

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

EXPRESS MAIL

May 20, 1985

Cheryl Hoffman, Esquire
Gibson, Dunn & Crutcher
333 S. Grand Avenue
Los Angeles, California 90071

Re: Vera Morris v. Lockheed Corporation, et al., including
Union Carbide Corporation as Doe 12
California Superior Court, Los Angeles County
Case No. C-409257

Dear Cheryl:

Pursuant to our telephone conversation on today's date, you have agreed to represent Union Carbide Corporation in the above-captioned matter. I enclose a copy of the summons and complaint, as well as a memorandum dated May 10, 1985 concerning our sales to Lockheed and a memorandum dated May 13, 1985 concerning trichlorethane. The Corporation was served on April 30, 1985 and we have until May 30, 1985 to answer.

Thank you for representing us in this matter.

Very truly yours,

Martha J. Friar

Martha J. Friar

MJF:mh
Enclosure

cc: L. A. Crisorio - P2-608 (without enclosure)
E. D. DeLoughy - B4-155 (without enclosure) - Has Kemper been notified?
R. ~~XXXXXXXXXX~~ - South Charleston (without enclosure)
C. C. Ivie, Esq. - Gibson, Dunn & Crutcher (with enclosure)
G. Justice, Esq. - Gibson, Dunn & Crutcher (with enclosure)

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"**

UCC
044454

RECEIVED

MAY 17 1985

UNION CARBIDE CORPORATION
Ethylene Oxide/Glycol Division

Old Ridgebury Road R. N. WHEELER
Danbury, CT 06817

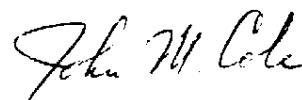
May 13, 1985

TO: M. Friar

CC: R. N. Wheeler

In regard to the litigation in which an employee of Lockheed Aircraft in Burbank, California alleges injury from exposure to trichlorethane supplied by Union Carbide, I wish to make the following comments. Union Carbide did make and sell ethylene dichloride up until 1972 when sale of this product was discontinued. To my knowledge, Union Carbide has never made or sold trichlorethane.

Very truly yours,



John M. Cole

JMC:pmh
0142h
P.71

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC
044455

California from June, 1978 to February, 1981, was exposed to polyvinyl chloride materials, tri-chloroethide ethane, as well as other chemicals and materials, which were used in the manufacture of airplanes and airplane parts. On May 7, 1981 she discovered she had scleroderma which has prevented her from working from February, 1979 to the present. She is claiming more than \$20,000,000 compensatory damages and \$75,000,000 punitive damages.

By copy of this letter to Nick Wheeler, would he please check the Corporation's sales records to see if we were a supplier to Lockheed Corporation during the 1978-1979 time period.

The chemical "tri-chloroethide ethane" as specified in the complaint is possibly a misspelling of trichloroethane. Nick Wheeler has initially indicated that Union Carbide has never sold trichloroethane, but this will have to be verified.

By copy of this letter to Ed DeLoughy, would he please notify the appropriate insurers of this pending lawsuit.

Very truly yours,

Martha J. Friar
Martha J. Friar

MJF:mh

Enclosure

cc: A. M. Robinson - E3-259 (without enclosure)

J. F. Skislock - D2-241 (without enclosure)

C. E. Van Dyk - E2-289 (with data sheet) - Please add this case to our group of polyvinyl chloride cases.

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"**

UCC
044457

Lockheed Corp
Muskogee Cal

Airplane & parts

June 1978 - Feb 1979

Exposed to PVC materials
and trichloroethylene

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC
044482