

Levinson Axelrod Wheaton

& Grayzel

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A PROFESSIONAL CORPORATION

Levinson (1934-1988)

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Of Counsel

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Peterson v. UCC
COURT PAPERS

March 27, 1989

Pitney, Hardin, Kipp & Szuch, Esqs.,
163 Madison Avenue,
Morristown, N.J. 07960-1945

Attn. Robert L. Hollingshead Esq.

Dear Mr. Hollingshead: Re: Peterson v. Union Carbide

I wish to advise you pursuant to Rule 1:9-1 that I wish the following persons to be produced at the time of trial:

R.N. WHEELER JR.,
DR. CARL U. DURNEHL;
DR. OTTO MATHEKE;
DR. ERICK G. COMSTOCK;
NEUBORNE BROWN;
DAVID P. ROMAINE;
THOMAS ARCHER;
EMIL BORCH;
E. EISENHOUR;
W.T. GRAY JR.;
JOHN MC DONALD;
JOHN WHITTLESEY;
GARY PILCHER

In addition, I also wish produced that person considered by Union Carbide to be an expert on PVC and VCM and that person most familiar with the production and shipping of PVC and VCM to OTD and ATC from 1966 to 1986.

Very truly yours,

ALFRED A. LEVINSON

AAL:ff

UCC 088776