

FILE NAME: Wagner (WAG)

DATE: 2016 Feb 15

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DOCUMENT DESCRIPTION: Letter to Barry Castleman from Jacobs & Crumplar
RE Barlow vs. Wagner Co.



**Jacobs &
Crumplar, P.A.**
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February 15, 2016

BARRY I. CASTLEMAN
Environmental Consultant
P.O. Box 188
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**Re: Herbert Barlow v. Charles A. Wagner Co., Inc., et al.
C.A. No. 14C-02-024, Del. Super, Ct.**

Dear Dr. Castleman,

I write to request that you testify at trial in Wilmington, DE on June 13, 2016. This trial that involves our plaintiff, Herbert Barlow, who worked at the Dupont Seaford plant from July 1965 until May 1971, during which he used and was exposed asbestos sweeping compound supplied by defendant, Charles A. Wagner Co., Inc. Asbestos Corporation Limited is also a defendant in this case as it supplied fiber to Wagner.

For information regarding Wagner, I have enclosed our opening brief on appeal in multi cases that was filed in the Delaware Supreme Court in March 2003, as well as the appendix to the brief which includes supporting documents and testimony regarding Wagner and its presence at the Dupont Seaford plant. In addition, enclosed are the following:

1. Wagner's answers to interrogatories;
2. Memo of National Paint, Varnish and Lacquer Assoc. dated 7/18/39;
3. National Paint, Varnish and Lacquer Assoc.'s Abstract Review of HAZARDS: Dusts, Fumes, and Mists in Industry, Anon., -Nat. Safety News, 87, No. 89-93, 95-105 (June 1963);
4. OSHA S&H Bulletin 10, July 19, 1972 to National Paint & Coatings Assoc.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Raeann Warner', is written over a horizontal line.

Raeann Warner

RW:pra

Enclosure
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