

Subject: RE: Help, please!

Date: Monday, December 13, 2004 7:35 AM

From: Hank Kidd <kidd@fcj.com>

To: J C Metcalf <jcmetcalf@comcast.net>

Thanks for your help Conard. Also, fyi, I think the privilege issue on the core UCC documents is now totally dead. UCC filed an MSJ in one of my cases last month. I filed a fairly lengthy response and attached many of the documents as exhibits. Carbide's atty showed up at the hearing and raised just about every objection known to man (i.e., not authenticated, hearsay, best evidence, irrelevant....) but failed to assert a claim of privilege. The Judge overruled the meritless objections and denied UCC's MSJ.

If any one contacts you about the privielge issue please give them my name, I am more than happy to sign an affidavit to prevent UCC from continuing to maintain their meritless position.

Hank Kidd
Franklin Cardwell & Jones
1001 McKinney, 18th floor
Houston, Texas 77002
(713) 222-6025
(713) 425-3224 (Direct line)
(713) 222-0938 - FAX

---Original Message---

From: J C Metcalf [mailto:jcmetcalf@comcast.net]
Sent: Monday, December 13, 2004 8:27 AM
To: David Egilman; Christian Hartley; Hank Kidd
Cc: Aaron DeLuca; Aaron DeLuca; Shep Hoffman;
jcmetcalf@trine-metcalf.com; Scott Frost; Jonathan Ruckdeschel; Jonathan Ruckdeschel
Subject: Re: Help, please!

Sorry, I didn't see this until this morning (Monday). Here is the requested info plus some other useful Weill stuff.
Conard

On 12/11/04 4:14 PM, "David Egilman" <degilman@egilman.com> wrote:

> i sent it to him about 50 seconds after i got the email
>
> ---Original Message---
> From: Christian Hartley [mailto:chartley@rpwb.com]
> Sent: Sat 12/11/2004 5:03 PM
> To: Hank Kidd
> Cc: Aaron DeLuca; Aaron DeLuca; Shepard Hoffman; J C Metcalf;
> jcmetcalf@trine-metcalf.com; sfrost@baronbudd.com; David Egilman; Jonathan
> Ruckdeschel; Jonathan Ruckdeschel
> Subject: RE: Help, please!
>
>
>
> Hank:
>
> My access to our database is down, so I am forwarding this to a few
> others who might have this document. Guys?

>
> Christian H. Hartley, Esq.
> Richardson, Patrick, Westbrook & Brickman, LLC
> 174 East Bay Street
> Charleston, South Carolina 29401
> Direct: (843) 727-6564
> Main: (843) 727-6500
> Fax: (843) 727-3103
>
>
> ---Original Message---
> From: Hank Kidd [mailto:kidd@fcj.com]
> Sent: Saturday, December 11, 2004 1:25 PM
> To: Christian Hartley
> Subject: RE: Help, please!
>
> Christian, do you have access to the letter from Dr. Weill to in the
> late 1970's to either AIA and/or W. Alcorn that talks about the state of
> the literature and says association b/t asbestos and cancer was
> confirmed in 1955? I started trial last Thursday and am in desperate
> need of this document. Any assistance you could provide would be
> greatly appreciated.
>
>
> Hank Kidd
> Franklin Cardwell & Jones
> 1001 McKinney, 18th floor
> Houston, Texas 77002
> (713) 222-6025
> (713) 425-3224 (Direct line)
> (713) 222-0938 - FAX
>
>
> ---Original Message---
> From: Christian Hartley [mailto:chartley@rpwb.com]
> Sent: Friday, October 15, 2004 3:29 PM
> To: MCK@lanierlawfirm.com; shoffman@shephoffman.com;
> aaron@aarondeluca.com; cmurphy@shephoffman.com;
> mgalindo@shephoffman.com; Hank Kidd; degilman@egilman.com;
> mroberts@egilman.com; jfalender@egilman.com; pabels@baronbudd.com;
> s.j.foley@att.net
> Cc: ERE@lanierlawfirm.com
> Subject: Re: Help, please!
>
>
> Please put the list in the body of the email.
> Christian Hartley, Esq.
> Richardson, Patrick, Westbrook, & Brickman, LLC
> 174 E. Bay Street
> Charleston, South Carolina 29401
> Direct Dial: (843) 727-6564
> Fax: (843) 727-3103
> www.rpwb.com
>
>
> ---Original Message---
> From: Maura Kolb <MCK@lanierlawfirm.com>
> To: Maura Kolb <MCK@lanierlawfirm.com>; Shoffman@shephoffman.com
> <Shoffman@shephoffman.com>; Aaron DeLuca <aaron@aarondeluca.com>; Cheryl
> Murphy <cmurphy@shephoffman.com>; mgalindo@shephoffman.com
> <mgalindo@shephoffman.com>; Hank Kidd <kidd@fcj.com>; Christian Hartley

> <chartley@rpwb.com>; David Egilman <degilman@egilman.com>; Megan Roberts
> <mroberts@egilman.com>; Julie Falender <jfalender@egilman.com>; Pat
> Abels <pabels@baronbudd.com>; s.j.foley@att.net <s.j.foley@att.net>
> CC: Eugene Egdorf <ERE@lanierlawfirm.com>
> Sent: Fri Oct 15 15:32:30 2004
> Subject: RE: Help, please!

>
> I should add that if any of you wish to contact me about this over the
> weekend, I can be reached at 713-302-5346. Thanks!

>
> -----Original Message-----

> From: Maura Kolb
> Sent: Friday, October 15, 2004 2:32 PM
> To: 'Shoffman@shephoffman.com'; 'Aaron DeLuca'; 'Cheryl Murphy';
> 'mgalindo@shephoffman.com'; 'Hank Kidd'; 'Christian Hartley'; 'David
> Egilman'; 'Megan Roberts'; 'Julie Falender'; 'Pat Abels';
> 's.j.foley@att.net'

>
> Cc: Eugene Egdorf; Maura Kolb
> Subject: Help, please!
> Importance: High

>
> Mark has directed us to find all 29 documents listed on the
> attached page by Sunday. This is very, very important and I would
> appreciate any help that any of you can give us. Thanks.

>
> Maura << File: Doc2.doc >>

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J C Metcalf
1435 Arapahoe Ave.
Boulder, CO 80302
(303) 442-0173