FILE NAME: The Budd Company (BUD)

DATE: 2018 Oct 16

DOC#: BUD020

DOCUMENT DESCRIPTION: Letter to BC Re Deposition

ROVEN-KAPLAN, LLP

ATTORNEYS AND COUNSELORS AT LAW

October 16, 2018

Dr. Barry Castleman
4406 Oxford Street
Garrett Park, MD 20896

Via FedEx

RE: *Little (Rabe) v. The Budd Company, Inc.*

Dear Dr. Castleman:

In advance of your deposition on October 23, 2018 in Rockville, John Roven has asked that I provide you with the following:

1. Notice of Intent to Take Oral and Videotaped Deposition of Dr. Barry Castleman; (10/23/18)
2. Cuts from depo transcript of Budd's corporate representative, Michael Bauer;
3. Budd's 1954 Annual Report;
4. Internal Note: Dust Studies;
5. First Internal Meeting;
6. Documents re: Budd's purchase of Continental Diamond Fibre;
7. Declarations of Co-workers (Grandstaff, Shaw & Annis);
8. Occupational Disease Prevention Article: Dr. E. H. McIlvain (Insulation in Stream-Lined Trains);
9. Industrial Hygiene Survey of Competitor, The Pullman Company;
10. Cuts from depo of Lawrence Brooks (*Munoz v. BNSF); and*
11. Text of Occupational Disease Act;

Should you have any questions, please do not hesitate to call.

Yours truly,

Dawn Joachim

Dawn Joachim
Legal Assistant to John R. Roven

JDR:dj
Enclosures
Cc: John Roven

John D. Roven Michael Kaplan
2190 North Loop West, Suite 410 * Houston, Texas 77018
(713) 465-8522-Telephone ** (713) 465-3658-Facsimile