



*1699 - Peterson
Cor.*

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

April 17, 1990

To: John R. Downey, Esq.
Re: Peterson, et al. v. Union Carbide, et al.
(Invoice dated 4/10/90)

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

/es

Attachment

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 089433

PITNEY, HARDIN, KIPP & SZUCH

CHARLES R. HARDIN, JR.
ROGER C. WARD
JAMES C. PITNEY
WILLIAM D. HARDIN
CLYDE A. SZUCH
S. JOSEPH FORTUNATO
DAVID J. CONNOLLY, JR.
WILLIAM H. MYATT, JR.
LAWRENCE F. REILLY
MURRAY J. LAULIGHT
ROBERT C. NEFF
EDWARD P. LYNCH
GERALD C. NEARY
JOSEPH LUNIN
RICHARD L. PLOTKIN
TIMOTHY R. GREINER
ROBERT L. HOLLINGSHEAD
FREDERICK L. WHITMER
GREGORY C. PARLIMAN
ROBERT G. ROSE
PATRICK J. MCCARTHY
JAMES E. TYRRELL, JR.

JOSEPH H. KOTT
MARY LOU PARKER
PAUL E. GRAHAM
J. MICHAEL NOLAN, JR.
WARREN J. CASEY
KEVIN J. O'DONNELL
GLENN C. GEIGER
DENNIS R. LAFIURA
GAIL H. ALLYN
HENRY NELSON MASSEY
JEANNETTE M. BOND
DENNIS T. KEARNEY
KENNETH J. NORCROSS
DONALD W. KIEL
JOEL M. ROSEN
PARTNERS

JANE H. HARDIN
EVELYN R. STORCH
JOHN C. MALONEY, JR.
COUNSEL

JOHN O. H. PITNEY (1902-1928)
JOHN R. HARDIN (1902-1946)

163 MADISON AVENUE
P.O. BOX 1945
MORRISTOWN, NEW JERSEY 07962-1945

MORRISTOWN (201) 267-3333
NEW YORK (212) 926-0331
NEWARK (201) 623-1980

TELEX 642014
TELECOPIER (201) 267-3727

NEWARK OFFICE
33 WASHINGTON STREET
NEWARK, NEW JERSEY 07102

April 10, 1990

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

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

Re: Peterson, et al. v. Union Carbide
Project No. 13-3345

Dear John:

I am enclosing herewith our statement for services for the period March 1, 1990 through March 31, 1990.

I trust this statement meets with your approval and, if so, I would appreciate it if you would process same for payment.

Sincerely,



ROBERT L. HOLLINGSHEAD

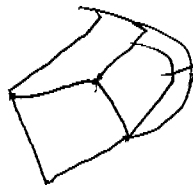
RLH:da
Enclosure

RECEIVED

APR 16 1990

J. R. DOWNEY

UCC 089434



PITNEY, HARDIN, KIPP & SZUCH

163 MADISON AVENUE

P.O. BOX 1945

MORRISTOWN, NEW JERSEY 07960-1945

TAX I. D. NO. 22-1661404

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

Invoice 1729428
80790.49622

Attn: John Downey, Esq.

April 10, 1990

FOR PROFESSIONAL SERVICES RENDERED:

For the period March 1, 1990 through
March 31, 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)

<u>Summary</u> <u>By Attorney</u>	<u>Classification</u>	<u>Hours</u>	<u>Rate/Hour</u>	<u>Totals</u>
R. Hollingshead	Partner	13.2	230.00	3,036.00
M. Tuzzio	Associate	11.8	145.00	1,711.00
N. Docherty	Paralegal	3.5	65.00	227.50

FOR SERVICES RENDERED \$ 4,974.00

Disbursements

Duplicating	\$	490.60
Express Deliveries	\$	36.46
Medical Records	\$	153.95
Postage	\$	10.15
Telephone/telecopier	\$	25.85
Word Processing	\$	30.00

TOTAL DISBURSEMENTS \$ 747.01

TOTAL AMOUNT DUE

\$ 5,721.01

PRIVILEGED AND
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UCC 089435

13-3345

OK J. Downey
4/16/90

DATE PRINTED 04/09/90 11:44 AM

FEES BILL THRU DATE: 03/31/90

BILLING ATTORNEY: R. Hollingshead

COST BILL THRU DATE: 03/31/90

FORM STATUS: A

CLIENT -- 80790

UNION CARBIDE CORPORATION

MATTER -- 80790-49622

Peterson, John et al.

BILL MEMO #

221339

TIMEKEEPER SUMMARY

ABBREV	NAME	HOURS	LAST TIME ENTRY DATE
117RLH	R. Hollingshead	13.2	04/04/90
480MKT	M. Tuzzio	11.8	03/30/90
528MKD	M. Docherty	3.5	04/04/90

BILL MEMO TOTALS

28.5

PRIVILEGED AND
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ORDER"

UCC 089436

DATE PAINTED 04/09/90 11:44 AM

FEES BILL THRU DATE: 03/31/90

BILLING ATTORNEY: R. Hollingshead

~~COPY~~ BILL THRU DATE: 03/31/90

FILE STATUS: A

CLIENT -- 80790

UNION CARBIDE CORPORATION

ATTORNEY -- 80790.49622

Peterson, John et al.

BILL MEMO # 221339

PRIVILEGED AND
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SUBJECT TO PROTECTIVE
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UNBILLED TIME (Through 03/31/90)

DATE	TIME- KEEPER	ACTUAL HRS.	WORK DESCRIPTION
03/12/90	480MKT	.2	Confer with R. Hollingshead.
03/12/90	480MKT	.1	Confer with R. Hollingshead.
03/13/90	117RLH	.2	Attention to various issues regarding discovery, etc.
03/14/90	117RLH	.3	Telephone conference with J. Downey regarding status of settlement; confer with M. Tuzzio.
03/16/90	117RLH	.9	Telephone conference with J. Downey and B. White regarding settlement status; review file for status of various discovery and trial items.
03/19/90	117RLH	.3	Confer with M. Tuzzio regarding status of various items.
03/20/90	117RLH	2.3	Review file for status of various discovery items; confer with M. Tuzzio regarding witnesses, expert report from Loomis, trial issues, etc; send Interrogatories to Loomis.
03/20/90	480MKT	2.8	Confer with R. Hollingshead; accumulate materials to send to D. Loomis.
03/21/90	117RLH	1.3	Confer with M. Tuzzio; attempted telephone calls to Dr. Loomis; attention to things to do.
03/21/90	480MKT	.3	Confer with R. Hollingshead.
03/22/90	117RLH	3.8	Attention to letter to Dr. Loomis; review exhibits from Epstein & Velez depositions; telephone call with Dr. Loomis; conference with M. Tuzzio; attention to status of various items.
03/22/90	480MKT	1.6	Confer with R. Hollingshead regarding Loomis materials; accumulate materials to send to Dr. Loomis.
03/23/90	117RLH	.3	Conference with M. Tuzzio regarding review of deposition of ATC employees.
03/23/90	480MKT	2.7	Review of transcript of Epstein deposition; confer with R. Hollingshead; telephone call to Dr. Loomis; gather materials from Maliko file.

UCC 089437

DATE PRINTED 04/09/90 11:44 AM

FEES BILL THRU DATE: 03/31/90

BILLING ATTORNEY: R. Hollingshead

COST BILL THRU DATE: 03/31/90

FILE STATUS: A

CLIENT -- 80790

UNION CARBIDE CORPORATION

MATTER -- 80790.49622

Peterson, John et al.

BILL MEMO # 221339

03/26/90	117RLH	2.1	Confer with M. Tuzzio; attempted telephone call to J. Downey; telephone conference with A. Levinson regarding trial date; telephone conference with M. Tuzzio and Dr. Loomis; telephone conference with M. Wheeler.
03/26/90	480MKT	1.5	Confer with R. Hollingshead; telephone conference with Dr. Loomis.
03/27/90	117RLH	.7	Attention to documents sent to Loomis; telephone call from A. Levinson regarding trial date and letter to J. Downey regarding same; telephone call with J. Downey's secretary regarding trial date; confer with M. Tuzzio.
03/26/90	480MKT	2.2	Review and study transcript of deposition of Neuberne Brown, Jr., taken in the Maliko matter.
03/29/90	117RLH	.3	Telephone call from A. Levinson; telephone call with Dr. Loomis; review his supplemental report; confer with M. Tuzzio.
03/29/90	528MKD	2.5	Attention to deposition digest of Henry V lez (11/1/89).
03/30/90	117RLH	.5	Attention to file and status of various items.
03/30/90	528MKD	.5	Review and revise deposition digest of Henry Velez (11/1/89).
03/30/90	480MKT	.4	Review of Maliko file to locate deposition transcript of Union Carbide fact witnesses.
03/31/90	117RLH	.2	Review B. Brensick's memo regarding Dr. Epstein.
03/31/90	528MKD	.5	Review and revise deposition digest of Henry Velez (11/1/89).

TOTAL HOURS 28.5

PRIVILEGED AND
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UCC 089438

DATE PRINTED 04/09/90 11:44 AM

FEES BILL THRU DATE: 03/31/90

BILLING ATTORNEY: R. Hollingshead

COST BILL THRU DATE: 03/31/90

FILE STATUS: A

CLIENT -- 80790

UNION CARBIDE CORPORATION

MATTER -- 80790.49622

Peterson, John et al.

BILL MEMO # 221339

UNBILLED COSTS (Through 03/31/90)

DATE	AMOUNT	COST DESCRIPTION
03/22/90	153.95	PAID HOSPITAL CORRESPONDENCE COPIERS FOR PAYMENT OF PHOTOCOPYING FEES FOR MEDICAL RECORDS. CK.#51314
03/22/90	36.46	FED EXP/ARLINGTON/CK# 51407
	25.85	Telephone/telecopier
	30.00	Word Processing
	490.60	Duplicating
	10.15	Postage
TOTAL COSTS	\$ 747.01	

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UCC 089439

REMITTANCE COPY

PITNEY, HARDIN, KIPP & SZUCH

163 MADISON AVENUE

CN 1945

MORRISTOWN, NEW JERSEY 07960-1945

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

TAX I. D. NO. 22-1661404

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Attn: John Downey, Esq.

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TOTAL AMOUNT DUE \$ 5,721.01

PRIVILEGED AND
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UCC 089440

