MONSANTO INSURANCE COMPANY LITIGATION: MAY 25,1990 ORDER PROTECTED MATERIAL TREAT AS PROTECTED UNDER ATTORNEY-CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE.

Monsanto

FROM (NAME & LOCATION): Dr. Kelly

DATE: March 25, 1975

SUBJECT: OCCUPATIONAL EXPOSURES

REFERENCE:

TO: Dr. George Roush, Jr.

There are two potentially serious conditions in some of our manufacturing plants which demand an intensive investigation and correction. They concern in-plant exposure to our workers and could involve possible development of occupational disease and/or government stoppage of our plant operations.

In these matters the Medical Department bears primary responsibility but such responsibility exists in concert with the operating company and CED so joint efforts must be undertaken.

The problem areas are in descending order of priority.

1. The DMAC, VER, VNCL and AN exposures in our textile plants, especially Decatur and Lingen

2. The SO_2, Flourine, silica, nuisance dust and possibly arsenic in our phosphorus manufacturing units.

I will treat these separately in the attached memoranda, together with recommendations.

R. Emmet Kelly, M. D.

REK/ln

EXHIBIT

MSL 0051919

WHP 0231315

IF THE [illegible] IS LESS CLEAR THAN THIS NOTICE, IT IS DUE TO THE QUALITY OF THE ORIGINAL DOCUMENT.

WHP 60

DEPOSITION EXHIBIT Kelly V-31 J-3-93 JB

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TRANSCRIPT OF PROCEEDINGS

IN THE SUPERIOR COURT

OF THE STATE OF DELAWARE

IN AND FOR NEW CASTLE COUNTY

MONSANTO COMPANY, Plaintiff, v. AETNA CASUALTY & SURETY COMPANY, et al., Defendants.	Civil Action Number 88C-JA-118-1-CV NON-ARBITRATION CASE

KELLY DEPOSITION EXHIBITS

PROTECTED MATERIAL: MONSANTO

INSURANCE COVERAGE LITIGATION

Washington, D. C.

Thursday, February 4, 1993

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