

X

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September 30, 1988

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COX DEFENSE GROUP

ATTENTION: ~~Peter F. Davey, Esquire (Union Carbide)~~ *James V. O'Garra*
Ms. Linda E. Hart (For Maxus Energy)
Beverly Gholson, Esquire (Georgia Gulf)
Gary A. Jones, Esquire (B.F. Goodrich) *Woodrow Ban* ✓
Richard J. Lorenz, Esquire (Tenneco Oil)
Amy Ng, Esquire (Conoco) *marina K. Pita*

RE: *Wanda Cox v. Georgia Gulf Corporation, et al*

PERSONAL AND CONFIDENTIAL

8257
#7908

STATEMENT

For professional services rendered from August 26, 1988,
through September 25, 1988, including:

August 26, 1988 (Mary Lou Hill)

Telephone conference with Mr. Richard Lorenz, Ms. Amy Ng,
Mr. Peter Davey and Ms. Ellie Swenson (of Mr. Davey's
office); revise and proof interrogatory answers; research
OSHA preemption defense and strict liability law.

.....06 hours 00 minutes

August 29, 1988 (Mary Lou Hill)

Receive and review interrogatory answers and correspondence
from Mr. Davey; receive executed verifications and
correspondence from Ms. Ng; telephone conference with Mr.
Endicott's office regarding verification; telephone conference
with Mr. Richard Lorenz regarding revised answers to
interrogatories.

.....02 hours 30 minutes

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"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

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August 30, 1988 (Donald A. Cockrill)
Review of answers and Rule 16 interrogatory answers;
telephone conference with plaintiffs' attorney R. Ariail
regarding proposed discovery and status of case.
..... 01 hour 15 minutes

August 30, 1988 (Mary Lou Hill)
Revise and finalize answer to complaint; answers of defendants
to interrogatories; legal research and draft memorandum
regarding defenses and telephone conference with Mr. Lorenz;
telephone conference with Mr. Brad Martin regarding answers.
..... 06 hours 00 minutes

August 31, 1988 (Mary Lou Hill)
Legal research for brief; finalize and prepare documents for
filing and service; receive verifications and insurance
information from Mr. Lorenz; revise interrogatory answers.
..... 05 hours 15 minutes

September 2, 1988 (Donald A. Cockrill)
Review answers and standard interrogatory responses of
defendants Formosa Plastics and Sumitomo Corporation;
telephone conference with Formosa defense attorney
regarding anticipated discovery.
..... 00 hours 45 minutes

September 6, 1988 (Mary Lou Hill)
Review letter from Ms. Ng; review answers to complaint and
Rule 16(b) interrogatories from Sumitomo and Formosa.
..... 00 hours 30 minutes

September 7, 1988 (Mary Lou Hill)
Review interrogatory answers of Formosa and Sumitomo;
research regarding cases cited by co-defendants regarding
defenses.
..... 03 hours 00 minutes

September 9, 1988 (Mary Lou Hill)
Telephone conference with Ms. Beverly Gholson regarding
ledger sheets.
..... 00 hours 15 minutes

September 12, 1988 (Mary Lou Hill)
Letter to defense group members regarding status of case;
legal research regarding exceptions to duty to warn.
.....

00 minutes
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September 13, 1988 (Donald A. Cockrill)
Legal research; work on list of needed discovery requests.
.....02 hours 45 minutes

September 13, 1988 (Mary Lou Hill)
Review letter from Marina Pita.
.....00 hours 15 minutes

September 14, 1988 (Donald A. Cockrill)
Review status of case and telephone conference with Mr. Bob
Ariail regarding same.
.....00 hours 45 minutes

September 14, 1988 (Mary Lou Hill)
Review file.
.....00 hours 30 minutes

September 19, 1988 (Donald A. Cockrill)
Telephone conference with defense attorney Dan White
regarding proposed discovery schedule.
.....00 hours 30 minutes

September 19, 1988 (Mary Lou Hill)
Legal research; draft brief and review case law regarding
defenses to strict liability.
.....02 hours 15 minutes

September 20, 1988 (Mary Lou Hill)
Legal research and draft memorandum regarding S.C. defenses
to strict liability and negligence/product liability.
.....04 hours 15 minutes

September 21, 1988 (Mary Lou Hill)
Draft brief outline.
.....01 hour 30 minutes

September 22, 1988 (Mary Lou Hill)
Draft memorandum regarding defenses; review South Carolina
law.
.....06 hours 00 minutes

September 23, 1988 (Mary Lou Hill)
Draft memorandum in support of Motion for Summary
Judgment.
.....04 hours 00 minutes

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Cox Defense Group
September 30, 1988
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Donald A. Cockrill
06 hours 00 minutes @ \$150/hour
Mary Lou Hill
44 hours 15 minutes @ \$100/hour

\$5,325.00

Plus Expenses

Reproduction of Copies\$418.55
Long Distance Telephone Calls..... 7.28

Expenses\$425.83

TOTAL SERVICES.....\$5,325.00

TOTAL EXPENSES..... 425.83

TOTAL STATEMENT.....\$5,750.83

Prorated Share
Among Six Parties.....

\$958.47

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