

RECEIVED

MAY 10 1985

R. N. Wheeler, Jr.

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

VIA EMERY

May 8, 1985

Mitch Axler, Esquire
Squire, Sanders & Dempsey
1800 Union Commercial Building
Cleveland, Ohio 44115

Re: Herman A. Dendinger, et al. v. Chrysler Plastic
Products Corporation, et al., including Union
Carbide Corporation
U.S. District Court, Northern District of Ohio,
Western Division
Docket No. 84-7854

Dear Mitch:

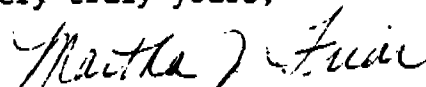
Pursuant to our telephone conversation on today's date, I enclose a copy of the summons and first amended complaint in the above-captioned action. The Corporation was served on May 6, 1985 by certified mail and we have twenty (20) days to answer, or by May 27, 1985.

Plaintiff was an employee of Chrysler Plastic Products Corporation in Sandusky, Ohio and alleges he was exposed to polyvinyl chloride resin and vinyl chloride monomer from August 9, 1968 to October, 1980 causing serious physical injuries, including cancer and associated pathologies. He has sued ten PVC resin manufacturers. By copy of this letter to Nick Wheeler, I would ask him to check the Corporation's sales records for sales to Chrysler in Sandusky, Ohio from 1968 to 1980. The plaintiff is seeking \$11,500,000 compensatory damages and \$10,000,000 punitive damages.

We have discussed the fact that Union Carbide may want to substitute counsel, if we discover we were a supplier to Chrysler, and join other defendants in a single law firm joint defense effort. The law firm of Fuller & Henry in Toledo, Ohio has been recommended by Diamond Shamrock Corporation and B. F. Goodrich Company.

I look forward to working with you on another case.

Very truly yours,



Martha J. Friar

MJF:mh
Enclosure

UCC
043926

Mitch Axler, Esquire
May 8, 1985
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cc: R. A. Butler - E3-262 (without enclosure)
L. A. Crisorio - P2-608 (with enclosure)
E. D. DeLoughy - B4-155 (with enclosure) - Please notify insurers.
J. F. Skislock - D2-241 (without enclosure)
C. E. Van Dyk - E2-289 (with data sheet) - Please add this
new case to your list
of polyvinyl chloride
cases.
R. N. ~~W. H. H. H.~~ - South Charleston (with enclosure)

UCC
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