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February 26, 1990

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Company, Inc.  
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Danbury, Connecticut 06817-0001

Re: Alice Warren, Administratrix v.  
The Dow Chemical Company, et al

Dear Larry, Judy and John:

A week or so ago I contacted Bob Powers, one of the Boston attorneys for Monsanto, explained that we would be taking the deposition of Ruth Griffith, an ex-Monsanto employee in the near future, and asking whether Monsanto would permit us to look over his file on Ms. Griffith in preparation for the deposition. I pointed out that I was already aware from conversations with Monsanto people in the course of the Cullinan case that Ms. Griffith had for some years been an active antagonist of Monsanto and other chemical companies. We would be interested in any facts that might help to reflect her bias and longstanding opposition. Bob said he would "check with St. Louis", Monsanto's headquarters and get back to me.

In this morning's mail I received a letter from Bob enclosing three recent excerpts from newspapers in the Holyoke/Springfield area. It is not clear to me whether this is intended to be everything that Monsanto planned to give us or whether it is simply a preliminary offering. I put in a call to

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Lawrence A. Looby, Esq.  
Judith Elledge, Esq.  
John R. Downey, Esq.

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Bob early Friday morning to ask about this but he has not yet returned it.

If it does turn out that these three newspaper clippings are all that Monsanto plans to show us, we may want to consider whether (1) someone in Dow, Conoco or Union Carbide should directly contact Monsanto with a request for more helpful cooperation and/or (2) our coming deposition subpoena duces tecum with respect to the Monsanto deposition should include a demand for all records and documents pertaining to Ruth Griffith, both during and after her employment by Monsanto.

Sincerely,



Lane McGovern

LM/DMB:LMLETR6.DC  
Enclosures

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