

UNION CARBIDE CORPORATION
OLD RIDGEBURY ROAD DANBURY CONN 06817
LAW DEPARTMENT

43307

Lit.
Warren
Cor

December 27, 1990

TO: John R. Downey, Esq.
RE: Alice L. Warren, et al. v. Union Carbide, et al.
(Invoice dated 12/13/90)

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

/es

Attachment

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 081700

NUTTER, McLENNEN & FISH

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2699

TELEPHONE: 617 439-2000 FACSIMILE: 617 973-9748

DIRECT DIAL NUMBER:

December 13, 1990
18371-1

John R. Downey, Esq.
Union Carbide Chemicals and Plastics Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Alice L. Warren, Administratrix
v. The Dow Chemical Company, Union Carbide, et al

Dear John:

I enclose our statement for services rendered for the period ending November 30, 1990. Your share of this bill is \$3,825.65. This reflects a courtesy discount of my rate from \$220.00 to \$210.00 per hour. Please let me know if you have any questions.

Best regards.

Very truly yours,

Sharon R. Burger
Sharon R. Burger

SRB/jlf
enclosure
5178i/29

OK J R Downey
Proj. # 13-3322
12/27/90

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NUTTER, McLENNEN & FISH

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2699
(617) 439-2000

December 13, 1990

John R. Downey, Esq.
Union Carbide Chemical & Plastics Company, Inc.
39 Old Ridgebury Road
Danbury CT 06817-0001

Judith Elledge, Esq.
Conoco Inc.
600 North Derry Ashford
P.O. Box 2197
Houston, Texas 77252-2197

Mary Sundt, Esq.
The Dow Chemical Company
D30 Willard H. Dow Center
Midland, Michigan 48674

Client 018371
Matter 0001

Bill No. 29060
SRB

FOR PROFESSIONAL SERVICES rendered and unbilled
through November 30, 1990 in connection with Alice L. Warren,
Administratrix of the Estate of John Warren v. The Dow
Chemical Company, et al, including:

Date	Description	Aty	Hours
11/01/90	Research regarding burden of causation - identification of manufacturers.	LJS	3.50
11/02/90	Attention to correspondence regarding discovery and office conference with S.Parsons regarding same; office conference with L.Shapiro regarding "causation" research; telephone call to J.Downey regarding discovery.	SRB	0.90

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PAYMENT DUE WITHIN THIRTY DAYS OF BILLING DATE
BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT

John R. Downey, Esq.
 Judith Elledge, Esq.
 Mary Sundt, Esq.
 December 13, 1990
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Date	Description	Aty	Hours
11/02/90	Research law regarding burden of causation and meeting with S.Burger; drafting memorandum regarding product identification.	LJS	4.00
11/05/90	Drafting memorandum regarding burden of proof in identification cases.	LJS	2.90
11/05/90	Review plaintiff's document requests and prepare objections to same.	SLP	1.50
11/06/90	Return telephone call to J.Rendini regarding R.Griffith deposition; office conference with S.Parsons regarding same; preparation for Griffith deposition.	SRB	4.50
11/06/90	Revision to memo regarding identification of products.	LJS	0.50
11/06/90	Conference with S.Burger regarding R.Griffith's deposition; review documents forwarded by plaintiff's counsel in response to Goodrich's document request; telephone call from counsel for Goodrich regarding court motion to compel plaintiff to respond to interrogatories.	SLP	0.80
11/07/90	Attend continued deposition of Ruth Griffith in Springfield, including discussions with counsel.	SRB	9.20
11/07/90	Review memo by L.Shapiro regarding plaintiff's burden of proof on causation and manufacturer identification under Massachusetts law.	SLP	0.20

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Judith Elledge, Esq.
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Date	Description	Aty	Hours
11/08/90	Review letter from client regarding objections to be raised to plaintiff's interrogatories and document requests; revise objections raised to plaintiff's document request; conference with S.Burger regarding results of R.Griffith's deposition.	SLP	1.80
11/09/90	Further edits on objections to plaintiff's document requests; review letter from client addressed to R.Wheeler.	SLP	0.80
11/12/90	Letter from J.Downey regarding plaintiff's discovery; telephone conference with M.Sundt regarding discovery and theories of causation (latency, etc.); office conference with S.Parsons regarding discovery.	SRB	1.30
11/12/90	Draft objections to plaintiff's interrogatories; review Mrs. Warren's diary entries to obtain specific information regarding vinyl chloride exposure at Monsanto.	SLP	4.80
11/14/90	Finish review of Mrs. Warren's diaries; revise letter to clients regarding plaintiff's response to document request; review wrongful death statute and cases thereunder to determine viability of Mrs. Warren's claim for emotional distress.	SLP	0.80

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Date	Description	Aty	Hours
11/15/90	Office conference with S.Parsons regarding discovery matters and communications with counsel.	SRB	0.60
11/15/90	Conference with S.Burger regarding obtaining extension of time in which to respond to interrogatories and litigation strategy; finalize letter to client regarding plaintiff's response to Goodrich's document request.	SLP	0.70
11/16/90	Further review of legal memoranda regarding burden of proof; letter to J.Downey, J.Elledge and M.Sundt regarding Griffith deposition and status; further attention to discovery status and discussions with S.Parsons regarding same.	SRB	1.70
11/16/90	Prepare court motion for enlargement of time to respond to discovery; memo to S.Burger regarding discovery, strategy and discussion with J.Rendini and J.Ellege.	SLP	0.30
11/16/90	Telephone call to plaintiff's counsel regarding extension of time to respond to plaintiff's discovery; telephone call to counsel for Goodrich regarding obtaining assent to extension, discussion of plaintiff's documents produced in response to discovery request and obtaining informal discovery from Monsanto; telephone call to J.Downey regarding obtaining plaintiff's assent to 60-day extension; telephone call to J.Ellege regarding obtaining discovery extension and Conoco's approach to discovery responses.	SLP	2.00

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Date	Description	Aty	Hours
11/19/90	Further research and revisions to memorandum regarding identification of product.	LJS	2.50
11/19/90	Review and revise S.Burger's draft letter to client regarding Ruth Griffith's deposition.	SLP	0.30
11/20/90	Revisions: memorandum to client	LJS	0.40
11/20/90	Revise memo to S.Burger; revise and file motion for enlargement of time.	SLP	0.80
11/26/90	Attention to correspondence and motions to enlarge time regarding discovery; letter from M.Sundt and review of materials regarding angiosarcoma of the liver: latency and exposure issues.	SRB	0.70
11/27/90	Telephone call from Dotti VonEhrenberg at Union Carbide regarding discovery.	SRB	0.50
11/27/90	Review memorandum of law (revised) regarding burden of proof in products identification; review interrogatory and document requests to defendants and consider appropriate objections; telephone call to J.Rendini regarding discovery and schedule meeting; office conference with S.Parsons regarding discovery, including strategy on responding and propounding interrogatories; telephone call to M.Sundt; review plaintiff's answers to B.F. Goodrich's interrogatories;	SRB	3.70
11/27/90	Conference with S.Burger regarding strategy for future discovery and review of objections to plaintiff's document requests and discussion of detailed written discovery to be served on plaintiff; revise objections to document requests; continue drafting objections to interrogatories.	SLP	4.40

John R. Downey, Esq.
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Date	Description	Aty	Hours
11/28/90	Telephone conference with M.Sundt regarding various discovery and strategy issues; memo to file regarding same; telephone conference with J.Rendini's office regarding meeting.	SRB	1.90
11/28/90	Conference with S.Glancy regarding organization of medical records, digest of Ruth Griffith and background facts of case.	SLP	0.40
11/28/90	Conference regarding medical records and case background; review selected parts of file.	SEG	0.90
11/29/90	Continue review of selected parts of file; organize documents; memo regarding same.	SEG	0.60
Total Hours...For Matter 0001			----- 59.90

		<u>Rate</u>	
BURGER, S.R.	25.00	210.00	5,250.00
PARSONS, S.L.	19.60	155.00	3,038.00
SHAPIRO, L.J.	13.80	95.00	\$1,311.00
GLANCY, S.E.	1.50	60.00	90.00
Total for Services.....			----- \$9,689.00

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DISBURSEMENTS recorded and unbilled
through November 30, 1990

COMP-AID RESEARCH	\$1,076.49
POSTAGE	20.55
OVERNIGHT COURIER	57.00
TELEPHONE	41.09
PHOTOCOPYING	405.60
WORD PROCESSING	114.90
TELECOPIER/TELEX	5.00
MILEAGE, TOLLS, PARKNG	67.30

Total Disbursement.....	\$1,787.93
Total This Bill.....	\$11,476.93
Total Due.....	\$11,476.93

Carbide & Shaw
\$3,825.65

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