

CIT 155077
CP

SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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125th
Anniversary
1866-1991

November 9, 1994

Gregory D. Winfree, Esq.
Union Carbide Law Dept. - E3-282
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Eirven y. UCC&P
Stevenson v. UCC&P

Dear Greg:

CP 11/4/94

Enclosed is a copy of the Joint Motion to Extend Time to Identify Experts in the Eirven matter, which we received from Reggie Wood, along with his letter to Catherine Baen regarding outstanding discovery matters in the Eirven and Stevenson matters.

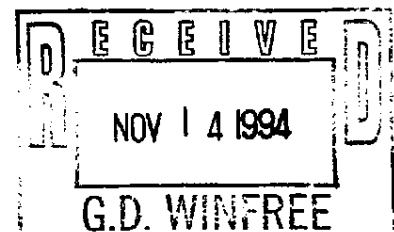
Sincerely,

Ted Theophilos (SR)

Theodore J. Theophilos

TJT/sr
Enclosure

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"



UCC 073329



617155047
CO

UNION CARBIDE CORPORATION
SOLVENTS & COATINGS MATERIALS DIVISION

November 8, 1994

VIA FAX

Theodore J. Theophilos, Esq.
Sidley & Austin
875 Third Avenue
New York, NY 10022

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"**

Re: **Eirven v. UCC&P**

Dear Ted:

This note is to let you know the first shipment of documents is leaving the plant this afternoon. The following explains the boxes leaving 11/8/94:

- Box 1: Original SVR documents
- Box 2: Original SVR documents (smaller box)
- Box 3: Original SVR documents
 - a. Please note file "OSHA Citation, July 1974"
 - b. Please note file "OSHA Regulation Legal Considerations"
(This file is located immediately following the "Gas Mask" file)
- Box 4: Industrial Hygiene Monitoring Data 1974 - 1989 (smaller box)
(Do not need to copy this box)

As we discussed, Boxes 1 - 3 will be copied, and the original documents will be returned to the plant. I have not had time to look through these documents but there appears to be a lot of IH monitoring data in them as well as some training records.

Tomorrow, I will ship some more boxes with a general explanation of each. When you get a chance, can you fax or mail the action items I could not get printed for you last Friday afternoon? Thanks.

Sincerely,

Karen M. Myers

/km

4 Boxes via Airborne Express for 11/9/94 arrival
✓ bcc: Greg Winfree, Esq.

