

LAW OFFICES
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A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS AND PROFESSIONAL CORPORATIONS

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December 30, 1988

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SCHENECTADY, NEW YORK

COX DEFENSE GROUP

ATTENTION: Woodrow W. Ban, Esquire (B.F. Goodrich)
Beverly Gholson, Esquire (Georgia Gulf)
Ms. Linda E. Hart (For Maxus Energy)
Richard J. Lorenz, Esquire (Tenneco Oil)
James V. O'Gara, Esquire (Union Carbide)
Marina K. Pita, Esquire (Conoco)

RE: *Wanda Cox v. Georgia Gulf Corporation, et al.*

PERSONAL AND CONFIDENTIAL

#9675

STATEMENT

For professional services rendered from November 26, 1988,
through December 25, 1988, including:

November 28, 1988 (Donald A. Cockrill)
Review status of case.

.....00 hours, 30 minutes

November 28, 1988 (Mary Lou Hill)
Letter to Defense Group; review letter from Ms. Gholson;
review letter from Mr. White; draft document responses;
telephone conference with Mr. Wally Culp regarding bar
meeting and scheduling order; trip to federal courthouse,
attend bar meeting; conferences with Messrs. Danny White,
Jim Watson and Robert Ariail regarding scheduling; service of
amended complaint and discovery.

.....05 hours, 30 minutes

November 29, 1988 (Mary Lou Hill)
Telephone conference with Mr. O'Gara regarding responses to
document requests; draft, revise and finalize documents and
responses for service; telephone conference with Mr. John
Endicott regarding document responses and affidavit; draft
affidavit of Endicott; telephone conference with Mr. Wally
Culp regarding reply brief; draft reply to plaintiff's anticipated
brief.

.....05 hours, 15 minutes

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 079307

November 30, 1988 (Mary Lou Hill)

Draft answers to amended complaint and document responses;
review document responses of Sumitomo.

..... 01 hour, 30 minutes

December 1, 1988 (Mary Lou Hill)

Telephone conferences with Mr. Tom Reitz regarding
document responses; review PVC shipment records of Stauffer;
revise and finalize Occidental Chemical Company's document
responses; review plaintiff's response to motion for Cox
Summary Judgment.

..... 02 hours, 45 minutes

December 2, 1988 (Mary Lou Hill)

Review letter from Clerk of federal court scheduling motion
for hearing; review motion for summary judgment response
from plaintiff; telephone conference with Mr. White regarding
reply brief.

..... 01 hour, 15 minutes

December 5, 1988 (Mary Lou Hill)

Telephone conference with Mr. Jim Watson regarding filing of
response brief; research adverse case law; telephone
conference with Ms. Gholson regarding plaintiff's response
brief and settlement; draft reply brief.

..... 06 hours, 15 minutes

December 5, 1988 (Donald A. Cockrill)

Review plaintiffs opposition to motion for summary judgment.

..... 01 hour, 00 minutes

December 6, 1988 (Donald A. Cockrill)

Telephone conference with Defense Group in-house counsel
regarding settlement possibilities.

..... 00 hours, 30 minutes

December 6, 1988 (Mary Lou Hill)

Telephone conference with Defense Group attorneys
regarding settlement; telephone conferences with Mr. O'Gara,
Mr. Bann, Mr. Endicott, Beverly Gholson, and Marina Pita;
draft reply brief; telephone conference with Judge Anderson's
law clerk regarding extension of time to reply; legal research
and draft reply.

..... 08 hours, 15 minutes

December 6, 1988 (William S. Rutchow)

Research and review cases, draft response memorandum.

..... 06 hours, 15 minutes

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December 7, 1988 (Mary Lou Hill)

Draft reply to plaintiff's memorandum; telephone conference with Mr. Ron Perry, Mr. Jim O'Gara, and Ms. Linda Hart regarding settlement.

.....08 hours, 00 minutes

December 7, 1988 (William S. Rutchow)

Revise response memorandum regarding cases cited by plaintiff concerning "sophisticated user defense".

.....00 hours, 45 minutes

December 8, 1988 (Donald A. Cockrill)

Review response to plaintiffs' opposition to defense summary judgment motion; legal research on cases cited by plaintiff.

.....01 hour, 30 minutes

December 9, 1988 (Mary Lou Hill)

Telephone conference with Mr. Perry and telephone conference with Mr. John Endicott; draft response brief; finalize same.

.....06 hours, 45 minutes

December 9, 1988 (William S. Rutchow)

Review of Defendants' Response to Plaintiffs Responses to Defendants' Summary Judgment Motion.

.....01 hour, 00 minutes

December 12, 1988 (Mary Lou Hill)

Review letter and medical literature from Mr. Endicott; telephone conference with Mr. Watson regarding motion for summary judgment-oral argument; prepare for summary judgment oral argument at motion hearing; telephone conference with Mr. Robert Ariail regarding settlement.

.....01 hour, 00 minutes

December 13, 1988 (Mary Lou Hill)

Draft answer to amended complaint; prepare for oral argument on motion for summary judgment; telephone conference with Ms. Linda Hart.

.....05 hours, 30 minutes

December 14, 1988 (Donald A. Cockrill)

Review status of case.

.....00 hours, 30 minutes

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December 14, 1988 (Mary Lou Hill)

Prepare for and present oral argument before Judge Ross Anderson regarding motion for summary judgment; office conference with Mr. Danny White regarding motion and argument.

.....04 hours, 30 minutes

December 15, 1988 (Donald A. Cockrill)

Telephone conference with Ms. Hill regarding results of hearing before Judge Anderson on Summary Judgment motion; legal research on Oman case.

.....00 hours, 45 minutes

December 15, 1988 (Mary Lou Hill)

Telephone conference with Ms. Beverly Gholson regarding hearing on motion for summary judgment; telephone conference with Mr. Richard Lorenz regarding filing of answers to amended complaint and settlement; telephone conference with Marina Pita; finalize and serve answers to amended complaint.

.....01 hour, 15 minutes

December 16, 1988 (Donald A. Cockrill)

Telephone conferences with plaintiffs attorney Mr. Bob Ariail and Ms. Hill regarding possible settlement of case.

.....01 hour, 15 minutes

December 16, 1988 (Mary Lou Hill)

Telephone conference with John Few, Judge Anderson's law clerk; conference calls with defense group telephone conference with Mr. Bob Ariail; telephone conference with Mr. Drew Rhodes' office.

.....01 hour, 30 minutes

December 19, 1988 (Donald A. Cockrill)

Review settlement strategy.

.....00 hours, 30 minutes

December 19, 1988 (Mary Lou Hill)

Telephone conference with Mr. Drew Rhodes regarding Stauffer's waiver of workers compensation lien.

.....00 hours, 30 minutes

December 20, 1988 (Donald A. Cockrill)

Review settlement strategy.

.....00 hours, 15 minutes

December 20, 1988 (Mary Lou Hill)

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December 20, 1988 (Mary Lou Hill)

Telephone conferences with Mr. Danny White regarding settlement; telephone conference with Mr. Ariail's office; telephone conference with Mr. Rhodes regarding waiver of lien.

.....01 hour, 15 minutes

December 21, 1988 (Mary Lou Hill)

Telephone conference with Ms. Beverly Gholson regarding settlement negotiations; telephone conference with Mr. Ariail regarding settlement; telephone conference with Mr. O'Gara regarding settlement negotiations.

.....00 hours, 45 minutes

December 22, 1988 (Donald A. Cockrill)

Review status of settlement negotiations.

.....00 hours, 15 minutes

Donald A. Cockrill

07 hours 00 minutes @ \$150/hour

Mary Lou Hill

61 hours 45 minutes @ \$100/hour

William S. Rutchow

08 hours 00 minutes @ \$75/hour

.....\$7,825.00

Plus Expenses

Reproduction of Copies.....\$779.60

Long Distance Telephone Calls.....86.52

Federal Express.....149.22

Computer Research.....225.00

Expenses.....\$1,240.34

TOTAL SERVICES.....\$7,825.00

TOTAL EXPENSES.....1,240.34

TOTAL STATEMENT.....\$9,065.34

Prorated Share

Among Six Parties.....\$1,510.89

Please remit to the Greenville Office.

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[Handwritten signatures and notes]
Already Paid
1/25/89
T.W.R.
3/20/89