

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.

REQUESTS FOR PRODUCTION
OF DOCUMENTS DIRECTED TO
ALL DEFENDANT PVC MANUFACTURERS

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

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Pursuant to Ohio Rule of Civil Procedure 34, plaintiffs request that the following documents be produced for inspection and copying at the offices of Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio, within 30 days after service of the following requests for production of documents.

1. All records of sales, direct or indirect, of Polyvinyl Chloride (PVC) resin from you to Chrysler Plastic Products Corporation (Chrysler) between January 1, 1967 and December 31, 1980.

2. All documents indicating the extent to which PVC resin sales to Chrysler during the time period indicated above, represented sales of PVC resin manufactured in the: (a) suspension; (b) emulsion; (c) bulk; or, (d) solution process.

3. All documents indicating the extent to which PVC resin sales to Chrysler during the time period specified in request number 1, were of (a) Homopolymer; (b) copolymer; or, (c) terpolymer.

RAY & MURRAY CO., L.P.A.
SAL PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
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300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

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4. All written documents indicating, with respect to PVC resin sold to Chrysler during the time period specified above, the size (in microns) of the resin sold.

5. All written documents indicating the results of any tests done on any PVC resin by you or any other entity to determine the concentration (in parts per million) of residual vinyl chloride monomer in PVC resin of the type sold to Chrysler during the time period specified in request number 1.

6. All Material Safety Data Sheets published by you prior to January 1, 1986, relating to any PVC resin manufactured by you.

7. All documents in your possession indicating the dates of manufacture and the dates of shipment of PVC resin sold to Chrysler.

8. All written results of any testing done on the PVC resin identified in the prior request to determine the concentration of residual vinyl chloride monomer.

9. All documents sent by you to the Occupational Safety & Health Administration, relating, in any way, to PVC.

10. All documents reporting or summarizing efforts taken by you, at any time since January 1, 1967 to reduce the percentage of residual vinyl chloride monomer in PVC resin manufactured by you.

JAY & MURRAY G.L.P.A.
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11. Each and every document sent to Chrysler, informing Chrysler of any known or potential human health hazards relating to exposure or over exposure to vinyl chloride monomer.


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Attorneys for Plaintiffs

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