

SUBPOENA DUCES TECUM

THE STATE OF INDIANA, {
Tippecanoe County, { ss:

The State of Indiana to the Sheriff of Tippecanoe County, in said State, Greeting:

You are hereby commanded to summon Charles Clarke, Industrial Hygienist, Essex Group, Inc., 1601 Wall Street, Fort Wayne, Indiana 46802, to bring with him, for the years 1979 through 1986 inclusive, all employee exposure records relating in any way to Clyde Paul Lynn Martin (a.k.a. Paul Lynn Martin), as such exposure records are defined in 29 CFR Section 1910.20, including all environmental monitoring or measuring records, biological monitoring results, material safety data sheets, or any other record revealing the identity and supplier of any and all toxic substances or harmful physical agents to which Mr. Martin was exposed during the course of his employment; and also all employee medical records as such term is defined in 29 CFR Section 1910.20, including medical and employment questionnaires or histories, results of medical examinations, medical opinions, diagnoses, progress notes and recommendations, descriptions of treatment, and prescription and employee medical complaints, and to bring with you all of said documents,

if may be found in your bailiwick, to personally be and appear for your deposition before the Judge of the Circuit Court of Tippecanoe County, at 2:00 o'clock P.M., on the 12th day of June, 1989, at the offices of Essex Group, Inc., 1601 Wall Street, Fort Wayne, Indiana, in the City of Lafayette, in said County, to testify in behalf of the Plaintiff

in a certain matter of controversy then and there pending between Estate of Paul Lynn Martin,

Plaintiff vs. Union Carbide Corporation,

Defendant ,

and not depart the Court without leave thereof. In this you shall not fail at YOUR peril; and have you then and there this writ.

WITNESS, the Clerk of our said Court, this day of A.D., 19

Paul C. Daniel Clerk
CLERK CIRCUIT COURT Deputy

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