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DATE: January 12, 1995

TO: Gregory D. Winfree
Union Carbide Corporation
FAX #: 912037946269

FROM: Theodore J. Theophilos
SIDLEY & AUSTIN NY
212-906-2380

SUBJECT:

COMMENTS:

IF THIS FAX IS UNCLEAR OR INCOMPLETE, PLEASE CONTACT
Theodore J. Theophilos AT 212-906-2380.

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"CONFIDENTIAL MATERIAL
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MEMORANDUM

VIA POUCH, FAX, STARMAIL

TO: Gary W. Jacob
FROM: Theodore J. Theophilos
RE: Eirven v. UCC&P
DATE: January 6, 1995

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Tim Kapshandy suggested that I speak with you directly. I need to get all available information regarding the following experts who have been designated by the plaintiffs in the above-captioned case:

John M. Dement, Ph.D., CIH
Duke University Medical Center
Division of Occupational and Environmental Medicine
Box 2914
Durham, North Carolina 27710
(919) 286-3232
Subject Matter: State of the Art

Dr. Frank H. Gardner
7602 Beluche Drive
Galveston, Texas 77551
(409) 744-4924
Subject Matter: Hematology

Dr. Marvin LeGater
University of Texas Medical Branch
2.102 Ewing Hall, 700 Strand
Galveston, Texas 77555
(409) 772-1803
Subject Matter: Toxicology; the genetic effects of
vinyl chloride exposure

In addition to any deposition or materials that Sidley & Austin has on these three gentlemen, I would appreciate it if you would do IDL and IDX searches for them. Any charges should be billed to 91444/45390.

Tim mentioned that there was some material regarding Mr. Dement's resume. I would appreciate it if you could also make sure that I receive that material. Thank you very much for your help. Please call me if you have any questions.

cc: Tim Kapshandy
Gregory W. Winfree, Esq.