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August 21, 1979

PLAINTIFF'S  
EXHIBIT  
CAM-395

Mr. Donald R. Ferry  
Metropolitan Talc Company, Inc.  
P. O. Box AM  
18-22 Bank Street  
Summit, New Jersey 07901

RE: Westfall, et al vs Whittaker, Clark & Daniels,  
John Doe Corporation vs Metropolitan Talc Company, Inc.  
and Pfizer, Inc.  
Our File: 79-356

Dear Mr. Ferry:

This will confirm my advice to your secretary that I have been engaged by Aetna Casualty and Surety Company to defend the third-party action brought against your company in the above-entitled matter.

In your letter to the Fowler Agency you referred to a documented study done by Professor Rubino. If a copy of this is available it would be appreciated if you would send a copy to me. Of course, if there is any other materials dealing with the product, particularly the component asbestos, I should have these also. I might add that I have had an asbestosis case in the recent past. In the course of that I had occasion to read Paul Brodner's book dealing with that particular problem.

From past experience I recognize that the most significant investigation will deal with your sources of supply, i.e. the producers and their respective locale. In addition, we would also want to know the history of your business relationship with the third-party plaintiff, Whittaker, Clark & Daniels.

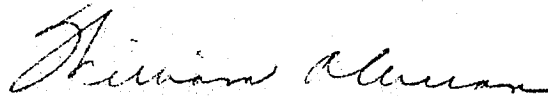
Upon receiving this assignment, I immediately went to the Worker's Compensation Commission and obtained the reports relating to Mr. Westfall's claim. They do encompass medical information pertaining to his ailment. Copies have been furnished to Aetna Casualty. If you feel you want copies and have not received same

from the Company, please advise.

A further source of helpful information you may have relates to other cases that may have involved the Company. If you are aware of any, I would like to know where they have been filed and who has protected the interests of Metropolitan Talc Company, Inc. If this is an industry problem, pre-trial discovery in other cases is often a fertile source of information for the defense.

One of the defenses that will be raised is that Metropolitan Talc Company, Inc. has no significant contact with the State of Rhode Island. Of course, I do not know this at this stage and I have no familiarity with your business operations. If you have salesmen or advertise in local papers or frequently ship goods into the State then this may be sufficient to confer jurisdiction. On the other hand, if you have no business contact with the State and make all deliveries to third-parties in New Jersey or other states, jurisdiction may pose a problem to the plaintiff. I would like to hear further from you concerning this also.

Very truly yours,

A handwritten signature in cursive script, appearing to read "William A. Curran".

William A. Curran

WAC:ner

CC: Aetna Casualty & Surety Company