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November 24, 1987

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

Re: Memice v. PPG Industries, et al.

Dear Peter:

Enclosed please find another set of Interrogatories served on us by plaintiff in this matter. The answers will be due on December 28, 1987.

The service of these Interrogatories appears to be permitted by Judge Mandak's Order of May 20, 1987, wherein it is stated:

A general set of interrogatories has heretofore been propounded by plaintiff upon all defendants. Those defendants who admitted supplying V.C.M. to Pantasote were and continue to be required to answer said interrogatories. Those defendants who deny supplying the V.C.M. to Pantasote, but who for any reason are unsuccessful in pursuing the limited summary judgment referred to in paragraph two above, shall also be required to answer said interrogatories, and the same requirement shall be placed upon those defendants who do not file such limited summary judgment motions.

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UCC 076619

12/1/87 spoke to R Hollingshead and he will advise whether we need to develop answers and which answers. Court conference is on for 12/14/87.

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Peter F. Davey, Esq.

November 24, 1987

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As you will recall, we determined that, although Carbide's records do not show a supply of V.C.M. to Pantasote, we could not move for summary judgment because Mr. Ertel of Pantasote testified that he recalled making "spot purchases" from Carbide. See my letter to you dated May 21, 1987.

Please call me so we can decide on the best course for answering these Interrogatories.

Sincerely,



ROBERT L. HOLLINGSHEAD

RLH:js

Enclosure

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