



August 6, 1981

The Sherwin-Williams Company
101 Prospect Avenue N.W.
Cleveland, Ohio 44115

Liberty Mutual Insurance Company
P. O. Box 5343
Cherry Hill, NJ 08002

Attn: Stan Barton
Claims Department

Re: **REDACTED**

Your File # HD327-6227(8)
D/I: 12/1/75

Dear Stan:

Enclosed is a copy of a Summons and Amended Complaint on the above matter as well as copies of some of our correspondence.

If my understanding is correct, Liberty Mutual should represent us in the subject suit under the Employer's Liability Section of our former workers' compensation policy. When the initial suit (notice-- this is an "amended" complaint) was filed we obtained outside counsel to represent us, namely, John Kearney of the law firm of Archer Greiner & Read in Haddonfield, New Jersey. Mr. Kearney was successful in having the initial suit totally dismissed; however, it was dismissed "without prejudice", which allowed the plaintiffs to file the enclosed amended complaint. Mr. Kearney would be pleased to discuss the case with you. His phone number is 609-795-2121.

Kindly advise me as soon as possible as to whether or not your company is bound to defend us in the above suit. You may contact me at 216-566-3064.

Thank you.

Very truly yours,

THE SHERWIN-WILLIAMS COMPANY

Thomas M. Locker
Administrator of Workers' Compensation

TML/ap
Encl.

cc: R. E. Bielek
J. B. Kearney

N40367