

DOOD AND FINN  
ATTORNEYS AND COUNSELLORS AT LAW  
712 MICHIGAN NATIONAL TOWER  
DETROIT, MICHIGAN 48203

CLAIM CHECK  
NO.  
940080

☐ HOLD

DATE

1ST NOTICE

2ND NOTICE

RETURN

**RTIFIED**

3 686 014

**MAIL**

Detached from  
PS Form 3842-A  
Oct 1980

Postage Requested

LD

Uniroyal, Inc.  
c/o Arthur, Dry & Kalish  
Ms. Linda D'Alessandro  
1230 Av. of the Americas  
New York, NY 10020

33311 TRN

**COPY RECEIVED**

APR 27 1980

ARTHUR, DRY & KALISH P.C.

LEE, PRISCILLA, (ESTATE OF JERRY LEE)  
VS  
UNIROYAL, INC., ET AL

19. Defendants' Brief in Opposition to Plaintiff's Motion for Rehearing, dated June 5, 1985.
20. Order Granting Defendants' Motion for Summary Judgment, dated June 26, 1985.
21. Notice of Appeal to the Court of Appeals from a Judgment or Order of a District Court, dated July 2, 1985.
22. Appearance of counsel dated July 23, 1985.
23. Brief for Plaintiff-Appellant, dated September 24, 1985.
24. Brief For Defendant-Appellee The B.F. Goodrich Company and Proof of Service, dated October 23, 1985.
25. Brief of Defendants-Appellees: Union Carbide Corp., Tenneco Resins, Inc. Uniroyal Chemical Corp., Allied Chemical Corp., Occidental Chemical Corp. & Firestone Tire and Rubber Co., undated.
26. Brief of Defendants-Appellees, dated November 22, 1985.
27. Release, dated June 23, 1986.
28. Order, filed July 31, 1986.
29. Order for Authority to Distribute Proceeds in a Wrongful Death Action, dated August 27, 1986.

URL 11334

Lee, Priscilla, (Estate of Jerry Lee)

vs

Uniroyal, Inc. et al

1. Summons and Complaint, dated April 23, 1984.
2. Defendants' First Set of Interrogatories and Request for Production to Plaintiff, dated June 20, 1984
3. Answer to Complaint of the Goodyear Tire & Rubber Company, dated May 22, 1984
4. Answer of B.F. Goodrich, dated May 29, 1984
5. Answer to Complaint of Stauffer Chemical Company, served June 11, 1984
6. Occidental Chemical Corporation's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
7. The Firestone Tire & Rubber Company's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
8. Tenneco Resins, Inc's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
9. Allied Corporation's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
10. Uniroyal, Inc's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
11. Union Carbide Corporation's Answer and Affirmative Defenses to Complaint, dated June 15, 1984
12. Notice of Hearing and Motion of Defendants to Compel Answers to Interrogatories and Production of Documents, dated Sept. 26, 1984
13. Brief in Support of Defendants' Motion to Compel Answers to Interrogatories and Production of Documents, undated.
14. Proof of Service, dated Sept. 26, 1984.
15. Defendants' Motion to Dismiss Complaint, Brief in Support of Motion, Notice of Hearing and Proof of Service, filed January 7, 1985.
16. Interrogatories to All Defendants, undated.
17. Supplemental Brief in Support of Defendants' Motion to Dismiss Complaint. dated January 25, 1985
18. Notice of Taking Deposition of Priscilla Lee, Bertha Lee and Lorraine Lee, dated March 27, 1985.

UHL 11335

STATE OF MICHIGAN  
IN THE PROBATE COURT FOR THE COUNTY OF MACOMB

RE: ESTATE OF JERRY LEE, Deceased

File No.: 87,370

ORDER FOR AUTHORITY TO  
DISTRIBUTE PROCEEDS IN  
A WRONGFUL DEATH ACTION

At a session of said Court held in the  
City of Mt. Clemens, County of Macomb,  
State of Michigan, on AUG 27 1986

PRESENT: Honorable \_\_\_\_\_

This matter having come on to be heard upon the Petition  
of Priscilla Lee, Personal Representative of the Estate of Jerry Lee,  
Deceased, for authority to distribute proceeds in a wrongful death  
action, and persons who may be entitled to damages, under the wrong-  
ful death action having been serviced with Notice of Hearing, and  
children of the Deceased having appeared and the parties having  
amicably agreed on the distribution of the proceeds and the Court  
being fully advised in the premises;

IT IS HEREBY ORDERED AND ADJUDGED that the net proceeds  
from the settlement, less attorney fees and expenses shall be  
distributed as follows:

|                           |       |             |
|---------------------------|-------|-------------|
| Priscilla Lee (Wife)      | .50%  | \$ 3,574.99 |
| Michael Lee (Son)         | .0625 | \$ 446.88   |
| Duwana Traylor (Daughter) | .0625 | \$ 446.88   |

JRL 11336

|                            |       |           |
|----------------------------|-------|-----------|
| Jerome Lee (Son)           | .0625 | \$ 446.88 |
| Gloria Jean Lee (Daughter) | .0625 | \$ 446.87 |
| Carol Ann Lee (Daughter)   | .0625 | \$ 446.87 |
| Marvin Lee (Son)           | .0625 | \$ 446.87 |
| Steven Lee (Son)           | .0625 | \$ 446.87 |
| Brandon Lee (Son)          | .0625 | \$ 446.87 |

IT IS FURTHER ORDERED AND ADJUDGED that the law firm of BOGOS & BOGOS shall be paid an attorney fee of One-Third (1/3) of the \$ 12,500.00 settlement less expenses in the amount of Three Thousand Five Hundred and Seventy Four Dollars and Ninety-Nine cents (\$ 3,574.99) and reimbursement of expenses in the amount of \$ 1,775.03 which includes a Guardian Ad Litem fee of Two Hundred (\$ 200.00) Dollars.

IT IS FURTHER ORDERED AND ADJUDGED that zero amount of compensation is awarded for conscious pain and suffering for the deceased.

JAMES F. NOWICKI  
PROBATE COURT JUDGE

URL 11337

No. 85-1574

UNITED STATES COURT OF APPEALS  
FOR THE SIXTH CIRCUIT

FILED

JUL 31 1985

PRISCILLA LEE, Personal  
Representative of the Estate  
of JERRY LEE, Deceased,

Plaintiff-Appellant,

v.

UNION CARBIDE CORPORATION,  
DIAMOND SHAMROCK CORPORATION,  
STAUFFER CHEMICAL COMPANY,  
TENNECO RESINS, INC.,  
UNIROYAL, INC.,  
ALLIED CHEMICAL CORPORATION,  
OCCIDENTAL CHEMICAL CORPORATION,  
FIRESTONE TIRE & RUBBER COMPANY,  
B.F. GOODRICH COMPANY,  
GOODYEAR TIRE & RUBBER COMPANY,

Defendants-Appellees.

JOHN P. HEHMAN, Clerk

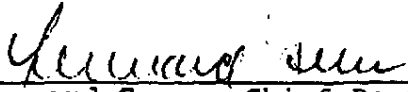
ORDER

UPL 11338

In accordance with Rule 18, Rules of the Sixth Circuit,  
and upon consideration of the Stipulation of the parties to  
voluntarily dismiss the appeal pursuant to 42(b), Federal Rules  
of Appellate Procedure,

IT IS ORDERED that the appeal be and it hereby is  
dismissed.

ENTERED PURSUANT TO RULE 18(c)  
RULES OF THE SIXTH CIRCUIT  
John P. Hehman, Clerk

  
Leonard Green, Chief Deputy Clerk

RELEASE

Priscilla Lee, Personal Representative of the Estate of Jerry Lee, for and in consideration of the sum of Ten Thousand Dollars (\$10,000.00), consisting of One Thousand One Hundred Eleven and 11/100 Dollars (\$1,111.11) apiece from Union Carbide Corporation, Diamond Shamrock Corporation, Stauffer Chemical Company, Tenneco Resins, Inc., Uniroyal, Inc., Allied Corporation, Occidental Chemical Corporation, The Firestone Tire & Rubber Company, and the B.F. Goodrich Company, receipt of which is acknowledged, does for herself, her children, heirs and assigns, release and forever discharge the above-named companies and all of their agents, representatives, parents, subsidiaries, related companies, divisions, employees, predecessors, successors, insurers and assigns, and all other corporations, persons and other legal entities, of and from all claims, demands, or causes of action which she may have, claim or assert individually or jointly, on her own behalf or as representative of others who might be entitled to recover under the laws of Michigan or any other jurisdiction against the parties herein released, including but not limited to those based on negligence, breach of warranty, strict liability, product liability or successor liability, which she may now have, have had, or may hereafter accrue, even if based on a change in the law or her understanding of the applicable law, arising in any way out of, any and all known and unknown, foreseen and unforeseen, present and future, injuries, conditions, diseases, losses and damages, and the consequences thereof, resulting, or to result from the exposure of Jerry Lee with chemical products, his death, or the subjects raised in Civil Action No. 84-2398, United States District Court for the Eastern District of Michigan.

URL 11339

Priscilla Lee, Personal Representative of the Estate of Jerry Lee, understands and agrees that this settlement is a full accord and satisfaction and the compromise of disputed claims, and that this settlement is not to be construed as an admission of liability. She hereby authorizes her counsel of record to cause an order of dismissal with prejudice to be entered by the Court in the above litigation.

Execution of this Release shall operate as a satisfaction of and bar against any claims by other parties to the extent that such other parties are or may be entitled to recover, by way of contribution, indemnity or otherwise, from the parties herein released.

Priscilla Lee further represents that no person or company holds any worker's compensation or other lien on the proceeds of this settlement. She agrees to indemnify, hold harmless and defend the parties herein released against

any loss, damages, or expenses, including reasonable attorney fees, in connection with claims, demands or suits relating in any way to the exposure of Jerry Lee to chemical products or to his death or the claims released herein, including claims (a) for enforcement of liens against the proceeds of this settlement; (b) ~~by any party seeking to recover, by way of contribution, indemnity or otherwise, from parties herein released;~~ or (c) by the children, heirs or assigns of Jerry Lee.

Priscilla Lee further declares and represents that she fully understands the terms of this Release, that no promise, inducement or agreement not herein expressed has been made to her, that this Release contains the entire agreement between the parties hereto, and that the terms have been explained to her by her counsel of record in the above litigation.

Executed on this 23rd day of June, 1986.

WITNESSED:

BOGOS & BOGOS

By:

Paul G. Bogos  
Paul G. Bogos

Priscilla Lee  
PRISCILLA LEE, Personal  
Representative of the  
Estate of Jerry Lee

URL 11340