

THE GEON COMPANY

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Gregory L. Rutman
Vice President,
General Counsel
and Secretary

June 17, 1994

To Legal Committee of the Vinyl Institute

RE: Legal research on Greenpeace related issues

RECEIVED

JUN 21 1994

Sherry M. Carr

As some of you may know, I assumed leadership of the Legal Committee of the Vinyl Institute.

On Friday June 17, 1994 the Executive Committee of the VI authorized engagement of outside counsel to review legal strategy and issues raised by the recent spate of Greenpeace anti-PVC literature.

I need your help. There follows a list of requirements identified for any outside counsel we retain. Please feel free to add to this list and most importantly give me your suggestions of any individuals you may know that are potentials. When the list gets narrowed, I will consult with you on final selection. We will, of course, consider Keller & Heckman in the process, particularly since they have just associated with a litigation firm.

OUTSIDE COUNSEL REQUIREMENTS

- National reputation as knowledgeable in State & Federal free speech issues, product disparagement, tortious interference with contractual rights, and fraud issues. Must have technical/chemical experience.
- A firm that has no qualms about taking on Greenpeace if it comes to that
- A firm that is known to have reputable, conservative billing practices
- A firm that has handled similar cases for other clients
- An experienced litigator with mature judgment who eats nails for breakfast.

Please call me ASAP with your ideas and comments.

Regards,

G.L. Rutman

cc: Bob Burnett VI
Peter de la Cruz-Keller & Heckman

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To: S. Carr	From: G. Rutman	
Co: Centric Teed-	Co: Geon Co	
Dept:	Priority: 216 447-6001	
Fax #: 215 341-7797	Ext: 3	

** TOTAL PAGE.001 **

*Called & informed
Mr. Rutman's Secretary
that you are in
agreement
mg 6/23/94
3:41 PM*

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