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May 14, 1976

Executive Committee, Board of  
Directors  
Asbestos Information Association/NA  
1660 L Street, N.W.  
Suite 601  
Washington, D.C. 20036

Gentlemen:

We are pleased to learn from your representative, G.G. Gabrielson, Jr., that Asbestos Information Association/NA ("AIA"), after rather extensive discussion with Wendell Alcorn, desires to retain Cadwalader, Wickersham & Taft as special counsel to consult with you regarding litigation arising from claims of asbestos-related diseases. Herein are outlined the undertakings we view as appropriate on an initial basis, following our meeting yesterday with Mr. Gabrielson.

We will review past and pending significant cases, analyzing the legal and factual issues generally involved. A product of the review should be an assessment of the validity of each defense in the several contexts and jurisdictions in which they have been presented. Included in this effort will be a restatement of the current posture of the so-called "state of the medical art defense".

Another function which we would undertake to perform is dependent upon completion of research by one or more medical specialists. We understand such specialists

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WASHINGTON OFFICE

May 14, 1976

Mr. Guy G. Gabrielson, Jr.  
President  
Nicolet Industries, Inc.  
Ambler, Pennsylvania

Re: AIA Special Counsel

Dear Guy:

Enclosed is the letter to the Executive Committee which you requested. Please let us know if you have any further questions or comments.

With very best personal regards, I remain

Sincerely,

*Wendell*  
Wendell B. Alcorn, Jr.

WBAjr./man  
Enc.

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