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Warren v. JCC
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April 13, 1990

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Law Department
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Re: Alice Warren, Administratrix v.
The Dow Chemical Company, et al.

Dear Larry, Judy and John:

I am enclosing for each of you a copy of a deposition notice received from the plaintiff's counsel calling for the deposition of one Carl C. Rehm who lives on Sterling Road in Holyoke, Massachusetts. The deposition is scheduled for May 10.

The name rang a faint bell in my memory. I checked the plaintiffs' answers to interrogatories in the Cullinan case and found a reference to Rehm. A copy of the plaintiffs' answer to interrogatory No. 140 is enclosed. You will notice that it says that "Carl Rehm, retired foreman, is also knowledgeable about the working conditions that Cullinan operated in, and will confirm

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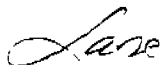
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April 13, 1990

the regular exposure to both VC and PVC." Presumably the plaintiff would like similar testimony from Mr. Rehm with respect to John Warren.

Sincerely,



Lane McGovern

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Enclosures

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