

July 5, 1962

Mr. Fred W. Armstrong, Claims Manager
Liberty Mutual Insurance Company
4650 Hampton Avenue
St. Louis 9, Missouri

Dear Mr. Armstrong:

Berry, et al., v. B. F. Drakenfeld & Company
and Monsanto Chemical Company

I enclose herewith 12 separate and independent petitions filed in the Circuit Court of the City of St. Louis against the above identified defendants. The particular actions are tabulated below:

<u>Cause No.</u>	<u>Plaintiff</u>	<u>Amount</u>
47803	Dorothy Berry	\$25,000
47804	Rita B. King	45,000
47805	Thelma Wieners	50,000
47806	Martha Syler	45,000
47807	Konnie Simpson	30,000
47808	Mildred Barrett	27,500
47809	Theodore Czarnecki	45,000
47810	Marie Clifford	27,500
47811	Mary Chapman	17,500
47812	Charlotte Shoemaker	47,500
47813	Hazel Schneider	17,500
47814	Walter Frank Miller	17,500

The total aggregate of these cases amounts to \$395,000. The allegations of each plaintiff are quite similar in that they allege skin eruptions extending over much of their bodies, including liver damage. Monsanto is named as a codefendant since our product, Aroclor 4465, is sold to the Drakenfeld Company where it is used in the manufacture of paints and

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enamel, which is used by a customer of Drakenfeld, the International Bent Glass Company of St. Louis, Missouri, at which place the plaintiffs are employees. At the time I advised you of the receipt of service of the petitions, you informed me that these employees had already filed workmen's compensation claims for which your company is the carrier.

Since these claims in the aggregate represent a significant amount of money and since a Monsanto product is involved, we wish to work closely with you in the defense of Monsanto.

Please undertake the defense of Monsanto Chemical Company in these petitions, and advise as to how we can be of service to you.

Yours very truly,

E. L. French
Attorney

ELF/vs
Enclosures

CC Mr. E. J. Putzell, Jr.
Dr. R. E. Kelly
Mr. E. F. Spawr
Mr. J. R. Durland

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