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AARON J. DeLUCA (PA)
JOHN T. TIERNEY III (PA, DC & AZ)

October 12, 1998

Richard Taylor, Esquire
USX Corp.
600 Grant Street
Pittsburgh, PA 15219

RE: EISENREICH

Dear Rick:

I spend a considerable amount of time reviewing the documents you produced on Friday, October 9, 1998. AC&S had two jobs at USX Clairton in 1968; each job was designated a different purchase order number. The two purchase order numbers at issue are as follows:

1. 535-96086
2. 135-00062

The job AC&S secured in June of 1968, with the purchase order number 135-00062 did not begin until the end of September of 1968, at which point in time Dennis Eisenreich was not at Clairton. You produced a document entitled "Acknowledgement of Order" executed by D.M. Coffin of AC&S (Bate Stamp #468) in regard to purchase order number 135-00062. In said Order, attached hereto, reference is made to a document entitled "General Conditions Covering Work on Purchasers Premises" which has not been provided despite my request. In addition, you did not produce an "Acknowledgement of Order" executed by an AC&S representative regarding purchase order number 535-96086. Can you please fax these documents to me immediately. Thank you for your anticipated cooperation.

Very truly yours,

Janice M. Savinis

JMS/sme

cc: Aaron J. DeLuca, Esquire



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October 22, 1998

Richard Taylor, Esquire
USX Corp.
600 Grant Street
Pittsburgh, PA 15219

RE: EISENREICH

Dear Mr. Taylor:

Enclosed please find Plaintiffs' Request for Admission Directed to Defendant USX Corporation in regard to the above matter.

Very truly yours,

Janice M. Savinis

JMS/sme
Enclosures

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,
PENNSYLVANIA

DENNIS C. EISENREICH AND
VICTORIA I. EISENREICH, his wife,

Plaintiffs,

v.

GARLOCK, INC., ET AL.,

Defendants.

) CIVIL DIVISION

)

)

) GD NO. 97-16440

)

) PLAINTIFFS' REQUEST FOR

) ADMISSION DIRECTED TO USX

) CORPORATION

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)

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) Counsel of Record:

)

) Janice M. Savinis, Esquire

) PA ID# 51943

)

) GOLDBERG, PERSKY, JENNINGS

) & WHITE, P.C.

) 1030 Fifth Avenue

) Pittsburgh, PA 15219

PLAINTIFFS' REQUEST FOR ADMISSIONS
DIRECTED TO USX CORPORATION

AND NOW COME the above-named Plaintiffs by and through their attorneys, Janice M. Savinis, Esquire and Goldberg, Persky, Jennings & White, P.C. and file the following Request for Admissions Directed to Defendant US Steel/USX Corporation which Defendant is required to answer fully and completely, under oath, within thirty (30) days of the date of service thereof pursuant to the Pennsylvania Rules of Civil Procedure.

1. Defendant USS has been unable to locate and/or does not have in its possession or control the document entitled "Acknowledgment of Order" executed by a representative of AC&S in the mid to late 1960s regarding work performed at USX Clairton Works Keystone Project at order number 535-96086.

_____ Admit

_____ Deny

2. Defendant USS has been unable to locate and/or does not have in its possession or control the document entitled "General Conditions Covering Work on Purchasers Premises" which would have been attached to the "Acknowledgment of Order" executed by a representative of AC&S in the mid to late 1960s regarding work performed at USX Clairton Works Keystone Project at order number 535-9686.

_____ Admit

_____ Deny

If the defendant denies either Request #1 and/or #2, plaintiff requests that the defendant produce said document.

Respectfully submitted,

BY: _____
Janice M. Savinis, Esquire

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Plaintiffs' Request for Admission Directed to USX Corporation was served upon counsel of record this ____ day of October, 1998.

Respectfully submitted,

BY: _____
Janice M. Savinis, Esquire

ATTORNEY FOR PLAINTIFF