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UNITED STATES DISTRICT COURT
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,)
UNION CARBIDE COMPANY and)
CONTINENTAL OIL COMPANY,)

Defendants.)

CIVIL ACTION NO. 89-30201-F

DOCKETED

ASSENTED TO MOTION OF DEFENDANTS
UNION CARBIDE CHEMICALS AND PLASTICS COMPANY, INC.,
THE DOW CHEMICAL COMPANY AND CONOCO, INC. FOR FURTHER
ENLARGEMENT OF TIME IN WHICH TO RESPOND TO
PLAINTIFF'S INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS

Defendants Union Carbide Chemicals and Plastics Company, Inc. ("Union Carbide"), The Dow Chemical Company ("Dow") and Conoco, Inc. ("Conoco"), hereby move the Court for an additional ten (10) day enlargement of time in which to respond or otherwise object to plaintiff's interrogatories and document requests and, in support thereof, state as follows:

1. On October 26, 1990, plaintiff served interrogatories and document requests by mail on defendants Union Carbide, Dow

ALLOWED.
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and Conoco. Accordingly, responses to said discovery were initially due on November 28, 1990.

2. On or about November 20, 1990, defendants filed an assented to motion for a sixty (day) enlargement of time (until January 28, 1991) to respond to plaintiff's discovery. The enlargement was requested on the basis that plaintiff's discovery requests sought information which spanned over a forty (40) year time period. Defendants therefore needed an additional sixty (60) days to search through their records and conduct interviews of current and former employees (if possible) in an effort to comply with plaintiff's requests.

3. The Court granted defendants' motion on November 26, 1990, and since that time defendants have made diligent efforts in responding to plaintiffs' discovery. However, given the vast amount of information involved, it has become apparent that an additional ten (10) days will be needed in order to comply with plaintiffs' discovery requests.

4. All counsel have assented to defendants' request for an additional ten (10) day enlargement of time.

WHEREFORE, defendants Union Carbide Chemicals and Plastics Company, Inc., The Dow Chemical Company and Conoco, Inc. respectfully request that the time within which they may serve

responses to plaintiff's interrogatories and document requests be enlarged to and including February 8, 1991.

Respectfully submitted,

THE DOW CHEMICAL COMPANY,
UNION CARBIDE CHEMICALS AND PLASTICS
COMPANY, INC. and CONOCO, INC.

By their attorneys,

Sharon R. Burger

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January 25, 1991

ASSENTED TO:

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CERTIFICATE OF SERVICE

I, Sharon R. Burger, hereby certify that a true and correct copy of the foregoing has been served upon all counsel of record by mail on this date.

Sharon R. Burger
Sharon R. Burger

January 25 , 1991

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