

MEMORANDUM

TO: Doug Cohen, Esq.
FROM: Charles McCrea, Esq.
RE: Telephone Call from Bill Snyder
DATE: March 27, 1992

Following are persons (by name or position) who we will want to depose once the Ninth Circuit has disposed of the Petition for Rehearing (presumably in our favor):

1. The people from GE, Westinghouse and Monsanto who prepared MSDS for PCBS.
2. The Indianapolis attorney and political kingpin (I will soon have his name) retained by GE who visited Governor Bayh of Indiana in an attempt to get him and the Indiana State Board of Health to disavow a study produced by NIOSH (Tom Sinks) and the Indiana State Board of Health (Greg Steel, an epidemiologist) showing the correlation of mortality statistics and PCB exposure.
3. Ed Bates, Manager of a GE manufacturing plant in New York.
4. Author of correspondence in California GE case (?).
5. Dr. Kelly of Monsanto (I think this is the chap that regularly takes the Fifth Amendment).
6. Mr. Pappageorge of Monsanto.
7. Don Sauter, Manager of the Westinghouse plant in Bloomington, Indiana.

Bill Snyder thinks there likely will be 300 to 400 requests for admissions. He also informs me that Mike Schroeder, a reporter for Business Week, is writing an article on the PCB cancer report which I distributed to you and Randall yesterday. This will appear in the April 6 edition of Business Week (available starting March 27). The news of this study also is likely to hit other publications, in view of the truly alarming increase in the rates of breast cancer and the striking correlation of breast cancer with the presence of PCBs in breast tissue. As recently as 15 years ago, a woman's chances of contracting breast cancer were 1 out of 19. Today, the chances are 1 out of 9.

Schroeder also informs Bill Snyder that if the Nevada Power decision holds in the Ninth Circuit, he will write an article on the Nevada Power case.

cc:J. Randall Jones

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