

Revised -- December 22, 1997

Ross v. Conoco, et al.

CMA Privilege Log

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Copies
004307-004310	04/23/80	CMA Interoffice Memorandum	J.T. Seawell (CMA Project Administrator, Vinyl Chloride)	David F. Zoll, Esq. (CMA staff counsel)	Report prepared in response to counsel's request for information regarding corporate participation in Vinyl Chloride Project Panel	Attorney Client Privilege ("A/C") (Affirmed by Case Master's 10/18/95 ruling)	010770-010773; 013739-013742; 21355-21358; 100590-100593; 100719-100722; 141596-141599; 148359- 148370 (copies submitted for Case Master's in-camera inspection)
004412	12/06/79	CMA Interoffice Memorandum	J.T. Seawell (CMA Project Administrator, Vinyl Chloride)	Edmund Frost, Esq. (CMA General Counsel)	Request for legal advice regarding draft summary of research conducted by independent contractor	A/C (Affirmed by Case Master's 10/18/95 ruling)	004121; 100826; 100833; 148372- 148373 (copies submitted for Case Master's in-camera inspection)

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004436	05/31/79	CMA Interoffice Memorandum	J.T. Seawell (CMA Project Administrator, Vinyl Chloride)	Edmund Frost, Esq. (CMA General Counsel)	Request for legal advice regarding funds being held in reserve from independent contractor	A/C (Affirmed by Case Master's 10/18/95 ruling)	001291; 101994; 148381- 148382 (copies submitted for Case Master's in-camera inspection)
014543- 014544	09/11/86	Letter	Has Shah; Gabrielle Williamson, Esq. (CMA staff counsel)	Vinyl Chloride Special Programs Panel	Legal advice of counsel regarding statutory obligations stemming from research reports prepared by independent contractors	A/C (Affirmed by Case Master's 10/18/95 ruling)	148397-148398 (copy submitted for Case Master's in-camera inspection)
020511- 020515	11/04/94	Memorandum	W. Caffey Norman, Esq. (Outside Counsel to Vinyl Chloride Panel)	Vinyl Chloride Panel	Legal advice of counsel regarding options available to vinyl chloride manufacturers in addressing Agency for Toxic Substances and Disease Registry test rule	A/C	115617-115621
031666- 031667	11/01/82	Letter	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Legal advice of counsel regarding proposed answers to interrogatories	A/C, Attorney Work Product ("W/P") (joint defense)	
031689- 031690	09/30/82	Letter	David F. Zoll, Esq. (CMA General Counsel)	Mark Travis (Aetna)	Letter to CMA insurer regarding pending litigation and insurance coverage issues	A/C, W/P (joint defense)	
031691- 031692	09/29/82	CMA Interoffice Memorandum	Jacqueline A. Simmons, Esq. (CMA staff counsel)	David F. Zoll, Esq. (CMA General Counsel) Dick Stoll, Esq. (CMA staff counsel)	Legal advice of counsel regarding pending litigation and insurance coverage issues	A/C, W/P	
031697	03/03/83	Letter	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Ron Green, Esq. (Outside Counsel to CMA)	Request for legal advice of counsel regarding discovery responses, litigation strategy, and insurance coverage	A/C, W/P	

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031698-031699	01/28/83	Letter	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer) cc: Berry St. John, Esq. (Outside Counsel to CMA)	Legal advice of counsel regarding response to request for production	A/C, W/P (joint defense)	
034095-034096	06/12/79	Memorandum	Don Evans, Esq. (CMA staff counsel)	Dr. Jay Young (CMA staff) cc: E.B. Frost, Esq. (CMA General Counsel) D.F. Zoll, Esq. (CMA staff counsel) G.V. Cox; J.C. Zercher (CMA staff)	Legal advice of counsel regarding revision of policies dealing with Transportation Incident Cards (CMA 156213-14 and CMA 034095-96 contain different handwritten notes)	A/C	156211-156212, 156213-156214
034139, 159710	06/12/79	Memorandum	Don Evans, Esq. (CMA staff counsel)	Dr. Jay Young (CMA staff)	Legal advice of counsel regarding revision of policies dealing with Transportation Incident Cards	A/C	159709 (copy of the first page of the document)
037136	01/11/77	CMA Board of Directors Meeting Minutes	George E. Best (Secretary-Treasurer, CMA)	CMA Board of Directors	Summary of report by counsel to CMA Board of Directors regarding settlement strategy in lawsuit against CMA	A/C, W/P	
037579	09/12/78	CMA Board of Directors Meeting Minutes	Bruce M. Barackman, Esq. (Acting Secretary-Treasurer, CMA)	CMA Board of Directors	Summary of report of CMA General Counsel to CMA Board of Directors regarding labeling of chemicals	A/C	071851
037590-037591	09/12/78	Attachment to CMA Board of Directors Meeting Minutes		CMA Board of Directors	Summary of legal advice of CMA General Counsel to CMA Board of Directors regarding labeling of chemicals	A/C	071862-071863
038215	06/06/84	General Counsel's Report	David F. Zoll, Esq. (CMA General Counsel)	CMA Board of Directors	Legal advice of CMA General Counsel to CMA Board of Directors regarding CMA's legal strategy in pending litigation and regulatory proceedings (attached to minutes of CMA Board of Directors meeting of 6/6/84)	A/C, W/P	074734

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Copies
038896	04/08/74	CMA Executive Committee Meeting Minutes	George E. Best (Secretary-Treasurer, CMA)	CMA Executive Committee	Summary of report and advice of CMA's outside counsel (Symington) regarding CMA participation in petition for judicial review of EPA effluent guidelines for inorganic chemicals	A/C, W/P	061729
038938	09/12/78	CMA Executive Committee Meeting Minutes	Bruce M. Barackman, Esq. (Acting Secretary-Treasurer, CMA)	CMA Executive Committee	Summary of report of CMA General Counsel and staff recommendation to CMA Executive Committee regarding chemical labeling	A/C	062088
042408	02/11/75	CMA Executive Committee Meeting Minutes	George E. Best (Secretary-Treasurer, CMA)	CMA Executive Committee	Summary of legal advice of CMA outside counsel (Cutler and Pickering) to CMA Executive Committee regarding possible legal ramifications of claims in lawsuit	A/C, W/P	061790
044163	09/08/80	Attachment to CMA Executive Committee Meeting Minutes		CMA Executive Committee	Summary of legal advice of CMA's outside counsel regarding CMA publications	A/C	072824
044403-044404	03/06/85	Attachment to CMA Executive Committee Meeting Minutes		CMA Executive Committee	Legal advice of CMA counsel to CMA Executive Committee regarding liability issues for chemical emergency response program	A/C	065365-065366
044504	09/08-09/80	CMA Board of Directors Meeting Minutes	Bruce M. Barackman, Esq. (CMA Secretary)	CMA Board of Directors	Summary of legal advice of CMA's General Counsel regarding legislation and litigation strategy	A/C	072592
044736	09/08-09/80	Attachment to CMA Board of Directors Meeting Minutes		CMA Board of Directors	Summary of legal advice of CMA's outside counsel regarding CMA publications	A/C	062826
046752	Undated	Handwritten Notes	Don Evans, Esq. (CMA staff counsel)		Notes of counsel in connection with request for legal advice regarding CMA safety publications	A/C	
046754-046755	05/04/79	Memorandum	Dr. Jay Young (CMA staff)	Don Evans, Esq. (CMA staff counsel) cc: E.B. Frost, Esq. (CMA General Counsel) G.V. Cox; J.C. Zercher (CMA staff)	Information provided in connection with request for legal advice of counsel regarding revision of policies dealing with Transportation Incident Cards (CMA 156215-16 contains handwritten notes) (advice provided in document CMA 034095-96, CMA 156211-12 and CMA 156213-14)	A/C	156215-156216

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047060-047072	10/12/82	Letter and Memorandum	Edmund Frost, Esq. (Outside Counsel to CMA)	R.A. Roland (CMA President) cc: D. Zoll, Esq. (CMA General Counsel)	Transmittal note from CMA General Counsel recommending potential use, and forwarding copy, of memorandum prepared by outside counsel regarding compensation legislation	A/C	
053803-053808	05/14/75	Memorandum	Wilmer, Cutler & Pickering (Outside Counsel to CMA) and Legal Advisory Committee	CMA Board of Directors CMA Executive Committee	Legal advice of counsel regarding advocacy before governmental bodies	A/C	061828-061833; 139373-139377; 140347-140352
061975	01/10/78	CMA Executive Committee Meeting Minutes	George E. Best (Secretary-Treasurer, CMA)	CMA Executive Committee	Summary of legal advice of Legal Advisory Committee and outside counsel to CMA Executive Committee regarding settlement strategy in lawsuit against CMA	A/C, W/P	
062324-062325	03/13/79	Attachment to CMA Executive Committee Meeting Minutes	Edmund B. Frost, Esq. (CMA General Counsel)	CMA Executive Committee CMA Finance Committee	Summary of legal advice of CMA General Counsel regarding litigation strategy (attached to minutes of joint meeting of CMA Executive Committee and CMA Finance Committee of 03/13/79)	A/C, W/P	
062423-062424	05/08/79	Memorandum	Edmund B. Frost, Esq. (CMA General Counsel)	CMA Executive Committee	Legal advice of CMA General Counsel regarding CMA Safety Data Sheets	A/C	
063791-063792	01/13/92	Attachment to CMA Executive Committee Meeting Minutes	Dell Perelman, Esq. (CMA staff counsel)	CMA Executive Committee	Memorandum prepared by CMA staff counsel regarding subpoenas served on CMA (attached to minutes of CMA Executive Committee meeting of 01/13/92)	A/C, W/P	
064777	03/08/83	General Counsel's Report	David F. Zoll, Esq. (CMA General Counsel)	CMA Executive Committee	Report and analysis of CMA General Counsel to CMA Executive Committee regarding brief filed by opposing party and legal ramifications of pending litigation (attached to minutes of CMA Executive Committee of 03/08/83)	A/C, W/P	
072247	11/19/79	General Counsel's Report	Edmund B. Frost, Esq. (CMA General Counsel)	CMA Board of Directors	Report of CMA General Counsel to CMA Board of Directors regarding litigation strategy and CMA participation in pending lawsuit challenging sulphur dioxide monitoring requirements (attached to minutes of CMA Board of Directors meeting of 11/19/79)	A/C, W/P	

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074283	09/13/83	General Counsel's Report	David F. Zoll, Esq. (CMA General Counsel)	CMA Board of Directors	Report of CMA General Counsel to CMA Board of Directors regarding outside counsel's analysis of pending litigation challenging EPA general pretreatment regulations (attached to minutes of CMA Board of Directors meeting of 09/13/83)	A/C, W/P	
077047-077048	01/14/92	Attachment to CMA Board of Directors Meeting Minutes	Dell Perelman, Esq. (CMA staff counsel)	CMA Board of Directors	Memorandum prepared by CMA staff counsel regarding subpoenas served on CMA (attached to minutes of CMA Board of Directors of 01/14/92)	A/C, W/P	
110322-110323	02/06/95	Letter	Carol Moors Toth, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Hasmukh Shah (Manager, Vinyl Chloride Panel) cc: Peter de la Cruz, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Legal advice of and request for information by outside counsel regarding transportation of Vinyl Chloride	A/C	
111092-111094	07/18/95	Letter	Carol Moors Toth, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Hasmukh Shah (Manager, Vinyl Chloride Panel)	Legal advice and analysis of outside counsel regarding petition to modify transportation regulation	A/C, W/P	
111137-111138	06/06/96	Letter	Carol Moors Toth, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Hasmukh Shah (Manager, Vinyl Chloride Panel) cc: Steven K. Russell, Esq. (CMA staff counsel)	Legal advice of outside counsel regarding legal challenge to administrative rule	A/C, W/P	
111204	12/05/95	Letter	Terrence D. Jones, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Hasmukh Shah (Manager, Vinyl Chloride Transportation Committee)	Legal advice of outside counsel regarding implications of agency response to petition seeking new rule	A/C, W/P	
111638	03/25/97	Memorandum	Carol Moors Toth, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Wendy Sherman (Manager, Vinyl Chloride Transportation Committee)	Legal advice of outside counsel regarding CMA publication (CMA 112493 contains handwritten notes)	A/C	112493

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112028-112029	09/03/92	Letter	S. Craig Tautfest, Esq. (Outside Counsel to Vinyl Chloride Transportation Committee)	Hasmukh Shah (CMA staff) cc: Robert Ondocsin, Esq. (CMA staff counsel)	Legal advice of outside counsel regarding implications of court ruling	A/C	
112194-112199; 112216-112239	03/23/97	Letters, memoranda and notes on draft video scripts	CMA member companies	Hasmukh Shah (Manager, Vinyl Chloride Panel)	Legal advice and comments of staff counsel of CMA member companies regarding draft video scripts relating to vinyl chloride	A/C	
115845	02/23/96	Letter	W. Caffey Norman, III, Esq. (Outside Counsel)	Hasmukh Shah (Manager, Vinyl Chloride Panel)	Legal advice of outside counsel regarding vinyl chloride risk assessment	A/C	
117865 117870 117875 117880- 117881 117886 117891 117896 117901 117906 117911 117916 117921 117928 117930 117932 117935- 117936 117941 118931- 118932 118937	11/14/96 07/24/96 05/16/96 04/23/96 02/05/96 11/22/95 10/06/95 08/04/95 07/06/95 05/12/95 03/03/95 02/07/95 06/30/93 09/21/93 02/23/94 12/15/94 02/07/95 05/07/97 02/06/97	Statements of Services, Memoranda of Services	Patton Boggs, L.L.P. (Outside Counsel)	CMA	Summaries, prepared by outside counsel, of legal services and advice provided to Chemstar Vinyl Chloride Panel	A/C	

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121595-121599	12/13/96	Letter	Peter L. de la Cruz, Esq. (Outside Counsel to Vinyl Institute)	James W. Kachtick (Occidental Chemical Corporation) cc: Greg Rutman, Esq., Larry Thomas, John Maguire, H. Patrick Toner, Lewis R. Freeman, Jr., Robert H. Burnett, Frank E. Borrelli	Legal analysis of outside counsel regarding petition to change Vinyl Chloride regulation	A/C, W/P (joint defense)	
156042-156086	04/20/77	Legal Memorandum and Attachments	James C. Langdon, Jr., Esq. Courtenay Ellis, Esq. (Both Outside Counsel to the American Petroleum Institute ("API"))	Stark Ritchie, Esq. (API General Counsel)	Legal advice of API outside counsel regarding potential liability issues raised by API activities	A/C, W/P	
156195-156207	10/12/82	Memorandum and Lists	Edmund B. Frost, Esq. (Outside Counsel to CMA)	David F. Zoll, Esq. (CMA General Counsel)	Transmittal memorandum from CMA outside counsel discussing, and forwarding copies of, draft lists prepared by outside counsel of issues raised by proposed compensation legislation	A/C	
159712-159783	06/04/76	Memorandum	Wilmer, Cutler & Pickering (Outside Counsel to CMA)	CMA Legal Advisory Committee	Legal advice of CMA outside counsel to CMA Legal Advisory Committee regarding CMA publications (this document is a draft version of document CMA 159940-160010)	A/C	
159798	08/04/76	Letter	Daniel Marcus, Esq. (Outside Counsel to CMA)	Bruce M. Barackman, Esq. (CMA staff counsel) cc: Edwin J. Putzell, Esq.	Transmittal letter from CMA outside counsel discussing and forwarding document CMA 159799-159812	A/C	
159799-159812	07/29/76	Memorandum	Wilmer, Cutler & Pickering (Outside Counsel to CMA) and the CMA Legal Advisory Committee	CMA Executive Committee and CMA Board of Directors	Memorandum prepared by CMA outside counsel and CMA Legal Advisory Committee summarizing legal advice of outside counsel regarding CMA publications (legal advice is contained in document CMA 159712-83)	A/C	159784-159797; 159815-159828; 159845-159858
159813, 159814	09/03/76	Letter and Cover Memorandum	Bruce M. Barackman, Esq. (CMA staff counsel)	CMA Legal Advisory Committee	Transmittal letter from Legal Advisory Committee discussing and forwarding document CMA 159815-159828 (same document as CMA 159799-159812) and cover memorandum	A/C	159844 (same document as 159814)

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159869	10/28/76	MCA Interoffice Memorandum	Bruce M. Barackman, Esq. (CMA staff counsel)	File cc: George E. Best Albert C. Clark William J. Driver Edward J. Klecka Victor H. Peterson William M. Stover (All CMA staff)	Summary of legal advice of CMA outside counsel regarding revision of CMA Safety Data Sheets	A/C	
159870-159871	06/22/78	Letter	Bruce M. Barackman, Esq. (CMA staff counsel)	Barbara E. Bergman, Esq. (Outside Counsel to CMA)	Request for legal advice of CMA outside counsel regarding CMA publications, and information provided in connection with request (advice provided in document CMA 159873-159908)	A/C	
159872-159908	09/25/78	Letter and Memorandum	John H. Pickering, Esq. (Outside Counsel to CMA)	Edmund B. Frost, Esq. (CMA General Counsel)	Transmittal letter from CMA outside counsel to CMA General Counsel discussing and forwarding copy of memorandum setting forth legal advice of CMA outside counsel with respect to CMA publications	A/C	
159909-159913	10/20/78	Letter and Memorandum	Conrad S. Kent, Esq. Director, Law Dept. Stauffer Chemical Company	Edmund B. Frost, Esq. (CMA General Counsel)	Transmittal letter from inhouse counsel of CMA member company to CMA General Counsel discussing and forwarding memorandum prepared by inhouse counsel regarding labeling of chemicals and CMA Safety Data Sheets	A/C	
159919-159926	04/04/79	Letter and Memorandum	Andrew T.A. Macdonald, Esq. (Outside Counsel to CMA)	Edmund B. Frost, Esq. (CMA General Counsel)	Transmittal letter forwarding copy of memorandum prepared by outside counsel setting forth legal advice regarding labeling of chemicals and CMA Safety Data Sheets	A/C	
159928-159929	04/13/79	Memorandum			Summary of legal advice of outside counsel regarding CMA publications and handwritten notes	A/C	159930-159931

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159932-159933	06/14/79	CMA Interoffice Memorandum	Dr. Jay A. Young (CMA staff)	Donald D. Evans, Esq. (CMA staff counsel) cc: G. V. Cox J. C. Zercher (CMA staff) E. B. Frost, Esq. (CMA General Counsel) D. F. Zoll, Esq. (CMA staff counsel)	Summary of legal advice of counsel regarding revision of policies dealing with Transportation Incident Cards	A/C	
159934-159935	10/06/80	CMA Interoffice Memorandum	Edmund B. Frost, Esq. (CMA General Counsel)	CMA staff	Legal advice of CMA General Counsel regarding procedures for responding to requests for information received by CMA	A/C	
159940-160010	08/02/76	Memorandum	Wilmer, Cutler & Pickering (Outside Counsel to CMA)	CMA Legal Advisory Committee	Legal advice of CMA outside counsel regarding CMA publications	A/C	
170645	03/17/92	Memorandum	Robert D. Ondocsin, Esq. (CMA staff counsel)	Has C. Shah and Elizabeth J. Moran (CMA staff) cc: David F. Zoll, Esq. (CMA General Counsel) Donald D. Evans, Esq. (CMA staff counsel) Kathy D. Bailey, Esq. (CMA staff counsel) Langley A. Spurlock (CMA staff)	Memorandum regarding preparation for depositions	A/C, W/P	033714
170646-648	07/23/82	Memorandum	David F. Zoll, Esq. (CMA General Counsel)	CMA Special Programs Project Administrators	Memorandum regarding guidelines and procedures for the protection of confidential information	A/C, W/P	
170649-667	11/17/64	Legal Memorandum	Fowler, Leva, Hawes & Symington (CMA Outside Counsel)	CMA	Legal memorandum regarding possible legal implications of CMA's Chem-Card program	A/C, W/P	

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170668-730	12/31/79	Letter and attachment	Gary H. Baise, Esq. (Outside Counsel for The Vinyl Institute)	Roger P. Batchelor, Jr. (Diamond Shamrock Corporation)	Letter regarding enclosed draft memorandum discussing reference documents cited by EPA to support its airborne carcinogen policy	W/P (joint defense)	

WORK PRODUCT FILES

Vassar v. Air Products

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Identical Copies
170476-517	06/27/95	Letter and attachments	Claudia Wilson Frost, Esq. (Outside Counsel to CMA and other Co-Defendants)	Robert Butler, Esq., J. Thomas Deal, Esq., Donald D. Evans, Esq., Carol R. Geiger, Esq., Theodore E. Laslo, Jr., Esq., DeWayne Layfield, Esq., Mary K. McLemore, Esq., Thomas A. Miller, Esq., Robert H. Sand, Esq., Barry J. Shainman, Esq. and A. Richard Winchester, Esq. (In-house Counsel for Joint Defense Group) cc: David J. Hanna, Esq. (Outside Counsel for Co-Defendant)	Letter and enclosed legal memoranda prepared to defend a vinyl chloride medical monitoring class action	A/C, W/P	
170518-520	01/08/95	Letter	Walter Conrad, Esq. (Outside Counsel to CMA and other Co-Defendants)	Robert Butler, Esq., J. Thomas Deal, Esq., Donald D. Evans, Esq., Gary A. Garfield, Esq., Carol R. Geiger, Esq., Theodore E. Laslo, Jr., Esq., Mary K. McLemore, Esq., Christi D. Quinn, Esq., Robert H. Sand, Esq., Barry J. Shainman, Esq. and Richard Winchester, Esq. (In-house Counsel for Joint Defense Group) cc: David J. Hanna, Esq. (Outside Counsel for Co-Defendant)	Letter of counsel regarding status of lawsuit	A/C, W/P	

NRDC v. EPA

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156816	03/17/87	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Kathy Bailey, Esq. (CMA staff counsel)	Correspondence from CMA outside counsel to CMA's in-house counsel regarding enclosed brief	A/C, W/P	
170521	08/08/85	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Albert J. Beveridge, Esq. (Outside Counsel for the Vinyl Institute) cc: Fredric P. Andes, Esq. (CMA staff counsel)	Correspondence between counsel for aligned parties regarding enclosed draft brief	W/P (joint defense)	
170522	07/30/85	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Arthur F. Sampson, Esq. (Outside Counsel for API) cc: Fredric P. Andes, Esq. (CMA staff counsel) Martha Beaucamp, Esq. (API staff counsel)	Correspondence between counsel for aligned parties regarding enclosed draft brief	W/P (joint defense)	
170523-543	08/01/85	Transmittal note and memorandum	Arthur F. Sampson, Esq. (Outside Counsel for API)	Neil Jay King, Esq. (Outside Counsel for CMA) cc: Fredric P. Andes, Esq. (CMA staff counsel) Martha Beaucamp, Esq. (API staff counsel)	Legal memorandum regarding jurisdictional arguments of respondents in <u>NRDC v. EPA</u>	W/P (joint defense)	

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170544-545	06/28/85	Letter	Peter L. de la Cruz, Esq. (Outside Counsel for The Vinyl Insitiute)	Neil Jay King, Esq. (Outside Counsel for CMA) cc: Arthur F. Sampson, Esq. (Outside Counsel for API) Fredric P. Andes, Esq. (CMA staff counsel) Stark Ritchie, Esq. Martha Beaucamp, Esq. (API staff counsel) Robert Brager, Esq. (Outside Counsel for The Vinyl Institute) Charles E. O'Connell Thomas J. McGrath Roy T. Gottesman, Ph.D.	Correspondence between counsel for aligned parties regarding status of <u>NRDC v. EPA</u> litigation	W/P (joint defense)	
170546-547	07/17/85	Letter	Arthur F. Sampson, Esq. (Outside Counsel for API)	Neil Jay King, Esq. (Outside Counsel for CMA) cc: Martha Beaucamp, Esq. (API staff counsel) Fred P. Andes, Esq. (CMA staff counsel)	Correspondence between counsel for aligned parties regarding legal memorandum on legislative history of relevant statutory provision	W/P (joint defense)	
170548-549		Notes			Handwritten notes of CMA staff counsel	W/P	
170550-557	11/06/87	Memorandum	Robert M. Sussman, Esq. William K. Rawson, Esq. (Outside Counsel for CMA Panel)	CMA Butadiene Program Panel	Draft memorandum regarding decision in <u>NRDC v. EPA</u>	A/C, W/P	
170558	03/19/87	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Arthur F. Sampson, Esq. (Outside Counsel for API) Kathy Bailey, Esq. (CMA staff counsel)	Letter enclosing draft outline for amicus brief in vinyl chloride litigation	A/C, W/P (joint defense)	
170559	04/01/87	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Kathy Bailey, Esq. (CMA staff counsel)	Letter enclosing drafts of brief for vinyl chloride litigation	A/C, W/P	

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170560-561		Notes			Handwritten notes of CMA staff counsel	W/P	
170563-574	12/02/86	Memorandum	Neil J. King, Esq. (Outside Counsel for CMA)	Donald D. Evans, Esq. and Fredric P. Andes, Esq. (CMA staff counsel)	Legal memorandum analyzing vinyl chloride decision	A/C, W/P	170575-586, 170614-625, 170630-641
170587-595	11/09/87	Memorandum	Robert M. Sussman, Esq. William K. Rawson, Esq. (Outside Counsel to CMA Panel)	CMA Butadiene Program Panel	Legal memorandum analyzing legal implications of decision in vinyl chloride litigation	A/C, W/P	
170596-604	07/31/87	Memorandum	Neil Jay King, Esq. (Outside Counsel for CMA)	CMA	Legal memorandum analyzing legal implications of decision in vinyl chloride litigation	A/C, W/P	170605-613
170626	11/04/86	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Donald D. Evans, Esq. Fredric P. Andes, Esq. (CMA staff counsel)	Letter analyzing decision in vinyl chloride litigation	A/C, W/P	
170627	06/26/85	Letter	Neil Jay King, Esq. (Outside Counsel for CMA)	Peter L. de la Cruz, Esq. (Outside Counsel for The Vinyl Institute) cc: Fredric P. Andes, Esq. (CMA staff counsel)	Letter between counsel for aligned parties analyzing legal issue in <u>NRDC v. EPA</u>	W/P (joint defense)	
170628	03/11	Notes			Handwritten notes of CMA staff counsel reflecting legal analysis regarding brief in vinyl chloride litigation	W/P	
170629	03/25	Notes			Handwritten notes of CMA staff counsel reflecting proposed legal strategy of aligned party	W/P	
170642-644	06/25/85	Memorandum	William P. Gullledge Alice R. Mayer (CMA staff) Fredric P. Andes, Esq. (CMA staff counsel)	Environmental Management Committee	Memorandum setting forth suggested legal strategy regarding vinyl chloride litigation	A/C, W/P	007543-007545; 101737-101739

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170913-914	09/04/87	Letter	Gary H. Baise (Outside Counsel to Vinyl Institute)	Peter de la Cruz, Esq. (Outside Counsel to Vinyl Institute)	Letter between counsel for aligned parties analyzing EPA reaction to decision in vinyl chloride litigation	A/C, W/P (joint defense)	

Arnstein v. MCA

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Identical Copies
156622-623	08/26/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of court order and filed pleading and analyzing same	A/C, W/P	
170776-777	12/16/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing invoices for legal services rendered and discussing settlement issues	A/C, W/P	
170778	03/16/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of court order and filed pleading and analyzing same	A/C, W/P	
170779	02/25/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of filed pleadings and analyzing same	A/C, W/P	
170780	03/03/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of filed pleading and analyzing same	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Identical Copies
170781-782	02/16/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of filed pleadings and analyzing same	A/C, W/P	
170783		Note	Bruce M. Barackman, Esq. (CMA staff counsel)	W. Driver (CMA President) G. Best (CMA staff)	Handwritten note regarding answer filed in case	A/C, W/P	
170784-786	02/04/76	Note and attachment	Bruce M. Barackman, Esq. (CMA staff counsel)	W. Driver (CMA President) G. Best (CMA staff)	Handwritten attorney notes regarding attached letter from outside counsel enclosing copy of order entered in case and analyzing same	A/C, W/P	
170787-788	01/22/78	Note and attachment	Bruce M. Barackman, Esq. (CMA staff counsel)	W. Driver (CMA President) G. Best (CMA staff)	Handwritten attorney note regarding attached letter from outside counsel enclosing copies of filed pleading and analyzing same	A/C, W/P	
170789-790	01/14/76	Note and attachment	Bruce M. Barackman, Esq. (CMA staff counsel)	W. Driver (CMA President) G. Best (CMA staff)	Handwritten attorney notes enclosing letter from outside counsel analyzing settlement issues	A/C, W/P	
170791	01/02/76	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Letter analyzing enclosed copy of a filed pleading	A/C, W/P	
170792-799	07/22/76	Memorandum	Kenneth D. Johnson (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum analyzing opinions of opposing expert witness	A/C, W/P	
170800-896	04/18/75	Memorandum and attachments	A.C. Clark (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum and attachments regarding information requested by counsel relating to Arnstein litigation	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Identical Copies
170897-899	02/06/75	Memorandum and attachments	A.C. Clark (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum and attachments regarding information requested by counsel relating to <u>Arnstein</u> litigation	A/C, W/P	
170900-907	02/05/75	Memorandum and attachments	Bruce M. Barackman, Esq. (CMA staff counsel)	Best, Clark, Klecka, Peterson, Stover and Campbell (CMA staff) cc: W. Driver (CMA President)	Memorandum and attachments regarding information requested by counsel relating to <u>Arnstein</u> litigation	A/C, W/P	
170908-909	02/03/75	Memorandum	Bruce M. Barackman, Esq. (CMA staff counsel)	J.G. Tritsch (CMA staff) cc: A.C. Clark (CMA staff)	Memorandum analyzing issues relating to insurance coverage	A/C, W/P	
170910	01/28/77	Letter	Alan J. Davis, Esq. (CMA Outside Counsel)	Bruce M. Barackman, Esq. (CMA staff counsel)	Letter enclosing copies of court order and filed pleadings and analyzing same	A/C, W/P	
170911-912	02/18/77	Letter	Bruce M. Barackman, Esq. (CMA staff counsel)	W. Driver (CMA President) G. Best (CMA staff)	Handwritten attorney notes regarding attached letter from outside counsel analyzing issues relating to settlement	A/C, W/P	
170915-921	02/09/76	Letter and attachment	Alan J. Davis, Esq. (CMA Outside Counsel)	Daniel Mayers, Esq. (CMA Outside Counsel) cc: Bruce M. Barackman, Esq. (CMA staff counsel)	Draft answer and accompanying transmittal letter	A/C, W/P	
170731-739	04/04/75	Memorandum and attachments	Bruce M. Barackman, Esq. (CMA staff counsel)	Best, Clark, Klecka, Peterson, Stover and Campbell (CMA staff) cc: W. Driver (CMA President)	Memorandum from counsel requesting information relating to <u>Arnstein v. MCA</u> litigation and responses to same	A/C, W/P	
170740-743	04/04/75	Memorandum and attachments	Bruce M. Barackman, Esq. (CMA staff counsel)	Best, Clark, Klecka, Peterson, Stover and Campbell (CMA staff) cc: W. Driver (CMA President)	Memorandum from counsel requesting information relating to <u>Arnstein v. MCA</u> litigation and responses to same	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Privilege	Identical Copies
170744-758	02/14/75	Letter and attachments	Bruce M. Barackman, Esq. (CMA staff counsel)	Alan J. Davis, Esq. (CMA Outside Counsel) cc: Daniel K. Mayers (CMA Outside Counsel)	Letter and attachments providing information requested by outside counsel regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170759	02/05/75	Letter	Bruce M. Barackman, Esq. (CMA staff counsel)	Alan J. Davis, Esq. (CMA Outside Counsel) cc: Daniel K. Mayers (CMA Outside Counsel)	Letter providing information requested by outside counsel regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170760-761	02/05/75	Memorandum	Bruce M. Barackman, Esq. (CMA staff counsel)	Best, Clark, Klecka, Peterson, Stover and Campbell (CMA staff) cc: W. Driver (CMA President)	Memorandum from counsel analyzing allegations in <u>Arnstein</u> litigation requesting information regarding same	A/C, W/P	
170762	02/07/75	Memorandum	William M. Stover (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum responding to request from counsel for information regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170763-765	02/06/75	Memorandum and attachments	A.C. Clark (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum responding to request from counsel for information regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170766-772	02/06/75	Memorandum and attachments	Robert E. Varnerin (CMA staff)	Victor H. Peterson (CMA staff)	Memorandum responding to request from counsel for information regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170773	02/11/75	Memorandum	E.J. Klecka (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum responding to request from counsel for information regarding defense of <u>Arnstein</u> litigation	A/C, W/P	
170774-775	02/10/75	Memorandum	M.V. Campbell (CMA staff)	Bruce M. Barackman, Esq. (CMA staff counsel)	Memorandum responding to request from counsel for information regarding defense of <u>Arnstein</u> litigation	A/C, W/P	

Arcell v. Ashland

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
158546-548	07/12/76	Letter	Shanley & Fisher (Outside Counsel to CMA)	Dr. Kenneth Johnson	Handwritten note attaching letter regarding information provided to outside counsel in <u>Arcell v. Ashland</u> litigation	A/C, W/P	
158549-552		List	K.D. Johnson (CMA staff)		List of exhibits assembled for possible submission in response to request to produce documents	A/C, W/P	
158649	07/08/76	Letter	Bruce M. Barackman, Esq. (CMA staff counsel)	Robert A. Boutillier, Esq. (Outside Counsel to CMA)	Letter regarding publications for the <u>Arcell</u> case	A/C, W/P	

Waldrop v. Vistron

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170000-015	08/20/80	Letter and attachment	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Draft response to interrogatories and document production request; report of counsel regarding same	A/C, W/P	
170016	08/08/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Peter R. Agnew, Bruce M. Barackman, John S. Beale, Albert C. Clark, Geraldine V. Cox, Wayne H. Harrington, Gary C. Herrman, George W. Ingle, Victor H. Peterson, Hugh M. Robinson, Hasmukh C. Shah, James N. Sites, Gordon D. Strickland, William M. Stover, John C. Zercher (All CMA staff)	Request of counsel for information responsive to interrogatories	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170017	08/11/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Geraldine Cox (CMA staff)	Request of counsel for information responsive to interrogatories	A/C, W/P	
070018	08/11/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Vic Peterson (CMA staff)	Request of counsel for information responsive to interrogatories	A/C, W/P	
170019	08/12/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Bill Stover (CMA staff)	Request of counsel for information responsive to interrogatories	A/C, W/P	
170020-034	08/06/80	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce (CMA staff counsel)	Legal advice of counsel regarding proper scope of discovery and responses to interrogatories	A/C, W/P	
170035	07/14/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	David F. Zoll, Esq. (CMA staff counsel)	Legal advice of counsel regarding response to interrogatories	A/C, W/P	
170036	07/14/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Berry St. John, Esq. (CMA's Outside Counsel)	Discussion regarding potential expert witness in related litigation	A/C, W/P	
170037-042	07/09/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	David F. Zoll, Esq. (CMA staff counsel)	Letter setting forth legal advice of outside counsel regarding plaintiff's counsel's solicitation of clients and enclosing legal memorandum regarding attorney-client joint defense privilege	A/C, W/P	
170043-044	06/27/80	Letter	Charles S. McCowan, Esq. (Outside Counsel of Co-Defendant)	Berry St. John, Esq. (CMA's Outside Counsel) cc: Marshall Pearlman Benton Leach	Request of counsel for legal advice and assistance in related litigation	W/P (joint defense)	
170045-047	06/27/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Joe B. Norman, Esq. (CMA's Outside Counsel) cc: David Zoll, Esq. (CMA staff counsel)	Response to counsel's request for information in support of legal argument	A/C, W/P	
170048-065	06/18/80	Letter Memorandum	Joe B. Norman, Esq. (CMA's Outside Counsel)	Berry St. John, Esq. (CMA's Outside Counsel)	Report and analysis of counsel regarding jurisdictional defense	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170066-068	06/11/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	David F. Zoll, Esq. (CMA staff counsel)	Report of counsel of legal strategy and request for information in support of legal argument	A/C, W/P	
170069-071	06/03/80	Letter	Edmund B. Frost, Esq. (CMA General Counsel)	Addressees cc: J. Berry St. John, Esq., Member representatives of the CMA Vinyl Chloride Special Projects Panel, Member representatives of the CMA Acrylonitrile Special Projects Panel, Dr. Geraldine V. Cox, CMA Vice President - Technical, Dr. Hasmukh C. Shah, Director, CMA Special Projects	Report of counsel regarding plaintiff's legal claims against defendants and funding of litigation	A/C, W/P	
170072-073	05/05/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	David F. Zoll, Esq. (CMA staff counsel)	Request of counsel for technical assistance in support of defense of lawsuit	A/C, W/P	
170074-088	11/18/80	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Draft opposition to plaintiffs' motion for order compelling discovery, and legal advice of counsel regarding response to opposing counsel's motion	A/C, W/P	
170089	11/14/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Peter Agnew (CMA staff)	Legal advice of counsel and request for assistance regarding ascertaining limits of insurance coverages	A/C, W/P	
170090-093	11/10/80	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer) bcc: Patrick C. Joyce, Esq. (CMA staff counsel)	Draft affidavit of insurance claim representative and legal advice of counsel regarding same	A/C, W/P (joint defense)	
170094-095	11/07/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Report and analysis of counsel regarding appellate court's ruling in related proceeding	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170096-097	10/31/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman, Esq. (CMA's Outside Counsel)	Legal advice of counsel regarding filing of answers and objections to interrogatories and request for production	A/C, W/P	
170098-109	10/31/80	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer) cc: Patrick C. Joyce, Esq. (CMA staff counsel) Joe B. Norman, Esq. (CMA's Outside Counsel)	Draft objections to interrogatories and request for production; consultation between joint defense counsel regarding same	A/C, W/P (joint defense)	
170110	10/30/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	<u>Waldrop v. Vistrion</u> Mailing List	Report and analysis of counsel regarding unauthorized pleading filed with court	A/C, W/P	
170111	10/21/80	Letter	James W. Greer (Claims Representative of CMA's Insurer)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel) Dan Atkinson, Esq. (Counsel for CMA's Insurer)	Communication with counsel regarding insurance coverage for lawsuit	A/C, W/P	
170112-122	10/16/80	Memorandum	Joe B. Norman, Esq. (CMA's Outside Counsel)	Berry St. John, Esq. (CMA's Outside Counsel)	Legal analysis of counsel regarding unauthorized answer filed by attorney as "General Appearance"	A/C, W/P	
170123	10/13/80	Letter	Daniel Atkinson, Esq. (Counsel for CMA's Insurer)	Berry St. John, Esq. (CMA's Outside Counsel)	Communication between joint defense counsel regarding filing of pleading	A/C, W/P (joint defense)	
170124-135	10/17/80	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Draft motion to withdraw appearance and memorandum in support thereof; legal advice of counsel regarding same	A/C, W/P	
170136-137	10/15/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Edmund B. Frost, Esq. (CMA General Counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Report and analysis of counsel regarding unauthorized appearance and pleading	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170138	09/26/80	Phone Message		Patrick C. Joyce, Esq. (CMA staff counsel)	Report of communication from claims representative of CMA's insurer regarding insurance coverage for lawsuit	A/C, W/P (joint defense)	
170140	09/26/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	James W. Greer (Claims Representative of CMA's Insurer) cc: Peter Agnew (Controller, CMA) Berry St. John, Esq. (CMA's Outside Counsel)	Communication by counsel regarding information in support of claim for insurance coverage for lawsuit	A/C, W/P (joint defense)	
170141	09/05/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Legal advice of counsel regarding depositions and implications of related litigation	A/C, W/P	
170142-144	08/04/81	Letter and attachment	Patrick C. Joyce, Esq. (CMA staff counsel)	James W. Greer (Claims Representative of CMA's Insurer) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Letter forwarding legal bills regarding defense of lawsuit	A/C, W/P	
170145	08/04/81	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	<u>Waldrop v. Vistrion</u> Mailing List	Report of counsel regarding status of litigation	A/C, W/P	
170146	07/31/81	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	R. Roland, B. Barackman, G. Cox, D. Carroll, J. Sites, H. Shah, C. Stack (All CMA staff)	Report and analysis of counsel regarding status of litigation	A/C, W/P	
170147	07/31/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Report of counsel regarding future joint defense planning	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170148-150	07/29/81	Letter and attachment	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Berry St. John, Esq. (CMA's Outside Counsel)	Draft pleading and report by counsel of communications with insurance claims representative regarding potential legal defenses	A/C, W/P (joint defense)	
170151	07/28/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Analysis of counsel regarding reply memorandum filed by opposing party	A/C, W/P	
170152	06/30/81	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman (CMA's Outside Counsel)	Communication by counsel regarding enclosed draft reply memorandum and revision of same	A/C, W/P	
170153-154	06/22/81	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Bruce Barackman, Esq. (CMA V.P. and Secretary)	Report and analysis of counsel regarding facts of case and legal strategy in same	A/C, W/P	
170155-156	06/10/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	James W. Greer (Claims Representative of CMA's Insurer) cc: Patrick C. Joyce, Esq. (CMA staff counsel)	Report of counsel regarding firm billing practices	A/C, W/P	
170157	06/08/81	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Joe B. Norman, Esq. (CMA's Outside Counsel)	Report of counsel's research regarding answers to plaintiff's interrogatories	A/C, W/P	
170158	06/02/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Legal advice of counsel regarding recent court decision	A/C, W/P	
170159-161	05/29/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Report of counsel's research regarding evidentiary issue	A/C, W/P	
170162	06/04/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Legal advice of counsel regarding objections to plaintiff's interrogatories	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170163	06/01/81	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Berry St. John, Esq. (CMA's Outside Counsel) cc: Joe B. Norman, Esq. (CMA's Outside Counsel) Bruce Barackman, Esq. (CMA V.P. and Secretary)	Communication with counsel regarding designated witness at hearing on motion	A/C, W/P	
170164-167	05/15/81	Letter and attachment	John L. Oberdorfer, Esq. (Outside Counsel to CMA)	Gloria Sodaro, Esq. (CMA staff counsel) cc: Ed Frost, Esq. (CMA General Counsel)	Legal advice of counsel regarding court litigation of market dominance regulations and memorandum summarizing legal research regarding appeal from ICC decision	A/C, W/P	
170168-169	03/10/81	Letter	Joe B. Norman, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Berry St. John (CMA's Outside Counsel)	Legal advice of counsel regarding response to plaintiff's interrogatories	A/C, W/P	
170170-177	03/18/81	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Berry St. John, Esq. (CMA's Outside Counsel)	Draft supplemental response to plaintiff's interrogatories and letter regarding same	A/C, W/P	
170178	01/06/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Analysis of counsel regarding co-defendant's motion for summary judgement	A/C, W/P	
170179-185	12/30/80	Letter and attachment	Patrick C. Joyce, Esq. (CMA staff counsel)	James W. Greer (Claims Representative, Aetna) cc: Berry St. John, Esq. (CMA's Outside Counsel)	Letter forwarding legal bills regarding defense of lawsuit	A/C, W/P	
170186-191	12/19/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Legal advice of counsel regarding service of process	A/C, W/P	
170192	12/29/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	<u>Waldrop v. Vistron</u> Mailing List	Report of counsel regarding status of litigation	A/C, W/P	
170193	12/02/80	Letter	Patrick C. Joyce, Esq. (CMA staff counsel)	Carol Stack (CMA Vinyl Chloride Program Administrator)	Analysis and report of counsel regarding status and funding of litigation	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170194-195	11/24/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman, Esq. (CMA's Outside Counsel)	Analysis and report of counsel regarding disposition of motion to withdraw and motion to compel discovery	A/C, W/P	
170196	11/21/80	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Analysis of counsel regarding appellate brief filed by co-defendant	A/C, W/P	
170197-198	11/20/80	Letter	James W. Greer (Claims Representative, Aetna)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Huntington T. Block (CMA's insurance broker) Berry St. John, Esq. (CMA's Outside Counsel) Dan Atkinson, Esq. (Counsel for CMA's Insurer)	Report to counsel setting forth insurer's willingness to defend CMA's interests, but reserving right to decline coverage and withdraw from defense	A/C, W/P	
170199	11/17/80	Letter	James W. Greer (Claims Representative, Aetna)	Patrick C. Joyce, Esq. (CMA staff counsel)	Report to counsel regarding defense of suit and insurance policy limits	A/C, W/P	
170200-275		Memorandum	J.T. Seawell (CMA Vinyl Chloride Project Administrator)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Report prepared at request of counsel regarding technical support for litigation strategy	W/P, A/C	170238-275 (without handwritten notation); 170437-474 (signed copy)
170276-86		Report	J.T. Seawell (CMA Vinyl Chloride Project Administrator)		Report prepared at request of counsel regarding technical support for litigation strategy	W/P, A/C	170287-298
170299-315	08/25/80	Letter and attachment	J. Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Draft discovery response and analysis of counsel regarding same	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170316	08/16/80	Letter	Charles S. McCowan, Jr., Esq. (Outside Counsel to Co-Defendant)	J. Berry St. John, Jr., Esq. Allen R. Fontenot, Esq. Roger Fritchie, Esq. David Robinson, Esq. Harry McCall, Jr., Esq. (Counsel to Co-Defendants)	Correspondence between counsel with aligned interests regarding related litigation matter	A/C, W/P (joint defense)	
170317	05/23/80	Letter	Edmund B. Frost, Esq. (CMA General Counsel)	J. Berry St. John, Esq. (CMA's Outside Counsel)	Letter enclosing requested information relating to litigation	A/C, W/P	
170318	09/20/83	Letter	J.N. Chett (Claims Manager of CMA's Insurer)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Letter to counsel regarding legal strategy in response to discovery requests	W/P, A/C (joint defense)	
170324	08/06/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman, Esq. (CMA's Outside Counsel)	Legal advice of counsel regarding strategy of opposing counsel	A/C, W/P	
170325-336	09/26/80	Letter with attachment	Patrick C. Joyce, Esq. (CMA staff counsel)	James Greer (Claims Representative for CMA's Insurer) cc: Patrick Agnew (Controller, CMA) Berry St. John, Esq. (CMA's Outside Counsel)	Follow up correspondence regarding CMA's insurance coverage	A/C, W/P (joint defense)	
170337-338	11/30/83	Letter	James E. Coleman, Esq. (Outside Counsel to CMA)	Robert W. Frantz, Esq. (CMA staff counsel)	Legal advice of counsel regarding response to subpoena	A/C, W/P	
170339	11/28/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Robert W. Frantz, Esq. (CMA staff counsel)	Legal advice of counsel regarding scope of discovery	A/C, W/P (joint defense)	
170340	11/08/83	Letter	Robert W. Frantz, Esq. (CMA staff counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Letter to counsel regarding legal strategy in response to plaintiff's deposition notice and document request	A/C, W/P (joint defense)	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170341	10/14/83	Letter	Richard P. Oatmanm, Esq. (Assistant Claim Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel) cc: J. N. Chett (Claims Manager of CMA's Insurer)	Response to counsel's letter regarding insurance coverage and attaching document	A/C, W/P (joint defense)	
170342	10/14/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Legal advice of counsel regarding possible notice of deposition including handwritten notes	A/C, W/P (joint defense)	
170343-344	10/12/83	Memorandum	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Robert W. Frantz, Esq. (CMA staff counsel)	Report and analysis of counsel regarding legal work undertaken in connection with lawsuit	A/C, W/P	
170345-347	08/26/83	Letter	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Richard P. Oatman, Esq. (Assistant Claim Counsel for CMA's Insurer)	Legal opinion of counsel regarding client's participation in joint defense of lawsuit	A/C, W/P (joint defense)	031663-031665
170348-350	07/18/83	Letter and attachment	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer) bcc: Aetna Life & Casualty (CMA's Insurer)	Draft discovery responses and legal opinion of counsel regarding discovery responses and proposed legal strategy in defense of lawsuit	A/C, W/P (joint defense)	
170351	06/30/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Request from counsel for information responsive to interrogatories and regarding trial witnesses	A/C, W/P (joint defense)	
170352-353	05/25/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Report of counsel regarding discovery and identification of defense witnesses	A/C, W/P (joint defense)	
170354-356	02/21/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Legal advice of counsel and request for comments regarding discovery strategy	A/C, W/P (joint defense)	
170357	01/24/83	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Legal advice of counsel regarding response to discovery request	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170358-359	10/21/82	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Request of counsel for advice regarding response to interrogatories and technical information in support of defense	A/C, W/P (joint defense)	
170360	10/08/82	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Berry St. John, Esq. (CMA's Outside Counsel)	Request of counsel for information in support of defense	A/C, W/P (joint defense)	
170361-362	09/21/82	Letter	C. William Bradley, Esq. (Outside Counsel to Co-Defendant)	Charles S. McCowan, Esq. (Outside Counsel to Co-Defendant) cc: Paul H. Spaht Roger M. Fritchie David W. Robinson Harry McCall, Jr., Esq. John E. Cox, Esq. (Counsel to Co-Defendants) J. Berry St. John, Esq. (CMA's Outside Counsel) Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Legal advice from counsel regarding expert witnesses	A/C, W/P (joint defense)	
170363	06/22/82	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Berry St. John, Esq. (CMA's Outside Counsel)	Report of counsel regarding case status and request for information to support defense	A/C, W/P (joint defense)	

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170365	06/28/82	Letter	Charles S. McCowan, Esq. (Outside Counsel to Co-Defendant)	Berry St. John, Esq. (CMA's Outside Counsel) Paul H. Spaht, Esq. Harry McCall, Esq. Roger M. Fritchie, Esq. John E. Cox, Esq. William S. Penick David W. Robinson, Esq. (Counsel to Co-Defendants) Daniel R. Atkinson, Esq. (Outside Counsel to CMA's Insurer) cc: Gayle Sanders Fred Dovell	Legal advice of counsel regarding deposition strategy	W/P (joint defense)	
170367-368	01/22/82	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) James W. Greer (Claims Representative for CMA's Insurer)	Letter forwarding legal bill regarding defense of lawsuit	A/C, W/P (joint defense)	
170368.1-368.2	11/12/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Legal advice from counsel regarding order of judgment and legal strategy regarding appeal of same	A/C, W/P	
170369-370	10/28/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman (CMA's Outside Counsel)	Legal advice from counsel regarding standards governing appeal from judgment	A/C, W/P	
170371-373	09/22/81	Letter and attachment	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) James W. Greer (Claims Representative for CMA's Insurer)	Letter forwarding legal bill regarding defense of lawsuit	A/C, W/P (joint defense)	

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170374	08/10/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer) cc: Patrick C. Joyce, Esq. (CMA staff counsel) James Greer (Claims Representative of CMA's Insurer) Joe B. Norman, Esq. (CMA's Outside Counsel)	Legal advice of counsel regarding draft pleading and coordination of joint defense	A/C, W/P (joint defense)	
170375	08/06/81	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Berry St. John, Esq. (CMA's Outside Counsel)	Request of counsel for information regarding allegations of case	A/C, W/P (joint defense)	
170376-379		Handwritten notes on pleading			Handwritten attorney marginalia reflecting potential responses to motion to compel	W/P (joint defense)	
170380	11/03/83	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Robert W. Frantz, Esq. (CMA staff counsel)	Legal advice of counsel regarding deposition strategy	A/C, W/P (joint defense)	
170381-383	07/18/83	Letter and attachment	Jacqueline A. Simmons, Esq. (CMA staff counsel)	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Draft discovery responses and opinion of counsel regarding proposed legal strategy in defense of lawsuit	A/C, W/P (joint defense)	031694-031696
170384	01/16/84	Letter	Daniel R. Atkinson, Esq. (Counsel for CMA's Insurer)	Robert W. Frantz, Esq. (CMA staff counsel)	Report by counsel regarding status of case and settlement negotiations	A/C, W/P (joint defense)	
170385	11/22/83	Letter	Robert W. Frantz, Esq. (CMA staff counsel)	Jim Coleman, Esq. (Outside Counsel to CMA)	Summary of legal strategy taken in defense of lawsuit	A/C, W/P (joint defense)	
170386-387	10/28/81	Letter	Berry St. John, Esq. (CMA's Outside Counsel)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: Joe B. Norman, Esq. (CMA's Outside Counsel)	Legal advice of counsel regarding standards governing appeal from judgment	A/C, W/P	
170388	08/14/80	Memorandum	A.C. Clark (CMA staff counsel)	Patrick C. Joyce, Esq. (CMA staff counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	

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170389	08/12/80	Memorandum	Hugh M. Robinson (CMA staff)	Patrick C. Joyce, Esq. (CMA staff counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	
170390-391	08/14/80	Memorandum	Kurt Sanford (CMA staff)	Patrick C. Joyce, Esq. (CMA staff counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	
170392-393	08/08/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Peter R. Agnew, Bruce M. Barackman, John S. Beale, Albert C. Clark, Geraldine V. Cox, Wayne H. Harrington, Gary C. Herrman, George W. Ingle, Victor H. Peterson, Hugh M. Robinson, Hasmukh C. Shah, James N. Sites, Gordon D. Strickland, William M. Stover, John C. Zercher (All CMA staff)	Request by counsel for information responsive to discovery requests and handwritten notes in response to same	A/C, W/P	
170394	08/08/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Peter R. Agnew, Bruce M. Barackman, John S. Beale, Albert C. Clark, Geraldine v. Cox, Wayne H. Harrington, Gary C. Herrman, George W. Ingle, Victor H. Peterson, Hugh M. Robinson, Hasmukh C. Shah, James N. Sites, Gordon D. Strickland, William M. Stover, John C. Zercher (All CMA staff)	Request from counsel for information responsive to discovery requests and typewritten note in response to same	A/C, W/P	
170395	06/26/80	Letter	David W. Robinson, Esq. (Outside Counsel to Co-Defendant)	Berry St. John, Esq. (CMA's Outside Counsel) cc: Paul S. McAuliffe Charles S. McCowan, Jr., Esq. (Outside Counsel to Co-Defendant)	Legal advice from counsel regarding upcoming trial and trial strategy in related litigation	W/P (joint defense)	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170396-397	06/21/80	Letter	Charles S. McCowan, Esq. (Outside Counsel to Co-Defendant)	David W. Robinson, Esq. (Outside Counsel to Co-Defendant)	Request from counsel for technical assistance in support of defense in related litigation	W/P (joint defense)	
170398	06/20/80	Memorandum	W. Harrington (CMA staff)	Patrick C. Joyce, Esq. (CMA staff counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	
170399-401	06/20/80	Note and attachment	John Beale (CMA staff)		Request from counsel for information responsive to discovery requests and handwritten note in response to same	A/C, W/P	
170402	06/24/80	Memorandum	John C. Zercher (CMA staff)	Patrick C. Joyce, Esq. (CMA staff counsel) cc: G. V. Cox (CMA staff) E. B. Frost, Esq. (CMA General Counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	
170406-407	08/11/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Geraldine Cox (CMA staff)	Results of research in regard to request by counsel for information responsive to discovery requests and handwritten notes in response to same	A/C, W/P	
170408-413	06/19/80	Memorandum	Patrick C. Joyce, Esq. (CMA staff counsel)	Bruce M. Barackman, John S. Beale, Albert C. Clark, Geraldine V. Cox, Wayne H. Harrington, Gary C. Herman, George W. Ingle, Victor H. Peterson, Hugh M. Robinson, Hasmukh C. Shah, James N. Sites, Gordon D. Strickland, William M. Stover, John C. Zercher (All CMA staff)	Request from counsel for information responsive to discovery requests and handwritten notes in response to same	A/C, W/P	

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170414	06/24/80	Memorandum	V.H. Peterson (CMA staff)	Patrick C. Joyce, Esq. (CMA staff counsel)	Results of research in regard to request by counsel for information responsive to discovery requests	A/C, W/P	
170415-420	06/09/83	Memorandum	Jeff Turner, Esq. (Outside CMA Counsel)	John L. Oberdorfer, Esq. (Outside CMA Counsel)	Legal advice from counsel regarding discovery against trade association	A/C, W/P	
170421-436	05/23/83	Memorandum	Jeff Turner, Esq. (Outside CMA Counsel)	CMA File	Draft memorandum regarding legal advice concerning discovery against trade association	A/C, W/P	

Miscellaneous

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170922	10/05/94	Letter	Robert Ondocsin, Esq. (CMA staff counsel)	Alison Berkes, Esq. (CMA Outside Counsel)	Letter to outside counsel re: documents pertaining to vinyl chloride	A/C, W/P	
170923	09/28/93	Letter	Mary Ann Fisher, Esq. (General Counsel to CMA Member Company)	David F. Zoll, Esq. (CMA General Counsel)	Letter regarding status of and analyzing issues in pending and potential vinyl chloride litigation	A/C, W/P	
170924-929	09/20/93	Letter	Edmund Frost, Esq. (CMA Outside Counsel)	David F. Zoll, Esq. (CMA General Counsel)	Memorandum and draft letter analyzing issues regarding document retention	AC, W/P	
170930-932	10/04/93	Memorandum	Brian W. Hayle (CMA legal staff)	David F. Zoll, Esq. (CMA General Counsel) Don D. Evans, Esq. (CMA staff counsel) cc: Bob Ondocsin, Esq. (CMA staff counsel)	Memorandum analyzing vinyl chloride litigation	A/C, W/P	

Bates Range	Date(s)	Document Type	Author	Addressee	Description	Reason for Withholding	Identical Copies
170933-941	07/10/92	Memorandum and attachments	Edmund Frost, Esq. Judith Altenberg, Esq. (CMA Outside Counsel)	David F. Zoll, Esq. (CMA General Counsel) Don Evans, Esq. Bob Ondocsin, Esq. (CMA staff counsel)	Analysis by counsel of legal issues identified in review of documents pertaining to acrylonitrile, butadiene, and vinyl chloride	A/C, W/P	
	Undated	Annotated Document Index	Davis, Graham & Stubbs (CMA Outside Counsel)		Annotated index of CMA documents prepared by CMA's outside counsel containing attorney mental impressions	A/C, W/P	