

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

THOMAS C. FLOREN, Administrator
of the Estate of Pamela S.
Floren, deceased, et al.,

Plaintiffs,

vs.

THE B. F. GOODRICH COMPANY,
et al.,

Defendants.

LAW NO. CL37-21553

RECEIVED MAR 17 1981

REQUEST FOR PRODUCTION
OF DOCUMENTS TO THE
DEFENDANT CONOCO, INC.

COMES NOW the Plaintiffs and through their attorneys and pursuant to the Iowa Rules of Civil Procedure request the above-named Defendant to produce or make available the following documents (at the reasonable expense of Plaintiffs) at the offices of Defendant's attorneys of record upon notice to Plaintiffs' attorneys within the time set forth in the above Rules.

1. Material Safety Data Sheets (MSDS) prepared by this Defendant (or in conjunction with the Chemical Manufacturers Association (CMA) formerly Manufacturing Chemists Association) in the last twenty (20) years the subject of which in whole or in part is:

- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

2. Safety Guides of the Chemical Manufacturers Association (CMA) formerly Manufacturing Association received by this Defendant in the last twenty (20) years the subject of which in whole or in part is:

- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

3. Guidelines for Risk Evaluation and Loss Prevention in Chemical Plants publication(s) received by this Defendant in the last twenty (20) years the subject of which in whole or in part is:

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- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

4. Index of Case Histories of Accidents in the Chemical Industry publication(s) received by this Defendant in the last twenty (20) years the subject of which in whole or in part is:

- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

5. Chemical Safety Data Sheets (CSDS) published by the Chemical Manufacturers Association (CMA) formerly Manufacturing Chemists Association and received by this Defendant in the last twenty (20) years the subject of which in whole or in part is:

- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

6. Any other technical/scientific publications prepared by this Defendant or in conjunction with the Chemical Manufacturers Association (CMA) formerly Manufacturing Chemists Association in the last twenty (20) years the subject of which in whole or in part is:

- Polyvinyl chloride (PVC)
- PVC compounds and resins
- PVC materials and products

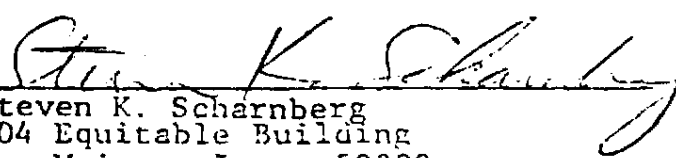
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