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October 21, 1986

Peter F. Davey, Esq.
Union Carbide Corporation
Law Department
39 Old Ridgebury Road
Danbury, Connecticut 06817-0001

Re: Memice v. PPG Industries, et al.

Dear Peter:

Enclosed please find a copy of Interrogatories which were served on me yesterday by counsel for the defendant Shintech, Inc. The answers are due on December 22.

I was under the impression that the defendants had informally agreed that they would not take discovery against one another, but I am not sure if Shintech was present at those discussions. I will check that out and advise you if it will be necessary to answer these Interrogatories.

Sincerely,

ROBERT L. HOLLINGSHEAD

RLH:js
Enclosure

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 076845

1 5/4 Morrison (w/10)
2 E. K. L.

PITNEY, HARDIN, KIPP & SZUCH

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[RECEIVED]

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October 17, 1986

Peter F. Davey, Esq.
Union Carbide Corporation
Law Department
39 Old Ridgebury Road
Danbury, Connecticut 06817-0001

Re: Memice v. PPG Industries, et al.

Dear Peter:

Enclosed please find copies of the following:

1. An Order dated October 10, 1986 providing that the plaintiff shall answer the Interrogatories of Borden and Monochem by October 24 and that the plaintiff's deposition shall be conducted on November 5, 1986.

2. A letter of October 10, 1986 from plaintiff's attorney, S. Robert Princiotto, together with his Notice of Cross Motion for a protective order, seeking to extend his time to respond to the Interrogatories of Monsanto and PPG.

On the subject of Interrogatories, please note that I have advised plaintiff's counsel that Union Carbide will rely upon the Interrogatories propounded by the Tompkins firm on behalf of the PPG group.

Sincerely,

Bob

ROBERT L. HOLLINGSHEAD

RLH:js
Enclosures

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
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ORDER"**

UCC 076846

MARCUS & LEVY
ATTORNEYS AT LAW

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*Member N.J. & Fla. Bar
*Certified Civil Trial Attorney

October 10, 1986

John M. Mayson, Clerk
SUPERIOR COURT OF NEW JERSEY
HUGHES JUSTICE COMPLEX
CN-971
Trenton, NJ 08625

Re: Memice v. PPG Industries, Inc., et al
Docket No. L-20509-86

Dear Sir:

Enclosed herewith for filing is an original Notice of Cross-Motion on behalf of the Plaintiffs, together with Affidavit in support of same. This Motion is returnable on October 24, 1986.

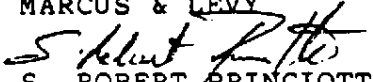
By copy of this correspondence, true copies of these enclosures are being filed with the Passaic County Clerk and served upon counsel for all Defendants.

In accordance with R.1:6-2, we are requesting that the above matter be decided on the moving papers alone and we are forwarding to the Passaic County Clerk, an original and three copies of a proposed Order, together with a self-addressed stamped envelope. We ask that the Clerk kindly submit same to the appropriate Judge for his approval and signature and that a copy of said Order be returned to the undersigned.

Thank you for your attention in this matter.

Very truly yours,

MARCUS & LEVY


S. ROBERT PRINCIOTTO

SRP:amr
Enclosures

cc: Passaic County Clerk, w/encs.
Stryker, Tams & Dill, Esqs., w/encs.
Tompkins, McGuire & Wachenfeld, Esqs., w/encs.
Crummy, DelDeo, Dolan, Griffinger & Vecchione, Esqs., w/encs.
Shanley & Fisher, Esqs., w/encs.
Budd, Lerner, Kent, Gross, Picillo, Rosenbaum, Greenberg
& Sade, Esqs., w/encs.
W. Stephen Leary, Esq., w/encs.
Goodman & Lustgarten, Esqs., w/encs.
Pitney, Hardin, Kipp & Szuch, Esqs., w/encs. ✓

UCC 076847

From:

Peter F. Davey
Law Department
E3-255

(203) 794-6255

Olga - CB has
her copy of

Re: Menice v. PPE Industries
et al.
dated
10/15/86

Grace, L.J. - Don't know
if Temp sent the
originals to you - pls.
be sure to keep all of this

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