

NUTTER, McLENNEN & FISH

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2699
(617) 439-2000

July 12, 1991

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

Judith Elledge, Esq.
Conoco Inc.
600 North Derry Ashford
P.O. Box 2197
Houston, Texas 77252-2197

Mary Sundt, Esq.
The Dow Chemical Company
D30 Willard H. Dow Center
Midland, Michigan 48674

Client 018371
Matter 0001

Bill No. 02124
SRB

FOR PROFESSIONAL SERVICES rendered and unbilled
through June 30, 1991 in connection with Alice L. Warren,
Administratrix of the Estate of John Warren v. The Dow
Chemical Company, et al, including:

Date	Description	Aty	Hours
06/04/91	Attention to B.F. Goodrich's Answer to Amended Complaint; letter to clients regarding same; review correspondence from S.Ritter to counsel regarding C.Pratte deposition.	SRB	0.50
06/05/91	Research law regarding sophisticated user, product identification.	LJS	0.20

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UCC 081418

PAYMENT DUE WITHIN THIRTY DAYS OF BILLING DATE
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

John R. Downey, Esq.
 Judith Elledge, Esq.
 Mary Sundt, Esq.
 July 12, 1991
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Date	Description	Aty	Hours
06/10/91	Attention to Court Notice regarding Further Scheduling Conference; telephone calls to J.Rendini and K.Minoff regarding same; letter from and letter to J.Downey regarding settlement issues.	SRB	0.80
06/11/91	Review discovery (interrogatories and documents) addressed to Dow by plaintiff; return telephone call to M.Sundt regarding status; telephone call from K.Minoff regarding scheduling conference and settlement conference.	SRB	1.20
06/12/91	Review recent products liability case law regarding sophisticated user defense; telephone call to clerk of court regarding scheduled conferences.	SRB	1.10
06/13/91	Review Dow discovery papers; letter to M.Sundt regarding same; telephone call to and telephone call from K.Minoff and telephone call from M.Granger regarding scheduling conferences with court.	SRB	1.10
06/17/91	Review B.F. Goodrich's response to plaintiff's interrogatories.	SPR	0.30
06/19/91	Letter from J.Rendini regarding B.F. Goodrich documents; telephone calls to J.Downey and M.Sundt regarding status and strategy and regarding Dow discovery issues; telephone calls to M.Granger regarding settlement issues; office conference with S.Ritter regarding same; placed telephone call to J.Elledge.	SRB	3.30

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 Judith Elledge, Esq.
 Mary Sundt, Esq.
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Date	Description	Aty	Hours
06/19/91	Telephone from Joe Rendini regarding Goodrich's responses to discovery and status of negotiations between co-defendants ; conference with S.Burger regarding same.	SPR	0.40
06/20/91	Telephone conferences with M.Granger, J.Downey, M.Sundt and J.Elledge's office regarding settlement issues and status.	SRB	1.50
06/20/91	Revise report letter to client regarding B.F. Goodrich discovery responses; review documents produced by plaintiff in response to defendants' discovery.	SPR	1.40
06/21/91	Telephone conference with M.Granger, K.Minoff and M.Sundt regarding settlement issues; letter to clients.	SRB	1.00
06/22/91	Conference with S.Burger regarding case status and strategy for conference with magistrate.	SPR	0.20
06/24/91	Telephone from J.Elledge regarding disclosing settlement percentages to Goodrich; memorandum to file regarding same; draft letter to plaintiff's counsel regarding request for more specific responses to plaintiff's interrogatories and request for conference regarding same.	SPR	1.50
06/25/91	Telephone conference with M.Granger; office conference with S.Ritter regarding settlement conference and issues; preparation for and attend court conference in Springfield before Magistrate Ponser; conferences among counsel; meeting with M.Sundt.	SRB	8.70

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DISBURSEMENTS recorded and unbilled
through June 30, 1991

POSTAGE	\$34.85
PHOTOCOPYING	246.80
TELECOPIER/TELEX	17.00
TRANSCPTS OF TESTMNY	103.60
TELEPHONE	42.50
AIR, TRAIN, BUS FARES (includes trip to St. Louis in May)	970.50

Total Disbursement.....	\$1,415.25
Total This Bill.....	\$7,439.25
6513z	

OK J.R. Downey
7/19/91
Orig. # 13-3324

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John R. Down y, Esq.
 Judith Elledge, Esq.
 Mary Sundt, Esq.
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Date	Description	Aty	Hours
06/25/91	Assist S.Burger in preparation for conference before Magistrate Ponser; review B.F. Goodrich documents; letter to clients regarding same.	SPR	2.50
06/26/91	Office conference with S.Ritter regarding settlement conference; telephone call to J.Elledge and telephone call to J.Downey regarding settlement conference; return telephone call to Elizabeth Jacobson of Fireman's Fund Insurance Company regarding status and billing; letter from J.Downey regarding settlement authority.	SRB	2.10
06/26/91	Conference with S.Burger regarding results of hearing before Magistrate Ponser and ramification of Contribution Among Joint Tortfeasor Act.	SPR	0.50
06/27/91	Telephone conference with M.Sundt regarding status; attention to Further Order of Court and dictate letter regarding same to clients.	SRB	0.50
06/28/91	Research regarding contribution among joint tortfeasors; memorandum to S.Burger regarding same.	SPR	1.00
Total Hours...For Matter 0001			29.80

		<u>Rate</u>	
BURGER, S.R.	21.80	220.00	\$4,796.00
RITTER, S.P.	7.80	155.00	1,209.00
SHAPIRO, L.J.	0.20	95.00	19.00
Total for Services.....			\$6,024.00

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