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May 23, 1990
18371-1

Mr. Raymond A. Deckert
Environmental Claim Technical Assistant
Kemper National Insurance Companies
Route 22
Long Grove, Illinois 60049-0001

Re: Insured: Union Carbide
Claimant: Alice Warren
Your File No.: 555 ON 146005-N

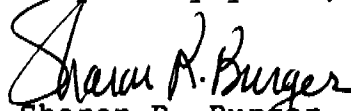
Dear Mr. Deckert:

Your recent letter to Pierce Cray of Ropes & Gray regarding this matter has been forwarded to me for response. This office now represents Union Carbide Chemicals and Plastics Company, Inc. in this matter, along with two of its co-defendants, Conoco Inc. and The Dow Chemical Company.

To bring you up-to-date on the status of this matter, you should know that discovery has commenced. In particular, the focus has been on product identification at this stage. That is, we have been attempting to determine whether or not plaintiff can establish that vinyl chloride monomer (VCM) distributed by each of the defendants actually found its way to plaintiff's decedent's work place at Monsanto in Springfield, Massachusetts. There has now been some identification of your insured's VCM at that site during the relevant period, but this is not to suggest the plaintiff can or cannot prove her case with the information at hand.

Please feel free to call me if you have any further questions at this time.

Very truly yours,


Sharon R. Burger

SRB/jlf

cc: John R. Downey, Esq.
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"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"