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December 28 2004

VIA HAND DELIVERY

Randall D Collins Esq
The Law Offices of Herschel L Hobson
2190 Harrison Avenue
Beaumont TX 77701

Re *Holmes et al v Airco et al*
Superior Court of New Jersey Law Division L
No 001307 04, Burlington County, New Jersey

Dear Randall

Enclosed are documents Bates labeled OCC 14093 – 20828 (except documents withheld on the basis of privilege) that are being produced as a supplemental production in the above referenced case Also enclosed are privilege logs for OxyChem's original and supplemental productions of documents in this case

OxyChem previously produced documents 19 000 through 3419 013 as well as documents OCC 0001 through OCC 14092 in prior cases Documents OCC 14254 14880 were previously produced as OCC 12022 12646 but have been re Bates labeled because of the numbers OCC 12022 12646 were inadvertently used twice in prior productions

Documents OCC 15382 15861 are documents that were obtained from PolyOne Corporation We are awaiting receipt from PolyOne slides and/or photographs of the Burlington plant during the relevant time period We will produce those as soon as we receive them and have them reproduced

As we discussed (and as OxyChem's formal objections note) OxyChem is not producing (1) personnel and medical files for employees other than Mr Holmes (2) personnel monitoring records for Burlington employees other than Mr Holmes (3) personnel and area monitoring records and water and soil testing documents from OxyChem's facility in Hicksville New Jersey (4) post May 1984 (when Mr Holmes ended work at Burlington) sales/supply

DLI 5892764v1

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RECEIVED

DEC 30 2004

cc Billy + DBB

aug - Best

04-047