

1/26/88

Cullinan v. Monsanto - Review of federal court file.

8/6/85 - filed in Superior Court - Hingham City

Now petition for removal to fed ct.

11/8/85 Great American Chemical dismissed by TT's

ATTY's

BF Goodrich

Allan van Gestel

Terrell J. Longella

Goodwin, Procter & Hoar

28 State St - Boston

(7) 523 - 5700

* See Dunn et al. v. Monsanto C.A. 85-0377-F

Numerous discovery motions; motion for
protective order.

TT's Answer to BF Goodrich's interrogatories:

Answer to # 64. - Lists numerous studies (21)

re: VC/PVC and Health Effects (

* Cullinan smoked 2 packs of Charlton cigarettes
daily from 1935-1981.

* BF Goodrich as a supplier:

R. Griffiths - Tank car # V8 2527 →

000283

BFG also supplied PVC resin, and a product called GEON

Harold Wilborn - polymerization worker from 1951-75
BF G supplied PVC resin + GEON product.
141 Moran Court, Sylla MA 01118

* TT's Answer to Dow interog -

- H. Wilborn : Saw Tank car into "DOW"
painted on side lined up beside
Rdgs 88+92 and being unloaded
at tank farm.
- PVC resin.

- R. Gupta - Tank car #X337 - Dow
Dow later primary supplier.

ELLEN Should arrange for us to have copies of all
Answers to interog (check we don't already have)
from fed. & file.

Alm F. Quinn v Morantz # 85-377

24 yrs at Morantz - Died of lung cancer;
never knew of cause. (Also had liver cancer; adrenal;
& lymphatic system).

TT has notice of PVC cause in 1981; action filed
in '85 was time barred.