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January 8, 1987

S. Robert Princiotta, Esq.
Marcus & Levy
Valley National Bank Building
80 Broadway (Route 4)
Elmwood Park, New Jersey 07407

Re: Memice v. PPG Industries, et al

Dear Mr. Princiotta:

On January 5, 1987 I received the set of Interrogatories which you had been granted leave by Judge Mandak to serve upon the defendants. I thought Judge Mandak had made it crystal clear that you were limited to ten single-question interrogatories within a narrowly defined range of relevance. I am sure that you will recall that I expressed my concern to Judge Mandak in this regard and that the Judge granted us leave to appear before him on short notice if the interrogatories were not consistent with his direction.

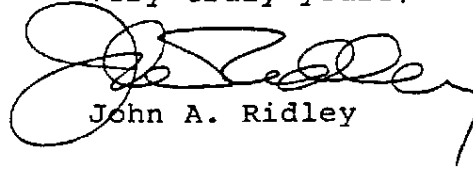
I have major substantive objections to the interrogatories you served. To take just one example out of many, your Interrogatory No. 4 which asks whether my client "recognizes that VCM could cause or result in cancer...." is totally inappropriate given Judge Mandak's direction. While I do not propose to rewrite your interrogatories to my client for you, I do request that you review these interrogatories in light of Judge Mandak's direction and contact me immediately in order that we may discuss a revision of these interrogatories so that they are consistent with the Court's Order. Unless I hear from you in this regard by the middle of next week, I will have no alternative other than to request a hearing before Judge Mandak, at which time I will ask for costs. I frankly

URL 21797

CRUMMY, DEL DEO, DOLAN, GRIFFINGER & VECCHIONE

assume that other defense counsel will do likewise, although I am not authorized in any way to speak on their behalf with respect to these interrogatories. If, for any reason, I am unavailable when you call, please speak with my associate, Rochelle Sobel.

Very truly yours,

A handwritten signature in dark ink, appearing to read "John A. Ridley", with a large, stylized flourish extending from the end of the signature.

JARld

cc: All Counsel of Record

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