

HENDERSON, HANEMANN & MORRIS

A PROFESSIONAL LAW CORPORATION

300 LAFAYETTE STREET

HOUMA, LOUISIANA 70360

PHILIP E. HENDERSON
CHARLES HANEMANN
J. MARK GRAHAM
JOSEPH A. REILLY, JR.
BARRY J. SOUDREAU
KEVIN J. WEBB
EMILIE MELANCON DAYE

ROBERT L. MORRIS (1940-1988)

HOUMA
(504) 866-2081
NEW ORLEANS
(504) 861-1434
FACSIMILE
(504) 866-0080

March 12, 1999

Mr. William B. Baggett, Jr.
BAGGETT, MCCALL & BURGESS
3006 Country Club Road
Post Office Drawer 7820
Lake Charles, LA 70606-7820

RECEIVED MAR 16 1999

Re: Daniel J. and Elizabeth Elaine Ross v. Conoco, Inc., et al.
Our File No. 0177.2738708

Dear Mr. Baggett:

I am delivering herewith Minnesota Mining and Manufacturing Company's objections, comments, and response to the plaintiff's supplemental request for production of documents, together with copies of the documents.

By copy of this letter, I am notifying all defense attorneys that they may obtain copies of the documents by requesting them from me.

Sincerely,

Kevin J. Webb

Kevin J. Webb

KJW/sb

Enclosures

F:\27387\CORRES\Baggett17.doc

cc: All Counsel of Record

cc: BTK
3-17-99
original
docs to Moline
100% of discovery

ELIZABETH ELAINE ROSS, ET AL. * 14TH JUDICIAL DISTRICT COURT
VERSUS NO. 90-4837 * PARISH OF CALCASIEU
CONOCO, INC., ET AL. * STATE OF LOUISIANA

**MINNESOTA MINING AND MANUFACTURING
COMPANY'S OBJECTIONS, COMMENTS, AND RESPONSES TO PLAINTIFFS'
SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS**

Minnesota Mining and Manufacturing Company (3M) makes the following objections, comments, and responses to plaintiffs' supplemental request for production of documents:

GENERAL OBJECTIONS

3M makes the following general objections, which apply to all seven of the plaintiffs' supplemental requests for production:

Insofar as the plaintiffs' requests call for the production of documents that relate to any substance other than vinyl chloride, 3M objects because documents concerning any substance other than vinyl chloride are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3M objects to the requests for production on grounds that they seek to extend the time period for discovery beyond the period set forth by the court in its order of March 12, 1996. All of 3M's responses to the plaintiffs' requests for production are limited to the period 1973 through 1995 to conform with that order.

GENERAL COMMENTS

3M makes the following general comments, which apply to all sixteen of the plaintiffs' supplemental requests for production:

1. 3M makes this response to the plaintiffs' requests for production after a diligent search of its records. This search is continuing. 3M reserves the right to supplement its response should it discover additional documents which may be responsive to the plaintiffs' request for production.

2. Certain of the documents produced herewith may be responsive to more than one of the plaintiffs' numbered requests.

3 3M has assigned production numbers to the documents which are being produced herewith. The production numbers assigned by 3M and the individual numbered request or requests to which 3M believes them to be responsive are:

<u>3M Document Nos.</u>	<u>Responsive to Request No.</u>
3M 110285 - 3M 110291 3M 110293 - 3M 110317 3M 110320 - 3M 110341 3M 110366 - 3M 110375 3M 110387 - 3M 110390 3M 110398 - 3M 110435	1 & 2
3M 010111 - 3M 010112 3M 010523 - 3M 010526 3M 105130 - 3M 105132 3M 105169 - 3M 105175 3M 105183 - 3M 105185 3M 105723 - 3M 105727 3M 107458 - 3M 107459 3M 107462 3M 107467 - 3M 107469 3M 109721 - 3M 109732 3M 110436 - 3M 110457 3M 110469 - 3M 110488 3M 110497 - 3M 110524 3M 110542 - 3M 110643 3M 110648 - 3M 110667 3M 110669 - 3M 110674 3M 110697 - 3M 110713 3M 110725 - 3M 110737 3M 110754 - 3M 110778 3M 110809 - 3M 110929 3M 111007 - 3M 111107	3
3M 110398 - 3M 110435 3M 110930 - 3M 110966	4 & 5
No Responsive Documents	6 & 7

RESPONSES AND SPECIFIC OBJECTIONS

3M makes the following responses and/or specific objections to the plaintiffs' supplemental requests for production:

REQUEST FOR PRODUCTION NO. 1:

Please produce any notes, memorandum, correspondence, record, minutes of meetings, calendar entries, and any other documents with regards to the ISEA (Industrial Safety Equipment Association) and passive dosimeters for any employee and/or officers of 3M, including but not limited to, Bob Weber and James Kvickstad.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

See comment No. 3 above

REQUEST FOR PRODUCTION NO. 2:

Please produce any correspondence, telephone message slips, telephone conversation summaries, or any other documents with regards to the ISEA (Industrial Safety Equipment Association) and passive dosimeters for any employee and/or officers of 3M, including but not limited to, Bob Weber and James Kvickstad.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

See comment No. 3 above

REQUEST FOR PRODUCTION NO. 3:

Please produce any written or electronic record, including e-mail, which in any way concerns passive dosimeters and vinyl chloride and/or halogenated hydrocarbons and/or chlorinated hydrocarbons.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

For written or electronic records that pertain to passive dosimeters and vinyl chloride, please see the documents produced by 3M in its response to the plaintiffs' original request for production.

Insofar as the request seeks written or electronic records that pertain to passive dosimeters and any other halogenated or chlorinated hydrocarbons, 3M objects to the request on grounds that it is too broad, vague and general to be susceptible of a categorical response, calls for information which is not admissible or reasonably calculated to lead to the discovery of the admissible evidence, and cannot be answered without imposing undue hardship and expense upon Minnesota Mining and Manufacturing Company. Without waiving those objections, 3M responds to the request as follows:

See comment to No. 3 above.

REQUEST FOR PRODUCTION NO. 4:

Please produce any notes, memorandum, correspondence, record, minutes of meetings, calendar entries, and any other documents with regards to the SEI (Safety Equipment Institute) and passive dosimeters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

See comment No. 3 above

REQUEST FOR PRODUCTION NO. 5:

Please produce any correspondence, telephone message slips, telephone conversation summaries, or any other documents with regards to the SEI (Safety Equipment Institute) and passive dosimeters.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

See comment No. 3 above

REQUEST FOR PRODUCTION NO. 6:

Please produce any notes, memorandum, correspondence, record, minutes of meetings, calendar entries, and any other documents with regards to the ASTM Committee D22 on Sampling and Analysis of Atmospheres (including but not limited to Subcommittee designation D22.04 on Methods of Sampling and Analysis of Work Place Atmospheres).

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

None.

REQUEST FOR PRODUCTION NO. 7:

Please produce any correspondence, telephone message slips, telephone conversation summaries, or any other documents with regards to the ASTM Committee D22 on Sampling and Analysis of Atmospheres (including but not limited to Subcommittee designation D22.04 on Methods of Sampling and Analysis of Work Place Atmospheres).

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

None.


Kevin J. Webb (#17857)
Henderson, Hanemann & Morris
A Professional Law Corporation
300 Lafayette Street
Houma, LA 70360
Tel: (504) 868-2081
Attorneys for Minnesota Mining
and Manufacturing Company

CERTIFICATE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been forwarded to all known counsel of record by placing same in the United States mail, postage prepaid and properly addressed.

Houma, Louisiana, this 12th day of March, 1999.

F:\27387\PL\DX\Req. for Prod.doc

Kevin J. Webb
Kevin J. Webb