

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

THE STATE OF TEXAS,	§	CIVIL NO.:	5:96CV91
	§		
Plaintiff	§	SECTION:	_____
—	§		
VS.	§	JUDGE:	<u>DAVID FOLSOM</u>
—	§		
THE AMERICAN TOBACCO COMPANY;	§	MAGISTRATE:	_____
—	§		
R.J. REYNOLDS TOBACCO	§		
COMPANY; BROWN & WILLIAMSON	§	<u>JURY</u>	
TOBACCO CORPORATION; B.A.T.	§		
INDUSTRIES, P.L.C.; PHILIP	§		
MORRIS, INC.; LIGGETT GROUP,	§		
INC.; LORILLARD TOBACCO	§		
COMPANY, INC.; UNITED STATES	§		
TOBACCO COMPANY; HILL &	§		
KNOWLTON, INC.; THE COUNCIL	§		
FOR TOBACCO RESEARCH-USA,	§		
INC. (Successor to Tobacco	§		
Institute Research Committee);	§		
and THE TOBACCO INSTITUTE, INC.,	§		
	§		
Defendants	§		

PLAINTIFF'S INITIAL DISCLOSURE

Pursuant to Fed.R.Civ.P. 26(a)(1) and Article Two (1)(a) of the Courts Civil Justice Expense and Delay Reduction Plan, Plaintiff, The State of Texas, makes the following Initial Disclosure:

I.
PERSONS WITH KNOWLEDGE
[Article (1)(a)(I)]

The following are persons who are likely to have information that bears significantly on claims and defenses raised in this case:

1. Mary Sapp, Executive Director
Texas Department on Aging
1949 IH-35 South, 3rd Floor
Austin, Texas 78741
(512)444-2727

Texas Department of Aging is likely to have information that bears significantly on Plaintiff's damages calculations.

Mary Sapp is the Executive Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

2. Agency Representative and/or Custodian of Record
Texas Department of Agriculture
9th Floor, Stephen F. Austin Bldg.
P. O. Box 12847
Austin, Texas 78711
(512)463-7541

Texas Department of Agriculture is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants' alleged wrongful conduct in the State of Texas.

3. Terri Blier, Executive Director
Texas Commission on Alcohol and Drug Abuse
710 Brazos
Austin, Texas 78701
(512)867-8751

Texas Commission on Alcohol and Drug Abuse is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants' alleged wrongful conduct in the State of

Texas.

Terri Blier is the Executive Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

4. Agency Representative and/or Custodian of Record
State Auditor's Office
206 E. 9th Street, Suite 1900
Austin, Texas 78701
(512)479-4700

The State Auditor's Office is likely to have information that bears significantly on Plaintiff's damages calculations.

5. Emily Untermeyer, Executive Director
Texas Cancer Council
211 East 7th, Suite 710
Austin, Texas 78701
(512)463-3190

The Texas Cancer Council is likely to have information that bears significantly on Plaintiff's damages calculations.

Emily Untermeyer is the Executive Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

6. Agency Representative and/or Custodian of Record
Texas Department of Commerce
1700 N. Congress
P. O. Box 12728
Austin, Texas 78701
(512)936-0101

Texas Department of Commerce is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants' alleged wrongful conduct in the State of Texas.

7. Agency Representative and/or Custodian of Record
Comptroller of Public Accounts
L.B.J. State Office Bldg.
Austin, Texas 78701
(512)475-0412

Comptroller of Public Accounts is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants' alleged wrongful conduct in the State of Texas.

8. Jerry Ann Robinson, Project Director
Texas Office for Prevention of Developmental Disabilities
4900 N. Lamar, Room 2552
Austin, Texas 78751-2399
(512)483-5042

Texas Office for Prevention of Developmental Disabilities is likely to have information that bears significantly on Plaintiff's damages calculations.

Jerry Ann Robinson is the Project Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

9. Mary Elder, Executive Director
Interagency Council on Early Childhood Intervention
4412 Spicewood Springs Road, Suite 600
Austin, Texas 78759
(512)502-4900

Interagency Council on Early Childhood Intervention is likely to have information that bears significantly on Plaintiff's damages calculations.

Mary Elder is the Executive Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

10. Agency Representative and/or Custodian of Record
Texas Education Agency
1701 Congress Avenue

William B. Travis Bldg.
Austin, Texas 78701-1494
(512)463-9720

Texas Education Agency is likely to have information that bears significantly on Plaintiff's damages calculations.

11. Jim W. Sarver, Director of the Group Insurance Division
Employees Retirement System of Texas
P. O. Box 13207
18th and Brazos
Austin, Texas 78701
(512)867-3217

Employees Retirement System of Texas is likely to have information that bears significantly on Plaintiff's damages calculations.

Jim W. Sarver is the Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

12. Agency Representative and/or Custodian of Record
General Services Commission
1711 San Jacinto, Central Services Bldg.
P. O. Box 13047
Austin, Texas 78701
(512)463-3960

General Services Commission is likely to have information that bears significantly on Plaintiff's damages calculations.

13. Tom Harrison, Executive Director
Texas Ethics Commission
1101 Camino La Costa
P. O. Box 12070
Austin, Texas 78752
(512)463-5800

Texas Ethics Commission is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants'

alleged wrongful conduct in the State of Texas.

Tom Harrison is the Executive Director of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

14. Agency Representative and/or Custodian of Record
Health and Human Services Commission
P. O. Box 13247
Austin, Texas 78711-3247
(512)424-6500

Health and Human Services Commission is likely to have information that bears significantly on Plaintiff's damages calculations.

15. Agency Representative and/or Custodian of Record
Department of Human Services
701 W. 51st Street
Austin, Texas 78751
(512)438-3114

Department of Human Services is likely to have information that bears significantly on Plaintiff's damages calculations.

16. Agency Representative and/or Custodian of Record
Department of Health
1100 West 49th Street
Austin, Texas 78756
(512)458-7236

Department of Health is likely to have information that bears significantly on Plaintiff's damages calculations.

17. Terri Chaney, Program Administrator
Texas Incentive and Productivity Commission
E.O. Thompson Bldg., Room 401
Austin, Texas 78701
(512)475-4812

Texas Incentive and Productivity Commission is likely to have information that bears significantly on Plaintiff's damages calculations.

Terri Chaney is the Program Administrator of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

18. Mary Keller, Senior Associate Commissioner
Texas Department of Insurance
333 Guadalupe
P. O. Box 149104
Austin, Texas 78714-9104
(512)475-1821

Texas Department of Insurance is likely to have information that bears significantly on Plaintiff's damages calculations.

Mary Keller is the Senior Associate Commissioner of this agency and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

19. Agency Representative and/or Custodian of Record
Texas Department of Criminal Justice
Price Daniel, Sr. Bldg.
209 West 14th Street, Suite 500
Austin, Texas 78701
(512)463-9988

Texas Department of Criminal Justice is likely to have information that bears significantly on Plaintiff's damages calculations.

20. Agency Representative and/or Custodian of Record
Texas Department on Licensing and Regulation
E.O. Thompson State Office Bldg.
P. O. Box 12157
Austin, Texas 78711
(512)463-3306

Texas Department on Licensing and Regulation is likely to have information that bears significantly on Plaintiff's claims regarding Defendants' alleged wrongful conduct in the State of Texas.

21. Agency Representative and/or Custodian of Record

Mental Health and Mental Retardation
909 W. 45th Street
P. O. Box 12668
Austin, Texas 78711-2668
(512)206-4591

Mental Health and Mental Retardation is likely to have information that bears significantly on Plaintiff's damages calculations.

22. Agency Representative and/or Custodian of Record
Texas Rehabilitation Commission
Central Office
4900 N. Lamar
Austin, Texas 78751-2316
(512)483-4055

Texas Rehabilitation Commission is likely to have information that bears significantly on Plaintiff's damages calculations.

23. Agency Representative and/or Custodian of Record
Secretary of State
Capitol, 1st Floor, Room 1E.8
Austin, Texas 78701
(512)463-5763

The Secretary of State is likely to have information that bears significantly on Plaintiff's damages calculations.

24. Agency Representative and/or Custodian of Record
Texas State Treasury
State Treasury Bldg.
200 E. 10th Street
Austin, Texas 78701-2436
(512)463-5971

Texas State Treasury is likely to have information that bears significantly on Plaintiff's damages calculations and claims regarding Defendants' alleged wrongful conduct in the State of Texas.

25. Agency Representative and/or Custodian of Record
Office of the Governor
P. O. Box 12428
Austin, Texas 78711

(512)463-1788

Office of the Governor is likely to have information that bears significantly on Plaintiff's damages calculations.

26. Agency Representative and/or Custodian of Record
Texas Natural Resource Conservation Commission
P. O. Box 13087
Austin, Texas 78711-3087
(512)239-5525

Texas Natural Resources Conservation Commission is likely to have information that bears significantly on Plaintiff's damages calculations.

27. Robert E. Molloy, Director of Employee Group Insurance
University of Texas System
702 Colorado Street, Suite 6.600
Austin, Texas 78701
(512)499-4616

The University of Texas System is likely to have information that bears significantly on Plaintiff's damages calculations.

Robert R. Molloy is the Director of Employee Group Insurance for the University of Texas System and is working to identify agency employees who may have knowledge of specific information relevant to this issue.

28. Steve Hassel, Associate Executive Director of System Human Resources
University of Texas A&M System
301 Tarrow, 5th Floor
College Station, Texas 77843
(409)845-2026

The University of Texas A&M System is likely to have information that bears significantly on Plaintiff's damages calculations.

Steve Hassel is the Associate Executive Director of System Human Resources for the Texas A&M University System and is working to identify agency employees who may have knowledge of specific information relevant to

this issue.

Plaintiff also believes the following individuals may have information pertaining to the Defendants' lobbying activities, government relations, legislative tracking, campaign contributions and non-governmental organizational contributions:

Allen, Bill	Bliss, Rich
Andres, Gary	Bring, Murray
Armstrong, Gaylord	Bring, H.
Bankoff, Barbara	Brown, Dick
Bankoff, Barbara	Brown, Bruce
Bartlett, Tuckie	Buechner, Congressman Jack
Bible, Geoff	Burleson, Pate & Gibson
Blake, Roy	Buzzi, Aleardo
Calio, Nicholas E.	Glennie, Larry
Campbell, Bill	Goldstein, Leonard
Cavazos, Eddie	Gomez, Frank
Chu, David	Greenbert, David
Clayton, Billy	Gullahorn, Jack
Collier, Cal	Hamberger, Ed
Coombs, Bruce	Harkrider, Mark
Coslos, Ted	Herbolsheimer, Bob
Costas, Theodore	Herger, Wally
Cowling, David E.	Houminer, Ehud
Craig, Hon. Larry E.	Ingram PC, Dick G.
Culley, Robert	Ison, Dan
David, Dick	Johnson, Gordon R.
Devitre, D.	Johnson, Robert
Dillard, Jack K.	Jones, Buddy
Dollisson, John	Kaplin, Bobby
Dowling, Ann	Keenan, J.
Dubois, Greg	Kelly, Rusty
Dunn, Warren	King, J.
Dyer, Jim	Knox, George
Eschberger, Brenda	Kochevar, John
French, Mike	Kristoff, Sandy
French, Stephanie	Leinhan, Kathleen
Fried, Don	Levin, Micheal
Fritz, Randy	Lewis, Bob
Gibson, Machree	Liebengood, Howard

Lienhan, Kathleen
Locke, Gen
Luna, Albert
Manatt, Chuck
Maples, Bob
Matheson, Dan
Maxwell, Hamish
McDaniel, Demetrius
McDonald, Chuck
McGarry, Mignon
McWilliams, Andrea
Melder, B.
Millman, Amy
Murphy, John
Murray, R.W.
Murray, Bill
Nelson, Don
Nelson, Jack
Newman, Fred
Newton, Gary T.
Oldaker, Bill
O'Rourke, Rita
Parish, Steven C.
Plackett, J.
Polan, Kraege
Pouland, John
Rawls, Lee
Reed, Claire
Resnick, Frank
Rhatican, Bill
Ritts, Leslie
Roberts, Jack
Robinson, Bernie
Rogers, Ralph
Rove, Carl
Ryan, Kathleen
Scanlon, John
Schleuter, Stan
Schreer, P.
Smith, Guy
Smith, Greg
Smith, Owen
Spach, Jo F.
Stanton, Jim
Sykes, Larry
Tearno, Dan
Thomas, W.
Toomey, Mike
Varner, Cal
Viault, R.

Villarreal PC, Jose N.

Vinovich, Ralph
Wachs, Dahalia
Wager, Bob
Walters, Tony
Walton, June

Webb, W.
Wilhelm, Richard
Windburn, John
Winokur, Matt
Woods, Joe
Wynne, Buck
Zelkowitz, David

The Plaintiff believes that the following individuals and/or firms may have information regarding the alleged misconduct by Defendants:

Shook, Hardy & Bacon
1200 Main Street
Kansas City MO 64105

Jones, Day, Reavis & Pogue
1450 G. Street, N.W.
Washington DC 20005

Covington & Burling
P. O. Box 7566
Washington DC 20044-7566

Jacob, Medinger & Finnegan
New York NY

Breslow, Lester
Califona, Joseph
Chilcote, Samuel
Dawson, Brennan
DeNoble, Victor
Farone, William
Goerlitz, David
Heep, Harriett
Homberger, Freddy
Johnson, F. Ross
Kastenbaum, Marvin
Lauria, Tom

Lincoln, Jetson
Mele, Paul
Merriman, Walker
Mold, James D.
Rivers, Jerome
Robinson, Joel
Sackman, Janet
Schechter, David
Stewart, Russell
Tamol, Ron
Teage, Claude
Tredennick, D.W.
Uydess, Ian
Velmans, Lest
Waiter, Charles
Wells, J. Kendrick
Wigand, Jeffrey S.
Williams, Merrill
Woodson, Walker
Zahn, Leonard

See also individuals listed on the attached list incorporated herein as Exhibit "A".

Plaintiff continues to work to obtain additional information and will supplement this disclosure in accordance with Article Two (5). Additionally, as discovery progresses, Plaintiff shall reveal additional information as it is

discovered.

II.
DOCUMENTS
[Article (1)(a)(ii)]

Enclosed are copies of documents (Bates Numbers DOCS00000-000723; HHSC000001-4624; HHSC005562-6081; HHSC006082-6562; HHSC006563-7044; HHSC007045-7226; HHSC004625-4964; HHSC004965-5561; and UCSF00001-1545) that are likely to bear significantly on claims and defenses raised in this case.

Additional documents will be made available as soon as practicable as efforts are continuing to locate, identify and copy documents for purposes of disclosure.

Plaintiff has information stored in the form of computer data and data tapes that is likely to bear on claims and defenses raised in this case. Counsel for Plaintiff have notified counsel for the Defendants that they will provide this information subject to applicable confidentiality laws as soon as a mutually agreeable method for production of the data can be worked out.

Plaintiff also possesses or has access to various publicly available documents that may bear on claims and defenses raised in this case including:

- a. U.S. Surgeon General Reports.
- b. Reports and data published by agencies of the United

States Government, such as the U.S. Department of Health Education and Welfare, the National Institutes of Health, the Department of Health and Human Services, the Center for Disease Control and Prevention, the Public Health Service, and the Census Bureau.

- c. Publications of the American Cancer Society.
- d. Print and broadcast media reports regarding the tobacco industry and the health-effects of smoking.
- e. Publications in scientific and medical journals regarding cigarettes and the health-effects of smoking.
- f. The Brown & Williamson Collection, Tobacco Central Archives, University of California San Francisco Library and Center for Knowledge Management (accessible via the Internet @ [HTTP:\\www.library.UCSF.edu\tobacco](http://www.library.ucsf.edu/tobacco)).

Because this information is readily obtainable from other sources and because Defendants in all likelihood already possess this information, Plaintiff has not provided copies as part of this disclosure.

Plaintiff continues to work to identify documents that fall within the scope of Article Two(1)(a)(ii) and will

supplement this disclosure in accordance with Article Two (5).

III.
DAMAGES
[Article (1)(a)(iii)]

This suit is intended to recover damages suffered by the State of Texas for the conduct set forth in the First Amended Complaint. The damages to the State generally fall into the following categories:

- A. Medicaid damages
- B. Damages to the employee insurance and retirement system
- C. Damages resulting from health care provided by State funded health care providers that are not included in the Medicaid damages.

These initial computations are subject to continuing analysis and will be revised or supplemented if and as necessary. Certain assumptions and calculations are likely to change as additional information is accumulated. Since past damages are increasing daily, these damages will continue to increase.

Additionally, the damages pursuant to the antitrust laws, consumer protection laws and RICO provide for the award of attorney's fees and other costs.

A. Medicaid Damages

Damages to the State of Texas begin with the inception of the Medicaid program in Texas in September 1967. The Medicaid

Act itself was established by Title XIX of the Social Security Amendments Act of 1965.

Medicaid functions in two major ways: (1) as a kind of basic health insurance program; and (2) as a funding source for service to the aged and people with disabilities or with chronic long-term care needs.

Medicaid is financed jointly by the Federal government and the states. Texas' matching rate for federal fiscal year 1994 is 64.18%. That is, the state must pay 35.82% of most Medicaid costs. Documents being provided to the Defendants provide this ratio for each year that it is available.

Under Texas law, the Texas Health and Human Services Commission (HHSC) has acted as the single agency for the Medicaid program since January 1993. Within HHSC, the Medicaid program is administered by the State Medicaid Director, Linda Wertz.

The number of Texans covered by Medicaid may be stated in several ways. One way is the "unduplicated count" which for the federal fiscal year 1993 was 2,308,443. Another way to state the Medicaid case load is the "monthly average" number of clients, which for federal fiscal year 1993 was 1,917,479.

Additionally, in federal fiscal year 1993 there were about 358,000 "eligibles", which are persons enrolled in Medicaid,

but who never actually incurred any claims. Documents being produced to the Defendants will provide this information for each available year.

The Center for Disease Control (CDC) has developed a computer model for estimating health care costs attributable to smoking. The latest version is called SAMMEC 2.1. The details of SAMMEC 2.1 are set forth in government documents that are being provided to the Defendants in the initial disclosure documents. Rather than repeating the details of the model in this document, the Defendants are referred to the complete document that has been produced.

Recently the CDC has begun developing a different model for estimating a smoking attributable fraction (SAF) that indicates the percentage of direct health care expenditures due to smoking. This method was described in the July 8, 1994 edition of CDC's Morbidity and Mortality Weekly Report, Volume 43, No. 26. A copy of this article has been produced to the Defendants.

The team of scientists gathered by CDC received funding from the Robert Wood Johnson Foundation in addition to the CDC.

Rather than attempting to interpret the work of these scientists, a copy of their article is attached as Exhibit

"B". The article is entitled "State Estimates of Publicly Funded Direct Medical-Care Expenditures Attributable to Cigarette Smoking, Results for Mississippi, 1980-1993."

The CDC team of experts has calculated damages to the State of Texas for the years 1980-1993, see Exhibit "C". That total is \$2,223,720,000. The CDC team has put a present value on these past damages at \$3,054,390,000. When 1994, 1995, and 1996 damages are added, the total will likely exceed \$4 billion for past damages.

Future damages are believed to exceed \$400 million per year. These yearly damages are expected to increase at a rate that exceeds the discount rates.

Punitive damages will be determined by the jury.

The State has asked for the recovery of attorney's fees and costs, which will be calculated as the case progresses.

These damage figures will undoubtedly be revised and fine tuned before the trial of this case. Plaintiff believes that the amounts disclosed are extremely conservative and that these numbers will be revised upward.

B. Damages to the employee insurance and retirement system

The State seeks damages for past and future State funds

spent for tobacco attributable health care costs incurred by the State in providing health-benefits to its retirees, employees, and their dependents. All State employees are provided health benefits by the State through the Employees Retirement System of Texas, the University of Texas System, or the Texas A&M University System. All three systems provide to their employees self funded health care plans and insured health care plans. For the most recent year, the cost incurred by the State in providing health care benefits through the Employees Retirement System of Texas, the University of Texas System, and the Texas A&M University System was approximately 1.2 billion, although a portion of the number includes premiums paid by employees for dependents.

A significant amount of this number, is attributable to tobacco use. The State seeks damages for many years in the past and future. The underlying documents concerning this element of damages are being provided as part of the disclosure. Additionally, Exhibit "B" addresses the computations given as an example using the State of Mississippi.

- C. Damages resulting from health care provided by State funded health care providers that are not included in the Medicaid damages.

The State seeks damages for past and future State funds

spent for tobacco attributable medical costs incurred by certain State funded hospitals. The principle State funded hospitals include, among others, the University of Texas Medical Branch-Galveston, the University of Texas M.D. Anderson Cancer Center, the University of Texas Health Science Center-Tyler, and two hospitals operated by the Texas Department of Health: the South Texas Hospital in Harlingen, Texas and the Center for Infectious Disease in San Antonio, Texas. The amount of funds expended by the hospitals for unreimbursed medical care is not known at the time of this disclosure. The State will supplement its disclosure with this information when it is available. However, a significant portion of the amount is attributable to tobacco related medical care. The underlying documents concerning this element of damages are being provided as part of the disclosure.

IV.
INSURANCE AGREEMENTS
[Article (1)(a)(iv)]

Not applicable.

V.
PRIVILEGED DOCUMENTS
[Article (1)(a)(v)]

The computer data and data tapes identified in Section II contain privileged medical information regarding individuals

not a party to this case and therefore must be redacted prior to production. To date, Plaintiff has identified no other privileged documents. In the event additional privileged documents are identified, Plaintiff will supplement this disclosure in accordance with Article Two (5).

For purposes of compliance with Section (1)(a)(v) of Article Two, Plaintiff contends that the employees of state agencies of the State of Texas identified in this disclosure should be considered as clients and/or client representatives for purposes of Rule 26(b)(1), Fed.R.Civ.P. Defendants are hereby notified that, prior to contacting, communicating or attempting to conduct discovery by any other means from state employees, Defendants must notify Plaintiff's counsel of their intent to do so and are prohibited from contacting said State employee directly.

VI.
MEDICAL AND EARNINGS RECORDS
[Article (1)(a)(vi)]

Not applicable.

Respectfully submitted,

DAN MORALES
Attorney General of Texas
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JORGE VEGA
First Assistant Attorney General
TX. Bar No.: 20533800

JAVIER AGUILAR
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Port Arthur, Texas 77642
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(409) 727-7671 Fax

By:

HUGH E. MCNEELY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Initial Disclosure has this the 5th day of June, 1996 been properly forwarded to all known counsel of

record as attached hereto as Exhibit "A" by hand delivery
and/or facsimile and/or first class mail.

HUGH E. MCNEELY

EXHIBIT "A"

Stephen McCormick
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200 East Randolph Drive
Chicago IL 60601

Paul E. Stallings
Vinson & Elkins
1001 Fannin St.
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Houston TX 77002-6760

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John B. Greer III
**Patton, Haltom, Roberts,
McWilliams, Greer**
P.O. Box 1928
700 Texarkana Nat'l Bank
Bldg.
Texarkana TX 75504-1928

Robert McDermett
Jones, Day, Reavis & Pogue
1450 G. St., N.W.
Washington D.C. 20005

Harold Waldrop
**Atchley, Russell, Waldrop,
Hlavinka**
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Mary Elizabeth McGarry
Jacob S. Pultman
Simpson, Thacher & Bartlett
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Damond Young
Young, Kesterson & Pickett
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Texarkana AR-TX 75504

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Arnold & Porter
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J Dennis Chambers
Harold Waldrop
Alan Harrel
Victor Hlavinka
**Atchley, Russell, Waldrop &
Hlavinka**
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Marjorie C. Bell
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William J. Crampton
Shook, Hardy & Bacon
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Robert A. Gwinn
Gwinn & Roby
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1201 Elm St
Dallas TX 75270

Nicholas H. Patton
Patton, Tidwell, Sandefur &

Paddock

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Texarkana TX 75504

Bruce Ginsberg
Davis & Gilbert
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Winford L Dunn Jr
Dunn, Nutter, Morgan & Shaw
State Line Plaza
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Texarkana AR 71854-5945

Steve Klugman
DeBevoise & Plimpton
875 Third Ave
New York NY 10022

William Key Wilde
Bracewell & Patterson
2900 South Tower Pennzoil
Place
Houston TX 77002

Lea F. Courington
Gwinn & Roby
4100 Renaissance Tower
1201 Elm St
Dallas TX 75270

William E. Hoffman, Jr.
King & Spalding
2500 Trust Company Tower
191 Peachtree St. N.E.
Atlanta GA 30303

Thomas E. Riley
Chadbourne & Parke
30 Rockefeller Plaza
New York NY 10112

James O. Copley
Latham & Watkins
855 Third Avenue
New York NY 10022

Murray R. Garnick
Arnold & Porter
555 Twelfth St, N.W.
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Munger, Tolles & Olson
355 South Grand Avenue
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Peter C. Hein
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Jack D. Maroney
Maroney, Crowley, Bankston, Richardson & Hull
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