

325

*lit.
Bernadino
Cr.*

PITNEY, HARDIN, KIPP & SZUCH
PARK AVENUE AT MORRIS COUNTY
P.O. BOX 1945
MORRISTOWN, NEW JERSEY 07962-1945

ROBERT L. HOLLINGSHEAD

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September 10, 1990

John Downey, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Bernadino v. Union Carbide Corporation
Gatto v. Diamond Shamrock Corporation, et al.
White V. Union Carbide Corporation, et al.

Dear John:

Enclosed please find budget estimates for 1991 for the Bernadino, White and Gatto cases. In connection with Gatto, please note that I have only estimated fees and expenses that would be attributable to Union Carbide under the fee sharing agreement between our joint clients.

Sincerely,

Bob

ROBERT L. HOLLINGSHEAD

RECEIVED

SEP 11 1990

J. R. Downey

RLH/dw
Enclosure

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 075148

CASE: Bernadino v.
Union Carbide Corp.

INITIAL BUDGET ESTIMATE: _____

COUNSEL: Robert L. Hollingshead (RLH)
Pitney, Hardin, Kipp & Szuch

BUDGET ESTIMATE FOR 1991: \$155,025

<u>Activity</u>	<u>Responsible Attorney/Paralegal</u>	<u>Rate</u>	<u>Time</u>	<u>Value</u>
DISPOSITIVE AND FORUM MOTIONS (List motions and activities involved)				
None Contemplated				
<u>LEGAL RESEARCH</u> (List items for research)				
1. General research for trial brief	Associate	\$115	20	\$ 2,300
2. Various evidence issues	Associate	\$115	20	\$ 2,300
<u>INVESTIGATIONS</u> (Describe)				
1. Interviews with UCC and ATC personnel	RLH Associate	\$250 \$115	20 20	\$ 5,000 \$ 2,300
<u>DISCOVERY</u>				
1. Responding to Interrogatories	RLH Associate	\$250 \$115	10 20	\$ 2,500 \$ 2,300
2. Responding to Requests for Admissions	RLH Associate	\$250 \$115	5 5	\$ 1,250 \$ 575
3. Depositions				
a. UCC personnel	RLH	\$250	20	\$ 5,000
b. Plaintiff's experts	RLH	\$250	40	\$10,000
c. UCC's experts	RLH	\$250	20	\$ 5,000

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UCC 075149

DISCOVERY MOTIONS
(list motions and
activities involved)

1. Various motions for discovery relief	Associate	\$135	20	\$ 2,300
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EXPERTS (UCC)

1. Selecting, inter- viewing and prep- aring opinions	RLH	\$250	20	\$ 5,000
	Associate	\$115	10	\$ 1,150
2. Preparing for depositions	RLH	\$250	10	\$ 2,500

MISCELLANEOUS

1. Deposition digests for use at trial	Paralegal	\$ 50	75	\$ 3,750
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TRIAL PREPARATION

RLH	\$250	80	\$20,000
Associate	\$115	80	\$ 9,200

TRIAL
(Assume weeks)

2 Weeks	RLH	\$250	140	\$35,000
	Associate	\$115	140	\$16,100

TRAVEL AND EXPENSES

1. Expert fees through trial	\$15,000.00
2. Deposition Transcripts	\$ 5,000.00
3. Travel Expenses	\$ 500.00
4. Duplicating Expenses	\$ 1,000.00

TOTAL: \$155,025.00

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UCC 075150