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May 25, 1990

James H. Tourtelotte, Esq.  
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Springfield, MA 01115

Re: Warren v. The B. F. Goodrich Company, et al.  
Our file no.: D- 16183

Dear Jim:

Mark Granger has referred your letter dated May 17, 1990 to the undersigned for reply.

There has been a misunderstanding between us based upon the request contained in our letter of May 2, 1990. We appreciate the time and expense required to assemble a complete medical record. Therefore, we try to relieve plaintiff's counsel of the burden of doing so by requesting, not the medical records, but forms authorizing the release of such medical records. It is our practice to directly reimburse all keepers of such records for any expenses of their assembly and reproduction.

Such was the request contained in our May 2, 1990 letter, which was why we included authorization forms for execution by Mrs. Warren. We enclose herein another set of authorization

EXHIBIT "B"

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James H. Tourtelotte, Esq.  
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forms in case the previous set has been misplaced or damaged. Please have Mrs. Warren execute the forms with her notarized signature and return the executed forms to us within fourteen days of receipt. There is no need for you to incur any expense on our behalf.

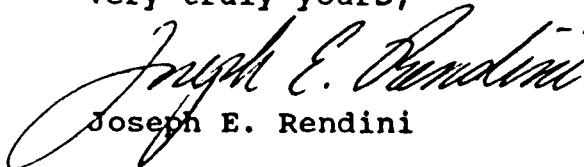
We follow the practice described above whenever we face claims of serious illness or injury in which causation is an issue. We have found that it is generally satisfactory to plaintiff's counsel, who are relieved of the responsibility of following up with their clients' health care providers, and to defendants, who are assured that they have received complete records direct from their source.

Of course, we will forward complete copies of all records received to you upon your agreement to pay our photocopying expenses.

Should you wish to telephone, we are always available to discuss any aspects of this action with you. Please let us know if you have any questions or if you have any difficulty in having Mrs. Warren execute the forms.

Thank you in advance for your anticipated cooperation.

Very truly yours,

  
Joseph E. Rendini

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