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PLAINTIFF'S EXHIBIT

FD-1514

Inter Office

Transmission and Chassis Division
General Office

February 24, 1984

To: Mr. E. M. Nelson
Mr. J. M. Poe
Mr. R. S. Pomaroli
Mr. R. L. Smith
Mr. R. L. Wabeke

cc: Mr. R. J. Donnellan
Mr. M. B. Leyda
Mr. M. L. South

file
Subject: Asbestos Litigation

The attached communication from Mr. R. J. Donnellan, of the office of General Counsel, serves to emphasize the growing need to come to grip with the "asbestos problem".

Because Mr. Donnellan's request is all inclusive, a written response would be difficult, accordingly after personal contact he has agreed to:

- Attend the March 1, 1984 Division Asbestos Meeting as an observer.
- He will send a legal assistant to the writer's office, 10:00 a.m., February 27, 1984, to review communications policy letters, etc., as currently retained in our files.

R. D. Byrom
R. D. Byrom

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Inter Office

Office of the General Counsel

February 17, 1984

TO: M. L. South
Transmission-Chassis Division

FROM: Robert J. Donnellan

RE: Asbestos Litigation

The Company is involved in litigation in which it is alleged that our products or components containing asbestos caused or contributed to asbestosis and other diseases. These diseases generally take twenty or more years to develop after the inhalation or ingestion of asbestos fibers.

Asbestos is used in brake linings, pads and clutch facings. It also is used in sealers, gaskets, adhesives, undercoating, and other parts and materials. In addition, the Company's facilities may have insulation and other materials that contain asbestos. Your Company activity seems to have had some involvement with asbestos and may have had involvement with asbestos substitutes.

Because of extensive discovery requests and in further preparation for the defense of this type of litigation, I am contacting some activities within the Company to obtain documents and information. Because most asbestos-related diseases have unusually long incubation periods, the Company should try to account for the period from 1930 to the present.

I should appreciate it if you would let me know if your activity has any documents related to asbestos or asbestos substitutes. The documents might include purchase orders, specifications, proposals, tests, memoranda, and reports. Please contact me on extension 33750, or Ms. Nancy Oatley on extension 35347. (Ms. Oatley is the paralegal assisting in this area.) Once I know some more about what documents you may have, we can discuss a review of the documents.

Robert J. Donnellan
Robert J. Donnellan

RJD/npc

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