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LAW OFFICES
OGLETREE, DEAKINS, NASH, SMOAK AND STEWART

A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS AND PROFESSIONAL CORPORATIONS

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February 5, 1989

COX DEFENSE GROUP

ATTENTION: Woodrow W. Ban, Esquire (B.F. Goodrich)
Beverly Gholson, Esquire (Georgia Gulf)
Ms. Linda E. Hart (For Maxus Energy)
Richard J. Lorenz, Esquire (Tenneco Oil)
James V. O'Gara, Esquire (Union Carbide)
Marina K. Pita, Esquire (Conoco)

OTHER OFFICES:
ATLANTA, GEORGIA
WASHINGTON, D. C.
RALEIGH, NORTH CAROLINA
COLUMBIA, SOUTH CAROLINA
NASHVILLE, TENNESSEE
ALBANY, GEORGIA
SPARTANBURG, SOUTH CAROLINA
SCHENECTADY, NEW YORK

RE: *Wanda Cox v. Georgia Gulf Corporation, et al*

PERSONAL AND CONFIDENTIAL

#10073

STATEMENT

For professional services rendered from December 26, 1988,
through January 25, 1989, including:

December 27, 1988 (Donald A. Cockrill)

Review denial of summary judgment motion.

.....00 hours, 30 minutes

December 27, 1988 (Mary Lou Hill)

Review order regarding motion for summary judgment;
telephone conferences with Mr. Bob Ariail, Ms. Beverly
Gholson, Mr. John Endicott and Mr. Wally Culp regarding
same; letter to defense group.

.....01 hour, 30 minutes

January 3, 1989 (Donald A. Cockrill)

Review status of settlement.

.....00 hours, 30 minutes

January 3, 1989 (Mary Lou Hill)

Review Formosa motion for summary judgment and
memorandum; review letter from Mr. Brad Martin regarding
dismissal of Sumitomo; review letter and caselaw from Ms.
Gholson; review answer of Formosa to Amended complaint.

.....01 hour, 00 minutes

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January 4, 1989 (Donald A. Cockrill)
Review status of case; telephone conference with defense group regarding same.
..... 01 hour, 00 minutes

January 4, 1989 (Mary Lou Hill)
Telephone conference with group defense counsel; telephone conference with Mr. Woody Ban regarding joint and several liability issues; telephone conference with Ms. Glenda Frost (Marina Pita's office); research regarding tort uniform act, joint and several liability and special interrogatories.
..... 02 hours, 00 minutes

January 5, 1989 (Mary Lou Hill)
Legal research regarding tort reform act, joint tortfeasors, liability and contribution and telephone conference with Ms. Pita regarding same.
..... 01 hour, 00 minutes

January 6, 1989 (Mary Lou Hill)
Review requests for admissions; letter to defense group regarding same.
..... 00 hours, 30 minutes

January 9, 1989 (Donald A. Cockrill)
Review plaintiffs' request to admit; review needed legal research and status of case.
..... 00 hours, 45 minutes

January 9, 1989 (Mary Lou Hill)
Telephone conference with Mr. Danny White regarding discovery trial tactics and settlement negotiations; review Notice of Bar Meeting and letter to defense group.
..... 01 hour, 00 minutes

January 10, 1989 (Donald A. Cockrill)
Review status of case and additional work needed; telephone conference with defense group members regarding settlement and trial strategy.
..... 01 hour, 30 minutes

January 10, 1989 (Devin M. Ehrlich)
Research regarding liability of de minimis joint tortfeasor.
..... 01 hour, 15 minutes

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January 10, 1989 (Mary Lou Hill)

Telephone conference with Mr. Danny White; telephone conference with defense group regarding settlement; telephone conference with Mr. Endicott regarding settlement and discovery; research regarding tort reform act 1988; telephone conference with Mr. Bob Ariail regarding settlement conference.

.....03 hours, 45 minutes

January 11, 1989 (Donald A. Cockrill)

Legal research on causation issue.

.....00 hours, 45 minutes

January 11, 1989 (Devin M. Ehrlich)

Research regarding liability of de minimis joint tortfeasor.

.....01 hour, 30 minutes

January 11, 1989 (Mary Lou Hill)

Telephone conference with Ms. Gholson; telephone conference with Judge Anderson's law clerk regarding settlement conference; telephone conference with Mr. Danny White regarding meeting; telephone conferences with Mr. Ariail and Mr. Ban regarding settlement.

.....01 hour, 30 minutes

January 12, 1989 (Donald A. Cockrill)

Telephone conference with Mr. Danny White regarding settlement and trial strategy; telephone conference with Mr. Endicott regarding settlement authority; review Mr. Endicott's memo regarding defense arguments to present to court during pretrial conference.

.....01 hour, 30 minutes

January 12, 1989 (Mary Lou Hill)

Telephone conference with Mr. Drew Rhodes' office regarding waiver of lien; telephone conference with Ms. Pita regarding settlement.

.....00 hours, 45 minutes

January 13, 1989 (Donald A. Cockrill)

Travel to Greenville to represent group at hearing before Judge Anderson; review trial preparation; telephone conference with Mr. Ariail regarding possible settlement.

.....07 hours, 30 minutes

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January 13, 1989 (Mary Lou Hill)

Respond to request for admissions from Mr. Ban; prepare for and attend settlement conference; review settlement strategies and theories of defendants; telephone conference with Mr. Endicott regarding settlement.

.....05 hour, 00 minutes

January 16, 1989 (Donald A. Cockrill)

Review status of settlement.

.....00 hours, 15 minutes

January 16, 1989 (Mary Lou Hill)

Telephone conference with Mr. White regarding trial preparation; telephone conference with Mr. Rhodes regarding setting up depositions of Dr. Northrup and Mr. Cliff Gandis; telephone conference with defense group regarding settlement and outcome of meeting with Judge Anderson.

.....01 hour, 30 minutes

January 17, 1989 (Mary Lou Hill)

Telephone conference with Mr. Ariail regarding scheduling depositions of plaintiff's experts; telephone conference with Mr. Rhodes regarding scheduling depositions of Dr. Northrup and Mr. Gandis.

.....00 hours, 30 minutes

January 18, 1989 (Donald A. Cockrill)

Review status of settlement and discovery; telephone conference with defense group regarding same.

.....01 hour, 15 minutes

January 18, 1989 (Mary Lou Hill)

Conference call with defense group regarding settlement; telephone conference with Mr. White regarding trial preparation; telephone conference with Mr. Rhodes regarding depositions; review interrogatories and document production requests from Formosa.

.....02 hours, 30 minutes

January 19, 1989 (Donald A. Cockrill)

Telephone conference with Mr. Ariail regarding status of settlement possibilities.

.....00 hours, 45 minutes

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January 19, 1989 (Mary Lou Hill)
Telephone conference with Mr. White regarding trial preparation; review letter from Mr. Ariail; review settlement and trial tactics.
.....01 hour, 00 minutes

January 20, 1989 (Donald A. Cockrill)
Telephone conference with defense group regarding status of settlement.
.....00 hours, 45 minutes

January 20, 1989 (Mary Lou Hill)
Telephone conferences with Mr. White regarding scheduling depositions of expert witnesses; trial preparation; review letter from Mr. Lorenz; telephone conferences with defense group regarding settlement; review medical journal articles from Mr. Endicott.
.....03 hours, 15 minutes

January 23, 1989 (Donald A. Cockrill)
Review status of settlement and telephone conference with defense group regarding same; telephone conference with Mr. Ariail regarding final offer.
.....01 hour, 00 minutes

January 23, 1989 (Mary Lou Hill)
Review discovery requests of defendant Formosa to plaintiff; review Formosa 16(b) interrogatories; telephone conference with Mr. Ariail regarding settlement; telephone conference with defense group regarding settlement; telephone conference with Mr. Culp regarding settlement; draft settlement documents.
.....02 hours, 30 minutes

January 24, 1989 (Donald A. Cockrill)
Review status of settlement.
.....00 hours, 15 minutes

January 24, 1989 (Mary Lou Hill)
Telephone conference with Mr. Danny White regarding settlement; telephone conferences with Ms Linda Hart and Mr. Rhodes regarding settlement; draft settlement documents.
.....03 hours, 00 minutes

January 25, 1989 (Donald A. Cockrill)
Review status of settlement.
.....00 hours, 15 minutes

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January 25, 1989 (Mary Lou Hill)

Telephone conferences with Messrs. White, Culp, Ariail and
Ban regarding settlement, release documents and settlement
check; draft letter to Mr. Doug Tally (Risk International)
regarding settlement draft.

..... 01 hour, 30 minutes

Donald A. Cockrill

18 hours 30 minutes @ \$150/hour

Mary Lou Hill

33 hours 45 minutes @ \$100/hour

Devin M. Ehrlich

02 hours 45 minutes @ \$75/hour

.....\$6,383.75

Plus Expenses

Reproduction of Copies\$39.00

Long Distance Telephone Calls.....110.69

Trip to Greenville, SC on January 13, 1989.....67.50

Computer Research.....275.00

Expenses\$492.19

TOTAL SERVICES.....\$6,383.75

TOTAL EXPENSES.....492.19

TOTAL STATEMENT.....~~\$6,383.75~~

6,875.94

Prorated Share

Among Six Parties.....~~\$1,145.99~~

Please remit to the Greenville Office.

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