

LIT 155-178
CO

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125th
Anniversary
1866-1991

January 31, 1995

Gregory D. Winfree, Esq.
Union Carbide Law Dept. - E3-282
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Overstreet v. UCC

Dear Greg:

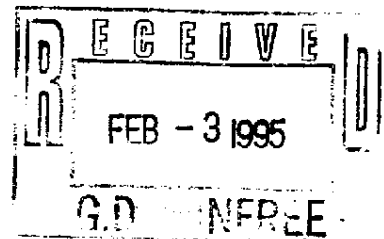
Enclosed are the Notices of Deposition which have been filed in the above-captioned case. I have not yet determined who these individuals are. Please call me at your earliest convenience to further discuss this matter.

Sincerely,

Ted Theophilos

Theodore J. Theophilos

TJT/sr
Enclosures



PRIVILEGED AND
"CONFIDENTIAL MATERIAL
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ORDER"

UCC 074106

Lit Overstreet
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312 853-4714

December 2, 1994

VIA FEDERAL EXPRESS

Barbara L. Johnson
Wickliff & Hall, P.C.
1000 Louisiana
Suite 5400
Houston, Texas 77002

Re: Overstreet v. Dow Chemical Company
and Union Carbide Corporation

Dear Barbara:

Enclosed are original copies of the notices of removal (state and federal) for the Overstreet case to be filed and served on Monday, December 5. Several final steps need to be taken before these papers are ready to be filed, however:

1. Dow Chemical has not formally retained counsel to handle this case. Because Walter Conrad at Baker & Botts has handled much of their litigation in the past, I have tentatively drafted these papers with Baker & Botts identified as Dow's counsel. We will know by Monday who will be handling the case for Dow and any necessary changes can be made at that time (a computer disk containing each of these documents is included for this purpose). In any event, both you and Dow Chemical's attorney will need to sign the final documents;
2. I will fax to you on Monday a copy of proof of service on Dow which needs to be included with the other materials already in Exhibit B;
3. We need to obtain a copy of the docket sheet in the Brazoria County action and attach it as Exhibit C; and

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