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Warren v. C
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NUTTER, McCLENNEN & FISH

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2699

TELEPHONE: 617 439-2000 FACSIMILE: 617 973-9748

DIRECT DIAL NUMBER:

January 23, 1991
18371-1

Keeper of the Medical Records for
Paul M. Quinlan, Ph.D.
Behavioral Science Associates
380 Union Street
West Springfield, MA 01089

Re: Alice L. Warren v. The Dow Chemical Company,
et al., C.A. No. 89-30201F

Dear Sir or Madam:

Please be advised that this office represents the
defendants Union Carbide Chemicals and Plastics Company, Dow
Chemical Company and Conoco, Inc. in the above-referenced
case. As part of our pretrial discovery in this case we need
to examine all the medical records of Alice Louise Warren of 40
Midway Street, Indian Orchard, Massachusetts 01151. To this
end, you are being served with a Notice of Taking Deposition
and Deposition Subpoena requesting you to bring these records
to the office of Nutter, McClennen & Fish, One International
Place, Boston, MA 02110-2699 on Monday, February 25, 1991 at
10:00 a.m. *filed CP 1/23/91*

Also CP 1/25/91

Since our main objective is to obtain the records
themselves, we would not require you to appear for deposition
if you would agree to forward the requested records to us as
soon as possible. If you decide to do so after being served
with the subpoena, please indicate this by checking the box
provided at the bottom of this letter and returning it to me by
return mail. A self addressed stamped envelope is enclosed for
your convenience.

Very truly yours,

Sharon R. Burger

Sharon R. Burger

RECEIVED

FEB 0 1 1991

J. R. DOWNEY

SRB/bjm
Enclosure

/ / I hereby agree to produce the requested records and will
forward them to you immediately.

bcc: John R. Downey, Esq.
Judith Elledge, Esq.
Mary Sundt, Esq.
Ms Yolanda Jackson

UCC 081620