EXHIBIT # 8B

February 3, 1975

Dr. Donovan Gordon
Industrial Bio-Test Laboratories

I wish to summarize my observations of the lesions seen in Dr. Kimbrough's study of Aroclor 1260 and the comparison of diagnoses with Dr. Kimbrough and Dr. Squire.

1.) The criteria that I used for diagnosis of the lesions are similar to what they used.

2.) My evaluation tends to be a little more conservative than theirs. For example: they would call some of my hepatomas carcinoma but with some question.

3.) Therefore, if we both read the same slides there might be a little variation in numbers of lesions in the different categories but no major difference.

4.) Dr. Squire and Dr. Kimbrough are using a new and revised terminology for the categories and list them as follows:

My Terminology (Classical Use)	Dr. Squire's (Revised Terminology)
Focal Hypertrophy	Cellular Alteration
Nodular Hyperplasia Hepatoma	Nodular Neoplasia or Neoplastic Nodule
Carcinoma	Carcinoma

5.) However, the lesions in Dr. Kimbrough's study were more severe than those in the Bio-Test study. The lesions that she and Dr. Squire are calling carcinoma are also carcinomas by my criteria. I would

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conclude from an examination of their material that Dr. Kimbrough's study demonstrated carcinogenicity.

Ward R. Richter

Ward R. Richter, D.V.M.
Dipl. Am. College Vet. Path.

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PROB 11G
(Rev. 8/82)

AUTHORIZATION TO RELEASE INFORMATION
(PRIVATE PERSON OR ORGANIZATION)
TO PROBATION OFFICER

TO WHOM IT MAY CONCERN:

I, Paul L. Wright, the undersigned, hereby authorize the United States Probation Office for the Eastern District of Missouri or its authorized representative(s) or employee(s), bearing this release or copy thereof, to obtain any information in your files pertaining to my:

- [x] Employment
- [ ] Education Records (including but not limited to academic achievement, attendance, athletic, personal history, and disciplinary records)
- [ ] Medical Records
- [ ] Psychological and Psychiatric Records

I hereby direct you to release such information upon request of the bearer. This release is executed with full knowledge and understanding that the information is for the United States Probation Office's official use.

I hereby release you, as custodian of such records, any school, college, or university, or other educational institution; hospital or other repository of medical records; social service agency; any employer, or retail business establishment including its officers, employees, or related personnel both individually and collectively, from any and all liability for damages of whatever kind which may at any time result to me, my heirs, family, or associates because of compliance with this authorization and request for information or any other attempt to comply with it.

The information hereby obtained by the aforementioned probation office is to be used only for the purpose of presentence investigation and report and, if applicable, for supervision.

Paul L. Wright — Paul Lee Wright — 3/2/84
(Authorizing Signature—Full Name) — *(Full Name—Printed or Typed)* — *(Date)*

WITNESS — — 3/2/84
(Probation Officer) — *(Date)*

DEPOSITION EXHIBIT
LEVIUSKAS-39
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Monsanto

Name of Nominee			Location
Paul L. Wright			Creve Coeur
Company Unit or Staff Dept.	Division	Business Group	Department
Corporate Staff	Medical		Medical
Position Title	Salary Grade	Annual Salary	Date of Last Increase
Toxicology Manager	19	$28,980.00	2/75
Performance		Growth	Date Last Employe Review
Excellent		Excellent	2/75

Type of Award (Select the award category from the opposite side of this sheet which most appropriately describes the award and enter the category and code below.)
Staff

Award Category	Category Code Number
Solution to product toxicity problem which permitted Monsanto to continue product manufacturing and sale.	28

Describe the achievement and its significance to Monsanto below:

Dr. Paul L. Wright has performed his regular duties exceedingly well and has, in addition, completed a specific "ad hoc" assignment with dispatch and distinction.

Dow informed us that they had encountered lung tumors in rats fed maleic anhydride and that they felt they had to report these findings to the Food and Drug Administration (FDA) at once under their "product stewardship" program. Dr. Wright was asked to contact Dow's toxicologists for details of their findings. This he did, and by his personal and professional efforts he convinced Dow personnel that while they had an obligation to report their findings to FDA, it would be foolhardy to act precipitously. Instead, Dr. Wright advised Dow to defer contacting FDA until they had thoroughly evaluated their findings and a subsequent course of action had been developed to allow resolution of questions which undoubtedly would be raised by their report of tumors. Dow agreed to this.

Dr. Wright then contacted the Process Chemicals business group and informed them of Dow's findings. He proposed a dual course of action. The first step was a commitment to support a repeat of the feeding study to determine whether Dow's findings were reproducible. The results of such a study would not necessarily resolve FDA's concern over the potential carcinogenicity of maleic anhydride, but the intent to conduct the study promptly would serve to forestall precipitous action against the product by FDA. The subsequent step was to provide assurance to FDA that a thorough investigation of the toxicity of maleic anhydride would be undertaken, either by Monsanto alone or in cooperation with others. This proposal was acceptable to the business group, and Dr. Wright so informed Dow.

Subsequently, Dr. Wright accompanied Dow personnel to FDA when they presented their findings on maleic anhydride. FDA's toxicologists reviewed the data and the proposed plans of actions. They concluded that while the questions of carcinogenicity would need to be resolved, there was no apparent need for immediate prohibition of maleic anhydride or polymers containing maleic anhydride in food contact applications. Thus, we believe that Dr. Wright played a singular, outstanding role in preventing FDA from publicly proclaiming that maleic anhydride was a suspect.

Recommended By:	Date	Award Amount Recommended:	Approved By:	Date	Award amount approved for payment:
R.J. Levinskas	16 Sep 75		[illegible]	[illegible]	$2,500.00

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DEPOSITION EXHIBIT
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