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August 28, 1989

VIA FEDERAL EXPRESS

John Downey, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

RECEIVED

AUG 29 1989

J. R. DOWNEY

Re: Peterson v. Union Carbide Corporation

Dear John:

Enclosed please find draft answers to the plaintiff's Supplemental Interrogatories in this matter. Please note that these answers were prepared following the receipt of proposed answers by Nick Wheeler, a conference with Nick in my office on August 16 and 17, and close scrutiny of the answers to five sets of Interrogatories in the Maliko case from 10 plus years ago.

You will note that several of the answers contain comments in brackets. Those comments are intended to remind either Nick or me as to certain follow-up steps that should be taken. For Nick, the primary follow-up is to check the accuracy of some of the information about OTD/ATC with Mr. Bowles or other individuals within Union Carbide. By another letter of this date, a copy of which is enclosed, I am asking Nick to kindly review the answers as soon as possible and complete whatever contacts he needs to make in order to verify the answers. If you can do the same, it would be greatly appreciated.

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John Downey, Esq.
August 28, 1989
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Betsy Weiss and I are looking forward to meeting you at our Morristown office on August 31 between 10 and 10:30 a.m. If you and Nick have completed your reviews by then, perhaps we can even finalize the answers at that time.

Sincerely,

Robert L. Hollingshead
ROBERT L. HOLLINGSHEAD (RH)

RLH:lh
Enclosure

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