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October 4, 1989

John Downey, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

PRIVILEGED AND "CONFIDENTIAL MATERIAL SUBJECT TO PROTECTIVE ORDER"

Re: Peterson v. Union Carbide Corporation

Dear John:

Enclosed please find copies of the following expert reports that were served on us yesterday on behalf of the plaintiffs:

1. Report of Henry Velez, M.D., dated August 15, 1989.

2. Preliminary Report of Samuel S. Epstein, M.D., dated September 13, 1989.

As you know from our recent conversations, I have submitted material from this case to Dr. Ted Loomis, who will serve as one of our expert witnesses. Dr. Loomis has previously served as an expert on a Union Carbide matter and is presently assisting me as an expert on two major cases for Allied. As you can see from the enclosed C.V.'s, he is both a medical doctor and toxicologist. I am today sending the reports of Drs. Velez and Epstein to Dr. Loomis for consideration in the preparation of his expert report.

Please call me as soon as you have had a chance to review the enclosed reports.

Sincerely,

RECEIVED
OCT 05 1989
J. R. DOWNEY

ROBERT L. HOLLINGSHEAD

RLH:lh
Enclosures

cc: Mr. R. C. Wise (w/encs.)
Mr. Nick Wheeler, Jr. (w/encs.)

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