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* NOT ADMITTED IN NEW YORK

Martha Friar, Esq.
Law Department
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut

Re: Sireci v. Union Carbide Corporation

Dear Martha:

I am enclosing cross-motion papers served on behalf of American Cyanamid seeking summary judgment. From these papers it appears that American Cyanamid has never manufactured or sold PVC resins.

Our motion is scheduled to be submitted to the court on August 14, 1985. I will keep you apprised of our progress on this motion.

Best regards.

Sincerely yours,


James V. O'Gara

JVO'G:eiw
Enclosure

UCC
044523

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August 1, 1985

Martha Friar, Esq.
Law Department
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06810

Re: Sireci v. Union Carbide Corporation

Dear Martha:

I am enclosing a copy of Kalex's papers in support of our motion for summary judgment. These papers include an affirmation from Mr. Stanley Mandel, Director of Materials Management for Kalex, as well as an affirmation from Kalex's counsel, Alexander Sansone.

Kalex's papers provide most of the information necessary to our position on this motion, however, they do not address the issue of purchases by Kalex of Union Carbide manufactured PVC resins from an independant distributor. Mr. Sansone is presently away on vacation and is scheduled to return on August 8. I will be in contact with him upon his return to obtain a supplemental affirmation from Mr. Mandel addressing this issue.

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KELLEY DRYE & WARREN

Martha Friar, Esq.

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August 1, 1985

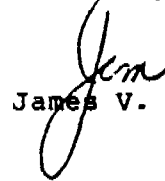
I am also enclosing plaintiff's affirmation in opposition to Monsanto's cross-motion for summary judgment.

Finally, a copy of an order pertaining to Kalex's motion for a protective order striking plaintiff's notice for discovery and inspection is also enclosed. As you will note, the court denied Kalex's motion and directed that Kalex produce the requested information within 60 days. Mr. Sansone has advised me that he intends to move to reargue this motion and, if that fails, appeal the order to the Appellate Division.

If you have any questions regarding the foregoing, please do not hesitate to call.

Best regards.

Sincerely yours,



James V. O'Gara

JVO:mlc
Enclosures

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