

EXHIBIT A
TO PROTOTYPE ASBESTOS PRE-TRIAL
CASE MANAGEMENT ORDER

PRELIMINARY FACT SHEET
(See Order dated _____)

1. State the complete name and address of each person whose claimed exposure to asbestos is the basis of this lawsuit ("exposed person"):

2. Date of birth of exposed person and, if applicable, date of death:

3. Social Security Number of exposed person:

4. Specify the nature or type of asbestos-related disease alleged by exposed person.

_____ Asbestosis		_____ Mesothelioma	
_____	Pleural Thickening/ Plaques	_____	Other Cancer: Specify: _____
_____	Lung Cancer other than Mesothelioma	_____	Other: Specify: _____

5. Specify the name and address of the exposed person's primary care physician, if any.

6. Does plaintiff anticipate filing a motion for a preferential trial date within the next six months? _____ Yes _____ No

7. Identify each location alleged to be a source of asbestos exposure, and to the extent known, provide the beginning and ending year(s) of each such exposure. Also specify exposed person's employer and job title or job description during each period of exposure. Examples of locations of exposure might be a specific shipyard, a specific railroad maintenance yard, or perhaps more generalized descriptions such as "merchant marine" or "construction". If an exposed person claims exposure during only a portion of a year, the answer should indicate that year as the beginning and ending year (e.g., 1947-1947).

<u>Location of Exposure</u>	<u>Employer</u>	<u>Job Title at Time of Exposure</u>	<u>Year(s) of Exposure</u>	
			<u>Beginning</u>	<u>Ending</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

(Attach additional pages, if necessary)

8. If there is a wrongful death claim, attach to the copy of this fact sheet a copy of the death certificate, if available. If an autopsy report was done, also attach a copy of it, if available.