

INTER-COMPANY MEMO



KOCH

REFINING COMPANY L. P.



ENVIRONMENTAL DEPARTMENT

DATE: July 17, 1995

TO: Sally Barnes-Soliz Joe Harris Walter Tyler
David Cantu John Kampfhenkel
Chico Flores Chris Mineo

cc: Brad Breuer Jim Cline John Wadsworth

FROM: Frank White *FW*

SUBJECT: ASBESTOS LAWSUIT

As you may be aware, Koch has been named in a lawsuit involving asbestos-related issues. Morten Vigilius, a Koch Attorney will be handling the case. Mr. Vigilius will be in Corpus on Thursday, July 20, to begin identifying documents dealing with asbestos removal at the refinery. If you have any relevant asbestos documents as described in the attached letter from Morten Vigilius, please prepare a list of the documents identifying what they are and the date.

Please plan to attend a meeting with Morten Vigilius on Thursday, July 20, 1995 at 8:30 in the Purchasing Conference Room. Bring the applicable documents or lists and / or any other information that may be relevant. If you are unable to attend the meeting, please call me with information regarding the location of the documents or have them available for review.

Thanks for your help. If you have any questions, call me at x 8755.

FHW/lds
Attachment
Solids-95-126

K 016723



LEGAL DEPARTMENT
LITIGATION SECTION

MORTEN VIGILIUS
ATTORNEY

July 13, 1995

VIA TELECOPY: (512) 242-8743

Mr. Frank H. White
Environmental Engineer
Environmental Department
KOCH REFINING COMPANY, L.P.
P.O. Box 2608
Corpus Christi, Texas 78409

Re: *King v. E.I. Du Pont de Nemours & Co.*

Dear Mr. White:

As we discussed on the telephone this morning, I am planning to be in Corpus Christi on Thursday, July 20, to visit with you and others involved in safety and health matters, including asbestos-related matters. The purpose of my visit is to identify documents relevant to the *King* case, specifically documents dealing with the presence or removal of asbestos at the refinery, KRC's policies and procedures regarding the handling of asbestos, KRC's retention of contractors for asbestos-related work (including intermittent services agreements), and the like.

I have previously been in contact with several KRC employees, in addition to yourself, who have assisted in identifying relevant documents. These include John Kampfenkel, Chico Flores, Sally Barnes, Walter Tyler, and Chris Mineo. I have tried to contact Joe Harris as well but he has been unavailable for health-related reasons. It would probably expedite matters if the foregoing employees

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KOCH LEGAL DEPT

JUL-13-95 THU 14:16

Mr. Frank H. White

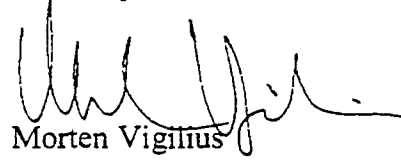
July 13, 1995

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received a copy of this letter and began to identify or copy the relevant documents,
not including the two binders you previously sent me.

Thank you for your help in this matter.

Sincerely,



Morten Vigilius

MV:sb

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