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December 16, 1983

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Law Department-3259  
Union Carbide Corporation  
Old Ridgebury Road  
Danbury, Connecticut 06817

LAW DEPARTMENT

DEC 20 1983

A. M. RUBINSON

Re: Sireci v. Union Carbide Corporation, et al.

Dear Mr. Rubinson:

For some time we have been attempting to set up a meeting among counsel for each of the defendants and representatives of Kalex, plaintiff's decedent's former employer.

When we first contacted Kalex, Mr. David Seabrook handled the discussions on its behalf. While Mr. Seabrook provided us with some useful information with respect to Kalex's purchasing practices of PVC products, he resisted the concept of meeting with the attorneys for each of the defendants. We recently learned that Mr. Seabrook has left Kalex, a fact which may account for his reluctance to have met with us earlier.

Ms. Dorothy Anderson has replaced Mr. Seabrook at Kalex. Ms. Anderson is willing to arrange a meeting with each of the defendant's counsels, provided a representative from Kalex's insurance carrier is also present.

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"CONFIDENTIAL MATERIAL  
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KELLEY DRYE & WARREN

Alan M. Robinson, Esq.

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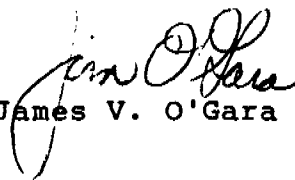
December 16, 1983

We have contacted Kalex's counsel, Becker, Ross, Stone, Destefano & Klein and are in the process of arranging this meeting.

We will keep you posted with respect to our progress in this regard. If you have any questions in the interim, please do not hesitate to call.

Best regards,

Sincerely yours,



James V. O'Gara

JVO:ch

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