



INTERNAL CORRESPONDENCE

P. O. BOX 471, TEXAS CITY, TEXAS 77360

TO: Ms. Betty Lynn White
Law Dept - E2281
Danbury Office

DATE: January 31, 1984

CC: Mr. D. B. Whittington
Dr. D. H. Glenn
Ms. Noreen Pritchett

RE: Dewey Bell, Deceased
(T&P Retiree 10/1/82)
vs. Dow Chemical Co.
Subpoena For Direct Quest

DECLASSIFIED

Dear Ms. White:

Per my recent conversation with John Day, I enclose a copy of the subpoena for direct questions responded to today in the subject suit for your records. As no records are maintained locally on vinyl chloride purchases, the current contacts in the General Purchasing Department have been named for obtaining further information.

Mr. Bell has been terminally ill due to Glioblastoma since his total and permanent disability retirement 10/1/82, and died January 6, 1984. He filed a claim for Worker's Compensation in April, 1982, and a copy of the negative Employers Report was sent to John Whittlesay by Dr. D. H. Glenn on April 21, 1982.

According to Noreen Pritchett, our Kemper representative, several pre-hearings on this case have been scheduled but cancelled by his attorney, David A. Slaughter. In the meantime, he has been loading Kemper's file with medical data. To date, no compensation has been paid, of course.

The above information is furnished for your background information only at this time as I complete this subpoena request. Any further inquiries should be directed to Mr. D. B. Whittington as I am now in another assignment and have no responsibilities in benefits administration and worker's compensation litigation matters.

Sincerely,

D. C. Heyen
ER Staff Administrator

DCH:ar
Enclosures

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SUBJECT TO PROTECTIVE
ORDER"

UCC
059013

Dewey Bell, et ux : Plaintiff

vs

G - 83 - 48
Civil Action Number

Dow Chemical Co : Defendant

Direct questions to be propounded to the witness, Custodian of Records for Union Carbide Corporation.

1. Q. Has Dewey Bell ever been an employee of Union Carbide Corporation?

A. Yes

2. Q. For each position or job description which Dewey Bell has ever held with Union Carbide, please state the following:

- a. The position or job title:
- b. The dates that Dewey Bell held the position:
- c. The duties which Dewey Bell performed:
- d. The names and current addresses of Dewey Bell's supervisor(s) in the position or job function:
- e. Whether Dewey Bell worked with vinyl chloride or any products containing vinyl chloride:
- f. If he did work with such products, what activity or work he performed with the product:

2. A. Job #1

- a. Laborer
- b. 5/27/55 to 11/12/63
- c. General labor work - no job description exists.
- d. Unknown specifically for this period. See Exhibit I for names of all supervisors of record.
- e. No record of any exposure.
- f. Ditto "e".

Job #2

- a. Tool Room Attendant
- b. 11/12/63 to 12/1/71
- c. No job description exists - General storekeeper activity in tool supply - check tools in and out.
- d. See Exhibit I - unknown specifically this period.
- e. No record of any exposure.
- f. See "a".

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2. A. Job #3

- a. Maintenance Supervisor
- b. 12/1/71 to 9/29/81 (Last Day Worked)
- c. Supervised various types of maintenance jobs being performed in areas to which he was assigned.
Area #4 (8 years) - #3 Olefins, Docks, Linear Alcohols,
Normal paraffins
Area #3 (3 Years) Ditto above + In-Plant Distribution
- d. See Exhibit I
- e. No record of exposure
- f. See "e"

3. Q. Does Union Carbide have any records of purchase of vinyl chloride? If so, who is the custodian of such records and what is his title?

A. Yes.

E. F. Krainer, General Purchasing Department
Union Carbide Corporation
Old Ridgebury Road
Danbury, Conn. 06817

4. Q. If Union Carbide has any record of purchase of vinyl chloride or products containing vinyl chloride, please state the following for each product:

- a. From whom it was purchased:
- b. The dates of purchase:
- c. The name and quantity of the product purchased:
- d. Any invoice numbers pertaining to the purchase of such products:
- e. Attach a copy of such invoices to this deposition:

A. Vinyl chloride has been purchased from the following vendors; however, contract copies nor invoices are retained at this location. All such records are in the custody of Union Carbide Corporation's General Purchasing Department. See Question 3 for contact:

Dow Chemical Company
PPG Industries
Stauffer Chemical Company
Diamond Shamrock Corporation

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Witness (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared _____, Custodian of Records for Union Carbide Corporation, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, and acknowledged to me that the answers to the foregoing questions are true as stated. I further certify that the records attached hereto are exact duplicates of the original records.

Given under my hand and seal of office this _____ day of _____, 1984.

Notary Public in and for the
State of Texas

David A. Slaughter
Attorney for Plaintiff
Dewey Bell, et ux
TX# 18488000

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EXHIBIT I

ATTACHMENT - SUPERVISORS

J. P. Alexander - Retired - Route 2, Box 235, Livingston, Texas 77351
R. F. Bobbitt - Retired - Date Of Death: 7-19-79
P. B. Botting - Active - 109 Bayou Drive, Hitchcock, Texas 77563
T. O. Blum - Active - 1525 22nd Avenue North, Texas City, Texas 77590
J. R. Dement - Active - 3518 Sweeney, Dickinson, Texas 77539
T. F. Drummond - Retired - 808 18th Avenue North, Texas City, Texas 77590
J. T. Floyd - Active - 2709 Belmost, Dickinson, Texas 77539
J. A. Fredericksen - Address Unknown - Left Carbide
R. E. Kirkland - Retired - 3707 Rau, Dickinson, Texas 77539
E. C. Pauls - Retired - 214 West Bayou Drive, Dickinson, Texas 77539
P. R. Schmeppe - Active - P. O. Box 8361, South Charleston, West Virginia 25303
(Engr - Tech Center)
E. E. White - Retired - 1109 Estates Drive, La Marque, Texas 77568

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