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Lit file

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PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

Re: Luis Aramis Cosme Ruiz, et als. v. Union Carbide Caribe Puerto Rico, Inc., Kemper National P & C Co., Oscar Castro Barnes,
Superior Court of Puerto Rico, Bayamón Part, Civil No. 91-0298

Dear Mr. Downey:

There have been some new developments in the referenced case. I have interviewed various persons who assert that plaintiff Luis Cosme has been working driving his taxi until last month when he got suspicious that we were following him. Only one of these persons, Ms. Olga Díaz is willing to testify but only as a last resort. According to the information provided, Mr. Cosme is supposed to get married within the next two months to a girl half his age. Apparently, Mr. Cosme and his girlfriend filed income tax returns together last year representing themselves as married. During his deposition, a few months ago, Mr. Cosme denied that he has been working and that he has filed income tax reports.

I am in the process of verifying the above information. Tomorrow I will be citing Mr. Cosme's girlfriend for a deposition as well as her parents. I will also subpoena the documents from Rochdale, the taxi company, and several banks. Hopefully we will obtain enough admissible evidence to make Mr. Cosme withdrawal his complaint.

Cordially,

Nereida Meléndez
Nereida Meléndez

cc: Mr. D.E. Belfiore

UCC 075956