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September 11, 1989

Mr. R. N. Wheeler, Jr.
1912 Shady Branch Trail
Richmond, Virginia 23233

Re: Peterson v. Union Carbide Corporation

Dear Nick:

While in the course of preparing answers to plaintiffs' Supplemental Interrogatories in this case, it came to my attention that we still need to provide additional information in response to the initial Interrogatories that Carbide answered a while ago. Specifically, I am enclosing a copy of my letter to Peter Davey, Esq. dated April 14, 1988 wherein I set forth the answers that required more detail.

I would appreciate it if you would review the enclosed to see if you can get any of the information that we need and then call me so we can discuss this further.

Sincerely,

ROBERT L. HOLLINGSHEAD

RLH/rtd

cc: John Downey, Esq. (w/enc.)

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SEP [illegible] 1989
J. D. DOWNEY

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Peterson v UCC
CORR

April 14, 1988

Peter F. Davey, Esq.
Union Carbide Corporation
Law Department E-1275
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Peterson v. Union Carbide

Dear Peter:

Please note that we have served our answers to plaintiffs' Interrogatories, but we still have to prepare more specific answers to some of those Interrogatories. The particular Interrogatories and my understanding of what needs to be done to prepare the answers are set forth below.

No. 33. This question asks about the manner of compensation paid to OTD/ATC by Carbide. We agreed that you will review the contract and speak to Mr. Bowles to obtain this information.

Nos. 38, 39 and 40. This question asks for information about the labels on the containers. Please obtain sample labels from the time period of 1960 to 1977. If labels are not available, then we should obtain the information requested from other sources, e.g., present or former employees.

No. 43. We stated in the answer that we will attempt to compile a list of persons who were in charge of research on PVC and who are still employed at Carbide. To assist you on this, please note that in the Maliko cas we listed the following chemists:

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| | |
|---|---|
| R.J. Hanna | J.A. Biddle |
| D.E. Richardson | T.L. Dawson |
| H.M. Rife | D.R. Montgomery |
| J.F. Erdmann | J.J. Brezinski |
| D.L. Engle | C.J. Haines |
| R.A. Walther | W.E. Whitehurst |

No. 46. Even though we have answered this question regarding your insurance coverage, I think you should ask Ed DeLoughy the amount of liability insurance coverage and the insurance company. I have the information in other cases, but I am concerned that it may not be accurate for the time span in this case, i.e., 1960 to 1977.

No. 52. We stated in this answer that recommendations as to protective clothing were contained on Material Safety Data Sheets, which would be supplied. Please collect the available MSDS's (or any product information sheets which may have preceded the use of MSDS's) and provide them to me.

No. 94. We stated in the answer that we will supply a list of Medical Directors. Please attend to this.

No. 145. This question requests additional insurance information, which should be obtained from Ed DeLoughy.

If you have any questions concerning the above, please call me.

Sincerely,

ROBERT L. HOLLINGSHEAD

RLH:js

cc: R.N. Wheeler

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