

ATTN: W. WANGLE GOSHKIN, POLLATSEK AND MEREDITH

JACK E. GOSHKIN  
JACK A. POLLATSEK  
SAMUEL E. MEREDITH  
CHARLES F. LEE  
EDWARD L. BEGGS  
OF COUNSEL

ATTORNEYS AT LAW

22 BATTERY STREET  
SAN FRANCISCO 94111

TELEPHONE  
(415) 851-1400

(NOV 11 1974)

CLEVELAND

Given to JACK W/11  
Rec. 11-15-74  
Meredith

October 21, 1974

Liberty Mutual Insurance Company  
3505 Broadway  
Oakland, California

Re: Redacted v. Sherwin Williams Paint Co.

Gentlemen:

Redacted

We have now received notice that the matter has been set for hearing in Oakland on December 11, 1974 before Referee Beulah Olsen. The case is scheduled to last all day. I have made arrangements to have Dr. Anthony Cosentino present to testify in the afternoon of that day.

I think that we should have someone from the insured's plant present to testify as to what this man has been exposed to and the general conditions of the area in which applicant worked. Our primary defense is, of course, a medical one but I note that the applicants and the lien claimant have indicated that they intend to present lay witnesses to testify to the conditions in which applicant worked. I think that we would do well to have someone in the position of authority there to rebut evidence of exposure to toxic subject matter. In addition, if the applicants produce a co-employee it might be good to have someone in the position of authority over them present to help keep their testimony in line. I note that Robert Burke was the decedent's supervisor but that apparently he was being transferred to New Jersey. I don't think that it would be worth the expense to your insured or to you to fly Mr. Burke out here to testify. However, I would like to get someone who was in a position of authority over the decedent and who could testify to the conditions at the plant. (See ask)

Let me know who to expect from Sherwin Williams.

Very truly yours,

Samuel E. Meredith

N40579

0007-SWP-005503984

LIBERTY  
MUTUAL



PLEASE DIRECT REPLY TO SENDER AT:  
LIBERTY MUTUAL INSURANCE CO.  
LIBERTY MUTUAL INS. CO.  
MOSSWOOD PARK BLDG.  
3505 BROADWAY  
OAKLAND, CA 94611

TO GOSHKIN, POLLATSEK & MEREDITH  
ATTORNEYS AT LAW  
22 BATTERY STREET ATTN: S. Meredith  
SAN FRANCISCO, CALIFORNIA 94111

CITY STATE ZIP

SUBJECT Redacted - Sherwin Williams (FILE OR POL) Redacted

MESSAGE Dear Sam,

With regards to your 10/21/74 letter, please be advised  
that Mr. Roy Weidman, supervisor of varnish and lacquer  
plants will be present for trial on December 11, 1974 @  
9AM @ WCAB 141 Jackson Street, Oakland, Ca.

He will be accompanied by Mr. Jim Wilson, Director  
of Security to help in keeping information and date  
correct.

I have sent a copy of this memo to Jim Wilson

DATE 11-6-74

SIGNED

Russell O. Kay

REPLY

cc Cleveland Claims  
cc Sherwin/Williams  
To Jim Wilson  
P.O. Box 23505  
Oakland, Ca

N40579.01

DATE

SIGNED

0007-SWP-005503985  
CONFIDENTIAL