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May 13, 1987

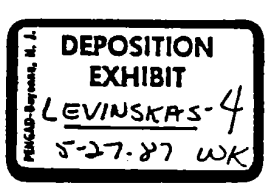
Walter Crawford
WELLS, PEYTON, BEARD, ICEBERG, HUNT & CRAWFORD
624 Petroleum Building
BEAUMONT, TEXAS 77704-3708

Re: *Cecil Scott v. Monsanto Company*, B-84-1103-CA

Dear Walter:

In order to minimize the burden on you of complying with Plaintiffs' requests for item 8 on IBT related documents --- which requests first came December 31, 1986, were renewed via 30(b)(6) notices April 3, 1987, and most recently, April 29, 1987 --- I repeat my verbal agreement with you of this morning that item 8 will at this time be satisfied if you provide each summary report regarding the analyses of, investigations of, and other detailed reports on IBT misconduct (actual or alleged) in connection with tests performed on Monsanto products.

I understand that IBT may have done as many as 650 separate studies for Monsanto on some 55 products. I also understand that third parties may have done some 350 study validations on IBT studies of about 50 Monsanto products. It is not clear whether the study validations were done before or after the IBT misconduct came to light. At this time, we do not insist on having the 350 study validations. We do, however, want to know the results of such validations, that is, whether or not the IBT studies were or were not found to be valid, and if not, why not.



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As concerns this particular request --- reports about IBT misconduct --- I suspect that Monsanto has some summary reports about the tests, the validations, independent investigations, internal IBT investigations, and even governmental investigations or reports. I suggest that you start with the reports presented to the highest level of Monsanto management and work your way downward until you reach the detailed study validations, stopping just short of them. Surely this will simplify your quest, and with the use of the wonderful Monsanto PCB index and document retrieval system and data base, you can gather this handful of documents together in a matter of days --- having already had months since the initial requests to identify the dangerous documents.

Thank you for your ongoing help in this matter.

Sincerely,

Joseph C. Blanks

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