

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

AT CHARLESTON

ERNEST LEE STEVENS and  
CAROLYN SUE STEVENS,

Plaintiffs,

vs.

CIVIL ACTION NO. 82-2483

UNION CARBIDE CORPORATION, a  
corporation; and FMC CORPORATION,  
a corporation,

Defendants.

MOTION FOR PRODUCTION OF DOCUMENTS

TO: Union Carbide Corporation and its attorney,  
Winfield T. Shaffer, Esquire  
Jackson, Kelly, Holt & O'Farrell  
Post Office Box 553  
Charleston, West Virginia 25322

The plaintiff hereby requests, pursuant to the West Virginia Rules of Civil Procedure, that the defendant, Union Carbide Corporation, be required to produce and permit the plaintiff to inspect and copy the following:

1. All records, reports or other written documentation indicating storage tank inventories from January 1, 1968, through December 31, 1983, for Union Carbide's loading and storage facilities located adjacent to the area commonly referred to as North Charleston.
2. All barge manifests, bills of lading or other similar documents from January 1, 1968, through December 31, 1983, which were loaded or unloaded at Union Carbide's loading and storage facility located adjacent to the area commonly referred to as North Charleston.

UCC 098943

3. All truck manifests, bills of lading or other similar documents from January 1, 1968, through December 31, 1983, which were loaded or unloaded at Union Carbide's loading and storage facility located adjacent to the area commonly referred to as North Charleston.

4. All railroad manifests, bills of lading or other similar documents from January 1, 1968, through December 31, 1983, which were loaded or unloaded at Union Carbide's loading and storage facility located adjacent to the area commonly referred to as North Charleston.

5. All records, reports or other written documentation of accidental or unintended spills, emissions or other releases of substances handled at the storage and loading facility located adjacent to the area commonly referred to as North Charleston occurring from January 1, 1968, through December 31, 1983.

6. All records, reports or other written documentation of emissions or releases of substances which are not classified as accidental or unintended occurring at the loading and storage facility located adjacent to the area commonly referred to as North Charleston occurring from January 1, 1968, through December 31, 1983.

7. All records, reports or other written documentation, prepared from January 1, 1968, through the present, of any analysis of organic air pollution occurring from the operation of Union Carbide's South Charleston plant and its accompanying loading and storage facility, which Union Carbide has performed themselves or has been performed by a third-party at their direction or request.

8. All records, reports or other written documentation, prepared from January 1, 1968, through the present, of any analysis of organic air pollution occurring from the operation of Union Carbide's South Charleston plant and its accompanying loading and storage facility which has been performed by any group or association to whom Union Carbide has supplied information.

9. All records, reports or other written documentation, prepared from January 1, 1968, through the present of any analysis of organic air pollution occurring which has been performed by any branch of the Federal, State or local government or any agency thereof with respect to Union Carbide's South Charleston plant and its accompanying loading and storage facility, excluding records already supplied in response to previous requests.
10. All records, reports or other written documentation of accidental or unintended spills, emissions or releases of substances handled at the Union Carbide facility located in South Charleston, West Virginia, from January 1, 1968, through December 31, 1983.
11. All records or other written documentation of emissions or releases of substances from the Union Carbide facility located in South Charleston, West Virginia, that are not classified as accidental or unintended emissions and releases occurring from January 1, 1968, through December 31, 1983.

It is requested that the aforesaid production of documents be made at the office of William C. Field, 603 Virginia Street, East, Charleston, West Virginia, by the 3rd day of March, 1986.



William C. Field  
603 Virginia Street, East  
Charleston, West Virginia 25301  
Counsel for Plaintiffs