

copy to D Banks 12/13
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COX, WANDA
V
GEORGIA
Gulf Corp
et al

LAW OFFICES
OGLETREE, DEAKINS, NASH, SMOAK AND STEWART

A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS AND PROFESSIONAL CORPORATIONS

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SPARTANBURG, SOUTH CAROLINA
SCHENECTADY, NEW YORK

November 29, 1988

COX DEFENSE GROUP

ATTENTION: Woodrow W. Ban, Esquire (B.F. Goodrich)
Beverly Gholson, Esquire (Georgia Gulf)
Ms. Linda E. Hart (For Maxus Energy)
Richard J. Lorenz, Esquire (Tenneco Oil)
James V. O'Gara, Esquire (Union Carbide)
Marina K. Pita, Esquire (Conoco)

DEC 02 1988

RE: *Wanda Cox v. Georgia Gulf Corporation, et al.*

PERSONAL AND CONFIDENTIAL

#9128

STATEMENT

For professional services rendered from October 26, 1988, through November 25, 1988, including:

RECEIVED

DEC 7 1988

R. P. LAWLOR

October 26, 1988 (Mary Lou Hill)

Numerous telephone conferences with Mr. Wally Culp regarding revisions to affidavits of Cliff Gandis and Dr. Northrop; redraft affidavits and finalize; research on vinyl chloride; draft summary judgment motion; telephone conference with Mr. Drew Rhodes regarding affidavits.

.....08 hours, 15 minutes

October 27, 1988 (Donald A. Cockrill)

Review status of case with Mary Lou Hill; review revised affidavit of Dr. Northrop.

.....01 hour, 30 minutes

October 27, 1988 (Mary Lou Hill)

Numerous telephone conferences with Mr. Brad Martin and Mr. Culp regarding affidavits; draft summary judgment motion; legal research; telephone conference with Bob Ariail; revise affidavits.

.....07 hours, 00 minutes

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October 28, 1988 (Donald A. Cockrill)

Review status of case.

.....00 hours, 30 minutes

October 28, 1988 (Mary Lou Hill)

Telephone conference with Mr. Culp regarding Stauffer file;
telephone conference with Mr. Rhodes' office; draft motion for
summary judgment.

.....04 hours, 00 minutes

October 31, 1988 (Donald A. Cockrill)

Review status of the case; telephone conference with Mr.
Danny White regarding expert witnesses on causation issues
and work on same.

.....03 hours, 30 minutes

October 31, 1988 (Mary Lou Hill)

Draft motion for summary judgment; telephone conferences
with Mr. John Barr regarding arsenic exposure of Mr. Cox and
testing for arsine at Stauffer plant; telephone conference with
Mr. White regarding status of motion; review of Cox personnel
files and workers' compensation file and monitoring file from
Stauffer Chemical Company; draft memorandum in support of
summary judgment; telephone conference with Mr. Charles
Lucas regarding affidavits of Northrop and Gandis.

.....08 hours, 30 minutes

November 1, 1988 (Donald A. Cockrill)

Review status of summary judgment motion; obtain affidavits
from Stauffer employees; legal research on issue of
applicability of sophisticated user defense to 34D2 A action.

.....02 hours, 00 minutes

November 1, 1988 (Mary Lou Hill)

Draft brief; telephone conference with Mr. Lucas regarding
affidavits.

.....06 hours, 00 minutes

November 2, 1988 (Donald A. Cockrill)

Work on legal issues in summary judgment motion; review
status of case.

.....01 hour, 30 minutes

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November 2, 1988 - (Mary Lou Hill)

Telephone conferences with Messrs. Rhodes and White regarding affidavit revisions; review file material regarding Diamond Shamrock; revise affidavits; draft brief; telephone conference with Mr. Richard Lorenz regarding answers to document requests.

.....08 hours, 30 minutes

November 3, 1988 (Donald A. Cockrill)

Review motion for summary judgment and legal issues associated with same and status of Gandis affidavit.

.....00 hours, 45 minutes

November 3, 1988 (Mary Lou Hill)

Draft and revise brief for summary judgment motion and telephone conference with Mr. Culp regarding same.

.....08 hours, 30 minutes

November 3, 1988 (William S. Rutchow)

Computer legal research to determine legal reporting status of Ohio PVC case.

.....00 hours, 15 minutes

November 4, 1988 (Mary Lou Hill)

Review letter from Mr. Ariail regarding settlement; review documents from Mr. Ban; draft motion for summary judgment.

.....07 hours, 30 minutes

November 7, 1988 (Donald A. Cockrill)

Review of OSHA materials on PVC.

.....00 hours, 15 minutes

November 7, 1988 (Mary Lou Hill)

Telephone conference with Mr. Rhodes' office regarding Gandis and Northrop affidavits; revise and finalize affidavits; telephone conference with Ms. Peggy Beck regarding affidavits of Gandis and Northrop.

.....07 hours, 30 minutes

November 7, 1988 (William S. Rutchow)

Review memorandum in support of Summary Judgment motion.

.....02 hours, 15 minutes

November 8, 1988 (Donald A. Cockrill)

Review status of case; review draft motion for summary judgment.

.....01 hour, 30 minutes

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November 8, 1988 (Mary Lou Hill)

Telephone conference with Mr. Culp regarding Gandis affidavit; draft and revise affidavit after conversation with Mr. Gandis and Mr. Rhodes; telephone conference with Mr. Rhodes regarding affidavit; telephone conference with Mr. Jim Watson regarding joint submission of briefs; draft summary judgment memorandum; prepare responses to document requests.

.....07 hours, 30 minutes

November 8, 1988 (William S. Rutchow)

Review summary judgment memorandum for legal sufficiency.

.....00 hours, 30 minutes

November 9, 1988 (Mary Lou Hill)

Review letter and documents from Ms. Marina Pita; review documents sent from Mr. Endicott; telephone conference with Mr. Culp regarding joint submission of briefs; letter to defense group; prepare and draft responses to document requests.

.....07 hours, 00 minutes

November 10, 1988 (Mary Lou Hill)

Telephone conference with Mr. Ban regarding document production and status of case; telephone conference with Ms. Beverly Gholson's office; telephone conference with Mr. Knouft regarding document responses to document requests.

.....07 hours, 15 minutes

November 11, 1988 (Mary Lou Hill)

Telephone conference with Mr. Ariail regarding settlement demand and motion filing; telephone conference with Mr. Danny White regarding brief, continuance, trial tactics; telephone conference with Mr. Rhodes regarding Gandis affidavit; draft document responses; review correspondence and documents from Ms. Gholson.

.....03 hours, 15 minutes

November 11, 1988 (William S. Rutchow)

Telephone conference with Mr. Bob Bunda in Ohio regarding expert depositions.

.....00 hours, 15 minutes

November 14, 1988 (Donald A. Cockrill)

Review developments in case.

.....00 hours, 15 minutes

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November 14, 1988 (Mary Lou Hill)

Telephone conference with Mr. Joel Beerman regarding document responses; telephone conference with Mr. White regarding filing of motions; review letter from Mr. Ariail regarding expert depositions; telephone conference with Mr. Lorenz regarding settlement and motion for summary judgment of Tenneco Oil; draft motion for summary judgment of Tenneco and memorandum in support of motion; revise and finalize brief.

.....05 hours, 00 minutes

November 14, 1988 (William S. Rutchow)

Update information on related PVC cases involving similar defendants.

.....00 hours, 15 minutes

November 15, 1988 (Donald A. Cockrill)

Review status of case.

.....00 hours, 15 minutes

November 15, 1988 (Mary Lou Hill)

Review documents from Georgia Gulf; telephone conference with Mr. Jim Watson regarding filing of motion; telephone conference with Mr. Knouft regarding document production; telephone conference with Mr. Culp regarding affidavit filing and service of motions for summary judgment; telephone conference with Mr. Rhodes' office (Rachel) regarding affidavit; letter to Ms. Birch (Clerk) regarding filing of motion; telephone conference with Ms. Carolyn Moss (Clerk's office) regarding filing; organize, finalize and prepare documents for filing with court and service; research preemption defenses; finalize for filing and service summary judgment motion of Tenneco Oil.

.....04 hours, 45 minutes

November 16, 1988 (Donald A. Cockrill)

Review status of case; telephone conference with Mr. Ariail regarding various issues in case and possible settlement.

.....01 hour, 00 minutes

November 16, 1988 (Mary Lou Hill)

Review federal and local rules of court; telephone conferences with Mr. Ariail regarding filing of amended complaint, settlement, and plaintiff's responses to our motion for summary judgment; telephone conference with Mr. White regarding consent order and trial continuance; research adverse case law cited by Mr. Ariail; review motion for summary judgment filed by defendant Formosa; review letter from Mr. Lorenz;

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telephone conference with Mr. O'Gara regarding document responses.

.....04 hours, 45 minutes

November 17, 1988 (Mary Lou Hill)

Office conference with Mr. Ariail regarding settlement, trial schedule, and motion; review consent order for filing of amended complaint; letter to defense group research law cited by plaintiff's attorney.

.....03 hours, 15 minutes

November 18, 1988 (Mary Lou Hill)

Review documents received from Mr. Joel Beerman regarding quality control data sheets; draft document responses; review motion and brief of defendant Sumitomo; research case law cited in Sumitomo brief; telephone conference with Mr. Endicott regarding settlement, motion and status of case.

.....03 hours, 45 minutes

November 21, 1988 (Mary Lou Hill)

Review letter from Mr. Knouft in response to plaintiff's document request; review order from Judge Anderson regarding extension of time for plaintiff to file responsive brief.

.....00 hours, 30 minutes

November 22, 1988 (Donald A. Cockrill)

Review of motions for summary judgment filed by defendants Formosa and Sumitomo; review status of trial date and amended complaint; legal research on preemption issue.

.....01 hour, 30 minutes

November 22, 1988 (Mary Lou Hill)

Review letter from Mr. Knouft regarding document responses; review documents and information from Mr. Ban regarding causation and VCM exposure; telephone conference with Mr. Watson regarding proposed order; telephone conference with Mr. White regarding proposed scheduling order, continuance and document production responses.

.....02 hours, 00 minutes

November 23, 1988 (Donald A. Cockrill)

Review of completed motion for summary judgment and Gandis' affidavit; review status of various discovery issues; review of correspondence from plaintiff's attorney regarding supplementing answers to court's interrogatories; prepare correspondence to Mr. Ariail regarding same.

.....02 hours, 00 minutes

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November 23, 1988 (Mary Lou Hill)

Draft answers to amended complaint; review causation and exposure literature and research; telephone conference with Ms. Gholson; draft document responses; telephone conference with Clerk of Federal District Court regarding order rescheduling case for trial, telephone conference with Judge Anderson's office regarding signing of order.

.....05 hours, 30 minutes

Donald A. Cockrill

16 hours 30 minutes @ \$150/hour

Mary Lou Hill

120 hours 15 minutes @ \$100/hour

William S. Rutchow

3 hours 30 minutes @ \$75/hour

.....\$14,762.50

Plus Expenses

Reproduction of Copies.....\$659.10

Long Distance Telephone Calls......45

Federal Express.....37.50

Professional Fees.....385.00

Expenses.....\$1,082.05

TOTAL SERVICES.....\$14,762.50

TOTAL EXPENSES.....1,082.05

TOTAL STATEMENT.....\$15,844.55

Prorated Share

Among Six Parties.....\$2,640.76

Please remit to the Greenville Office.

OK
KJ/amb
12/9/88

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