

30 b 6 to Mons:

pmk about comar w/
NIOSH.

John
fax 314 621-3136

2

Documents

Table

Exh. P.

-- [~~Peter #~~ 58] James J. Collins → Fingerhut 6/1/90 --
all drafts, all attachments, ^{all} tables, ^{previous} all letters referenced,
~~#1~~ ("Monsanto letters dated 11/12/85, 1/21/86, 5/4/87,
1/29/88" p. 4), all other communications ~~#~~
betw. NIOSH & Monsanto on the subject of Nitro
workers and/or the Monsanto studies.

depose
this guy??

-- All records cited on tables attached to Collins letter, above

-- all peer reviews of the 3 studies

-- all internal (Monsanto or Kettering) reviews or comments on
the 3 studies (at any stage of their conduct).

-- all ^{attachments &} materials, including computer tapes & printouts thereof,
that accompanied Strauss 6/4/87 letter to Fingerhut
(~~Peter #~~ 91) R 18

-- all materials referenced but not attached to

-- all records discussing or referring to destruction
of documents relating to the Zack/Gaffey study
(Zack Nitro depo ¹⁴⁷ p. 35)

-- all records discussing or referring to missing
data on the Zack/Gaffey study.

from
Nitro case:

- Plaintiffs' exhibit 62 in Boggs, July 1954 Suskind et al Toxicological Report.
- Plaintiffs' exhibit 338 in above. (includes tox tests on Diamond Alkali materials)
- Plaintiffs' exhibit 59 memo of June 22, 1956 meeting with Monsanto where Suskind discussed results of human experiments.
- Plaintiffs exh. ~~63~~ 64 : 1956 Environmental Survey of Nitro Plant.
- Testimony of Max Galloway.

Plaintiffs' exh. 43

- Records of Monsanto meetings: with Von Oettel Aug. 4, 1960;
 ^{4/21/60} Emmett Kelly memo to Suskind re: meeting with Von Oettel; 5/2/60 Suskind memo to Emmett Kelly re: meeting with Von Oettel; 6/30/60 Von Oettel letter to Suskind; 7/13/60 Suskind letter to Von Oettel.



- Def. ex. 396 12/24/76 Roush letter to Suskind about conduct of follow up studies at Nitro.
- Suskind to Roush 6/9/78 letter defining 37 "heavily involved" workers.

-- All Monarchs records discussing or referring to Steward memo.

- All comm between Toulon + Gaffey discussing or referring in any way to the Kenney case and Sturgeon spill.

- All comm between Toulon + Gaffey discussing or referring in any way to the Nix's workers' lawsuits.

- All ~~production~~ communications between anyone at Monarchs & anyone at EPA discussing or referring in any way to Dr. Kate Jenkins' allegations of falsification of dioxin health studies. See ~~Peters #67~~, ^{Q17} Attachment E, Memo. James Sanger cited previous corresp. from Richard Mahoney.

- All ~~comm~~ records discussing or referring in any way to EPA's criminal investigation of Monarchs Co. cover-up of dioxin contamination in products & falsification of dioxin health studies

- All records provided to EPA for this investigation

Where & when on deposition & subpoena duces tecum? ← Green??

Documents

30(6/6):

- Copies of the "retraction and clarification" discussed in Peter # ^{M¹⁷} ~~15~~ (Gaffey's pl. of the 1980 P.R.) + ^{O¹⁵} ~~15~~

PME on

destruction
of EPA
of samples
from NDS
Tier 1 + 2.

Airtransicate

- ~~State~~: show # ~~18~~ ^{H⁸}, Gaffey letter, I⁹, P's letter, + ^{K¹¹} ~~15~~, Gaffey.

- All records of ~~the~~ communications between Roosh &

PME on

comm w/
Roosh

comm
Gaffey

Gaffey referred to in Roosh testimony (Peter # ^{K¹¹} ~~15~~, pp. 1) including all tables, whether introduced in Kinney or not.

- All comm. between Roosh & Gaffey discussing or referring to the Strauss memo (Tab ^F 6)

Vaugh James

204-632-8397

Research - legal

disposal haz waste

Monsanto PCBs/
dioxin

Set of doc

Bates no's.

Am Pub H. Hgin-
Resolution or change in.

Louis Royce

We ask Monsanto to produce persons most kn. (30 b 6) -
set forth in attachment subjects they should testify ab.

30 b 6 to Mons:

comm w/ Gough

w/ EPA
w/ NIOSH

~~we~~ what facts + invest into facts each statement
in Loer letter.

put VP (Loer letter) on witnesses list

- get Gaffey's letters to Peter.

- ask Gerson for Peter's lawyer's memo on wh/ he
has to prove

- every publication Gaffey has in wh/ allegations / ^{of Mons.} ~~find~~
in the study were made; all common. w/ those public,
including complaints, responses etc.

+ an interrog. state all reasons why he singled out Peter Montague & how Gaffey singles out damages ^{allegedly} caused by Peter's publ., from damages allegedly caused by others.

— commun. between Monsanto & Gaffey, Gaffey & his agents & attys, Monsanto & agents & attys, Suskind, Zack's ditto, regarding publ. of allegedly false stats ab. study.

— doc's to be authenticated: all press clips on hand.

@ not. of numbers.

M for Monsanto.

look for ex stickers

Ex. 1 Peter's article

Ex. 2 Zack/Gaffey study

Ex. 3 Zack/Suskind

Ex. 4 ~~Zack/Suskind~~ Hertzberg
The Third Study