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*What industr.
processes did
Sperry run?*

July 31, 2019

Dr. Barry I. Castleman
P.O. Box 188
Garrett Park, MD 20896

Re: Sperry/Unisys
Michael Lombardo v. Unisys
P.C.C.P. April Term 2015, No. 2140

Dear Dr. Castleman:

Thank you for agreeing to review the above-captioned matter. As we discussed on the phone, our client, Michael Lombardo, worked at Sperry/Unisys (the company became Unisys in 1985/1986) as a computer programmer. He worked in the Blue Bell, Pennsylvania facility from 1974 through the early 1990s.

I have enclosed an Affidavit from Thomas Morrison, a co-worker, who describes renovations that took place at Blue Bell beginning in 1974 until the 1990s. This renovation turned an old manufacturing plant into an office facility. We contend as a result of the dust created from removing asbestos products including tiles and pipe covering, Mr. Lombardo was exposed to asbestos dust causing his death from mesothelioma.

For your review, I have also enclosed the 1951 National Safety Council (NSC) meeting for the National Safety Congress. You will note that Thomas Morgan, Chairman of the Board at Sperry, (p. 97), was a member of the NSC. Additionally, I have sent to you a copy of the American Industrial Hygiene Association Membership Book for 1970-1971. On page 58 you will see that one of the members was E. Roscoe Evavold of Sperry.

*Governing
Board
NSC*

In addition to those documents, you should know that Kevin Krueger, corporate representative of Unisys, recently testified. Mr. Krueger admitted that before 1985, Sperry/Unisys did not have any program to determine if employees were exposed to asbestos-containing dust from the Blue Bell renovation. He also acknowledged that Sperry/Unisys did not know what NIOSH had to say about asbestos from 1974 through the mid-1980s. Finally, Mr.

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Krueger testified that despite hiring an abatement company in 1986 to complete renovations, asbestos dust continued to be an issue at Unisys necessitating a 1991 operating manual finally informing employees regarding asbestos dust still being created at the facility. The bottom line from Unisys is that they claim they did not know the products in the renovation contained asbestos until the mid-1980s and, that, regardless, the 1972 OSHA requirements were not applicable to their business.

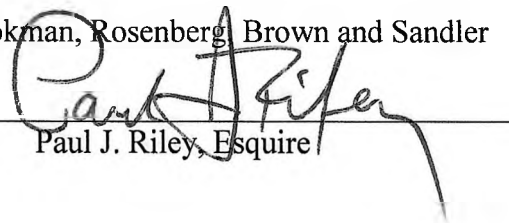
We would request you review this matter and provide a report which discussed the state of the art with specific reference to what, if any, knowledge Sperry/Unisys did or should have had from 1974 through 1991.

Please feel free to contact me should you have any questions.

Very truly yours,

Brookman, Rosenberg, Brown and Sandler

BY:


Paul J. Riley, Esquire

PJR/ag