

LIBERTY MUTUAL



Mosswood Park Office Building, 3505 Broadway, Oakland, California 94611 • Tel. (415) 653-5800

December 5, 1974

Mr. Jack Kull
Insurance Dept.
The Sherwin-Williams Co.
101 Prospect Ave., N.W.
Cleveland, Oh. 44115

Redacted

INSURANCE

DEC 11 1974

Redacted

RE: - SHERWIN-WILLIAMS CO.

Redacted

Dear Mr. Kull:

I appreciated the opportunity to discuss this case with you and Mr. Malone on November 22, 1974. This was a good opportunity to clarify our lines of communication on the handling of this and future claims.

Subsequent to our conversation, we have received correspondence from our attorneys advising that the Kaiser attorney, Mr. Laws, has again made an effort to settle the Kaiser lien claim. Through our attorneys, we have declined to do this. Mr. Laws has then advised that he will recommend to Kaiser that they dismiss their claim, as he does not feel there is sufficient medical evidence to substantiate that claim.

In the background is a pending malpractice claim against the Kaiser Medical Facility, filed by the widow's attorney. However, this has not as yet been served upon Kaiser. Kaiser is in a delicate position, in that if they pursue the industrial matter, whatever medical evidence is revealed at the industrial hearing might well reflect unfavorably on Kaiser's medical handling. Thus, Kaiser is afraid that the widow's attorney will simply use the industrial hearing to prove his malpractice case.

Because of these factors, I can see why Kaiser might well wish to drop their industrial lien claim. We will be watching developments with interest as they lead up to the December 11, 1974, scheduled hearing.

If you have had an opportunity to develop any information in regard to your premium payments to the Kaiser Health Plan, as affected by this claim, I

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