



November 1, 1982

The Sherwin-Williams Company
101 Prospect Avenue N W
Cleveland, Ohio 44115

MacKenzie Smith Lewis Michell & Hughes
600 Onondaga Savings Bank Building
Syracuse, New York 13202-1399

Attn: Kevin M. Reilly

REDACTED

Re: v. New Primex Realty Associates
v. The Sherwin-Williams Company.

Dear Mr. Reilly:

Please excuse the tardy response to your letter of August 26, 1982.
In response to your questions:

1. We could not locate a personnel file for **REDACTED**.
She was a part-time employee. We doubt that it would have included any useful information since it would have been very small.
2. Enclosed is the job description you requested.
- 3.-5. Enclosed is a copy of our store Safety Manual as well as store specification sheets. If this does not provide you with answers to the subject questions, they simply were never specifically addressed by our stores division.
6. There was no benzene present in our paints at the time worked at our store. If there was any present, it was there as a contaminant. Material data safety sheets are enclosed regarding the alleged "leukemia causing" products at our store. Ethyl benzene is entirely different than benzene itself.
- 7.-8. Refer to Safety Manual. **REDACTED**
9. We will not release this information. **N40513**
10. Retail outlets were periodically inspected by our interstate workers' compensation insurer's loss prevention engineers. The inspections were done on a random basis. We have over 1500 stores. We could find no record of the last loss prevention visit by our insurer. Any procedures for a check of the store ventilation system would be included in our Safety Manual.

We have no record of any Sherwin-Williams employee contracting leukemia as a result of their work environment with the exception of



REDACTED

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alleged claim. The same is true with respect to general liability claims. We do not use benzene in our products.

Our medical consultant on _____ claim was Mitchell Zavon, M.D. We are enclosing his report. You may feel free to contact him.

We are enclosing copies of information from our workers' compensation file which you may not have previously received. Should you have any questions regarding the enclosures, please do not hesitate to contact the undersigned at 216-566-3064.

Again, sorry for the delay.

Very truly yours,

THE SHERWIN-WILLIAMS COMPANY

Thomas M. Locker
Administrator of Workers' Compensation

TML/ap

Enclosures

cc: J. Mulcahey

BPS: John, what's the status of the comp claim?

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