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April 17, 1986

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Re: Herman A. Dendinger, et al. v. Chrysler Plastic
Products Corporation, et al.;
Etta Wallace v. Chrysler Plastic Products
Corporation, et al.

UCC
045724

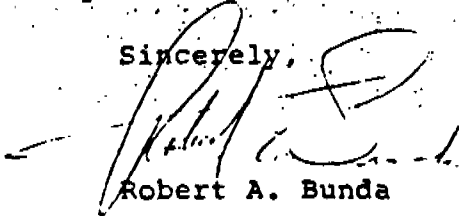
FULLER & HENRY
TOLEDO, OHIO

Counselors:

I'm enclosing a copy of interrogatories to the PVC manufacturers and requests for the production of documents directed to the PVC manufacturers in both the Dendinger and Wallace cases.

Please review these enclosed pleadings and provide me with the information required to respond to these discovery requests. The requests were hand delivered by plaintiffs' counsel at the pretrial of these cases on April 14, 1986. The responses are due on or before May 14.

Sincerely,


Robert A. Bunda

RAB/mh
enclosure
3861-1

cc: Mr. Nelson R. Goodrich (#875ERB201697H; #875ERB201703A)
Mr. R. E. Wildey (#555 QN 115219-Z; #555 QN 115218-Z)
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UCC
045725

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

ETTA WALLACE, personal representative
of the Estate of Fred A. Wallace,
et al.,

Plaintiffs,

-VS-

CHRYSLER PLASTIC PRODUCTS
CORPORATION, et al.,

Defendants.

INTERROGATORIES DIRECTED TO
ALL DEFENDANT PVC MANUFACTURERS

Case No.: C84-7864
Judge Nicholas J. Walinski

-oOo-

Pursuant to Ohio Rule of Civil Procedure 33, plaintiffs propound the following interrogatories to be answered in writing and under oath by each defendant PVC Manufacturer, within thirty (30) of the date of service. It is understood that these interrogatories shall be of a continuing nature and must be supplemented as soon as new or additional information is available.

INTERROGATORY NO. 1: Are you a manufacturer of polyvinyl chloride (PVC) resin?

ANSWER:

INTERROGATORY NO. 2: When did you first begin manufacturing

PVC resin?

ANSWER:

INTERROGATORY NO. 3: Have you manufactured PVC resin continuously since the date indicated in your answer to interrogatory number 2?

ANSWER:

INTERROGATORY NO. 4: Indicate the percentage of all PVC resin manufactured by you in calendar year 1967 that was the result of the following processes: (a) suspension; (b) emulsion; (c) bulk; or, (d) solution.

ANSWER:

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A LEGAL PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
SUNBELT BUILDING
200 CENTRAL AVENUE
CINCINNATI, OHIO 45202

INTERROGATORY NO. 5: Indicate the extent to which the percentages of your total PVC resin output attributed to any of the four processes identified in the prior interrogatory have changed since calendar year 1967, by indicating the specific changes made and dates of all such changes.

ANSWER:

INTERROGATORY NO. 6: Did you sell any PVC resin to Chrysler during calendar year (a) 1967; (b) 1968; (c) 1969; (d) 1970; (e) 1971; (f) 1971; (g) 1972; (h) 1973; (i) 1974; (j) 1975; (k) 1976; (l) 1977; (m) 1978; (n) 1979; and, (o) 1980.

^N
ANSWER:

- (a)
- (b)
- (c)
- (d)
- (e)
- (f)
- (g)
- (h)
- (i)
- (j)

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ATTORNEYS AT LAW
SUNNYVALE, CALIFORNIA
100 CENTRAL AVENUE
SANDHURST, CALIF. 94580

(k)

(l)

(m)

(n)

(o)

INTERROGATORY NO. 7: If your answer to the preceding interrogatory is, in any part, "yes," indicate the total volume of PVC sold to Chrysler during every year that you sold PVC resin to Chrysler.

ANSWER:

INTERROGATORY NO. 8: For every calendar year between 1967 and 1980, inclusive, that you sold PVC resin to Chrysler, indicate the percentage of such resin which was manufactured by the following processes: (a) suspension; (b) emulsion; (c) bulk; and, (d) solution.

ANSWER:

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ATTORNEYS AT LAW
MURRAY BUILDING
100 CENTRAL STREET
SANDUSKY OHIO 44870

INTERROGATORY NO. 9: Did you at any time conduct any testing to determine the concentration of vinyl chloride monomer contained in your PVC resin at any time following manufacturing?

ANSWER:

INTERROGATORY NO. 10: If your answer to the preceding interrogatory is "yes," indicate: (a) what testing was done; (b) when such testing was done; (c) who conducted the testing; and, (d) what the results were.

ANSWER:

INTERROGATORY NO. 11: For every calendar year in which you sold PVC resin to Chrysler, indicate what percentage of the PVC resin sold was: (a) homopolymer; (b) copolymer; or, (c) terpolymer.

ANSWER:

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SUITE 200
300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

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045730

INTERROGATORY NO. 12: With respect to every sale of PVC resin from you to Chrysler, indicate the date on which such resin was manufactured and the date on which such resin was shipped to Chrysler.

ANSWER:

INTERROGATORY NO. 13: Did you, at any time, notify Chrysler of any studies indicating that vinyl chloride monomer was: (a) hazardous to human health or (b) that vinyl chloride monomer was a suspected carcinogen?

ANSWER:

INTERROGATORY NO. 14: If your answer to the prior interrogatory is "yes," state in full, the date and substance of every such notification to Chrysler.

ANSWER:

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300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

INTERROGATORY NO. 15: When did you first become aware of any study indicating that vinyl chloride monomer was a suspected carcinogen; or, (b) hazardous to human health?

ANSWER:

INTERROGATORY NO. 16: What steps were taken by you prior to, or during the course of, your sales of PVC resin to Chrysler to determine the concentration of residual vinyl chloride monomer in said resin.

ANSWER:

INTERROGATORY NO. 17: What steps were taken by you prior to, or during the course of, your sales of PVC resin to Chrysler, to determine whether any component of that resin was an actual or potential carcinogen?

ANSWER:

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ATTORNEYS AT LAW
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SANDUSKY, OHIO 44870

INTERROGATORY NO. 18: Did Chrysler, at any time, ever ask you whether you were aware of any studies indicating that exposure or overexposure to vinyl chloride monomer posed any actual or potential human health hazard?

ANSWER:

INTERROGATORY NO. 19: Describe the steps taken by you subsequent to January, 1967 to reduce the concentration of residual vinyl chloride monomer in PVC resin manufactured by you.

ANSWER:

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SANDUSKY, OHIO 44870

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INTERROGATORY NO. 20: State the full name, home address and business address of your employee who is most knowledgeable concerning the residual concentrations of vinyl chloride monomers in the PVC resins manufactured by you between January 1, 1967 and December 31, 1980.

ANSWER:

Kirk J. Delli Bovi

Kirk J. Delli Bovi
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