

8/27/87 R.C. Wice - pls quickly review and let me know
to R.L. Hollingshead. pls call UCC.

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August 24, 1987

Peter F. Davey, Esq.
Union Carbide Corporation
Law Department
39 Old Ridgebury Road
Danbury, CT 06817-0001

RECEIVED

AUG 27 1987

P. DAVEY

Re: Peterson, et al. v. Union Carbide

Dear Peter:

Enclosed please find a copy of Interrogatories that were served on us by the plaintiffs in the above-entitled matter. The answers are due on October 21.

Please recall that in my letter of April 27, 1987 I mentioned that I need to contact someone in the management of Amboy Terminals Company to arrange for a tour and to learn about the working conditions for these plaintiffs. Also, I indicated that I would like to know who at Union Carbide has taken Nick Wheeler's place as our resident expert on PVC/VCM. I would appreciate it if you would call me with this information as soon as possible. When you call, we can also discuss the information that we need to gather to answer the plaintiffs' Interrogatories.

I look forward to your call.

Sincerely,

ROBERT L. HOLLINGSHEAD

RLH:js
Enclosure

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 088927

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AUG 10 1987

P. J. BARRY

4817

August 6, 1987

C
Alfred A. Levinson, Esq.
Levinson, Conover, Axelrod,
Wheaton & Grayzel, P.C.
Lincoln Plaza
2 Lincoln Highway
Edison, New Jersey 08818

Re: John Peterson and Shirley Mae Peterson, et al.
vs. Union Carbide Corporation
Docket No. L-060148-87

Dear Mr. Levinson:

P
In connection with the above matter, we hereby serve you with an original and two copies of Initial Interrogatories to Plaintiffs John Peterson and Shirley Mae Peterson propounded by Union Carbide Corporation to be answered in accordance with the rules governing the courts of New Jersey.

Please review the "Definitions" section so that the answers will be fully responsive.

Very truly yours,

ROBERT L. HOLLINGSHEAD

Y
RLH:lk
Enclosures

Certified Mail
Return Receipt Requested

✓ bcc: Peter S. Dav y, Esq. (wo/e)

UCC 088928

~~RECEIVED~~

AUG 10 1987

PITNEY

August 6, 1987

C
Alfred A. Levinson, Esq.
Levinson, Conover, Axelrod,
Wheaton & Grayzel, P.C.
Lincoln Plaza
2 Lincoln Highway
Edison, New Jersey 08818

P
Re: John Peterson and Shirley Mae Peterson
et al. v. Union Carbide Corporation
Docket No. L-060148-87

Dear Mr. Levinson:

P
In connection with the above matter, we hereby
serve you with an original and two copies of Initial
Interrogatories to Plaintiff Donald D'Elia propounded by
Union Carbide Corporation to be answered in accordance
with the Rules Governing the Courts of New Jersey.

Please review the "Definitions" section so that
the answers will be fully responsive.

Very truly yours,

R. L. HOLLINGSHEAD

Y
RLH/ht
Encls.
Certified Mail - RRR

bcc: ~~Peter P. Barry, Esq.~~
UCC Law Department E-2,39
Old Ridgebury Road
Danbury, Connecticut 06817-0001

UCC 088929