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March 29, 1989

Robert L. Hollingshead, Esq.,
163 Madison Avenue,
Morristown, N.J. 07960-1945

Dear Mr. Hollingshead: Re: Peterson v. Union Carbide

I wish to advise you that depositions were taken in the case of Maliko et al v. Union Carbide, bearing Civil Action No. 76-1533 in the United States District Court of various employees of Union Carbide which I intend to use in the instant matter. I had discussed this briefly with you recently and thereafter checked Rule 4:16 (d) which provides for the use of these depositions. I refer particularly to the following:

Emil K. Borch - April 14, 1977

Thomas Archer - July 19, 1978

Neuborne H. Brown Jr., - June 22, 1978 and July 10, 1979

David Romaine - July 10, 1979

Roscoe Nicholas Wheeler Jr., - February 9, 1979

John Whittlesey - May 30, 1978

Gary Pilcher - July 10, 1979

Eric G. Comstock - December 14, 1979

William J. Fodor - June 23, 1978

Dr. Bertram W. Carnow - December 13, 1978 - not a sample

UCC 088750

If you do not have all these depositions, I would be happy to provide copies for you. If, on the other hand, there are other depositions which you would like to use and which I have not referred to, please let me know and I will add them to this list. You may anticipate my cooperation herein.

Very truly yours,



ALFRED A. LEVINSON

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