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November 9, 1993

PLEASE REPLY TO ST. LOUIS

Mr. Peter Montague
Research Director
Environmental Research Foundation
P.O. Box 5036
Annapolis, MD 21403-7036

Re: William Gaffey v. Peter Montague, et al.

Dear Peter:

Enclosed please find the final interrogatories, response to request for admissions, and response to request for production of documents. Also enclosed please find copies of all of the documents which we produced to plaintiff's attorneys.

We had originally included correspondence and documents from Rex Carr for production. We talked about this generally, and I also talked with Paul and John about it. Paul, John and I concurred that we would make a full and fair disclosure of materials which we had received from Carr and from your research into the matter.

When I received the Gerson Smoger fax from Merrell on Monday afternoon, Gerson mentioned he did not want to provide the Carr materials. As such, I deleted them from the production until we could get together and make a decision on it because we had crossed signals and I was out of time. Also deleted from production were the research materials, until we could discuss the matter again. I went ahead and produced the Freedom of Information requests and responses.

Mr. Peter Montague
November 9, 1993
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John will be back in the office on Thursday, and hopefully by that time we will be able to get this straightened out. In the meantime, as we discussed, I am having the Kemner trial transcript and exhibits examined by two of our associates, who will get copies of the relevant materials in time for the depositions in the case.

Please let me know if you have any questions.

Very truly yours,

Kathi Chestnut
Kathi L. Chestnut

KLC:rs

cc: Mr. Gerson Smoger
Mr. Paul Merrell
Mr. Gerald Ortvals
Mr. Mark Bronson