

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ALICE L. WARREN, ADMINISTRATRIX
OF THE ESTATE OF JOHN H. WARREN,
DECEASED,

Plaintiff,

v.

THE DOW CHEMICAL COMPANY,
THE B.F. GOODRICH COMPANY,
WHITTAKER DEVELOPMENT CO.
(FORMERLY GREAT AMERICAN CHEMICAL
CORPORATION), UNION CARBIDE
COMPANY, AMERICAN CYANAMID
CORPORATION, AND CONTINENTAL
OIL COMPANY,

Defendants.

C.A. No. 89-30201-F

NOTICE OF TAKING DEPOSITION

To: Lane McGovern, Esq.
Pierce O. Cray, Esq.
Ropes & Gray
One International Place
Boston, MA 02110

James H. Tourtelotte, Esq.
Robinson, Donovan, Madden &
Barry, P.C.
1500 Main St., Suite 1400
Springfield, MA 01115

PLEASE TAKE NOTICE that, pursuant to the provisions of Fed.R.Civ.P., Rule 30, The B.F. Goodrich Company ("BFG"), a defendant in the captioned action, will, by its attorneys, Morrison, Mahoney & Miller, take the deposition upon oral examination of Ruth Griffith, at the offices of Morrison, Mahoney & Miller, 1145 Main Street, Springfield, Massachusetts, at 10:00 AM on Wednesday, May 9, 1990 before an officer authorized by law to administer oaths. The oral examination will continue from day to day until completed.

The deponent is required to bring to the deposition the following documents:

UCC 085776

1. Any and all records of shipment or receipt of vinyl chloride from any entity at the Monsanto facilities in the Springfield area during the years 1947-1983.
2. Any and all notes, papers, books and other writings relating to the shipment, receipt, use, storage or disposal of vinyl chloride at the Monsanto facilities in Springfield during the years 1947-1983.
3. Any and all photographs or drawings that depict the shipment, receipt, use, storage or disposal of vinyl chloride at the Monsanto facilities in Springfield during the years 1947-1983
4. Any and all notes, drawings, papers, books and other writings relating to the operation of the Monsanto facilities in the Springfield area during the years 1947-1983
5. Any and all notes, drawings, photographs, papers, books and other writings relating to or written by John H. Warren.
6. Any and all photographs, drawings, papers, notes, books, and other writings relating to the exposure of workers at the Monsanto facilities in the Springfield area to vinyl chloride during the years 1947-1983
7. Any and all photographs, drawings, papers, records, notes, books and other writings relating to or identifying the names and addresses of suppliers of vinyl chloride to Monsanto facilities in the Springfield area during the years 1947-1983

You are invited to attend and cross-examine.

Date: 4/18/90

I certify that this document has been served upon all counsel of record in compliance with the F.R.C.P.


Mark S. Granger
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Morrison, Mahoney & Miller
Attorneys for Defendant
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