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RECEIVED

DEC 20 1982

Corp., Risk Mgmt.

December 17, 1982

Mr. Thomas M. Locker
Administrator of Workers' Compensation
Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115

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Re: v. New Primex Realty
Associates v. The Sherwin-Williams Company

Dear Mr. Locker:

In response to your November 1, 1982 correspondence and documentation, I have a few additional requests.

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First of all, it is of the utmost importance that we locate personnel file, since part of our defense will be that even if there were cancer-causing materials in the Sherwin-Williams product as a contaminant or otherwise, nevertheless, her exposure to the product was of such a passing nature and of such short duration as to not be causative of her leukemia condition. Of special interest would be any pre-employment physical, any history of health problems she may have had during her period of employment, the number of days per week she worked and the number of hours per day she worked. If you do not have this at your national offices, perhaps something could be located in your Syracuse division.

At your response to my question at number 6, you indicated that benzene was not present in your paints at the time worked at your store. However, a testing done at your new location in May of 1979 indicated that there were traces of benzene present in the atmosphere. Would you kindly explain this further. For instance, did Sherwin-Williams use benzene as a thinner or in combination with any process it may have had as a preservative, etc.

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