

PROTECTED MATERIAL: MONSANTO INSURANCE COVERAGE LITIGATION

From **MONSANTO CHEMICAL COMPANY**

At St. Louis - General Offices

Date April 11, 1958

To ~~Dr.~~ R. E. Kelly

Reference

At General Offices

Subject

*BU*  
cc J. P. Ekberg-LA  
J. Elwood-LA  
Elmer Wheeler-1700 S. 2nd.  
W. M. Russell - G.O.  
*Mon*  
*June 9*

As you requested, the following summarizes the Pydraul 625 situation at North American Aviation in Inglewood (Los Angeles), California.

In order to capture the 20,000 gallon potential, it will be necessary to convince North American Aviation that they need have no fears about toxicity of Pydraul 625.

Their engineer, Jim Stansbury, is handling the project of installing new equipment which will use a total of 20,000 gallons of fluid. He does not rule out Pydraul on toxicity, but their medical and hygiene departments may, and we must be prepared to meet this obstacle when it arises. To help us, Mr. Stansbury has outlined the conditions of exposure which may be met and asks our opinion on the degree of hazard. Details are given in the attached memo of R. Davis to H. S. Litzsinger of April 2, 1958.

As is pointed out, it is too early to discuss this problem with the medical and hygiene people at North American for they will not enter the picture until August 1 of this year. I certainly appreciate your offer to visit them when you are in Los Angeles in June and by copy of this memo I am asking John Elwood if it is advisable to call that early. If not, perhaps a call can be tied in with other calls when you or Elmer Wheeler are in California.

Thanks again for your offer to help us capture this large potential.

*1260 750% more - his carrying*  
*machine 1100-64 TCP*  
*TEA*  
*would about*

*Richard*  
Richard Davis

RD:vlw

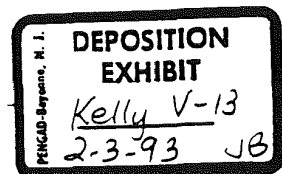
Attach.

IF THE FILM IMAGE IS LESS CLEAR THAN THIS NOTICE, IT IS DUE TO THE QUALITY OF THE ORIGINAL DOCUMENT.

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# TRANSCRIPT OF PROCEEDINGS

IN THE SUPERIOR COURT  
OF THE STATE OF DELAWARE  
IN AND FOR NEW CASTLE COUNTY

|                                  |   |
|----------------------------------|---|
| -----X                           |   |
| MONSANTO COMPANY,                | : |
|                                  | : |
| Plaintiff,                       | : |
|                                  | : |
| v.                               | : |
|                                  | : |
| AETNA CASUALTY & SURETY COMPANY, | : |
| al.,                             | : |
|                                  | : |
| Defendants.                      | : |
|                                  | : |
| -----X                           |   |

Civil Action Number  
88C-JA-118-1-CV  
NON-ARBITRATION  
CASE

## KELLY DEPOSITION EXHIBITS

PROTECTED MATERIAL: MONSANTO  
INSURANCE COVERAGE LITIGATION

Washington, D. C.

Thursday, February 4, 1993

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