

DANIEL B. BADGER
JOSEPH W. BARNETT, JR.
JONATHAN D. CARUSLE
BRUCE F. COHEN
EVERETT FISHER
PETER E. HEWITT
DONAT C. MARCHANO
MILES F. McDONALD, JR.
PAUL J. PACIFICO

FRANCINE J. MORRIS
FERNANDO F. DE ARANGO

BADGER, FISHER, COHEN & BARNETT

ATTORNEYS AT LAW

ONE STAMFORD SQUARE

3001 SUMMER STREET

STAMFORD, CONN. 06905

(203) 869-5900

TRENHOLM H. MARSHALL
(1948-1981)

FRANKLIN E. PARKER, JR.
(1948-1983)

CHARLES S. BRADFORD
OF COUNSEL

AUBREY J. CARTER
OF COUNSEL

GREENWICH OFFICE
P. O. BOX 1189
49 WEST PUTNAM AVENUE
GREENWICH, CONN. 06830
(203) 869-5900

December 14, 1981

Harold J. Fast, Esq.
Senior Corporate Counsel
B. F. Goodrich Company
500 South Main Street
Akron, Ohio 44318

Dear Harold:

I enjoyed our brief but informative talk during the recess in the presentation by the "alleged experts". As mentioned, I am defending a significant case involving chlordane and heptachlor in which both Dr. Epstein and Dr. Wagner appear as plaintiff's experts. You indicated that you might have some data on Epstein which would be helpful in his deposition and trial. We would be more than happy to pay for any reproduction costs if such material is available.

Please don't hesitate to give me a call or drop me a line if I can be of any assistance to you since I am accumulating data from various sources and researching such issues as whether or not opinions of the type rendered by Dr. Epstein are admissible in the State of Connecticut.

I hope you have a very merry Christmas.

Very truly yours,

Miles F. McDonald, Jr.

MFMCDC: jm

RECORDED

DEC 17 1981

U. S. DEPT.

21144001

BFG10789

DOCUMENT NUMBER: _____

Pulled for Attorney-Client Privilege/Work Product

DOCUMENT NUMBER: 21145001

Pulled for Attorney-Client Privilege / Work Product

DOCUMENT NUMBER: _____

Pulled for Attorney-Client Privilege/Work Product