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NORMAN GORDON
EMPLOYEE BENEFITS
SR. LEGAL ASSISTANT

AUG 6 1988
ROSEANN RUSSO
ADMINISTRATOR

July 5, 1988

Laughlin, Falbo, Levy & Mores
Calendar

JUL 12 1988

Alfonso J. Moresi, Esq.
LAUGHLIN, FALBO, LEVY & MORESI
ICEHOUSE II
151 Union Street, Suite 300
San Francisco, CA 94111-1221

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ASM

RE: deceased) v.
SHERWIN WILLIAMS COMPANY and
INSURANCE COMPANY OF NORTH AMERICA
WCAB Case No.: OAK 141300
P&A File No.: 2574

Dear Mr. Moresi:

This office has been retained by Pacific Employers Insurance Company, workers' compensation carrier for Sherwin Williams from August 31, 1982 through July 1, 1984. My initial information is that the insurance coverage only applied to the facility located at 2756 Eldorado Street in San Leandro.

I do not yet know where worked. If he worked at that location then obviously there is no insurance coverage question. If he did not work at that location then we should promptly join the appropriate carrier on behalf of Sherwin Williams.

Since you seem to have assumed a coordinating role in this matter, would you please obtain copy from Sherwin Williams of personnel file and provide that to me. Also, because it will be necessary to present evidence regarding asbestos exposure or lack of asbestos exposure as well as evidence regarding safety procedures both as to how they relate to exposure and as how they relate to the negligence issue, would you please provide me with the identity of those people at Sherwin Williams who are in the best position to testify regarding these matters

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or in the best position to provide the appropriate documentation that may be necessary.

Thank you.

Very sincerely yours,

LAW OFFICE OF BILL PARRISH

Bill Parrish
BILL PARRISH

BHP:ps

cc: Insurance Co. of North America
Attn: Clayton Johnson

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