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January 27, 1988

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PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

Re: Peterson, et al. v. Union Carbide

Dear Peter:

The plaintiff has filed a motion returnable February 5 requesting the Court to fix a time by which Union Carbide must answer Interrogatories. Failure to answer within the time so fixed will result in suppression of our defenses. In response to the motion, I contacted plaintiff's attorney, Alfred Levinson, who consented to a 45 day extension until March 15 and I have sent him a Consent Order to that effect. Mr. Levinson also advised me that, if necessary, we could have an additional extension. However, I would like to use March 15 as our target date.

From our conversations, I know that Nick Wheeler will be acting as my contact regarding Carbide's VCM/PVC business, but I do not know if Nick is the person who will assist in preparing the answers. Please advise me on this so I can start the process.

Regarding the Interrogatories, my review indicates that they are generally relevant, although quite extensive. The following Interrogatories appear to be burdensome, and we should probably respond with an objection and a limited answer:

12, 13, 23, 27, 28, 29, 30, 37, 50, 93 and 94.

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PITNEY, HARDIN, KIPP & SZUCH

Peter F. Davey, Esq.
January 27, 1988
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Many of the others are repetitive, especially those dealing with toxicity, research and labeling practices.

Obviously, it will require some hard work over the next several weeks to respond to these Interrogatories, so please advise me promptly as to who will be assisting me. I have obtained Carbide's answers to Interrogatories in the Maliko case and will be reviewing them to see if the information can be used in this matter, which will make our task a lot easier.

Please call me as soon as you can so we can start on this project. Kindly note that Steve Larsen is working with me on the case, so you can talk to him in my absence.

Sincerely,



ROBERT L. HOLLINGSHEAD

RLH:js

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