PLAINTIFF'S EXHIBIT 1718.0

Knowlton Exh 3
8/13/85

DEPOSITION EXHIBIT 92 BALDWIN

PLAINTIFF'S EXHIBIT WV-10960

ASBESTOS DEFENSE SEMINAR - PITTSBURGH CORNING

Essential Elements for Claim Files

Much can be done to eliminate unnecessary paperwork that we find in many of our asbestos files. It is not necessary for our attorneys to send us copies of every legal document produced during discovery. This is both costly in photocopy expenses and space consuming by making thicker files. We should limit documentation to that needed to evaluate the exposure of the insured and co-defendants, the plaintiff's alleged losses, and the claimant's medical condition. Most of that information can be obtained from The Summons and Complaint, medical records, deposition summaries (if depositions were taken), answers to the insured's interrogatories, product identification (both the insured's and co-defendants), lost wage information and any compensation liens, and our defense counsel's evaluations based upon local law, etc. Since in most jurisdictions Travelers conducts the actual settlement negotiations with plaintiff counsel or the defense group, it is necessary for us to receive the above listed information rather than rely on our attorneys to summarize this material for us. Additionally, Travelers has different needs other than just evaluating the cases, such as documentation of our files for subrogation purposes with other carriers and satisfaction of excess carrier reviews.

John Baldwin

Baldwin was contacted with reference to setting a meeting date for him to come to the Hartford area. He stated that he would be busy during the rest of April and then spend two weeks in Europe in early May. He will call Travelers the latter part of May and advise us of a convienent date. When queried as to what topics he wanted to discuss, Baldwin stated that he had no specific problem areas, but he wanted to discuss our operation as part of his ongoing education process in the asbestos litigation.

Approach of Pittsburgh Corning and their Corporate Attorneys

Travelers has always been concerned about Pittsburgh Corning's attempt to downplay the Tyler and Port Allegany history and their attempt to place first knowledge of the dangers to insulators in the mid to late 1960's. We have handled these cases on the basis that Pittsburgh Corning has a limited to non-existent state of the art defense, despite their arguments to the contrary. Many of our local defense attorneys have expressed concern about Pittsburgh Corning's approach to the asbestos litigation, and through our National Coordinator, Neil Danaher, Travelers has attempted to provide our attorneys with a realistic assessment of our exposure in view of industry knowledge, etc.

For obvious reasons, Pittsburgh Corning has attempted to separate the Tyler and Port Allegany claims from the insulator/shipyard claims, and Travelers concurs. However, we believe local counsel cannot be kept in the dark about those plants. We educate selected counsel of Tyler/Port Allehany discovery on a need to know basis. It should be noted that Pittsburgh Corning did not want to mention anything about Tyler/Port Allegany at our seminar, and their presentation was at our insistance.

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Clark Ex 7
Parsons Ex 5

Caliber of Pittsburgh Corning Local Defense Counsel

Comments regarding the caliber of attorneys is generally correct. Most of our counsel are very competent, but have taken a secondary role behand Johns-Manville counsel, thus may not appear as well versed as they should. We know where our problem areas are (Cleveland, Mississippi, West Virginia and Denver), and these attorneys were specifically invited to our siminar in hope of educating them in various aspects of the asbestos litigation. In areas like Cleveland, Mississippi, West Virginia and Colorado, Travelers will attempt to settle out of the remaining cases for Pittsburgh Corning. If that is not possible, we are prepared to replace counsel as we did in Philadelphia.

Our New York (Maloney) and Boston (Cooley) attorneys are considered very competant by the Travelers staff and by our National Coordinator. While Cooley can be opinionated and aggressive, and Maloney somewhat reserved, they both work well with our staff and appear able to try cases if necessary. Our Pittsburgh counsel (McConnell) has only eight cases, and we do not expect to have any problem settling those cases. It should be noted that McConnell is a member of the Dickie, McCamey and Chilcote firm, who act as national coordinators for PPG Industries in the asbestos cases. McConnell only handles the Pittsburgh Corning files.

Donald C. Clark
Assistant Manager

DCC:mmr

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