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353

August 28, 1998

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John E. Iole, Esq.
Jones, Day, Reavis & Pogue
Suite 3100
500 Grant Street
Pittsburgh, Pennsylvania 15219

Re: Brenner v. American Cyanamid Company, et al.
Index No.: 12596/93
Our File No.: 26801.0035

Dear Mr. Iole:

As you are aware, I reviewed the documents from this most recent production at your New York City office on August 12, 18 and 26, 1998. Please provide me with copies of the following documents. The numbers and documents listed below refer to the Index of Materials in Conference Room 34A as of August 11, 1998 which was provided by Chris Lopata.

Box 1

Please copy the entire box.

Box 2

Please copy the following redwelds:

Redweld: Sherwin Williams Co. Executive Minutes 1938
Redweld: Dutch Boy (Device, Design, Words)
Redweld: Plant Depreciation Statement

In addition, please copy the following pages:

7561-7579

NEW YORK CITY OFFICE: 118 EAST 80TH STREET, NEW YORK, NEW YORK 10022-1504, 212-208-6870
BEVERLY HILLS OFFICE: 380 NORTH BEDFORD DRIVE, SUITE 204, BEVERLY HILLS, CALIFORNIA 90210-6197, 310-246-1080
ALDEN OFFICE: 1472 EXCHANGE STREET, ALDEN, NEW YORK 14004-1978, 716-837-8484
AMHERST OFFICE: 36 MAPLE ROAD, WILLIAMSVILLE, NEW YORK 14221-2730, 716-866-1200
EAST ALPORA OFFICE: 243 MAIN STREET, EAST ALPORA, NEW YORK 14053-1804, 716-652-4280

N24178

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Box 4

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Box 7

Please copy the following pages:

34470-34682
36827-36829
37097-37103
37143-37193
37194-37210
37211-37246
37262
37323
37330-37334
37410-37412
37450
36614-36622
36782-36783
36830-36809
36910-37051
36194-36276
35641-35656
35660

Box 8

Please copy the following pages:

46345-26346
46277-46521
47000-47019
47118-47123
47165-47179
47225-47227
47948-48112
47393-47406
47413

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47495-47530
47788-47791
47792-47818
47904-47917
47822-47844
47879-47883
47885-47889

Box 12

Please copy the following materials:

Manilla Folder: GS Factory Reports Output August 1948
Redweld: Raw Material Consumption Report September 1, 1958-August 31, 1959
Redweld: Raw Material Consumption Report September 1, 1959-August 31, 1960

Box 13

Please copy the following pages:

34411-34440

Box 14

Please copy the following pages:

17888-17906
17907-17915

Box 15

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Box 17

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Page 4

Box N/A - Ship Date 8/4/94 (index p. 9)

The first four redwelds listed on page 9:

Redweld: 732 Paint History

Redweld: 784 Coffeyville Plant

Redweld: 733 Paint, Varnish & Chemical Industry

Redweld: "Professional bulletins on Painting and Finishing Vol. 1 No. 2

Box N/A - Ship Date 8/5/94 (index p. 10)

Please copy the following pages:

43633-43663

47890-47895

Box N/A - Ship Date 8/6/94 (index p. 12)

Please copy the following pages:

39420-39432

46265-46276

Please advise me of the amount of time that will be required in order to copy these documents so that I may determine the amount of additional time that will be required in order to prepare plaintiff's Response to the Manufacturing Defendants' Motion for Summary Judgment. In addition, please advise me of the cost of per page before having any of the documents photocopied.

Very truly yours,

**LIPSITZ, GREEN, FAHRINGER,
ROLL, SALISBURY & CAMBRIA LLP**

Larsine Kelley
By: Larsine Kelley

/cm

**cc: All Defense Counsel
(see attached service list)**