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Warren v VCC
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NUTTER, McCLENNEN & FISH

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May 10, 1990
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John R. Downey, Esq.
Union Carbide Chemicals and Plastics Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, CT 06817-0001

RECEIVED

MAY 14 1990

J. R. DOWNEY

Judith Elledge, Esq.
Conoco Inc.
600 North Derry Ashford
P.O. Box 2197
Houston, Texas 77252-2197

Mary Sundt, Esq.
The Dow Chemical Company
D30 Willard H. Dow Center
Midland, Michigan 48674

Re: Alice L. Warren, Administratrix
v. The Dow Chemical Company, Union Carbide, et al

Dear John, Judy and Mary:

I enclose copies of two letters dated May 4, 1990 from Joseph Rendini, along with the enclosures.

I have reviewed briefly the Answer and Jury Claim of Goodrich to the Amended Complaint. The Answer itself is unremarkable. The sheer number of affirmative defenses (32) is, on the other hand, unusual. I would doubt that Goodrich through its counsel seriously intends to pursue all of these defenses in this case. ✓

As to the medical records from Monsanto concerning John Warren, I am forwarding them to you without having first reviewed them. In fact, the medical records remain a portion |

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NUTTER, McCLENNEN & FISH

John R. Downey, Esq.
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Mary Sundt, Esq.
May 10, 1990
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of the file which I have not yet reviewed and I hope to speak with Mary regarding the review of medical records performed (or to be pereformed) at Dow before undertaking my own review.

Best regards.

Very truly yours,

Sharon (g.)

Sharon R. Burger

SRB/jlf
enclosures
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