

FILE NAME: General Motors (GM)

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MEMORANDUM

TO: STEVE GRUBER/PAT FOLKERTH/JEFF SIMON/WILLIAM SPEARS' FILE
FROM: DIANE ANDREW
DATE: 7/20/95
RE: General Motors May 9, 1995 Workers' Compensation Records
Inspection

I received GM's documents pulled from our document inspection (all \$1,383.88 worth!) today. They will be copied and sent to Pat for her review and a determination as to whether any warrant addition to our GM exhibit list.

I quickly perused them and didn't find anything too exciting. Jeff, as I recall, however, you did find one asbestos-related disease claim which you dictated quite a bit about, yet I did not see it in the documents provided. As I do not know which documents Pat, Jeff or Steve requested, I cannot determine whether GM's production was complete or not. Please advise Pat as to the documents you requested at the inspection so that she may determine if the documents produced included same. The documents I requested were produced.

Please also advise me as to whether any of you wish to further pursue (i.e., depositions of custodians of records) GM's apparent removal of the 1960 claims. I do not plan to do so in the Spears case, but I will help coordinate the scheduling of any depositions you wish to take on this subject matter. If I do not hear from you, I'll assume there is no interest on your part.

Thank you very much for your assistance. I hope all is going well with you.

Diane