

21- 511
Cox v. UCC
5/1

UNION CARBIDE CORPORATION
39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001
LAW DEPARTMENT

September 13, 1988

TO: Peter F. Davey, Esq.
FROM: Thomas W. Reitz
SUBJECT: Cox v. Georgia Gulf Corp., UCC et al. Invoice
(dated 9/2/88)

This is to inform you that the above-referenced invoice
has been forwarded for payment.

TW Reitz
Thomas W. Reitz

TWR/els
attachment

SEP 13 1988
P. F. DAVEY

PRIVILEGED AND
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ORDER"

UCC 079471

orig to D. B...
on 9/1/7
Cox v. Gulf v. UCC

LAW OFFICES
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PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS AND PROFESSIONAL CORPORATIONS

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September 2, 1988

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COX DEFENSE GROUP

ATTENTION: Peter F. Davey, Esquire (Union Carbide)
Ms. Linda E. Hart (For Maxus Energy)
Beverly Gholson, Esquire (Georgia Gulf)
Gary A. Jones, Esquire (B.F. Goodrich)
Richard J. Lorenz, Esquire (Tenneco Oil)
Amy Ng, Esquire (Conoco)

RE: *Wanda Cox v. Georgia Gulf Corporation, et al.*

PERSONAL AND CONFIDENTIAL

#7908

STATEMENT

For professional services rendered from July 26, 1988, through August 25, 1988, including:

July 26, 1988 (Mary Lou Hill)
Letter to Ms. Linda Hart (Aetna) regarding status of case and sending all documents; letter to Defense group regarding status of case and requesting answer to interrogatories; receive and review insurance information regarding Diamond Shamrock Corporation from Mr. Endicott; draft answer to complaint; draft affirmative defenses; telephone conference with Mr. Bob Ariail; research successor liability; review case decision; review local federal rules of civil procedure.

..... 07 hours 45 minutes

July 27, 1988 (Mary Lou Hill)
Telephone conference with Mr. Danny White regarding motion to enlarge time to answer; draft motion for enlargement of time; draft consent order; draft affidavit of counsel to support motion for enlargement of time to answer; telephone conference with Mr. John Endicott regarding answers to 16(b) interrogatories; draft answers to 16(b) interrogatories; review answers to interrogatories from Ms. Gholson; research regarding South Carolina strict liability;

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telephone conference with Mr. Bob Ariail; review memoranda and decisions regarding bulk supplier and learned intermediary defenses.

..... 08 hours 15 minutes

July 28, 1988 (Donald A. Cockrill)

Telephone conference with Mr. Richard Lorenz regarding answers to court's standard interrogatories.

..... 00 hours 15 minutes

July 28, 1988 (Mary Lou Hill)

Legal research regarding liability of successor corporation and strict liability; deliver signed consent order for extension of time to Mr. Ariail's office.

..... 01 hour 45 minutes

July 29, 1988 (Mary Lou Hill)

Trip to Mr. Ariail's office to secure signed consent order and deliver same to Judge Anderson; telephone conference with Mr. Gary Jones regarding interrogatory answers.

..... 00 hours 45 minutes

August 1, 1988 (Mary Lou Hill)

Proof and redraft answer to complaint.

..... 02 hours 45 minutes

August 2, 1988 (Mary Lou Hill)

Research regarding defenses and strict liability; draft interrogatory answer; telephone conference with Ms. Linda Hart regarding relationships; telephone conference with Ms. Paige Marlow regarding interrogatories.

..... 03 hours 45 minutes

August 4, 1988 (Mary Lou Hill)

Telephone conference with Mr. Endicott regarding answers of Occidental to local rule interrogatories; review letter from Ms. Hart; review OSHA VC standards and PVC articles.

..... 04 hours 00 minutes

August 5, 1988 (Mary Lou Hill)

Telephone conference with Ms. Beverly Gholson regarding Stauffer ledger sheets and letter regarding same; review medico-legal literature regarding vinyl chloride regulations.

..... 04 45 minutes

August 8, 1988 (Mary Lou Hill)

Telephone conference with Mr. Bob Ariail regarding supplier information; review supplier invoices; draft and prepare

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answer; draft verifications; research regarding case law S.C. and 4th Circuit, statement of Torts regarding negligence and strict liabilities in tort.

..... 05 hours 15 minutes

August 9, 1988

(Mary Lou Hill)

Research case law regarding strict liability and negligence, learned intermediary defense; draft 7.06 interrogatories.

..... 07 hours 45 minutes

August 10, 1988

(Mary Lou Hill)

Review federal regulations (1978) regarding vinyl chloride; draft 7.06 interrogatory answers.

..... 07 hours 15 minutes

August 11, 1988

(Mary Lou Hill)

Draft 7.06 interrogatories; telephone conference with Mr. Endicott regarding list of Diamond Shamrock insurers; research for summary judgment motion regarding defenses.

..... 07 hours 15 minutes

August 12, 1988

(Mary Lou Hill)

Finalize answers to complaint and interrogatories for Georgia Gulf Corporation; research restatement of Torts; case law regarding negligence and strict liability for motion for summary judgment; draft summary judgment outline; draft 16(b) interrogatory answers.

..... 07 hours 45 minutes

August 13, 1988

(Katherine Thomas)

Retrieving restatement (2d) of Torts Sections for Mary Lou Hill.

..... 00 hours 30 minutes

August 15, 1988

(Mary Lou Hill)

Draft 16(b) interrogatory answers and finalize same.

..... 02 hours 30 minutes

August 16, 1988

(Donald A. Cockrill)

Review of complaint and responses to standard court interrogatories.

..... 00 hours 30 minutes

August 16, 1988

(Mary Lou Hill)

Finalize Rule 16(b) interrogatories; prepare answer for mailing; letter to defense group counsel; research law regarding failure to warn/strict liability in preparation for

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drafting motion for summary judgment; telephone conference with Mr. Ariail regarding federal court docket call.

..... 07 hours 15 minutes

August 17, 1988 (Mary Lou Hill)

Research and review Restatement of Torts regarding strict liability and negligent failure to warn.

..... 07 hours 45 minutes

August 18, 1988 (Mary Lou Hill)

Research case of law for summary judgment motion; telephone conference with Ms. Marlow regarding letter; draft motion for summary judgment.

..... 05 hours 00 minutes

August 19, 1988 (Mary Lou Hill)

Revise Conoco's interrogatory answers; legal research regarding case law involving bulk supplier defense for motion for summary judgment.

..... 03 hours 15 minutes

August 23, 1988 (Mary Lou Hill)

Research case law; organize cases for summary judgment motion; revise answers to 16(b) interrogatories.

..... 03 hours 45 minutes

August 24, 1988 (Mary Lou Hill)

Legal research regarding cases in support of motion for summary judgment; finalize interrogatory answers of Georgia Gulf Corporation.

..... 03 hours 15 minutes

August 25, 1988 (Mary Lou Hill)

Numerous telephone conferences to counsels' offices; organize cases and research; review case law and draft motion for summary judgment.

..... 06 hours 00 minutes

This statement represents time expended by the following attorneys:

Donald A. Cockrill

00 hours 45 minutes @ \$150/hour

Mary Lou Hill

107 hours 45 minutes @ \$100/hour

Katherine Thomas

00 hours 30 minutes @ \$50/hour

.....\$10,912.50

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Cox Defense Group
September 2, 1988
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Plus Expenses

Reproduction of Copies\$249.40
Federal Express9.75
Computer Research75.00

Expenses\$334.15

TOTAL SERVICES\$10,912.50

TOTAL EXPENSES334.15

TOTAL STATEMENT\$11,246.65

Prorated Share

Among Six Parties\$1,874.44

Please remit to the Greenville Office.

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*Project # 3103
7/28/88
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