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NUTTER, McCLENNEN & FISH

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Warren v. ITC
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BOSTON, MASSACHUSETTS 02110-2699

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TELEX: 94-0790 TELECOPIER: 617 973-9748

May 15, 1990
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Judith Elledge, Esq.
Conoco Inc.
600 North Derry Ashford
P.O. Box 2197
Houston, Texas 77252-2197

John R. Downey, Esq.
Union Carbide Chemicals and Plastics Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, CT 06817-0001

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

Dear Judy and John:

I enclose a copy of the medical summary prepared on behalf of the Dow Chemical Company in the Warren case. It is based upon the medical records forwarded to Dow prior to March 7, 1990. It was prepared by Elizabeth E. Gresch, M.D. who is certified in occupational medicine and serves as a consultant to Dow's litigation section. Dow is very careful to protect all privileges (including Dr. Gresch's identity) with respect to her litigation support activities. Accordingly, I have been asked to limit disclosure of her summary to persons at my firm who have a need to know the information in order to defend this case. I have also been authorized to provide unaltered copies of the summary to each of you as members of the joint defense group and to ask that you too limit disclosure of this document or Dr. Gresch's identity to those persons at your company who have a need to know the information in order to defend this case.

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"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

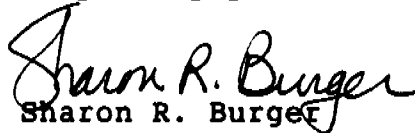
NUTTER, McCLENNEN & FISH

John R. Downey, Esq.
Judith Ell dge, Esq.
May 15, 1990
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Additionally, I have been authorized to provide a copy of this document to counsel for B. F. Goodrich but in such form as to eliminate Dr. Gresch's identity. Under cover of separate letter this date, I am accordingly forwarding a redacted copy of this document to Attorney Joseph Rendini.

Please let me know if you have any questions...

Very truly yours,


Sharon R. Burger

SRB/jlf
enclosure

cc: Mary K. Sundt, Esq.

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