

8/24/83

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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NICOLINA SIRECI, as Executrix of the
Estate of JOSEPH E. SIRECI, Deceased,
Plaintiff(s)

-against-

DEMAND FOR
AUTHORIZATIONS

CHEMCO, INC., ROMAN HASS, INC., MON-
SANTO, INC., UNION CARBIDE INC., AM-
ERICAN CYANAMID, INC., AMERICAN
CYANAMID, MONSANTO, et al, Defendant(s)
-----X

S I R S :

PLEASE TAKE NOTICE, that you are hereby required, pur-
suant to the Rules of this Court, to serve upon and deliver to
the undersigned and all other parties to the action, the follow-
ing:

- (a) Copies of the medical reports of those physicians who
have treated or examined the party seeking recovery,
and who will testify on his/her behalf. The same shall
include a detailed statement of the injuries and con-
ditions as to which testimony will be offered at the
trial, and shall identify those x-rays and technicians'
reports which will be offered at trial.
- (b) Duly executed and acknowledged written authorizations
(containing full name & address of doctor/hospital)
permitting all parties to obtain and make copies of all
hospital records, and such other records, including
x-rays and technicians' reports as may be referred to
and identified in the statement of the examined party's
physicians.
- (c) Duly executed authorizations (containing full name &
address of physicians/laboratories) permitting defendant
to discover, inspect and copy the records of all
physicians and laboratories in which or by whom plain-
tiff was examined or received treatment or tests for
the same or similar injuries and complaints as those
which are at issue in this lawsuit.

Dated : New York, New York
August 24, 1983

MORRIS, DUFFY, IVONE & JENSEN
Attorneys for defendant(s)
ROHM & HAAS COMPANY
233 Broadway
New York, New York 10279 0130

TO: MANGIATORDI & CORPINA, ESQS.
Attorney(s) for Plaintiff(s)

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