

DOCUMENT NUMBER: **21355001**

Pulled for Attorney-Client Privilege/Work Product

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Mary A. Dendinger, et al.,	)	Case No. C87-7117
	)	
Plaintiffs,	)	[Hon. Nicholas J. Walinski]
	)	
vs.	)	
	)	DEFENDANT THE BFGOODRICH CO.
Chrysler Plastic Products	)	RESPONSES TO PLAINTIFFS'
Corporation, et al.,	)	REQUEST FOR PRODUCTION
	)	OF DOCUMENTS 101-110
Defendants.	)	
	)	[Louis E. Tosi (0019756)
	)	Robert A. Bunda (0019775)
	)	Peggy A. Whipple (0029589)
	)	One SeaGate
	)	17th Floor
	)	P.O. Box 2088
	)	Toledo, Ohio 43603
	)	Telephone: (419) 247-2500
	)	Attorneys for Defendants:
	)	The BFGoodrich Co., The
	)	Firestone Tire & Rubber
	)	Company, Conoco, Inc.,
	)	Uniroyal, Inc., Tenneco, Inc.,
	)	Tenneco Polymers, Inc., Union
	)	Carbide Corporation and
	)	Occidental Chemical Corp.]

For its response to plaintiffs' request for production
of documents, Nos. 101-110, Defendant The BFGoodrich Co.,
responds as follows:

REQUEST FOR PRODUCTION OF DOCUMENTS NO.101: All
correspondence and documents sent to or received from
the Manufacturing Chemists Association or any committee

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thereof, prior to 1975, pertaining to vinyl chloride or polyvinyl chloride.

Answer: Defendant The BFGoodrich Co., has no documents which satisfy this request.

Request For Production Of Documents No. 102: All correspondence and documents sent to or received from any other polyvinyl manufacturer, or any employee thereof, prior to 1975, regarding vinyl chloride or polyvinyl chloride.

Answer: Defendant The BFGoodrich Co., has no documents which satisfy this request.

Request For Production Of Documents No. 103: All internal (within your company) communications, bulletins and memoranda, authored prior to 1975, concerning the actual or potential chronic health effects, including cancer, in animals or humans, of exposure to vinyl chloride.

Answer: Defendant The BFGoodrich Co., has documents which satisfy this request. These records are voluminous and are available for copying at plaintiffs' expense as is, where is. To arrange for inspection and copying of these records, plaintiff should contact: Robert A. Bunda, Esq., who requests 5 days advance notice to make necessary arrangements at Fuller & Henry, One SeaGate, 17th Floor, Toledo, Ohio 43603, Telephone: (419) 247-2500.

Request For Production Of Documents No. 104: All documents in your possession relating to the tentative, preliminary and final results of any studies, surveys, reports, articles, tests or analyses pertaining to the actual or potential chronic health affects, including cancer, in animals or humans, of exposure to vinyl chloride which have not appeared in published medical or scientific journals.

Answer: Defendant The BFGoodrich Co., has documents which satisfy this request. These records are voluminous and are available for copying at plaintiffs' expense as is, where is. To arrange for inspection and copying of these records, plaintiff should contact: Robert A. Bunda, Esq., who requests 5 days advance notice to make necessary arrangements at Fuller & Henry, One SeaGate, 17th Floor, Toledo, Ohio 43603, Telephone: (419) 247-2500.

Request For Production Of Documents No. 105: All documents in your possession inconsistent with or refuting the sworn deposition testimony in this case of your designated representative(s) regarding RVCM concentrations in your resins.

Answer: Defendant The BFGoodrich Co., has no documents which satisfy this request.

Request For Production Of Documents No. 106: All documents pertaining to the RVCM concentrations in your resins prior to 1980, which you have not previously produced.

Answer: Defendant The BFGoodrich Co., has no documents which satisfy this request.

Request For Production Of Documents No. 107: Each and every document you intend or expect to introduce into evidence at the trial of this action.

Answer: This defendant objects to Request For Production Of Document No. 107 as calling for attorney-work product information which is immune from discovery pursuant to FRCP 26(b)(3).

Request For Production Of Documents No. 108: Each and every document reviewed or examined by any of your witnesses in the course of preparing for trial testimony.

Answer: This defendant objects to Request For Production Of Document No. 108 as calling for attorney-work product information which is immune from discovery pursuant to FRCP 26(b)(3).

Request For Production Of Documents No. 109: Each and every document which will be used by any of your witnesses in the course of giving trial testimony.

Answer: This defendant objects to Request For Production Of Document No. 109 as calling for attorney-work product information which is immune from discovery pursuant to FRCP 26(b)(3).

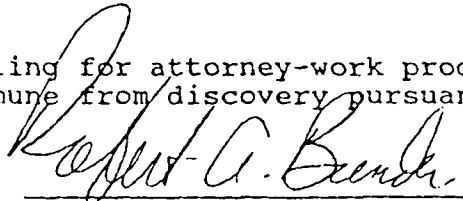
Request For Production Of Documents No. 110: Each and every document upon which any of your witnesses will rely or base his or her trial testimony.

Answer: This defendant objects to Request For Production Of

Document No. 110 as calling for attorney-work product information which is immune from discovery pursuant to FRCP 26(b)(3).

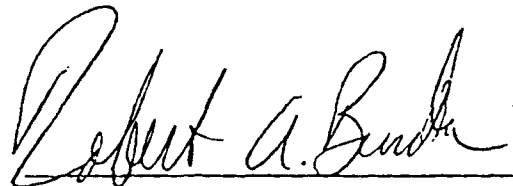
Of Counsel for

The B.F. Goodrich Co.,
The Firestone Tire & Rubber
Company, Conoco, Inc.,
Uniroyal, Inc., Tenneco, Inc.,
Tenneco Polymers, Inc.,
Union Carbide Corporation, and
Occidental Chemical Corp.:


Louis E. Tosi
Robert A. Bunda
Peggy Ann Whipple
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Toledo, Ohio 43603
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Trial Counsel for The B.F.
Goodrich Co., The Firestone
Tire & Rubber Company,
Conoco, Inc., Uniroyal,
Inc., Tenneco, Inc., Tenneco
Polymers, Inc., Union
Carbide Corporation, and
Occidental Chemical Corp.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Responses of The BFGoodrich Co., to Plaintiffs' Request for Production of Documents has been mailed by United States Mail, postage prepaid, to Kirk J. Delli Bovi, Esq., attorney for plaintiffs, at his office located at Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio 44870, and to defense counsel as set forth in the attached Schedule of Service this 12th day of December, 1988.



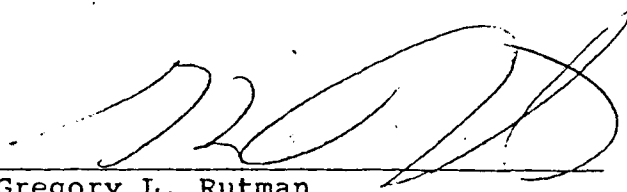
An Attorney for Defendants
The B.F. Goodrich Co.,
The Firestone Tire & Rubber
Company, Conoco, Inc.,
Uniroyal, Inc., Tenneco,
Inc., Tenneco Polymers,
Inc., Union Carbide
Corporation, and Occidental
Chemical Corp.

STATE OF OHIO)
) SS
CUYAHOGA COUNTY)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

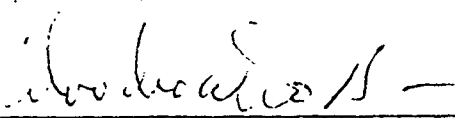
Mary A. Dendinger, et al.,)
) Case No. C87-7117
 Plaintiffs,)
)
vs.)
)
Chrysler Plastic Products)
Corporation, et al.,)
)
 Defendants.)

I, Gregory L. Rutman, being duly sworn, state that I am Assistant Secretary of The B.F. Goodrich Company; that the responses to plaintiffs' request for production of documents are not based upon my personal knowledge but are based upon information contained in regular business records and upon information received from other employees; and that the responses to plaintiffs' request for production of documents are true and correct to the best of my knowledge and information.



Gregory L. Rutman
Assistant Secretary
The B.F. Goodrich Company
6100 Oak Tree Boulevard
Cleveland, OH 44131
(216) 447-6001

Subscribed and sworn to before me this 8th day of December, 1988.



Notary Public

klw/2712k

WOODROW W. BAN, Notary Public
STATE OF OHIO
Attorney, Lifetime Commission
Recorded in Lake and
Cuyahoga Counties

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