

Squire, Sanders & Dempsey

*Additional Offices:
Brussels, Belgium
Columbus, Ohio
Miami, Florida
New York, New York
Phoenix, Arizona
Washington, D.C.*

*Counsellors at Law
1800 Huntington Building
Cleveland, Ohio 44115*

July 31, 1985

*Telephone (216) 687-8500
Cable "Squiresand"
Telex 985.661
Telecopier 1 (216) 687-8777
Telecopier 2 (216) 687-8780*

*Direct Dial Number
(216) 687-8741*

Martha J. Friar, Esq.
Law Department
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

RECEIVED
AUG 5 1985
M. J. FRIAR

Re: Neff, Perkins, Sheppard, and Whitmer

Dear Martha:

I am enclosing a copy of Celanese's Answers to Plaintiffs' Interrogatories. ~~You will note that Celanese identifies~~ Stauffer Chemical Company, B.F. Goodrich, and Conoco (DuPont) as the suppliers of PVC's or VC to its Hilliard, Ohio facility between January 1, 1968 and January 1, 1981 (Interrogatory No. 14).

Celanese claims that it had meetings, which all manufacturing personnel attended, warning them of the dangers of VC and PVC. A reading of the interrogatories as a whole makes it clear that these meetings took place some time after OSHA regulations became effective.

If you have any questions, please call me.

Very truly yours,

Mitchel B. Axler

Mitchel B. Axler

MBA:dms
Enclosure
cc: Mr. W.C. Brown (w/encl)

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ORDER"

UCC 071327

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Brussels, Belgium
Columbus, Ohio
Miami, Florida
New York, New York
Phoenix, Arizona
Washington, D.C.

Counsellors at Law
1800 Huntington Building
Cleveland, Ohio 44115

Telephone (216) 687-8500
Cable "Squerosand"
Telex 985-661
Telecopier 1 (216) 687-8777
Telecopier 2 (216) 687-8780

July 8, 1985

Direct Dial Number
(216) 687-8741

RECEIVED

AUG 7 1985

M. J. FRIAR

Martha J. Friar, Esq.
Law Department
Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

Re: Neff, Perkins, Sheppard and Whitmer

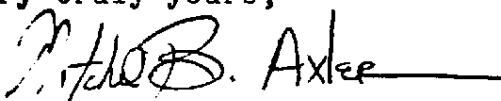
Dear Martha:

The Celanese answers to interrogatories did not name Union Carbide as a supplier of VC or PVC to the Hilliard facility. Robin Weaver spoke to Michael Moore, one of the plaintiffs' attorneys, and asked whether the plaintiffs would now dismiss Union Carbide from these four cases. Mr. Moore's answer was that Celanese attorneys had told him that a document search had not been completed and that Celanese's answers to interrogatories were incomplete. Plaintiff has granted Celanese an extension of time until August 19 to produce documents with respect to purchases of VC and PVC.

In the meantime, plaintiff has granted us an additional stipulation that we do not have to answer the complaints until after the documents are produced on the 19th. Presumably, Mr. Moore will examine those documents, inquire of Celanese's attorneys if they have now completed their document search, and then make a decision whether to dismiss Union Carbide. Depending on what Celanese ultimately produces, we may be able to achieve dismissal from these cases without filing motions for summary judgment. Mr. Moore seems to be a reasonable fellow who will dismiss those defendants who are not implicated by Celanese's records.

If you have any questions, please call me.

Very truly yours,


Mitchel B. Axler

MBA:dms
cc: Robin G. Weaver, Esq.

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Lit
H. J. S. S. S.
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UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

July 30, 1985

Mitchel B. Axler, Esq.
Squire, Sanders & Dempsey
1800 Huntington Building
Cleveland, Ohio 44114

Re: Sally Neff, Charles Perkins, Sinda Sheppard,
Andrew John Whitmer

Dear Mitch:

I enclose for your information a German article and memo
from Nick Wheeler dated July 2, 1985.

Very truly yours,



Martha J. Friar

ld

Enclosure

cc: L. A. Crisorio (w/o enc.)
M. McDonald (w/enc.)
R. N. Wheeler, Jr. (w/o enc.)

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