

CY IN EACH FILE

LIBERTY MUTUAL



2 Executive Campus, P.O. Box 5343, Cherry Hill, New Jersey 08002 • Tel. (609) 663-9121

February 12, 1980

FEB 12 1980

T. M. L.

REDACTED

Sherwin Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115

ATTN: THOMAS LOCKER, WC ADMINISTRATOR

RE:

VS LIBERTY MUTUAL

FILE: HD327-6227(8)
D/LOSS: 12/1/75

RECEIVED

FEB 14 1980

CORPORATE
INSURANCE

Dear Mr. Locker:

This letter is a follow up to our telephone conversation of October 30, 1979. At that time, we discussed several items concerning the above captioned matter. Further, you had asked that I submit a list of specific questions for you to answer. Therefore, I would ask that you respond to the following questions:

REDACTED

1. What does John Lucas Company, Incorporated, produce?
What are their raw materials?
2. Could you supply us with whatever information you have on plaintiffs concerning their employment.
Could you supply us with documentation and verification of John Lucas' corporate history, documents, etc?
3. Could you supply us with material safety data sheets on all materials received at John Lucas?
4. Could we find out how shipments are received: for instance, by rail, truck, ship, etc.?
5. Could you identify the names of the people in charge of John Lucas Company, Incorporated?
6. Specifically, could you identify the Safety Director?
7. What kind of first aid facility was present at John Lucas?
8. If OSHA records were kept at Lucas, could these records be made available to us?
9. Could you supply us with first aid records for John Lucas?

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