

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

VIA EMERY

May 9, 1985

Mitch Axler, Esq.
Squire, Sanders & Dempsey
1800 Union Commercial Building
Cleveland, Ohio 44115

Re: Sally V. Neff, et al. v. Celanese Piping Systems, et al.
Case No. 85 CV-04-2279
Charles Perkins, et al. v. Celanese Piping Systems, et al.
Case No. 85 CV-04-2289
Sinda L. Sheppard, et al. v. Celanese Piping Systems, et al.
Case No. 85 CV-04-2290
Andrew John Whitmer, et al. v. Celanese Piping Systems,
et al.
Case No. 85 CV-04-2288
Common Pleas Court, Franklin County, Ohio
Special Corporate Account

Dear Mitch:

I enclose copies of the summons and complaints for the four above-captioned lawsuits. In addition, in the Neff case, there are plaintiff's first set of interrogatories and first request for production of documents, which need to be answered in thirty (30) days or by June 5, 1985. The complaints were served on the Corporation on May 6, 1985 by certified mail, and we have twenty-eight (28) days to answer, or by June 3, 1985.

A total of 126 former employees of Celanese Piping Systems and Celanese Plastics Company in Hilliard, Ohio are suing Celanese as well as ten polyvinyl/chloride resin manufacturers for "cancers, tumors and associated pathologies" from exposure to polyvinyl chloride (PVC) resins and vinyl chloride monomer (VCM). The exposure years range from 1951 to 1981. By copy of this letter to Ed DeLoughy, I request him to notify the appropriate insurers.

Nick Wheeler has checked the Corporation's sales records and it doesn't appear that we supplied any form of polyvinyl/chloride to Celanese at its Hilliard, Ohio plant. Mr. Wheeler will verify this. We have also received information from an inhouse attorney at Celanese that we probably were not a supplier. We would like to obtain a quick dismissal from these cases if that is the case.

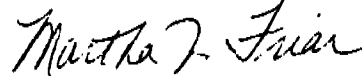
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Some of the co-defendants will be retaining the Jones, Day firm in a joint defense effort. Should our sales records reveal that we were a supplier to Celanese, I would like to keep the option of substituting counsel in favor of the Jones, Day firm. You have indicated that you would not have a problem with this arrangement.

I appreciate your excellent work on our behalf and look forward to working with you on these cases.

Very truly yours,



Martha J. Friar

MJF:mh
Enclosures

cc: R. A. Butler - E3-262 (without enclosure)
L. A. Crisorio - P2-608 (with enclosure)
E. D. DeLoughy - B4-155 (with enclosure)
J. F. Skislock - D2-241 (without enclosure)
C. E. Van Dyk - E2-289 (with data sheets) - Please add these cases
to our list of polyvinyl/
chloride cases.
~~South Charleston~~ - South Charleston (Via Emery) (with enclosure)

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