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August 17, 1989

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

Re: Joan Bernadino, Executrix of the
Estate of Robert J. Bernadino
v. Union Carbide Corporation

Dear John:

This will acknowledge receipt of your letter of August 3, 1989, together with copies of the Summons and Complaint in this action. Of course, we will be pleased to defend the interests of Union Carbide in this matter.

Please be advised that the answer to the Complaint will be due on September 5, 1989. I will send you a draft of same for your review during the preceding week.

Kindly note that Betsy Weiss, Esq., will assist me in this case. Betsy's current hourly rate is \$135. Any paralegal time spent on this file will be no higher than \$75.00 per hour.

As we have discussed, it is my intention to file a motion to consolidate this action with the Peterson case,

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J. R. DOWNEY

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John Downey, Esq.
August 17, 1989
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which also involves an employee's exposure to PVC and other chemicals at the Amboy Terminaling Company in Perth Amboy, New Jersey. Additionally, the plaintiffs in both cases are represented by the same attorney.

Thank you for requesting us to represent Union Carbide in this matter. Betsy and I are looking forward to working with you once again.

Sincerely,



ROBERT L. HOLLINGSHEAD

RLH:lh

cc: R.C. Wise

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