

ROPES & GRAY
ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2624

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February 7, 1990

John R. Downey, Esquire
Union Carbide Chemicals & Plastics
Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, Connecticut 06817-0001

Re: Alice L. Warren, Administratrix Of The
Estate Of John H. Warren, Deceased v. The
Dow Chemical Company, et al., United States
District Court For The District Of
Massachusetts Civil Action No. 89-3021F

Dear John:

I enclose this firm's 1989 fourth quarter statement for
services rendered in the above-referenced action and an
accompanying computerized billing memorandum. We have divided
the total into equal thirds among Dow, Union Carbide, and Conoco.

I also should advise you that, effective January 1, 1990, my
hourly billing rate is \$285.00, Pierce Cray's is \$215.00, and
Colleen Murphy's is \$150.00.

Please do not hesitate to call me if you have any questions.

Very truly yours,



Lane McGovern

LM/ves:POCRDONE.DC

Enclosures

POCRDONE.DC

RECEIVED

FEB 09 1990

J. R. DOWNEY

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 082249

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2624

February 7, 1990

John R. Downey, Esquire
Union Carbide Chemicals & Plastics
Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, Connecticut 06817-0001

FOR PROFESSIONAL SERVICES rendered between October 1, 1989 and December 31, 1989 in connection with the action Alice L. Warren, Administratrix Of The Estate Of John H. Warren, deceased v. The Dow Chemical Company, et al., United States District Court For The District Of Massachusetts Civil Action No. 89-30201F, as set forth in more detail in the attached computerized billing memorandum, including drafting and filing of Motion To Enlarge Time; review of service of process issues; drafting and filing of Answers; review of possible structured settlement alternative; review of discovery provided by the Monsanto Company in other vinyl chloride litigation; preparation for, attendance at, and debriefing of December 7, 1989 defense counsel conference, together with necessary conferences, telephone conferences, correspondence, memoranda, and legal research in connection with the foregoing \$8,160.00

RELATED DISBURSEMENTS AND CHARGES

Telephone	\$ 50.01	
Telex and Telecopy	149.25	
Photocopy	273.20	
Delivery and Postage	17.90	
Courier Service	73.22	
Meals	18.80	
Travel	14.50	
Automated Document Preparation . .	<u>254.46</u>	
Document Binding	4.00	\$ 855.28

Total

\$ 855.28

LESS AMOUNT PAYABLE BY CODEFENDANTS

\$9,015.28

\$6,010.19

\$3,005.09

POCJDOB.DC

JRD deducted "word processing" charges (Cardinal's share) which he feels we should not have to pay)

84.80
2920.29

4/12/90 OK J. Downey

UCC 082250

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The following chart summarizes the hourly rates, hours worked, and dollars billed during the previously referenced calendar quarter by each of the Ropes & Gray professionals working on this matter.

<u>NAME</u>	<u>RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
Lane McGovern	\$265.00	17.50	\$ 4,637.50
Pierce O. Cray	\$185.00	8.50	\$ 1,572.50
Collen P. Murphy	\$120.00	16.25	<u>\$ 1,950.00</u>
TOTAL			\$ 8,160.00

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