

7-20-79

Cyprus Mines Corporation

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CONFIDENTIAL

Mr. Chet Oliver
Oliver & Company
1 New York Avenue
Atlantic City, N.J. 08401

July 19, 1979

Dear Mr. Oliver:

In confirmation of our telephone conversation of July 19, 1979, you are authorized to investigate the lawsuit Thomas E. Westfall and Elizabeth Westfall versus Whittaker, Clark & Daniels, et al versus Metropolitan Talc Company, for Cyprus Mines Corporation. As I have indicated, Mr. Westfall, as an employee of Uniroyal, allegedly contacted mesothelioma from breathing in talc while employed at a rubber plant in Rhode Island. Talc may have been provided by Whittaker, Clark & Daniels, a sales agent for Metropolitan. Cyprus is in the process of acquiring Metropolitan Talc Company and thus the investigation must be completed by August 17th.

Questions which we have developed are as follows:

- 1) We need the details of this claim including other defendants.
- 2) We need the full employment history of Mr. Westfall, including employers, plants, construction of plants, i.e. asbestos type material, materials worked with including the trade names of talcs, medical history including smoking, prior workers' compensation or liability claims submitted, protective clothing worn during employment.
- 3) We need the full history of product shipments and dates from Whittaker, Clark & Daniels to Uniroyal such as Canada or New York talc.
- 4) We need details on Metropolitan talc operations, including dates, limits and provisions of insurance coverage relating to this claim, production of crude and source of crude talcs.

PLAINTIFF'S
EXHIBIT
CAM-145

P X D Ex. No.: 7
Deponent: P. DOWNEY
Date: 3/23/16
Shirley Q. Casilan, CSR No. 12361

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Mr. Chet Oliver

-2-

July 19, 1979

Obviously the acquisition of Metropolitan by Cyprus is confidential including the details of this claim. In no way do we want to inhibit Metropolitan's defense of this claim, but rather enhance the defense.

Very truly yours,



Jeffrey W. Paul
Assistant Treasurer

JWP/kei
Enclosure
cc: J. Andrews, J&H

bcc: K. F. Julin ✓
H. T. Mulryan
G. D. Lessner

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