

PITNEY, HARDIN, KIPP & SZUCH

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ROBERT L. HOLLINGSHEAD

DIRECT DIAL NUMBER

(201) 966-8017

April 9, 1993

BY UPS OVERNIGHT MAIL

Tracking No: 0203 9489 268

Gregory A. Lalim, Esq.
Union Carbide Corporation
Law Department E3-285
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Colby v. Union Carbide Corporation

Dear Greg:

Pursuant to our discussion today, I am enclosing a copy of a memo, dated March 30, 1993, from my associate, Kathryn Decker, regarding oncologists who might serve as expert witnesses on Union Carbide's behalf in this matter. C.V.'s for some of these experts are also enclosed. As soon as we receive C.V.'s for the others, we will forward them to you. Also please note that we are compiling a list of toxicologists who may serve as experts and will forward that list as soon as it is completed, as well.

As we agreed, Kathryn and I will call you on Monday to discuss these experts in more detail.

Sincerely,

ROBERT L. HOLLINGSHEAD

RLH:pc
Enclosures

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"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 075831

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**PITNEY, HARDIN, KIPP & SZUCH
INTRA-OFFICE MEMORANDUM**

TO: R. L. HOLLINGSHEAD

DATE: March 30, 1993

FROM: K. M. DECKER *YD*

COPY TO:

SUBJECT: COLBY V. UNION CARBIDE CORPORATION

Set forth below is a preliminary list of medical defense experts for your consideration in the above referenced case:

I. INTERNIST/ONCOLOGIST

- A. Michael Scoppetullo M.D.**
(specializing in Oncology)
36 Newark Avenue, Suite 304
Belleville, NJ 07109
(201) 751-8880

Dr. Scoppetullo has testified for me in the past in medical malpractice actions. He has testified on behalf of plaintiff and defendant. I spoke with him briefly on the telephone the other day to see if he would be interested in reviewing this case, after discussing it in very general terms. I am obtaining a copy of his C.V.

- B. Frederick B. Cohen M.D.**
(specializing in Internal Medicine and Medical Oncology)
Beth Israel Medical Center
201 Lyons Avenue
Newark, NJ 07112
(201) 926-7230

Dr. Cohen has testified on behalf of the defense for the most part, but recently began to review cases for plaintiffs.

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UCC 075832

- f
- C. **Arnold Rubin, M.D.**
(specializing in Oncology)
174 Union Street
Ridgewood, NJ 07450
(201) 444-2528

Dr. Rubin has testified primarily for the defense but recently has reviewed cases for plaintiffs. He is also the Chairman of the Oncology/Hematology Department at St. Joseph's Hospital in Paterson.

- D. **Michael J. Nissenblatt M.D.**
(Medical Oncologist/Hematologist)
Central Jersey Oncological Center
205 Easton Avenue
New Brunswick, NJ 08901
(908-828-9570)

Dr. Nissenblatt has been utilized as an expert primarily for the defense. Although I have never retained him personally, he has been my adversary's witness on more than one occasion. He is mediocre. However, his location in New Brunswick may be advantageous with a Middlesex County jury. He also holds several positions on the staff of Robert Wood Johnson Hospital and St. Peter's Medical Center, both hospitals located in Middlesex County.

- E. **Charles A. Leff M.D.**
Lawrence S. Koons M.D.
(specializing in Internal Medicine/Oncology)
1314 Park Avenue
Plainfield, NJ 07060
(908) 754-0400

This group was recommended by a neurosurgeon who has served as my expert in the past. This group has privileges at Muhlenberg Hospital, Somerset Medical Center and St. Peter's Medical Center.

- F. **Louis Aladort M.D.**
(Oncologist)
c/o Mt. Sinai Hospital
New York, NY

This physician was considered for use as an expert in asbestos litigation. He also has been used as a defense witness in medical malpractice actions. His credentials are very impressive. Attached is a copy

- 2 -

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of his C.V. for your review.

- G. Peter Levine Geller, M.D. (Surgeon)
Columbia Presbyterian Hospital
New York, NY
Attached is a copy of his C.V.
- H. David E. Befeler, M.D. (Surgeon)
709 Springfield Avenue
Summit, NJ
(908) 277-3232
I am obtaining a copy of his C.V.

- 3 -

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UNION CARBIDE CORPORATION
39 Old Ridgebury Road
Danbury, CT 06817-0001
Law Department
Gregory A. Lalim (E3-285)
(Telephone: 203-794-5196)

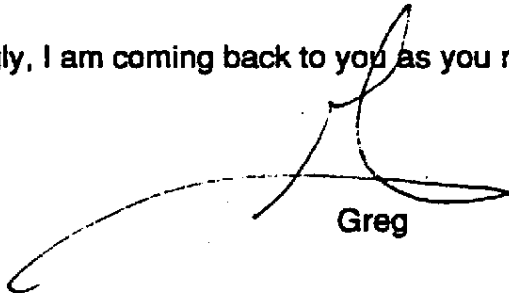
March 22, 1993

MEMORANDUM

To: Betty-Lynn White, Esq.
From: Gregory A. Lalim, Esq.
Re: Colby

Per your suggestion, we have checked the files of prior vinyl chloride cases, but have been unable to locate any expert witnesses. Our outside counsel has informed me that experts he has previously utilized are retired (or worse). I also touched base with J. O'Gara, but his cases never reached that stage.

Accordingly, I am coming back to you as you requested. Any ideas?


Greg

GAL/es

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124571
Lit.
Colby
Co
Lit
Colby, Phyllis
V
UCC

39 Old Ridgebury Road
Danbury, CT 06817-0001
Law Department
Gregory A. Lalim (E3-285)
(Telephone: 203-794-5196)

*Lit
Colby, Phyllis*

To
file
1245715
CO

*VC-cases have
been handled
by Pittney Hardin*

March 8, 1993

*Kepp since
early
70's. Check
the database
for previous case
and experts
if this fails
ask me
again*

MEMORANDUM

To: Betty-Lynn White, Esq.
From: Gregory A. Lalim, Esq.
Re: Colby

Plaintiff in the above-referenced action, now deceased, alleges that he contracted liver cancer due to exposure to, inter alia, vinyl chloride while employed at the Amboy OTD Terminal from 1960-67.

I was wondering if you had any experience with an oncologist and/or toxicologist who might be appropriate witnesses in this matter, or perhaps could direct me to someone who has.

Many thanks,

Greg
Greg

GAL/es

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