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May 16, 2003

VIA HAND DELIVERY

Mr. William B. Baggett, Jr.
Baggett, McCall, Burgess, Watson & Gaughan
P.O. Box 7820
Lake Charles, LA 70606-7820

Re: Monsanto VCM Documents

Dear Billy:

Several weeks ago you and I spoke about documents that I recently discovered at the old site of Monsanto's PVC facility in Springfield, Massachusetts. With this letter are three boxes of documents that I have bates stamped with the labels RSV0022123 to RSV0030026. These documents include those I discovered at Springfield as well as some documents that have been located in the course of the Claude Taylor litigation.

I have tagged several documents in boxes 1 and 3. The tag indicates where "gaps" in the bates numbering occurs. These are the locations of documents that I believe are privileged. I'll be revising our privilege log to include these documents. For the most part, they are documents that were contained in litigation files- attorney notes, drafts of discovery responses, etc. If in reviewing the documents you come upon any additional gaps, please let me know so that I can determine what they are. I caught a couple that was caused by error on the part of the copy vendor. The vendor added a sheet certifying those errors where they were found.

As always, we are continuing to search for documents that may be relevant to the VCM cases. As documents are located, I will produce them as expeditiously as possible. I would ask that you please notify your co-counsel in the various VCM matters of this production. If they would like their own copy, I can send a set to a copy vendor for their purchase.

- If you have questions about any of this, please call me so that we can discuss.

With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink, appearing to read "K Powell", written over the printed name.

KEVIN POWELL

MKP/lcj

Enclosure