

MORRISON, MAHONEY & MILLER

COUNSELLORS AT LAW
1145 MAIN STREET
SPRINGFIELD, MASSACHUSETTS 01103
413-737-4373
FACSIMILE 413-739-3125

ALAN G. MILLER*
STEPHEN J. PARIS
ALAN H. ROBBINS
DAVID A. BAKST
PAUL W. GOODRICH
EDWARD T. CROSSEN
RICHARD R. EURICH
STEPHEN J. ANDRICK
MICHAEL DANK
JOEL F. PIERCE
RICHARD H. PETTINGELL
PETER C. KNIGHT

MARK P. HARTY
JEAN M. KELLEY
MARK S. GRANGER
ALAN M. REISCH
RICHARD E. BRODY
D. ALICE OLSEN
LAWRENCE F. BOYLE
MARK R. SEGALINI
PAUL S. GRAND
ALAN B. RINDLER**
MICHAEL A. PEZZA, JR.
LEE STEPHEN MACPHEE++

JOSEPH S. BUCKLEY, JR.
ELIZABETH BUTLER
SAMUEL PERKINS
JOHN J. DAVIS
MICHAEL F. AYLWARD**
ELIZABETH M. FAHEY ΔΔ
JAMES J. MORAN, JR.
WILLIAM F. BARRY
MITCHELL S. KING
GERALD FABIANO
BRUCE R. HENRY
JOSEPH A. REGAN

250 SUMMER STREET 1130 MECHANICS BANK TOWER
BOSTON, MASSACHUSETTS 02210 100 FRONT STREET
617-439-7500 WORCESTER, MASSACHUSETTS 01608
FACSIMILE 617-439-7590 OR 617-737-8890 508-757-7777
TELEX 94-0878 FACSIMILE 508-752-6224

SIX LLOYDS AVENUE
LONDON, EC3N 3AX ENGLAND
01-488-2984
TELEX 9811764

ONE OLD STONE SQUARE 700 PLEASANT STREET
PROVIDENCE, RHODE ISLAND 02903 NEW BEDFORD, MASSACHUSETTS 02740
401-331-4660 508-999-0014
FACSIMILE 401-351-4420 FACSIMILE 508-990-0316

JAMES M. GRAHAM
VALERIE NOEL CARDI
MURRAY I. RAPAPORT
JOANNE P. KEATING+++
CAROL A. GRIFFIN+
LAWRENCE A. DUGAN+
PAUL J. MUELLO
LEONARD H. KESTEN
RALPH C. SULLIVAN
JEFFREY D. PETHICK ΔΔ
JOHN F. BURKE, JR.
MARK E. DEFOSSSEZ
MARGARET L. COSTA
HUNTER OHANIAN
MICHAEL R. HETHERMAN
NANCY REGAN
WILLIAM BOGAERT
KAREN M. MORAN
FAITH A. LASALLE ΔΔ
DENNIS M. POWERST
JOSEPH E. RENDIN+
JOHN A. SAKAKEYNY
THOMAS C. FEDERICO

CAREY H. SMITH
THOMAS G. FIORE+++
DAVID J. HIMMELBERGER.
THOMAS M. ELCOCK
GARY W. HARVEY
DAVID M. MCCARTHY
JAMES H. O'BRIEN
KIMBERLY M. SAILLANT
LINDA W. WILCOX
KATHRYN M. WINN+
DAVID E. MAGLIO ΔΔ
KEVIN S. WREGE
MARY PAT RIELLY***
MARK W. MURPHY
JOSEPH F. STRUMSKI, JR.
MARK S. BODNER
MARK P. BAILEY
JANET MACNAB
JOSEPH A. SECKLER
CYNTHIA R. KOEHLER++
LAUREN B. PILLSBURY
RHONDA L. RITTENBERG
JANE B. PARKER

MARY M. PERRY
MICHAEL READY
SEAN J. MILANO***
LAURIE J. CONDOS
JOCELYN M. SEDNEY**
THOMAS A. MONTMINY*
JAMES E. McCAMBRIDGE, III
LAUREN MOTOLA-DAVIS
MICHAEL A. FAGER
PAUL E. MITCHELL
ROBERT M. MACK
CAROLE A. SAKOWSKI
MARIA E. COUSINEAU
JUDITH A. PERRITANO
DANIEL R. BURKE
STEPHEN P. HARTEN
KARYN T. HICKS
RANDALL L. SOUZA ΔΔ
GEORGE J. VOGRIN, JR.
DAVID W. HEINLEIN
CHARLES H. YELEN
JAMES M. FAY**

WRITER'S DIRECT DIAL NUMBER:

* ALSO MEMBER OF FLORIDA BAR
+ ALSO MEMBER OF NEW YORK BAR
Δ ALSO MEMBER OF NEW MEXICO BAR
† ALSO MEMBER OF MICHIGAN BAR
** ALSO MEMBER OF NEW HAMPSHIRE BAR
++ ALSO MEMBER OF MAINE BAR

ΔΔ ALSO MEMBER OF RHODE ISLAND BAR
†† ALSO MEMBER OF ALASKA BAR
*** ALSO MEMBER OF CONNECTICUT BAR
+++ ALSO MEMBER OF WASHINGTON DC BAR
** ALSO MEMBER OF MARYLAND BAR
++ ALSO MEMBER OF NORTH CAROLINA BAR

April 19, 1990

HAND DELIVERED

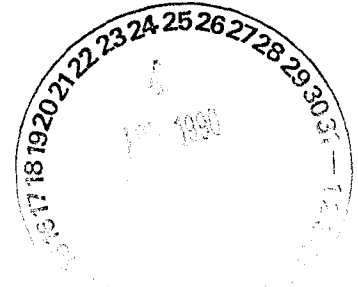
United States District Court
Civil Clerk's Office
1550 Main Street
Springfield, MA 01103

Re: Alice L. Warren, Administratrix of the Estate of
John H. Warren v. The Dow Chemical Company, et al
Civil Action No.: 89-30201-F
Our File No.: D-16183

Dear Sir/Madam:

Enclosed please find the following relative to the above:

1. Notice of Taking of Deposition of the Keeper of Records of The Monsanto Company;
2. Notice of Taking of Deposition of The Monsanto Company; and
3. Notice of Taking of Deposition of Ruth Griffin.



001740

MORRISON, MAHONEY & MILLER

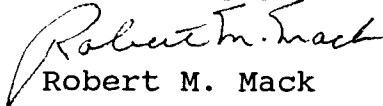
Civil Clerk's Office

April 19, 1990

Page 2

Thank you very much.

Very truly yours,


Robert M. Mack

RMM:dmb

Enclosures

cc: Lane McGovern, Esquire
Pierce O. Cray, Esquire
Ropes & Gray
One International Place
Boston, MA 02110

✓ James H. Tourtelotte, Esquire
Robinson, Donovan, Madden & Barry, P.C.
1500 Main Street
P.O. Box 15609
Springfield, MA 01115

001741

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ALICE L. WARREN, ADMINISTRATRIX)
OF THE ESTATE OF JOHN H. WARREN,)
DECEASED,)
Plaintiff,)

C.A. No. 89-30201-F

v.)

THE DOW CHEMICAL COMPANY,)
THE B.F. GOODRICH COMPANY,)
WHITTAKER DEVELOPMENT CO.)
(FORMERLY GREAT AMERICAN CHEMICAL)
CORPORATION), UNION CARBIDE)
COMPANY, AMERICAN CYANAMID)
CORPORATION, AND CONTINENTAL)
OIL COMPANY,)
Defendants.)

NOTICE OF TAKING DEPOSITION

To: Lane McGovern, Esq.
Pierce O. Cray, Esq.
Ropes & Gray
One International Place
Boston, MA 02110

James H. Tourtelotte, Esq.
Robinson, Donovan, Madden &
Barry, P.C.
1500 Main St., Suite 1400
Springfield, MA 01115

PLEASE TAKE NOTICE that, pursuant to the provisions of Fed.R.Civ.P., Rule 30, The B.F. Goodrich Company ("BFG"), a defendant in the captioned action, will, by its attorneys, Morrison, Mahoney & Miller, take the deposition upon oral examination of The Monsanto Company, by the person having charge of its records, at the offices of Morrison, Mahoney & Miller, 1145 Main Street, Springfield, Massachusetts, at 10:00 AM on Wednesday, May 2, 1990 before an officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

001742

The deponent is required to bring to the deposition the following documents:

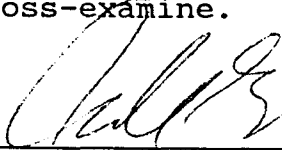
- A. the complete employment records of John H. Warren, including but not limited to all attendance records, applications, pay stubs, tax records, disciplinary records, evaluations, accident records or infirmary or health care records;
- B. all literature (including but not limited to correspondence, memoranda, booklets, brochures, flyers, pictures, diagrams, photographs, films, video or audio tapes) pertaining to worker safety or chemical exposure made available to John H. Warren during his employment by Monsanto;
- C. all invoices, receipts, ledgers or other records (whether physically or electronically recorded) memorializing the purchase, delivery, storage or utilization of vinyl chloride utilized at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;
- D. any and all charts or diagrams or documents of whatever description memorializing or depicting the corporate structure of Monsanto between January 1, 1947 and January 1, 1983, inclusive;
- E. any and all documents in the possession of Monsanto or of any of its agents, officers, employees, directors or servants between January 1, 1947 and January 1, 1983, inclusive (whether physically or electronically recorded) which memorialize, relate or refer to:
 - 1) any information with regard to the physical or health effects of exposure to vinyl chloride;
 - 2) any information with regard to the physical or health effects of exposure to any chemicals to which John H. Warren was exposed (other than vinyl chloride) during his employment with Monsanto;

- 3) any studies, surveys or health monitoring pertaining to the health or safety of Monsanto employees who were exposed to or utilized vinyl chloride between January 1, 1947 and January 1, 1983, inclusive;
- F. any and all industrial hygiene or worker safety reports pertaining to or referring to any and all Monsanto employees employed at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;
- G. any and all collective bargaining agreements pertaining to the Springfield facility or any Monsanto employees employed at the Springfield facility in effect between January 1, 1947 and January 1, 1983, inclusive;
- H. any documents of whatever description relating to or referring to or memorializing any complaint or grievance pertaining to worker health or safety (or the processing of any such grievance) at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive.

You are invited to attend and cross-examine.

Date: 4/18/90

I certify that this document has been served upon all counsel of record in compliance with the F.R.C.P.


Mark S. Granger
Joseph E. Rendini
Morrison, Mahoney & Miller
Attorneys for Defendant
B.F. Goodrich Company
250 Summer Street
Boston, MA 02210
(617) 439-7500

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ALICE L. WARREN, ADMINISTRATRIX)
OF THE ESTATE OF JOHN H. WARREN,)
DECEASED,)
Plaintiff,)

C.A. No. 89-30201-F

v.)

THE DOW CHEMICAL COMPANY,)
THE B.F. GOODRICH COMPANY,)
WHITTAKER DEVELOPMENT CO.)
(FORMERLY GREAT AMERICAN CHEMICAL)
CORPORATION), UNION CARBIDE)
COMPANY, AMERICAN CYANAMID)
CORPORATION, AND CONTINENTAL)
OIL COMPANY,)
Defendants.)

NOTICE OF TAKING DEPOSITION

To: Lane McGovern, Esq.
Pierce O. Cray, Esq.
Ropes & Gray
One International Place
Boston, MA 02110

James H. Tourtelotte, Esq.
Robinson, Donovan, Madden &
Barry, P.C.
1500 Main St., Suite 1400
Springfield, MA 01115

PLEASE TAKE NOTICE that, pursuant to the provisions of Fed.R.Civ.P., Rule 30(b)(6), The B.F. Goodrich Company ("BFG"), a defendant in the captioned action, will, by its attorneys, Morrison, Mahoney & Miller, take the deposition upon oral examination of The Monsanto Company at the offices of Morrison, Mahoney & Miller, 1145 Main Street, Springfield, Massachusetts, at 10:00 AM on Wednesday, May 2, 1990 before an officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

001745

The Monsanto Company ("Monsanto") will designate one or more directors, managing agents or other persons to testify who is or are most knowledgeable about the following topics:

1. Monsanto's employment of John H. Warren, including but not limited to the following:
 - a. all job titles held by, all job duties performed by and all job descriptions describing the employment of John H. Warren;
 - b. all training and equipment furnished to John H. Warren by Monsanto;
 - c. the identification, including the names and addresses of the manufacturers and distributors and the dates of purchase by Monsanto, of all chemicals and chemical compounds handled by John H. Warren or to which he was exposed in the course of his employment by Monsanto;
 - d. the nature, extent, degree, time, place and duration of any exposure to any chemicals or chemical compounds experienced by John H. Warren in the course of his employment by Monsanto;
 - e. the physical dimensions, description and general appearance of all worksites where John H. Warren worked in the course of his employment by Monsanto;
 - f. all warnings, cautions or instructions given to John H. Warren relating to exposures to any chemicals or chemical substances by Monsanto or any of its agents, employees, servants, officers or directors;
 - g. all physical injuries or illnesses suffered by John H. Warren during his employment by Monsanto;

- h. the names, job titles and current or last-known addresses of all Monsanto employees who either:
 - 1) held any job title the same as that held by John H. Warren between January 1, 1947 and January 1, 1983, inclusive, or
 - 2) had any supervisory responsibilities with respect to John H. Warren;
- 2. The purchase of vinyl chloride for use at Monsanto's facility in Springfield, Massachusetts ("the Springfield facility") between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:
 - a. the dates of all purchases of vinyl chloride;
 - b. the names and addresses of all manufacturers or distributors from whom vinyl chloride was purchased;
 - c. a description of all documents of whatever kind maintained at any time by Monsanto to memorialize any purchase of vinyl chloride;
 - d. the names and current or last known addresses of all Monsanto employees whose duties included the purchase of, or supervision of the purchase of, vinyl chloride for use at the Springfield facility;
- 3. The delivery of vinyl chloride to and storage of vinyl chloride at the Springfield facility between January 1, 1947 and January 1, 1983, including but not limited to:
 - a. all documents of whatever kind maintained at any time by Monsanto to memorialize the delivery of vinyl chloride to or the storage of vinyl chloride at the Springfield facility;

- b. all containers or devices used to store or transport vinyl chloride within the Springfield facility;
 - c. the names, job titles and current or last known addresses of all Monsanto employees whose duties included receiving or storing vinyl chloride at the Springfield facility;
- 4. The manufacture or production by Monsanto or by any corporation or business entity owned by, controlled by or affiliated with Monsanto of vinyl chloride between January 1, 1947 and January 1, 1983, inclusive;
- 5. The corporate structure of Monsanto between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:
 - a. all corporations or business entities owned by, controlled by or affiliated with Monsanto through common ownership or control or otherwise, and the functions served or products produced by any such corporations or business entities;
 - b. the ownership and control of the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;
 - c. the production and sale of vinyl chloride.
- 6. The utilization of vinyl chloride at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:
 - a. all chemical, industrial or manufacturing processes in which vinyl chloride was utilized;
 - b. all products in whose manufacture vinyl chloride was utilized;
 - c. all Monsanto employees whose duties included the utilization of or

supervision of any processes involving the utilization of vinyl chloride;

- d. the physical dimensions, location and general appearance of all work sites or work stations within the Springfield facility in or at which vinyl chloride was utilized;
 - e. all equipment or materials used in the process of utilizing vinyl chloride within the Springfield facility;
7. All information known to Monsanto or to any of its agents, employees, officers, directors or servants between January 1, 1947 and January 1, 1983, inclusive, pertaining to or relating to the physical or health effects of exposure to:
- a. vinyl chloride;
 - b. all chemicals or chemical compounds to which John H. Warren was exposed during the course of his employment;
8. All studies or surveys pertaining to the state of health of or the incidence of disease among any Monsanto employees who worked at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive, including but not limited to the names and current or last known addresses of all individuals who designed, conducted, or supervised the design or conduct of any such studies or surveys;
9. All measures taken to monitor or promote or safeguard the health and safety of Monsanto employees who were exposed to or who utilized vinyl chloride between January 1, 1947 and January 1, 1983, inclusive, including but not limited to:
- a. all safety equipment furnished to employees;
 - b. all instructions, warnings or cautions given to employees;

- c. all health monitoring or care provided to employees;
- 10. The names, dates of employment, job titles, job descriptions, duties, responsibilities and current or last known addresses of all individuals employed by Monsanto between January 1, 1947 and January 1, 1983 who had responsibility for industrial hygiene or worker safety at the Springfield facility;
- 11. The location, description, purpose and contents of any industrial hygiene or worker safety reports or records pertaining to or referring to any and all Monsanto employees employed at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;
- 12. The names and current or last known addresses of all labor union officers, stewards or business agents or any other collective bargaining representatives who represented John H. Warren or any bargaining unit of which he was a member during his employment with Monsanto;
- 13. All complaints or grievances pertaining to worker health or safety brought against or presented to Monsanto by any:
 - a. Monsanto employee at the Springfield facility between January 1, 1947 and January 1, 1983, inclusive;
 - b. union officer, steward or business agent or any other collective bargaining representative who represented John H. Warren or any bargaining unit of which he was a member during his employment with Monsanto;

The individual or individuals designated to testify are required to bring with them to the deposition the following documents:

- A. the complete employment records of John H. Warren, including but not limited to all attendance records, applications, pay stubs,

tax records, disciplinary records, evaluations, accident records or infirmary or health care records;

- B. all literature (including but not limited to correspondence, memoranda, booklets, brochures, flyers, pictures, diagrams, photographs, films, video or audio tapes) pertaining to worker safety or chemical exposure made available to John H. Warren during his employment by Monsanto;
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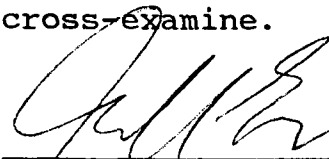
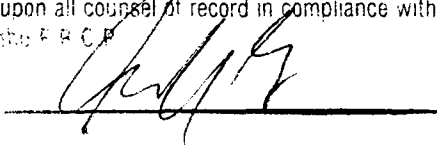
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You are invited to attend and cross-examine.

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Mark S. Granger
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Attorneys for Defendant
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250 Summer Street
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