

*Bill  
UCC*  
**From:**  
**Peter F. Davey**

**E3255**  
**Ext. 6255**

October 10, 1984

To: Mr. O. H. Cunningham  
Mr. E. D. DeLoughy

Re: Dorothy Bell v. Union Carbide  
Corporation, et al.

*filed 10/12/84*  
The attached is for your information.

PFD

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ORDER"

UCC 071798

12/5  
EDEL

BAKER & BOTTS  
ONE SHELL PLAZA  
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[RECEIVED]

OCT 5 1984

P. F. DAVEY

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AUSTIN, TEXAS 78701

D-25,854  
Dorothy Bell v. Union  
Carbide Corporation, et al.

October 2, 1984

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Mr. Peter Davey  
Union Carbide Corporation  
Old Ridgebury Road  
Danbury, CT 06817

Dear Peter:

I have spoken with George Scott, whose name was provided to me by yourself or Dr. Glenn, as being a person who may have some knowledge about suppliers of vinyl chloride monomer to the Texas City Plant. Mr. Scott is currently with Gulf Oil, and his telephone number in Houston is 754-4125. Another former Union Carbide employee named Mike Parker who was in purchasing at Texas City in 1973-74 works with Scott, and I had the benefit of hearing from both of them. Scott was in production at Texas City from 1957 to 1965 and was the product manager in New York for suspension PVC which would have included the Texas City vinyl chloride function from 1974 to 1977.

Scott says that all of the VCM which was received at Texas City was of Dow origin. In 1973 and 1974 Robintech and a Japanese concern formed a joint venture called Shintech which was building a plant and receiving VCM even though not yet ready to process it. As a result, the Texas City plant received some VCM from Shintech either directly or through brokers which it tolled. It, however, was of Dow origin.

In 1977 there was an explosion at the Texas City plant and as a result the VCM manufacturing facility was inoperable. As a result, Scott was trading Dow origin VCM which Union Carbide had received and having it tolled at Shintech, Diamond and Stauffer into PVC. This, however, would have been again Dow origin VCM and being tolled at other plants so the plaintiffs would not have come into contact with it at all.

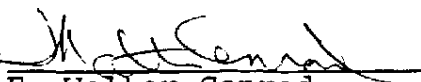
UCC 071799

I asked Scott about the list of companies you recently provided to me including GAF, Armstrong World, Uvalde Rock, etc. Scott explained that these companies provided Dow origin VCM to Union Carbide which tolled it into PVC and furnished it back to the customer.

While it is still possible that some of the companies on the list which fall outside of the dates about which Scott has awareness sold VCM to Union Carbide, it appears that at least during the period of Scott's presence that all of the VCM received was of Dow origin.

Sincerely yours,

BAKER & BOTTS

By:   
F. Walter Conrad

FWC:118

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