

Cleveland

Insurance

Cleveland

Legal

July 23, 1971

A. D. Childs

REDACTED

Workmen's Compensation Claim
(Deceased) vs.
The Sherwin-Williams Co.

The attached set of Interrogatories was sent to us to be signed by an officer.

In reviewing our files, we note that the above captioned former employee at our Bound Brook Plant died on December 14, 1967 of a condition described as brain metastasis-carcinoma of lung. The widow, has alleged that her husband's death was caused by an exposure to noxious fumes and substances which aggravated a pre-existing condition of carcinoma of the lungs.

Our carrier, Liberty Mutual, has denied liability and has taken the position for us that the decedent's death was due to causes unrelated to and independent of his employment with us. We have also raised the statute of limitations as a defense.

The attached Interrogatories were prepared with the assistance of F. W. Bartelme of our Bound Brook Plant and Mr. Edward Fialaka who was production supervisor. I have checked with Fred Bartelme and he tells me that the answers to the Interrogatories are the correct answers to the best of his knowledge.

The last set of Interrogatories carried a Certification with them which was amended slightly by you before signing. If you have any objection to signing the current Certification in its present form, I see no reason why you couldn't amend it as you feel appropriate.

I'll see that the signed copies are transmitted to Liberty promptly. Thanks for your cooperation.

R. J. MALONE

RJM/bas
Encl.

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