

1697
U. T. Peterson Cor. 4
Court + [unclear]

PITNEY, HARDIN, KIPP & SZUCH
163 MADISON AVENUE
P.O. BOX 1945
MORRISTOWN, NEW JERSEY 07962-1945

ROBERT L. HOLLINGSHEAD

DIRECT DIAL NUMBER
(201) 631-4817

MORRISTOWN (201) 267-3333

NEW YORK (212) 926-0331

TELEX 642014
TELECOPIER (201) 267-3727

NEWARK OFFICE
33 WASHINGTON STREET
NEWARK, NEW JERSEY 07102
(201) 623-1980

June 7, 1990

John Downey, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

RECEIVED

JUN 11 1990

J. R. DOWNNEY

Re: Peterson v. Union Carbide Corporation

Dear John:

Pursuant to your request, enclosed please find the original Release executed by the Petersons in this matter.

Sincerely,

RLH

ROBERT L. HOLLINGSHEAD

RLH/da
Enclosure
cc: Raymond A. Deckert,
Kemper Insurance Company

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 089407



1699

*dit.
Peterson
Cor.*

UNION CARBIDE CORPORATION 39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001

June 5, 1990

To: John R. Downey, Esq.
Re: Peterson, et al. v. Union Carbide, et al.
(Invoice dated 5/24/90)

This is to inform you that the above referenced invoice
has been forwarded for payment.

/es

Attachment

1

PRIVILEGED AND
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ORDER"

UCC 089408

REMITTANCE COPY

PITNEY, HARDIN, KIPP & SZUCH

163 MADISON AVENUE

CN 1945

MORRISTOWN, NEW JERSEY 07960-1945

RECEIVED

JUN 1 1990

R. P. LAWLOR

UNION CARBIDE CORPORATION
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

TAX I. D. NO. 22-1661404

Invoice 1731327
80790.49622

Attn: John Downey, Esq.

May 24, 1990

TO PROFESSIONAL SERVICES RENDERED

For the period April 1, 1990 through April 30, 1990 in connection with the defense of an action in the Superior Court of New Jersey, Law Division, Middlesex County, entitled "Peterson, et al. v. Union Carbide," as described on the attached printout. (Project No. 13-3345)

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Bill Summary

<u>Time Spent By:</u>	<u>Rate</u>	<u>Hours</u>
R. Hollingshead	\$ 230	34.6
P. Herrigel	\$ 95	27.4
M. Tuzzio	\$ 145	2.9

HOURS SUMMARY 64.9

FOR SERVICES RENDERED \$ 10,981.50

Disbursements

Duplicating	\$	131.04
Expert Fee	\$	3930.00
Express Deliveries	\$	64.99
Expert Deposition Fee	\$	1300.00
Payment of Expert Expenses	\$	2938.30
Postage	\$	10.35
Telephone/telecopier	\$	15.87
Travel Expenses	\$	34.00
Word Processing	\$	50.00

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DISBURSEMENTS

\$ 8,474.55

\$ 19,456.05

Proj. # - 13-3345

OK
K. J. [signature]
5/30/90

PRIVILEGED AND
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SUBJECT TO PROTECTIVE
ORDER"

DATE PRINTED 05/23/90 9:06 AM
FEES BILL THRU DATE: 04/30/90
BILL THRU DATE: 04/30/90
FILE STATUS: A

BILLING ATTORNEYS: R. Hollingshead

CLIENT == 80790 UNION CARBIDE CORPORATION
MATTER == 80790.49622 Peterson, John et al.

BILL MEMO # 225413

UNBILLED TIME (Through 04/30/90)

DATE	TIME- KEEPER	ACTUAL HRS.	WORK DESCRIPTION
04/02/90	117RLH	1.8	Confer with M. Tuzzio and P. Herrigel regarding trial brief, witnesses, etc.; attention to trial deposition.
04/02/90	366PJH	1.3	Meet with M. Tuzzio and R.L. Hollingshead on status of case; telephone call to R.M. Wheeler;
04/02/90	480HKT	2.4	Confer with R. Hollingshead; confer with R. Hollingshead and P. Herrigel; review Maliko materials; telephone conference with Wheeler.
04/03/90	117RLH	1.7	Telephone conference with J. Downey regarding settlement status; telephone conference with Dr. Loomis regarding answers to interrogatories regarding his report and his evaluation of Epstein's opinion and deposition; confer with P. Herrigel regarding depositions from Maliko case.
04/03/90	366PJH	4.5	Review file status; review deposition digests and answers to interrogatories;
04/04/90	117RLH	.7	Telephone calls with A. Levinson and J. Downey regarding settlement status; letter to A. Levinson regarding his amended list of witnesses.
04/04/90	366PJH	5.0	Review interrogatories and experts' deposition digests;
04/05/90	366PJH	3.5	Review expert reports, deposition digests and memos to file;
04/05/90	117RLH	1.7	Attention to settlement status; telephone call from Dr. Loomis; telephone conference with A. Levinson's office; draft answers to Interrogatories regarding Loomis' report.
04/06/90	117RLH	5.1	Attention to trial issues and witnesses; telephone conferences with M. Wheeler and Dave Romaine (with Peter Herrigel); telephone call from J. Downey; letters to Levinson regarding supplementing answers to Interrogatories and answering Interrogatories regarding Dr. Loomis; organize files for trial.
04/06/90	366PJH	4.6	Review deposition digests from Maliko trial; telephone call to M. Wheeler and D. Romaine;

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BILL THRU DATE: 04/30/90
FILE STATUS: A

BILLING ATTORNEY: R. Hollingshead

CLIENT == 80790 UNION CARBIDE CORPORATION
MATTER == 80790.49622 Peterson, John et al.

BILL MEMO # 225413

DATE	FILE NO	TIME	DESCRIPTION
			review medical records and responses to interrogatories.
04/07/90	117RLH	8.5	Prepare for trial; organize files and review files and materials from Maliko case; read depositions from Maliko; confer with P. Herrigel regarding statute of limitations issues and preparation of witnesses.
04/07/90	366PJH	5.5	Review medical records; review documents from Maliko trial.
04/08/90	117RLH	3.5	Read depositions from Maliko case; consider issues regarding use of those depositions in this case; review research memo regarding same.
04/09/90	117RLH	8.1	Attention to various letters to A. Levinson regarding witnesses, amending answers to interrogatories, etc.; luncheon conference with A. Levinson regarding settlement; telephone call with Dave Romaine regarding his reaction to Peterson's deposition.
04/09/90	366PJH	3.0	Review Petersen medical records for statute of limitations purposes.
04/09/90	480NKT	.5	Confer with R. Hollingshead regarding status; confer regarding settlement.
04/10/90	117RLH	.3	Telephone conference with A. Levinson to confirm settlement; confer with P. Graham.
04/11/90	117RLH	.9	Telephone call with J. Downey regarding settlement; letter regarding same; telephone call from J. Downey's secretary regarding check; telephone calls with R.W. Wheeler and Dr. Loomis; attention to files.
04/12/90	117RLH	.7	Letter regarding Epstein's fees; letter to Levinson regarding settlement; attention to budget for 1990 and letter to J. Downey regarding same; confer with P. Herrigel regarding payment of expert's preparation time for deposition.
04/16/90	117RLH	.5	Letter to Dr. Loomis; review Release from plaintiffs; attention to filing and moving papers to Bernadino file.
04/17/90	117RLH	.7	Organize files and transfer some to Bernadin; attention to letter to A. Levinson regarding fees of experts.

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DATE PRINTED 05/23/90 9:06 AM

FEE BILL THRU DATE: 04/30/90

BILLING ATTORNEY: R. Hollingshead

COST BILL THRU DATE: 04/30/90

FILE STATUS: 1

CLIENT == 80790

UNION CARBIDE CORPORATION

MATTER == 80790.49622

Peterson, John et al.

BILL MEMO # 225413

04/19/90 117RLH .3 Attention filing; letter to John Downey regarding insurance information.

04/23/90 117RLH .1 Letter to Wheeler regarding his bill.

TOTAL HOURS 64.9

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DATE PRINTED 05/23/90 9:06 AM
FEES BILL THRU DATE: 04/30/90
G T BILL THRU DATE: 04/30/90
FILE STATUS: A

BILLING ATTORNEY: R. Hollingshead

CLIENT == 80790 UNION CARBIDE CORPORATION
MATTER == 80790.49622 Peterson, John et al.

BILL MEMO # 225413

TIMEKEEPER SUMMARY

ABBREV	NAME	HOURS	LAST TIME ENTRY DATE
1178LH	R. Hollingshead	34.6	05/21/90
366PJH	P. Herrigel	27.4	05/16/90
480WKT	N. Tuzzio	2.9	05/19/90
BILL MEMO TOTALS		64.9	

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