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September 27, 1988

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Tony Colangelo
Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: dec'd) v. Kaiser Shipyard
#3, et al.
WCAB Case No: OAK 141300
Claim No: 918 C 31408/SMBS No: 144.054

Dear Mr. Colangelo:

Enclosed herewith, please find copies of correspondence directed to the co-defendants and to Self-Insurers Services, your adjusting agency here in California. We believe our letter to the adjusting agency brings you up to date on the disposition at the conference of September 20, 1988.

As we have discussed over the past few days, it would be greatly appreciated if you could in fact identify someone at the local plant in Emeryville whose deposition will shed some light on the operation of the plant over the past 30 yers. We think it is going to be next to impossible to specifically identify an individual at this juncture that may fit within the requirements of co-defendant; but, we believe an effort should be undertaken to do something so that Judge Mason is satisfied that the newly-joined co-defendants have in fact done their utmost to satisfy all discovery orders.

As mentioned in our letter to Ms. Del Vecchio of Self-Insurers Service, we are going to be sure that the co-defendants undertake proper discovery procedures, because

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Re:

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we certainly do not wish to place Sherwin-Williams in the position of having to go to trial without proper medical having been obtained.

We look forward to working with you on this matter; and, as always, if you have any questions, please feel free to contact the undersigned directly.

Very truly yours,

LAUGHLIN, VALBO, LEVY & MORESI

By:

Alfonso J. Moresi

AJM/jm

Enclosure

cc: John F. King, Esq., Sherwin-Williams Company,
101 Prospect Avenue, N.W., Cleveland, OH 44115-1075
Ann Del Vecchio, SIS, 2620 Augustine Drive, Suite
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