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SCHROETER, GOLDMARK & BENDER, P.S.
ATTORNEYS AT LAW

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Of Counsel:
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John Goldmark (1917-1979)
Dean Bender (1933-1988)

PLAINTIFF'S EXHIBIT
tabbies
AL-622

April 4, 1994

General Counsel
Aluminum Company of America
1501 Alcoa Building
Pittsburgh, PA 15219

Re: Newberg v. Fibreboard Corp., et al.

Dear Counsel:

We represent the family of the late Hubert E. Wright in an action against various asbestos manufacturers. Mr. Wright worked as a welder at the Alcoa plant in Vancouver, Washington, from the years 1944 to 1971.

In this regard, it is important that we obtain information concerning asbestos-containing materials that were in use at this plant during the above stated time period.

Enclosed please find a Notice of Deposition Pursuant to Civil Rule 30(b)(6). We would appreciate your cooperation in this matter and would hope to avoid any unnecessary expenditure of time and money on both our part and yours by forcing us have a subpoena issued in Pennsylvania. Please be aware that we have no intention of naming ALCOA as a defendant in this matter.

I would appreciate you contacting me at 1-800-422-4604 at your earliest convenience to advise me if I can expect your cooperation in this matter. We will be glad to change the date and time to suit your convenience.

Sincerely,

WILLIAM RUTZICK

WR/nld
Enclosure

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SANDRA NEWBERG, for herself, and as Personal Representative of the Estate of HUBERT E. WRIGHT, Deceased,

Plaintiff,

v.

FIBREBOARD CORP., et al.,

Defendants.

NO. 90-2-06688-6

NOTICE OF DEPOSITION PURSUANT TO CIVIL RULE 30(b)(6) (By Telephone)

TO: ALUMINUM COMPANY OF AMERICA

AND TO: THEIR COUNSEL OF RECORD

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that pursuant to Civil Rule 30(b)(6), the testimony of the Aluminum Company of America, also known as ALCOA (hereinafter ALCOA), will be taken on oral examination before trial at the instance and request of the plaintiffs in the above-entitled and numbered action before a court reporter at the offices of Schroeter, Goldmark & Bender via telephone on Monday, May 9, 1994, commencing at the hour of 1:00 p.m. Eastern Standard Time; the said oral examination of said corporation at said time and place to be subject to continuance or adjournment from time to time or place to place until completed.

ALCOA0002303

SCHROETER, GOLDMARK & BENDER, P.S.
ATTORNEYS AT LAW
500 Central Building • 810 Third Avenue
Seattle, Washington 98104
(206)622-8000

Johnson & Garvin
Attorneys at Law
610 Hoge Building
705 Second Avenue
Seattle, Washington 98104
(206) 625-1711
Facsimile (206) 625-1627

Kathleen Garvin
(206) 625-1630

File Number

May 13, 1994

Mr. Jeff Reed
LeBoeuf, Lamb, Greene & MacRae
601 Grant Street
Pittsburgh, PA

VIA FAX: 412-594-5237

RE: Hubert E. Wright v. Owens-Illinois, Inc.

Dear Mr. Reed:

It was a pleasure speaking with you this morning. I would appreciate receiving a copy of Mr. Wright's employment records and copies of any documents responsive to the 30 (b)(6) subpoena served by the law firm of Schroeter, Goldmark & Bender.

Attached to this fax is a copy of the original stipulation authorizing the release of employment records.

We previously received copies Mr. Wright's retirement records.

Thank you for your assistance.

Sincerely,

Kathleen Garvin
KG:tlh

Attachment

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

SANDRA NEWBERG, for herself, and as personal representative of the Estate of HUBERT E. WRIGHT, Deceased,

Plaintiff,

v.

FIBREBOARD CORP., et al.,

Defendants.

NO. 90-2-06688-6

STIPULATION TO OBTAIN EMPLOYMENT RECORDS OF HUBERT E. WRIGHT

TO: EMPLOYMENT RECORDS CUSTODIAN OF:

Alcoa Aluminum Plant
Vancouver, WA
Dates of Employment: 1944-1971

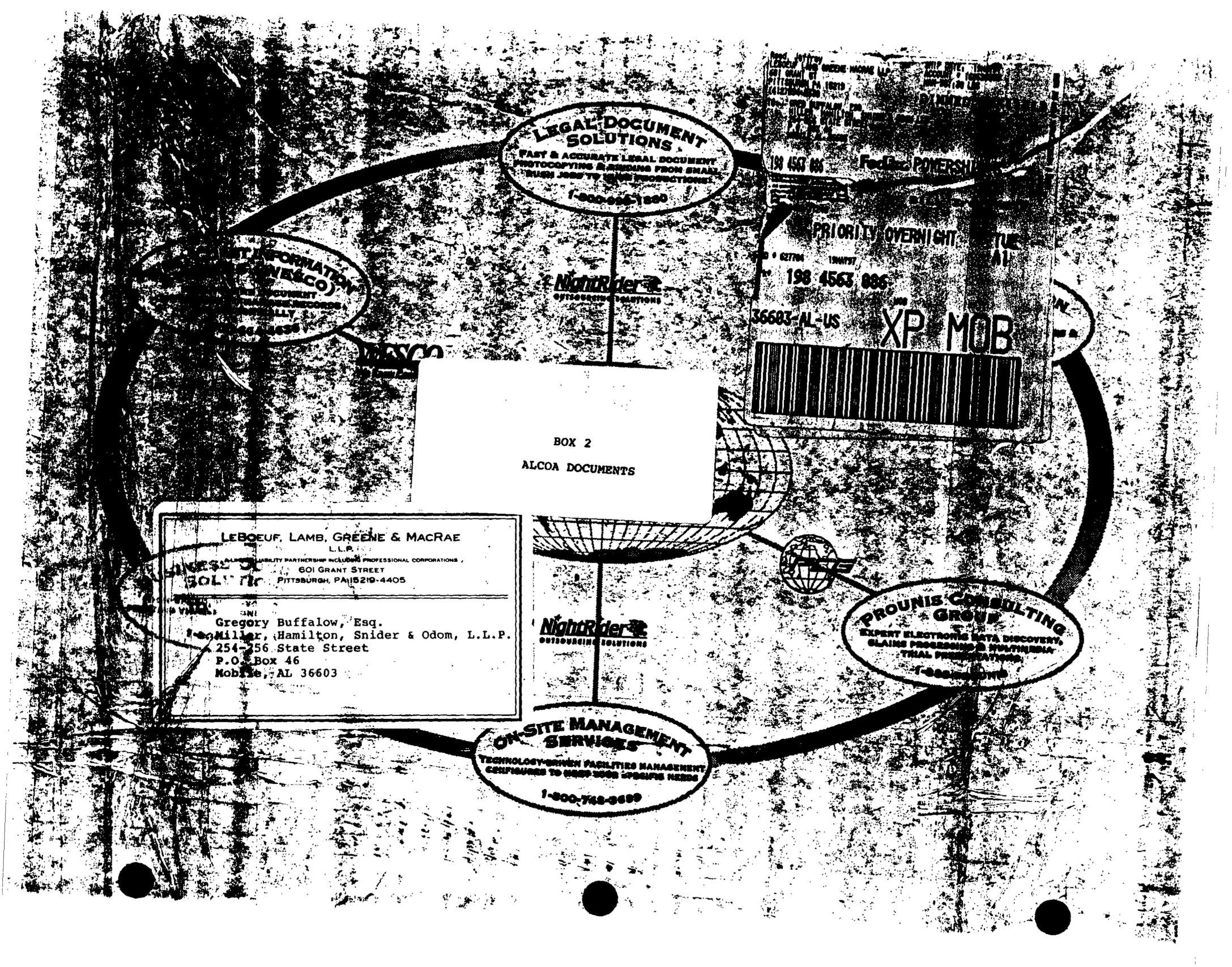
Kaiser Shipyards
Vancouver, WA
Dates of Employment: 1941-1944

International Association of Machinists & Aerospace Workers,
District Lodge #1374
Portland, OR

COME NOW THE PARTIES HERETO, through their respective counsel and stipulate as follows:

That the Records Custodian of the above-named facilities are hereby authorized to release copies of, or make available for copying by a field representative of MEDRECS Copy Service the complete

Schroeter, Goldmark & Bender, PS
Attorneys at Law
700 Central Building • 810 Third Avenue
Seattle, Washington 98104
(206) 622-8000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L.L.P.
601 GRANT STREET
PITTSBURGH, PA 15219-4405
Gregory Buffalow, Esq.
Miller, Hamilton, Snider & Odom, L.L.P.
254-256 State Street
P.O. Box 46
Mobile, AL 36603
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Jane P. Cheatwood *Excellence through Quality* 940517

To: Tom:

I got a call this afternoon from Nancy Driver of Schroeter, Goldmark & Bender saying that she had sent a Federal Express package addressed to the General Counsel of Alcoa and further that Federal Express had not been able to trace it satisfactory. We never received the Federal Express package and I asked her to fax the document to me.

It is attached. Lee looked at it and said to send it to you.

Jane C.
4/26/94

Primary Metals
Vancouver

ALCOA

1501 Alcoa Building
Pittsburgh, PA 15219

SCHROETER, GOLDMARK & BENDER, P.S.
ATTORNEYS AT LAW

500 Central Building • 810 Third Avenue • Seattle, WA 98104
Phone: (206)622-8000 • Fax: (206)682-2305

URGENT FAX!

Please deliver at once to:

Name: Jane Cheatwood Department: _____

Office: ALCOA Fax Number: 1-412-553-3335

This is page 1 of a 5 page transmission.
Date sent: 4/26/94
Time sent: _____

☐ Please call _____ at (206)622-8000 to acknowledge receipt of this fax.

☐ Please distribute additional copies of this fax to the following persons at your location.

_____

_____

_____

Comments:
Per our conversation

_____

_____

From: Nancy DRIVER

This facsimile transmission (and or documents accompanying it) may contain confidential information belonging to the sender which is protected by the attorney-client privilege. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this information is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone to arrange for return of the documents.

Thank you.

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