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CO
Eirven.

SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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January 25, 1995

**PRIVILEGED - ATTORNEY
WORK PRODUCT**

VIA FEDERAL EXPRESS

Dr. Frank Weir
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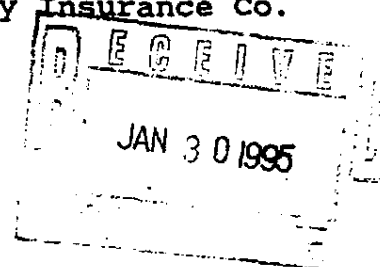
Re: Eirven v. Union Carbide Corporation

Dear Sir:

At the direction of Ted Theophilos, enclosed is a set of documents concerning the medical and employment history of Robert Eirven. The enclosures consist of:

- a) First Amended Complaint;
- b) Plaintiffs' answers to Union Carbide Corp.'s first set of interrogatories;
- c) Union Carbide Corp.'s answers to plaintiffs' first interrogatories and requests for production of documents;
- d) draft of Union Carbide Corp.'s supplemental answers and supplemental responses to plaintiffs' first set of interrogatories and requests for production;
- e) Union Carbide Corp.'s employee file and medical file on Robert Eirven produced to plaintiffs as Bates numbered documents 00001 to 000172;
- f) documents produced by Union Carbide Corp. in response to plaintiff's requests for production (Bates numbers UCC 0000173 to 002190) with index;
- g) medical records and other records received in response to subpoenas duces tecum served upon (i) Gary B. Weiss, M.D.; (ii) Burton Hinke Jr., M.D.; (iii) Andreus A. Piske, M.D. and Salvador Faus, M.D.; (iv) Humana Hospital Clear Lake; (v) Walgreen's Pharmacy; (vi) La Marque Independent School District; and (vii) Aetna Life and Casualty Insurance Co.

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"**



UCC 073227

SIDLEY & AUSTIN

NEW YORK

Dr. Frank Weir
January 25, 1995
p.2

Efforts to obtain additional medical records are ongoing and will be supplemented as the records are received.

Very truly yours,


H. Scott Kenyon
Legal Assistant

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 073228

bcc: Greg Winfree, Esq. (w/o enclosures)

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UCC 073229