

October 10, 1969

Mr. Edison A. Picklesimer
Claims Manager
Liberty Mutual Insurance Company
Liberty Mutual Building
240 South Harrison Street
East Orange, New Jersey 07019

REDACTED

Re:

C324-447277

Dear Mr. Picklesimer:

Recently Mr. Michael Rosler of your staff forwarded to Mr. DeCastro, Personnel Manager of our Newark Plant, a set of Interrogatories issued in connection with the above captioned claim. It will be a function of this Department to complete and return to you, the Interrogatories. We are endeavoring at the present time to complete each of the questions to the best of our knowledge.

One of the questions recited requests the name and address of each co-worker and immediate supervisor with respect to the departments in which the claimant worked. Since the claimant was a "long-service" employee and normal turnover in some of the departments in which he worked were quite substantial, the task involved represents virtually weeks of going through files. Nevertheless, we are making an attempt to go through our current records and obtain as much of a list as we can beginning with the most recent dates and working backwards.

Of more concern to us are the questions relating to the materials handled by the claimant and the chemical composition of them. This is probably an impossible burden. We've talked to our lab people and they have simply thrown their hands up in frustration. The claimant worked in the Receiving and Stores Department for the greatest period of his employment and therefore handled everything that has gone into the manufacturing of paint from 1949 to 1967. To ask us to list all of the materials and their chemical composition would require a man working full time on this particular question for the next 8 or 9 years. We're not even sure we can resurrect records dating back that far. Your guidance on this point would therefore be appreciated.

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