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Mr. Steve Borgstrom  
Workmen's Compensation  
Service Company  
55 W. 22nd Street  
Suite #109  
Lombard, Illinois 60148

**REDACTED**

I acknowledge receipt of this file and note that this is an occupational disease case and I am filing Co-Counsel Appearances on your behalf.

You will note that the Application for Adjustment of Claim alleges a permanent total disability and it could well be that this individual will die before this litigation is over at which point this could become a death case.

It appears from those job descriptions that he would be exposed to paint fumes.

He began having lung problems sometime ago and in 1956 was diagnosed as having bronchitis and the flu by Dr. Louis Feldman at 7261 Exchange Avenue. He had another incident of the same condition in 1968 and in 1969 was diagnosed as having the flu syndrome by Dr. R. J. Craven at 9790 S. Kedzie in Evergreen Park, Illinois 60642.

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Mr. Steve Borgstrom  
February 17th, 1982  
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RE:                                -v- Sherwin Williams

More recently he was admitted to Little Company of Mary Hospital from November 19th, 1981 to December 17th, 1981.

He has treated variously by Dr. John Baron, 3319 W. 95th Street, Evergreen Park, Illinois 60642, Dr. Pushpa Shah, 10325 S. Western Avenue, Chicago, Illinois 60643 and Dr. Manuel Yu, 10325 S. Western Avenue, Chicago, Illinois 60643.

His treatment included an oncology or cancer evaluation and exploratory thorectomy, right multiple biopsy for lung tumor, a fiber optic bronchoscopy and mediastonoscopy. He apparently was put under group insurance with Provident Washington Insurance Company.

By way of investigation, please obtain any records which are still available, namely 1) Dr. Louis Feldman, 2) Dr. R. J. Craven, 3) Dr. John Baron, 4) Dr. Pushpa Shah, 5) Dr. Manuel Yu, and 6) Little Company of Mary Hospital records.

Also, by way of investigation, if                                received long-term group disability benefits, please advise me of the amount and number of weeks of payment so that we may obtain a credit when we go to hearing on this matter. Also, in that regard, did he or his doctor's sign group insurance forms admitting that his condition did not arise out of his employment.

In my initial phone conversation with attorney Wiedner after I received a call from you on January 29th, 1982 and also in a conference had at the Industrial Commission on February 11th, 1982, I learned that                                is apparently suffering of mesothelioma and that he is approaching the terminal stages, meaning, in Mr. Wiedner's opinion, he will die soon.

**REDACTED**

This is a somewhat rare condition of the mesothelial-lining surfaces which form cancerous tumors and is generally associated with asbestos exposure.

I believe your investigation should concentrate on that angle and it will probably be necessary to confer with a long employed chemist with our insured to determine if there were times during Mr. Williams' work history when Sherwin Williams used asbestos in some of their paint compositions.

One of the unfortunate problems that we will have with this case is that [redacted] apparently was such a long term employee that it will be hard to allege he had exposure at some other occupation.

We therefore have a skillful and knowledgeable opponent to deal with and I believe we will need a full investigative work-up to defeat this claim.

However, I would not begin your investigation until we can confirm the medical diagnosis through the doctor and hospital records. At that point I would give it a full work-up from the asbestos angle first and then any other potential exposures along those lines.

BAUM &amp; RUFFOLO

BAUM & RUFFOLO  
Richard W. Baum

RWB / ppm

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