

MEMORANDUM

To: JHT
From: KAM *KAM*
Re: Warren case
Date: 5/7/91

*OK Keith
Thanks JHT*

On May 6th I spoke with Dr. Peter Infante at OSHA. I have sent him the deposition of Carl Rehm to review. I discussed some of the issues which the defendants have raised with Dr. Infante. If he were called to testify, his position would be that all of the vinyl chloride to which Mr. Warren was exposed including during the years 1969 through 1974 contributed to his condition. If asked whether John Warren had already received a fatal dose of vinyl chloride before Dow started shipping vinyl chloride in 1969 his answer will simply be that it is impossible to know. He did make one interesting suggestion as to how to argue causation. Assuming that Warren was never exposed to vinyl chloride before 1969 when Dow began to supply it, would he have still had enough exposure to develop cancer. The answer, of course, would be yes. Although speculative, not a bad way of approaching the problem.

Dr. Infante will be calling me after he has had a chance to review the Carl Rehm transcript.

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MEMORANDUM

To: KAM
From: JHT
Re: Warren/Dow
Date: February 19, 1991

In Sharon's letter of February 13 she mentions Dr. Torkelson's articles and 50 PPM. Let's ask Doctor Infanti about 50 PPM. One assumes that that is still too high an exposure. We should also find out from Monsanto what, if anything, they did, that is, did they receive the warning, and how did they respond to it.

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