BRCA2 after he was asked about it *by Plaintiffs*. Plaintiffs' counsel undoubtedly opened the door for Dr. Feingold's explanation, not only by discussing the mutation throughout this trial, but by specifically asking Dr. Feingold about Mrs. Plant's BRCA2 mutation. His answer was appropriate, clarifying and explaining the medical background in response to her question:

Q: One of the things you have in your report, it was just a notation of what her actual treating physician said, is that one of the real -- one of the many drawbacks of her mesothelioma is that it has delaying her getting important surgeries because she has BRCA2. Do you remember that?

A: Yes.

Q: They had to hold off her hysterectomy due to the concerns from her actual treating physician, Dr. Ripley, that premenopausal women have the greatest outcomes from mesothelioma. And so taking away her estrogen, taking away that extra protection that's been noted in the literature was a problem. Just starting off, do you remember this being in one report noting a medical record for Sarah Plant?

A: Yes. But you've got it all confused. Premenopausal women have the greatest outcomes because, universally, their mesotheliomas are not caused by asbestos. And especially -- especially -- mesotheliomas caused by germline mutations have a seven-year prognosis instead of a one-year prognosis. So you're confounding. You're saying it's because they're premenopausal. It's not because they're premenopausal. It's because their mesothelioma was not caused by asbestos, most likely caused by BRCA1 or BRCA2. And those people have a much better prognosis.

MS. DEAN: Your Honor, I move to strike as nonresponsive and in violation of clear orders.

THE COURT: The testimony is struck.

(Ex. O, Trial Tr., 3/2/2023 PM Session, at 115:14-116:23). The Court's insistence on striking Dr. Feingold's statement prejudiced WCD both by (1) excluding important information from the jury that would have explained an important topic related to the causation of Mrs. Plant's mesothelioma, and (2) signaling to the jury that Dr. Feingold was behaving badly and severely hindering his authority in their eyes.

From the onset, it was evident that the Court had personal opinions regarding BRCA2 and its relationship with mesothelioma and did everything it could to exclude such testimony. Indeed, at the Pretrial Conference the Court remarked as follows: "Well I have not heard of anyone talk about BRCA as causing mesothelioma And to say that BRCA, genetic factors, I have those too. I survived breast cancer" (Ex. A, Pre-Trial Hearing, 2/15/2023, at 156:8-10).

iv. Error relating to Dr. Maddox

The Court further erred by instructing the jury that WCD and its expert, Dr. Feingold, were misleading them with a slide about Dr. Maddox's Pathology Report, when, in fact, the slide was completely accurate. The Court's advocacy against WCD through its erroneous instruction to the jury undermined the jury's trust for WCD and its experts and adversely affected the outcome of this case for WCD.

Before Dr. Feingold was called, WCD exchanged its power point slide deck with counsel for Plaintiffs in order to address any objections. Certain objections were made, and slides were willingly cut accordingly. One of the slides that was explicitly NOT objected to, was number 12, which referenced Dr. Maddox, an expert retained by Plaintiffs in this case who generated a report, but did not testify at trial. The slide at issue follows below:

Mrs. Sarah Elizabeth Plant
Dr. John Maddox – pathology consult

- 08/20/2022 Dr. John Maddox, pathologist of Riverside Regional Medical Center confirmed diagnosis
- Review of lung tissue:
 - “The available slides do not show pulmonary parenchymal fibrosis with asbestos bodies nor any hyalinized pleural plaques. A 15-20 minute review of multiple iron stains of lung and lymph nodes **does not reveal any definite asbestos bodies**, so the asbestos burden cannot be estimated, histologically.”
- These findings represent strong evidence of a non-asbestos etiology of the patient's mesothelioma

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(Ex. W, Feingold Slideshow at 12). As was made clear by the witness, the outside bullet points are the words and opinions of Dr. Feingold, and the indented paragraph with quotation marks is a *direct quote* from Dr. Maddox's Report relating to Mrs. Plant, issued in this case:

Q: I want to be real clear of this last thing that you write here, that this represents strong evidence of a nonasbestos mesothelioma?

A: Yes.

Q: That didn't come from Dr. Maddox, did it?

A: No. It came from me, and it's overwhelmingly true.

(Ex. O, Trial Tr., 3/2/2023 PM Session at 118:20-119:2). Counsel's nonobjection to this slide, coupled with this exchange, shows that there was nothing misleading about this slide.

Before Dr. Feingold was called, the Court was made aware that Dr. Maddox would be mentioned in a slide, but that Plaintiffs had no objection as long as Dr. Maddox was not referenced as a witness retained by Plaintiffs. (*See id.*, at 9:24-10:23). Counsel for Plaintiffs, after pre-reviewing the slide above, even stated in an email, "we won't object as long as nobody (counsel or witness) refers to Dr. Maddox as 'as plaintiff's expert' or 'retained by the plaintiff in this case'." (*See* Ex. Y, e-mails between WCD and Plaintiffs' counsel).

Despite all of the careful preparation, this proved not to be true in front of the jury. During Plaintiffs' cross-examination of Dr. Feingold, after he clearly stated that the final opinion on the slide¹³ was his own, Plaintiffs' counsel accused Dr. Feingold of being "dead wrong," alleged that Dr. Maddox said the exact opposite of him, and alleged in open court that WCD violated one of the

¹³ The final bullet on slide 12 stated, "These findings represent strong evidence of a non-asbestos etiology of the patient's mesothelioma" (Ex. W, Feingold Slideshow at 12).

Court's orders¹⁴. (Ex. O Trial Tr., 3/2/2023 PM Session, at 120:3-121:8). The Court intervened, and the following exchange occurred in front of the jury:

THE COURT: Well, I am concerned about this, Mr. Thackston, that *this slide would imply that Dr. Maddox said that there was no definite asbestos bodies, so the asbestos burden can't be estimated. But it turns out that's not Dr. Maddox's words, is it?*

MR. THACKSTON: No, Your Honor.

THE COURT: All right. This is—

MR. THACKSTON: There was no objection to the slide before we started.

THE COURT: This is – well, I, frankly, am surprised because I didn't understand it that way. *But what you're saying is that he took a pathology report and looked at slides that Dr. Maddox had looked at, and he comes – "he," this witness, comes to the conclusion that there is no asbestos.*

MR. THACKSTON: Yes, Your Honor.

THE COURT: All right. *Dr. John Maddox, as I understand it, came to exactly the opposite conclusion. He was the pathology expert. Am I correct about that?*

MS. DEAN: *That is correct.*

THE COURT: All right.

THE WITNESS: *That's not correct.*

THE COURT: *Let the record reflect that this is a misleading slide as it's currently being put up. It turns out he disagrees with the – with Dr. Maddox's analysis, and so the record is clear. And I won't strike it, but I will clarify that this is not the opinion of Dr. Maddox. This is Dr. Feingold's opinion. All right? The pathology report says exactly the opposite. All right. With that clarification, you may proceed.*

(*Id.* at 120:9-121:22).

¹⁴ A recurring pattern throughout this trial involved counsel for Plaintiffs themselves eliciting testimony from witnesses, through their own questions, that they then turned around and alleged violated one of the Court's limiting orders. This very slide was already carefully addressed through WCD's *direct examination*, including an explanation of the terms used in the quote, without a single objection. (Ex. O, Trial Tr., 3/2/2023 PM Session, at 45:17-47:18). It was only during Plaintiffs' cross-examination that issues arose. This argument continues in the following section.

Contrary to the Court's instruction that Dr. Maddox's pathology report says "exactly the opposite" of the slide, Dr. Maddox stated in his Report *precisely* what was quoted in the slide, "The available slides do not show pulmonary parenchymal fibrosis with asbestos bodies nor any hyalinized pleural plaques. A 15-20 minute review of multiple iron stains of lung and lymph nodes does not reveal any definite asbestos bodies, so the asbestos burden cannot be estimated, histologically." (Ex. Z, Dr. Maddox Plant Report at p. 3). Dr. Maddox's report ultimately concluded that Mrs. Plant's mesothelioma was caused by her cumulative asbestos exposures, but his conclusion was *not* based on finding any asbestos bodies in her pathology material. According to the Helinski criteria that Dr. Maddox cited in his Report, "in the absence of such markers, a history of significant occupational, domestic, or environmental exposure to asbestos will suffice for attribution." *Id.* Thus, Dr. Maddox's conclusion was simply based on the summary of Mrs. Plant's alleged historic asbestos exposure provided to him by Plaintiffs' counsel, rather than a finding of asbestos bodies. (*Id.* at p. 1). Dr. Feingold and Dr. Maddox *were* in perfect agreement about the lack of asbestos bodies in the slides. They simply drew differing conclusions from this information, as experts sometimes do. Plaintiffs' counsel was addressing this through cross-examination before the Court interfered and went too far.

Accordingly, the Court's representation to the jury that WCD and its expert were misleading, and that Dr. Maddox's pathology report said "exactly the opposite" of the slide was: (1) demonstrably wrong, and (2) supremely detrimental to WCD's trust from the jury. Further, the Court mentioned the very point that Plaintiffs did not want mentioned—that Dr. Maddox was their retained pathology expert. When the Judge, the authority figure in the courtroom, instructs the jury that a party and/or its witness is misleading them, the damage and prejudice is extraordinary and difficult

to return from. The fact that the Court erred in its understanding of the slide and instructed the jury with a falsehood is a very serious error that adversely affected the outcome of this case for WCD.

v. The Court erred by making a special instruction to the jury following Dr. Feingold's testimony that further limited his testimony.

As noted above, a recurring pattern throughout this trial involved counsel for Plaintiffs themselves eliciting testimony from witnesses, through their own questions, then proceeding to allege that WCD violated one of the Court's limiting orders and seeking sanctions. This occurred during Dr. Feingold's examination regarding the issues relating to Slide Number 12, discussed above. The slide was carefully addressed through WCD's *direct examination*, without a single objection. (Ex. O, Trial Tr., 3/2/2023 PM Session, at 45:17-47:18). It was only during Plaintiffs' cross-examination that issues arose due to Plaintiffs' own insistent questioning. After Plaintiffs' counsel, during a hostile cross-examination, brought up Mrs. Plant's BRCA2 genetic mutation and asked Dr. Feingold about premenopausal women having the greatest outcomes from mesothelioma, he responded by correcting her medical conclusion generally and explaining, "It's not because they're premenopausal. It's because their mesothelioma was not caused by asbestos, most likely caused by BRCA1 or BRCA2. And those people have a much better prognosis." (*Id.*, at 116:14-19). Notably, Dr. Feingold was referring to premenopausal women, not Mrs. Plant specifically. Nevertheless, Plaintiffs later told the court that, "[H]e testified that the BRCA2 gene is what caused her cancer." (*Id.* at 159:22-25).

Following the Court's suggestion of an instruction to the jury, counsel for WCD stated that, "Your Honor, all I'll say is he didn't say a word about it on direct. **He was badgered on cross specifically about Mrs. Plant until he said something *that could be construed as a causation opinion*.** He didn't do that on direct. That was them going into it over and over and over again." (*Id.*, at 162:3-11) (emphasis added). The Court responded, "Well, that may well be so. I'm not

disagreeing with you about that, Mr. Thackston.” (*Id.* at 162:12-14). Yet, still, the Court gave the charge to the jury that, “In connection with the last expert we heard from, Dr. Feingold, I made rulings about the scope of his testimony before he took the stand. Dr. Feingold cannot express any direct opinion about the cause of Sarah Plant’s mesothelioma but he, of course, can testify as he did in his area of expertise about the matters he presented.” (*See* Ex. AA, Final Jury Charge). Such an instruction was not warranted based on Dr. Feingold’s testimony. It was not a direct causation opinion relating to Mrs. Plant’s mesothelioma and, furthermore, the door was well-opened by Plaintiffs.

If the Court had not already sufficiently neutered WCD’s expert and undercut his credibility with the jury, surely this special charge—the only charge mentioning any expert by name—was enough to severely prejudice WCD. The Court’s special charge targeting Dr. Feingold, despite Plaintiffs opening the door to such testimony throughout the entire trial, in addition to badgering him about it on cross-examination, was in error.

III. WCD Is Entitled To A New Trial Absolute Because WCD Was Denied Its Statutory Right To Assert Another Potential Tortfeasor, Whether A Party Or Not, Contributed To The Alleged Injury Or Damages.

The Court also erroneously restricted WCD’s statutory right to introduce evidence and present argument regarding other potential contributors to Plaintiffs’ damages. Regardless of whether it is called the “empty-chair defense” or the right to assert another tortfeasor contributed to the injury, the result is the same: A defendant has the right to point to another potential cause for the injuries alleged by the plaintiff, and the General Assembly codified this right *without any exception for asbestos cases*. As the South Carolina Court of Appeals explained:

The empty-chair defense is the defendant's “right to assert another potential tortfeasor, whether a party or not, contributed to the alleged injury or damages” and was codified in the Uniform Contribution Among Tortfeasors Act (the Act) at section 15-38-15 of the South Carolina Code (Supp. 2020). *Smith v. Tiffany*, 419 S.C. 548,

557, 799 S.E.2d 479, 484 (2017) (emphasis added) (quoting § 15-38-15(D)). Dawkins [plaintiff in the underlying case] relies on *Tiffany* for the proposition that the defense “is not boundless and the non-settling defendant cannot expand the scope of the case and make evidence relevant by the fact [that] another tortfeasor settled.” However, *Tiffany* is distinguishable. In that case, the court interpreted the Act on appeal of a defendant's request to join as a party an individual—with whom plaintiff had already settled and released from the action—in order to allow the jury to apportion fault. *Id.* at 554–55, 799 S.E.2d at 482–83. The court held the plain language of the Act precluded the defendant from joining the prior codefendant. *Id.* at 555–59, 799 S.E.2d at 483–85 . . . ***Tiffany* did not discuss the empty-chair defense in the context of an intervening and superseding negligence defense or provide the parameters of the defense**

Dawkins v. Sell, 434 S.C. 572, 590, 865 S.E.2d 1, 10 (Ct. App. 2021), *reh’g denied* (Dec. 2, 2021) (emphasis added).

This Court, contrary to the plain language of the statute and the Court of Appeals’ recent pronouncements regarding the limited holding of *Smith v. Tiffany*, crafted its own impossible standard of proof for WCD, which the Court then imposed as a prerequisite for any defendant who wishes to invoke its statutory right to the empty chair defense in asbestos/talc cases:

I’m not going to allow you to tell the jury, “You need to find Mary Kay liable, because as bad as we were, we weren't as bad as Mary Kay.” That's not how empty chair works. You can't mention the name of Mary Kay or anybody else and say they're the bad guys, not us. Unless you can show that they 100 percent caused Sarah Plant's injuries, then there's nothing in the record that would support that.

(Ex. N, Trial Tr., 3/2/23 AM Session at 68:5-15).

The defense is that if the other person – we have shown you that the other person we want to say is the responsible party, negligence was so direct and well proved that it supersedes any negligence we might have had. That’s what an empty chair is. It’s not there’s somebody else out there, and they also have some responsibility.

(*Id.*, at 65:2-10).

Just like all the people that were dismissed beforehand, settled beforehand, they are out of the equation because there’s no evidence that’s been put before this jury that other defendants, potential defendants settled. Did defendants meet the requirements of the empty chair, which is the 100 percent requirement. Nothing has been put in that proves that.

(*Id.* at 66:3-12). Compounding the Court’s erroneous refusal to allow WCD to introduce evidence of other potential contributors to Plaintiffs’ injury is the fact that the Court *did not restrict Plaintiffs from doing so*, as they were permitted to elicit testimony about “other companies of concern.” (*See* Ex. H, Trial Tr., 2/27/23 AM Session at 77:3-11). This confused the jury and prejudiced WCD.

The language of the statute is plain, and it does not require a defendant to meet a burden of proof before being qualified to take advantage of the statute’s protection. Section 15-38-15(D) also does not limit the parameters of this defense or make it contingent on whether a defendant alleges the other potential tortfeasor contributed 10% to the injuries or 100% to the injuries. This “codified empty-chair defense” does not require a defendant to prove or even allege that another potential tortfeasor (like any of the settled defendants or any other joint tortfeasor who was never a party but whose products – including art-related products and winemaking-related products – could have contributed to Mrs. Plant’s injuries in this case) was the sole proximate cause or sole party 100% responsible for Mrs. Plant’s injuries – as the Court seems to have concluded it does. Quite the opposite. Pursuant to the plain language of § 15-38-15(D), the defense is available even if a defendant claims the other potential tortfeasor *just “contributed”* to the alleged injury or damages, regardless of whether that party “may be liable for *any or all* of the damages alleged by any other party” (although the use of the conjunction “and/or” in the statute makes clear that argument is permitted as well). S.C. Code Ann. § 15-38-15(D)(emphasis added).

The Court’s misreading of the statute was extremely prejudicial to WCD, as it was repeatedly denied the right to argue or even introduce evidence that another potential tortfeasor contributed to Plaintiffs’ injuries. (*See* Ex. H, Trial Tr., 2/27/23 AM Session at 121 (refusing to allow another defendant’s counsel to explore possible other exposures to asbestos-containing products); at 131-36 (refusing to allow WCD’s counsel to elicit on cross-examination any testimony from Mrs. Plant

regarding possible other contributors to her injury and instructing the jury to disregard any references thereto); and at 6-12 (additional discussion of the above two “violations”); *see also* Ex. A, Pre-Trial Hearing, 2/15/2023 at 28:1-22 (invoking *Smith v. Tiffany* as authority for the determination that there would be no mention of any settled defendants)). Although this Court has wide discretion to determine the relevancy of evidence, the statutory language controls here. Because WCD was prejudicially denied its statutory right to introduce evidence at trial that another potential tortfeasor contributed to Plaintiffs’ alleged damages, a new trial absolute is the only remedy.

IV. WCD Is Entitled To A New Trial Absolute Because The Court Improperly Instructed The Jury.

The Court also improperly instructed the jury on four topics, and a new trial is required as a result of these errors as well. The Court misguided the jury and prejudiced WCD when it: (1) failed to charge the jury as to WCD’s statutory right to argue the empty chair as required by S.C. Code § 15-38-15(D); (2) failed to charge the jury on “but for” causation; (3) failed to charge the jury on the sophisticated purchaser/user defense; and (4) improperly instructed the jury to disregard portions of Dr. Feingold’s opinion testimony. None of these errors was harmless. *See State v. Middleton*, 407 S.C. 312, 317, 755 S.E.2d 432, 435 (2014) (“When considering whether an error with respect to a jury instruction was harmless, we must determine beyond a reasonable doubt that the error complained of did not contribute to the verdict.” (internal quotation marks omitted)). While each of the four erroneous instructions stands alone in warranting a new trial, the compounding effect of all four errors resulted in overwhelming prejudice to WCD that can only be rectified by the granting of a new trial. *See Horry Cty. v. Laychur*, 315 S.C. 364, 368, 434 S.E.2d 259, 262 (1993).

A. The Court erred when it failed to charge the jury as to WCD’s statutory right to argue the empty chair as required by S.C. Code § 15-38-15(D).

The law is clear: “It is error for the trial court to refuse to give a requested instruction which

states a sound principle of law when that principle applies to the case at hand, and the principle is not otherwise included in the charge.” *Clark v. Cantrell*, 339 S.C. 369, 390, 529 S.E.2d 528, 539 (2000) (citing *Sanders v. W. Auto Supply Co.*, 256 S.C. 490, 497, 183 S.E.2d 321, 325 (1971)). Such is the case with WCD’s statutory right to point to other potential tortfeasors as contributors to Plaintiffs’ injuries, which WCD requested to be charged in two different ways – each of which was rejected by the Court. First, when Plaintiffs proposed as part of Charge No. 4 a section titled “**OTHER PARTIES ARE GONE**,” notifying the jury that two absent parties were “no longer defendants” (in black below), WCD requested that such an instruction *also* notify the jury of WCD’s retained right under § 15-38-15(D) to argue those absent parties contributed to Plaintiffs’ injuries (in green below):

OTHER PARTIES ARE GONE

MARY KAY AND COLOR TECHNIQUES ARE NO LONGER PARTIES TO THIS CASE.
YOU ARE NOT TO SPECULATE AS TO THE REASONS. THOUGH YOU MAY STILL
CHOOSE TO HOLD EITHER OF THEM FULLY LIABLE FO THE PLAINTIFFS’
INJURIES IF YOU FIND BY A PREPONDERANCE OF THE EVIDENCE THAT
EITHER MARY KAY OR COLOR TECHNIQUES IS RESPONSIBLE FOR THOSE
INJURIES.

The Court refused, prejudicing WCD by denying it a requested charge stating “a sound principle of law” applicable to former parties and “not otherwise included in the charge.” *Clark*, 339 S.C. at 390, 529 S.E.2d at 539.

Second, when Plaintiffs proposed as part of Charge 22 a portion that approximated WCD’s right under § 15-38-15(D), but erroneously conditioned that right on whether Plaintiffs had met their burden of proof, WCD objected:

UNDER SOUTH CAROLINA LAW, A DEFENDANT IS ENTITLED TO ASSERT THAT OTHER PERSONS OR ENTITIES, CONTRIBUTED TO THE ALLEGED INJURY OR DAMAGES. THE MATTER OF THE OTHERS' ALLEGED FAULT IN CAUSING THE PLAINTIFFS' INJURIES HAS BEEN RAISED BY THE DEFENDANT, AND IT IS PROPER FOR YOU TO CONSIDER THE ACTIONS OF OTHERS, BUT ONLY IN SO FAR AS PLAINTIFFS HAVE MET THEIR BURDEN PROOF. OBJECTION: THE "EMPTY CHAIR" DEFENSE IS NOT TETHERED TO THE PLAINTIFF'S BURDEN OR EVEN TO WHETHER OR NOT THE ALLEGED ENTITY AT FAULT IS A PARTY IN THIS ACTION. S.C. CODE 15-38-15(D) PROVIDES A DEFENDANT SHALL RETAIN THE RIGHT TO ASSERT ANOTHER POTENTIAL TORTFEASOR, WHETHER OR NOT A PARTY, CONTRIBUTED TO THE ALLEGED INJURY OR DAMAGES AND/OR MAY BE LIABLE FOR ANY OR ALL OF THE DAMAGES ALLEGED BY ANY OTHER PARTY.

It is utterly inconsistent with § 15-38-15(D) for Plaintiffs to limit WCD's right to assert that others contributed to Plaintiffs' injuries "only in so far as Plaintiffs have met their burden proof [sic]" as to the "actions of others." WCD's proposed modification above would have omitted that inconsistent portion – leaving only the correct statement of law. The Court refused WCD's proposal and charged the jury as Plaintiffs requested. When WCD expressed concern that the Court's charge was inconsistent with the statutory right afforded to WCD, the Court reiterated its erroneous belief that "[y]ou've got to show, in order to avail yourself of the defense of empty chair, that the absent defendant was 100 percent completely responsible to the exclusion of the defendant that's in the case." (See Ex. N, Trial Tr., 3/2/23 AM Session at 102:4-8). As discussed, *supra*, in Section IV, the Court's interpretation of § 15-38-15(D) continues to impose – contrary to the plain language of the statute – a prerequisite level of proof as to the potential fault of a non-party. This denies WCD the right the General Assembly clearly afforded to it, and to every defendant *regardless of whether the case at hand involves asbestos or talc or any other subject matter*. There is no exception for cases on the asbestos docket. At the conclusion of this discussion with the Court, Plaintiffs' counsel piled on to the Court's misinterpretation of § 15-38-15(D) by – quite astonishingly – suggesting that perhaps WCD could have been able to invoke its rights under § 15-38-15(D) "if they had expert

testimony coming in here and saying that this exposure or that exposure was a proximate cause.” (*See id.* at 103:9-14). Of course, the only reason WCD did not present evidence of the type that would have done the trick according to Plaintiffs’ counsel, is because the Court excluded it by invoking § 15-38-15(D), as discussed *supra*, Sections II and III (prohibiting WCD from presenting any evidence that another entity’s product contributed to Plaintiff’s injuries).

This second error was highly prejudicial as it conditioned WCD’s right under § 15-38-15(D) on whether Plaintiffs had met their burden of proof regarding the actions of others – which is utterly contradictory to the very plain statutory language: “A defendant shall retain the right to assert that another potential tortfeasor, whether or not a party, contributed to the alleged injury or damages and/or may be liable for any or all of the damages alleged by any other party.” The Court’s above refusal on Charge 4 to include WCD’s proposed language only deepened the prejudice WCD suffered when the Court incorrectly limited WCD’s statutory right in Charge 22. Together, these errors worked to completely deprive WCD of its statutory right under § 15-38-15(D), requiring a new trial.

B. The Court erred when it failed to charge the jury on “but for” causation.

It was also error for this Court to refuse to charge WCD’s requested instruction on causation, which included South Carolina’s well-settled proximate cause jurisprudence on “but-for” causation. (*See* WCD Additional Proposed Charges on Proximate Cause, filed 3/2/2023). The Court refused to charge but-for causation in this case, because it agreed with Plaintiffs that the causation standard in a talc case is the “frequency, regularity, and proximity” test used to determine the applicability of the Door Closing Statute¹⁵ in *Henderson v. Allied Signal, Inc.*, 373 S.C. 179, 644 S.E.2d 724 (2007). (*See* Ex. N, Trial Tr., 3/2/23 AM Session at 97:10-24).

¹⁵ S.C. Code Ann. § 15-5-150(2).

WCD does not dispute there may be an inherent conflict between “the frequency, regularity, and proximity” test and traditional standards of proof for proximate cause under South Carolina law, but a test *Henderson* borrowed for use in applying the Door Closing Statute cannot supplant long-standing South Carolina standards for proving proximate cause – including but-for causation – in a defective product case like this one. Indeed, the Court in *Henderson* adopted the test when considering a non-resident plaintiff’s capacity to sue under South Carolina’s Door Closing Statute, *not when considering a plaintiff’s burden to show the causation element of a products liability claim*. In this case, which for WCD does not implicate the Door Closing Statute’s requirement of “actionable exposure” in South Carolina, *Henderson*’s use of the “frequency, regularity and proximity” test cannot replace South Carolina’s traditional causation standard.

It is axiomatic that for any claim under South Carolina law premised on a defective product theory, Plaintiffs must establish that the product defect was the proximate cause of the injury sustained. *See Bray v. Marathon Corp.*, 356 S.C. 111, 117, 588 S.E.2d 93, 95 (2003); *Rife v. Hitachi Const. Machinery Co., Ltd.*, 363 S.C. 209, 216, 609 S.E.2d 565, 569 (Ct. App. 2005). Proximate cause requires proof of both causation-in-fact and legal cause. *Bray*, 356 S.C. at 116-17, 588 S.E.2d at 95. To establish the causation-in-fact arm of the analysis, Plaintiffs must show that their injuries would not have occurred “but for” WCD’s negligence. *Small v. Pioneer Mach., Inc.*, 329 S.C. 448, 462, 494 S.E.2d 835, 843 (Ct. App. 1997). Even when potentially concurring causes are involved, as Plaintiffs have alleged in this case, WCD’s conduct still must be established as one of the “*direct*, concurring causes of the injury.” *Rife*, 363 S.C. at 216-17, 609 S.E.2d at 569 (emphasis added); *see also Small*, 329 S.C. at 464, 494 S.E.2d at 843.

It is clear that *Henderson* did not adopt the “frequency, regularity and proximity” standard to override the need for a plaintiff to establish proximate cause, but rather to determine whether a party