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+++ ALSO MEMBER OF MAINE BAR		
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○○ ALSO MEMBER OF WASHINGTON D.C. BAR		
AND NEW YORK BAR		
** ALSO MEMBER OF NORTH CAROLINA BAR		
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○○○ ALSO MEMBER OF GEORGIA BAR		

March 22, 1991

FEDERAL EXPRESS

Keith A. Minoff, Esq.
Robinson, Donovan, Madden
& Barry, P.C.
1500 Main Street, Suite 1100
Springfield MA 01115

Re: Warren v B.F. Goodrich et al.
USDC C.A. No.: 89-3026
Our File No.: D-16183

Dear Mr. Minoff:

In connection with the above captioned action, enclosed please find the following:

1. RESPONSE OF DEFENDANT THE B.F. GOODRICH COMPANY, INC. TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS.

Very truly yours,

Joseph E. Rendini
Joseph E. Rendini

JER/smr
Enclosure
cc: Sharon R. Burger, Esq.

000818

CLIENT _____

RDM&B CLIENT NO. _____ MATTER NO. _____

COUNTY _____

COURT _____ DOCKET NO. _____

CASE NAME Warren v. Dow et al

Vol III

PARTY	ATTORNEY	ADDRESS	TELEPHONE

NO.	DATE FILED	DESCRIPTION	DUE DATE
51	1/21/91	Depo Notices of Monsanto people	
52	1/23/91	Depo Notice of Dr. Quinlan	
53	1/24/91	BF Goodrich Motion to Enlarge Time to Respond to Discovery	
54	1/25/91	Union Carbide, Conoco & Dow's Motion to Enlarge Time to Respond	
55	1/30/91	P's Motion to Enlarge Time to Respond to Discovery	
56	2/8/91	Dow's Motion to Enlarge Time to Respond to Discovery	
57	2/8/91	Conoco's Motion for Protective Order & Brief in Support	
58	2/21/91	T's Motion to extend Time To Respond to Discovery	020819 allowed

[illegible]

United States District Court

FOR THE
DISTRICT OF MASSACHUSETTS

CIVIL ACTION
NO. 89-30201F

Alice L. Warren, Administratrix, Estate of John H. Warren
Plaintiff (s)

vs.

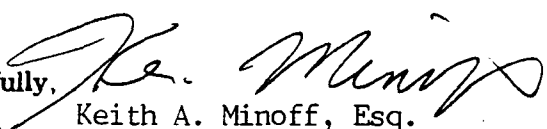
The Dow Chemical Co., et al
Defendant (s)

NOTICE
OF
TAKING
DEPOSITION

TO: Carl C. Rehm
11 Sterling Rd.
Holyoke, MA 01040

Please take notice that commencing at 1:00pm o'clock on April 9,, 19 91
at the offices of 11 Sterling Rd., Holyoke, MA, the
plaintiff in this action by the attorney will take the deposition upon oral examination of
Carl C. Rehm pursuant
to rule 30 of the Federal Rules of Civil Procedure before RAYMOND F. CATUOGNO, Notary Public, in
and for the Commonwealth of Massachusetts, or before some other officer authorized by law to
administer oaths. The oral examination will continue from day to day until completed. You are invited to
attend and cross-examine. ~~The Dependent is requested to bring the following:~~

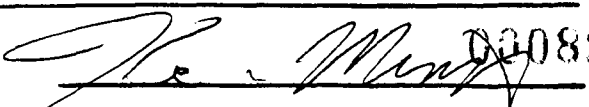
Respectfully,

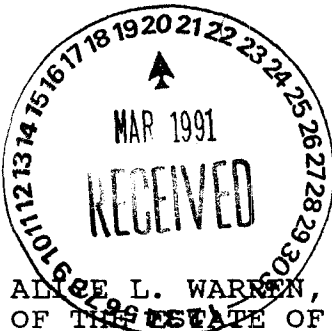

Address: Keith A. Minoff, Esq.
1500 Main St., Suite 1400, Springfield, MA 01115
Tel. No.: 413-732-2301
Attorney for the Plaintiff

CC: CATUOGNO COURT REPORTING SERVICE, 1365 Main Street, Springfield, MA Call Collect 413/733-8100

CERTIFICATE OF SERVICE

I hereby certify that on, February 28, 19 91, I served the above notice on the Defendants
in the above-entitled action by mailing a copy thereof, postage prepaid, to
counsel of record.


Attorney for Plaintiff



UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE
MAR 13 11 08 AM '91
U.S. DISTRICT COURT
SOUTHERN DISTRICT
C.A. No. 89-30201-F
MASSACHUSETTS

ADRIE L. WARREN, ADMINISTRATRIX
OF THE ESTATE OF JOHN H. WARREN,
DECEASED,
Plaintiff,
v.
THE DOW CHEMICAL COMPANY,
THE B.F. GOODRICH COMPANY,
UNION CARBIDE COMPANY, AND
CONTINENTAL OIL COMPANY,
Defendants.

Keith

DOCKETED

DEFENDANT THE B.F. GOODRICH COMPANY, INC.'S
MOTION FOR FURTHER ENLARGEMENT OF TIME TO RESPOND
TO PLAINTIFF'S INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
(ASSENTED TO)

Pursuant to the provisions of Fed.R.Civ.P., Rules 33(a) and 34(b), Defendant The B.F. Goodrich Company, Inc. ("BFG") moves this Court for an order enlarging its time to answer or otherwise respond to Plaintiff's Interrogatories up to and including March 29, 1991 and Request for Production of Documents up to and including March 22, 1991.

As justification for this motion, BFG states that the thirty-day periods allowed by Rules 33 and 34 have proved inadequate for the formulation of appropriate responses despite its diligent efforts to comply. More time is needed to permit the defendant corporation to search for and assemble the requested information, which is extensive both in subject matter and time period, applying to issues of chemical exposure extending back to 1947.

ALLOWED.
Michael A. Pourn USPT
3.18.91

000822

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ALICE L. WARREN, ADMINISTRATRIX)
OF THE ESTATE OF JOHN H. WARREN,)
DECEASED,)
Plaintiff,)
v.)
THE DOW CHEMICAL COMPANY,)
THE B.F. GOODRICH COMPANY,)
UNION CARBIDE COMPANY, AND)
CONTINENTAL OIL COMPANY,)
Defendants.)

C.A. No. 89-30201-F

DEFENDANT THE B.F. GOODRICH COMPANY, INC.'S
MOTION FOR FURTHER ENLARGEMENT OF TIME TO RESPOND
TO PLAINTIFF'S INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS
(ASSENTED TO)

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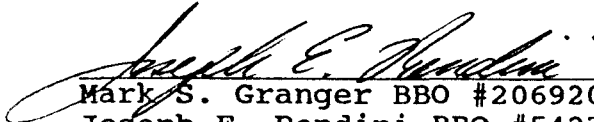
Finally, BFG states that it has conferred with plaintiff's counsel, who has assented to the instant motion

CONCLUSION

The Court should allow the instant motion.

Respectfully submitted,

Date: 3/14/91


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Joseph E. Rendini BBO #542746
Morrison, Mahoney & Miller
Attorneys for Defendant
The B.F. Goodrich Company, Inc.
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(617) 439-7500

ASSENTED TO:


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Keith A. Minoff, Esq.
Robinson, Donovan, Madden
& Barry, P.C.
Attorneys for the Plaintiff
1500 Main Street, Suite 1400
Springfield, MA 01115
(413) 732-2301

I certify that this document has been served
upon all counsel of record in compliance with
the F.R.C.P.

