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Peterson v. UCC
CORR.

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August 1, 1989

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AUG 02 1989

J. D. DOWNER

John Downey, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Peterson v. Union Carbide
Corporation

Dear John:

Enclosed please find copies of Mr. Levinson's letter of July 28, 1989 and the expert report of Dr. Burton Davidson on behalf of the plaintiff in this action. I have been advised by Mr. Levinson that he intends to use at least one other expert, Dr. Samuel Epstein. I expect to receive that report in the near future. Please note that Drs. Davidson and Epstein also served as plaintiff's experts in the Maliko case.

I will be in touch with you shortly to discuss the retention of our experts.

Sincerely,

Robert L. Hollingshead
ROBERT L. HOLLINGSHEAD (RH)

RLH:lh
cc: Mr. Nick Wheeler
(w/enc.)

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 088633

B7-31-89

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A PROFESSIONAL CORPORATION

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JULY 28, 1989

Robert L. Hollingshead, Esq.,
163 Madison Avenue
Morristown, N.J. 07960-1945

Dear Mr. Hollingshead:

Re: Peterson v. Union Carbide

Please be advised that I wish to supplement answers to interrogatories to set forth that I will call upon Dr. Burton Davidson, an expert, at the time of trial to testify on behalf of the plaintiff herein and in that connection, I am enclosing a copy of his report for your file.

Unless I hear from you to the contrary, I shall assume you will accept this letter in lieu of more formal answers herein.

Very truly yours,

ALFRED A. LEVINSON

AAL:ff
enc.

UCC 088634

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