

47307 LIT
Warren v. C
Case

NUTTER, McCLENNEN & FISH

ONE INTERNATIONAL PLACE
BOSTON, MASSACHUSETTS 02110-2699

TELEPHONE: 617 439-2000 FACSIMILE: 617 973-9748

DIRECT DIAL NUMBER:

(617) 439-2460

January 30, 1991
18371-1

John R. Downey, Esq.
Union Carbide Chemicals and Plastics Company, Inc.
Law Department
39 Old Ridgebury Road
Danbury, CT 06817-0001

Judith Elledge, Esq.
Conoco Inc.
600 North Derry Ashford
P.O. Box 2197
Houston, Texas 77252-2197

Mary Sundt, Esq.
The Dow Chemical Company
D30 Willard H. Dow Center
Midland, Michigan 48674

Re: Alice L. Warren, Administratrix
v. The Dow Chemical Company, Union Carbide, et al

Dear John, Judy and Mary:

I enclose a copy of the latest round of deposition notices, reflecting the following deposition schedule:

February 25, 1991: 10:00 a.m. Larry Gormally
1:00 p.m. Joseph Tierney
3:00 p.m. Jerry Nolet

February 26, 1991: 10:00 a.m. Lucy Konieczny
1:00 p.m. Robert Bourget
3:00 p.m. Keeper of Records,
Monsanto Chemical
Company

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

RECEIVED

FEB 1 1991

DOWNNEY

HYANNIS, MASSACHUSETTS
COUNSEL: AMSTERDAM • LONDON • TOKYO

UCC 081586

NUTTER, McCLENNEN & FISH

John R. Downey, Esq.
Judith Elledge, Esq.
Mary Sundt, Esq.
January 30, 1991
Page 2

*filed CP
1/24/91*

Also, I enclose a copy of B. F. Goodrich Company, Inc.'s Motion for Enlargement of Time served by Joe Rendini last week.

I do not recall who all of the individual deponents are. I shall look back over the 30(b)(6) deposition of Monsanto and Ruth Griffith's deposition to figure out who these people are, and I shall then let you know.

This is a very ambitious deposition schedule. I can only assume that Keith Minoff believes he is unlikely to obtain much information from any of these people, but feels the necessity to depose them, nevertheless. Once determining who they are, I anticipate attempting to make contact with these individuals to explore, before their depositions, what information and documents they may have. Perhaps this is where Monsanto's counsel could assist in our efforts, and I anticipate approaching him about this.

Best regards.

Very truly yours,

Sharon R. Burger
Sharon R. Burger

SRB/jlf
enclosure

cc: Ms. Yolanda Jackson (File No. H105L-76-034969)

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 081587