

1745- 417
Colby v. C
Coke

PITNEY, HARDIN, KIPP & SZUCH

(MAIL TO)
P.O. BOX 1945
MORRISTOWN, NEW JERSEY 07962-1945

ROBERT L. HOLLINGSHEAD

DIRECT DIAL NUMBER
(201) 966-8017

(DELIVERY TO)
200 CAMPUS DRIVE
FLORHAM PARK, NEW JERSEY 07932

FLORHAM PARK (201) 966-6300
NEW YORK (212) 926-0331

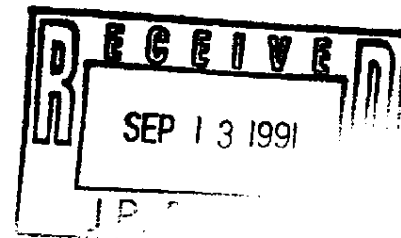
TELEX 642014
FACSIMILE (201) 966-1550

NEWARK OFFICE
33 WASHINGTON STREET
NEWARK, NEW JERSEY 07102
(201) 623-1960

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
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ORDER"

September 11, 1991

John R. Downey, Esq.
Union Carbide Chemicals
and Plastics Company, Inc.
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001



Re: Colby v. Union Carbide

Dear John:

Please be advised that we have been served with (1) Interrogatories, (2) Supplemental Interrogatories, and (3) Requests for Admissions from the plaintiffs' attorneys in this matter. The answers to the Interrogatories and Supplemental Interrogatories will be due on November 5, 1991. The answers to the Requests for Admissions will be due on October 5, but I have obtained an extension until November 5 for those answers, too.

All of these discovery requests appear identical to those in the Peterson and Bernadino cases. Therefore, I will prepare identical answers wherever possible. To the extent that I require additional information, I will let you know. When the answers are prepared, I will send them to you for your review.

I am not sending you copies of these discovery items at this time because of their volume and because I do not believe that you need to see them until we have prepared answers. I will assume that you agree unless I hear from you to the contrary.

UCC 076164

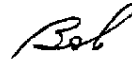
PITNEY, HARDIN, KIPP & SZUCH

John Downey, Esq.
September 11, 1991
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Please advise me if Nick Wheeler will serve as my technical advisor in this case, as he has in other PVC cases. If so, either you or I should put Nick on notice as to the existence of the suit and his role.

Best regards.

Sincerely,



ROBERT L. HOLLINGSHEAD

RLH:pc
cc: R.C. Wise

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