

LIBERTY MUTUAL



2 Executive Campus, P.O. Box 5343, Cherry Hill, New Jersey 08002 • Tel. (609) 663-9121

November 10, 1981

REDACTED

Sherwin-Williams Company
101 Prospect Avenue NW
Cleveland, OH 44115

RE: *76-2737*
- SHERWIN-WILLIAMS
FILE NUMBER: CE 327-15881
- SHERWIN-WILLIAMS
FILE NUMBER: CE 327-19930

ATTENTION: THOMAS M. LOCKER, ADMINISTRATOR OF WORKER'S COMPENSATION

Dear Mr. Locker:

Enclosed you will find a carbon copy of our Attorney Edwards' letter of November 5, 1981. Also enclosed is a copy of a Request For Production of Documents.

You will note from Mr. Edwards' letter that he asks that you contact his office as soon as possible concerning this request.

Thank you in advance for your kind cooperation in this matter.

Very truly yours,

S.E. Barton
S.E. Barton
Claims Supervisor

SEB:hl

Enc.

CALLER:
EDWARDS ON 11/18/81. HE SAID DECISION
ON HIS MOTION IS BEING WITHHELD UNTIL RECEIVED
12/4/81 BY THE COURT. I TOLD HIM WE
WILL GIVE OUT NOTHING UNTIL WE GET A
SUBPOENA. EDWARD WILL TELL STAN I CALLED
FULL FU 12-15-81

NOV 18 1981

CORPORATE
INSURANCE

N40366

LAW OFFICES

MONTANO, SUMMERS, MULLEN & MANUEL
A PROFESSIONAL CORPORATION

ARTHUR MONTANO
JAMES A. MULLEN, JR.
F. HERBERT OWENS, III
ROBERT E. EDWARDS
ROBERT T. ZANE
ALAN P. BRUCE
ALFRED P. VITARELLI
GLENN P. CALLAHAN
PAUL F. GILLIGAN, JR.

WILLIAM W. SUMMERS
G. WESLEY MANUEL, JR.
CARL J. GREGORIO
GARY L. JAKOB
F. MICHAEL DAILY, JR.
MICHAEL J. WEISS
BERNARD J. TKACZYNSKI
LAWRENCE D. LALLY
TIMOTHY J. HIGGINS

SUITE 420 - TWO EXECUTIVE CAMPUS
ROUTE 70 & CUTHBERT BLVD.
CHERRY HILL, NEW JERSEY 08002

CARL KISSELMAN
(1899-1975)

TELEPHONE
AREA CODE 609
665-6800

November 5, 1981

PLEASE REFER TO
OUR FILE:

5610-E

Liberty Mutual Insurance Company
2 Executive Campus
P. O. Box 5343
Cherry Hill, New Jersey 08002

ATTN: Mr. S. E. Barton

REDACTED

Re: v. The Sherwin-Williams Company, et al
Your File Nos. CE327-15881 and CE327-19930

Dear Mr. Barton:

Enclosed are copies of a Notice of Motion brought by Archer, Greiner & Read on behalf of John Lucas & Company, as a division of The Sherwin-Williams Company, to dismiss the Complaint in the above captioned matter based upon the Workmen's Compensation Statute. We have filed an identical motion, both of which are returnable on November 20, 1981. Additionally, we enclose copies of the Request for Production of Documents, which has been served upon us. I would suggest that this Request immediately be forwarded to The Sherwin-Williams Company and that they be advised to contact my office concerning this Request. The document production appears to be lengthy and may require some additional time to answer. Of course, if our motion to dismiss this Complaint is successful on November 20, 1981, there will be no need to produce the documents, at least until such time as a subpoena is served upon The Sherwin-Williams Company for them.

Please be advised that we have now filed our Answer, which has been executed by John B. Kearney as counsel for The Sherwin-Williams Company as to punitive damages only, with the Court in this matter. We enclose our invoice in the amount of \$40.00 for the cost of filing same with the Court.

We shall keep you further advised.

Very truly yours,

MONTANO, SUMMERS, MULLEN & MANUEL
A Professional Corporation

Robert E. Edwards

N40366.01

REE:hl
Encs.

0007-SWP-005806010
CONFIDENTIAL