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October 16, 1997

VIA FEDERAL EXPRESS

Wells T. Watson, Esq.
BAGGETT, McCALL & BURGESS
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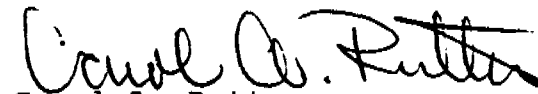
RE: Ross, et al. v. Conoco, et al., 90-4837

Dear Mr. Watson:

We recently obtained closed files from Olin's outside counsel in litigation closed some twelve years ago. From those files, we are making a small supplemental production of documents, bates numbered OLI 4865 through OLI 6182 (copies enclosed). The bulk of this supplemental production, OLI 5364 - 5790 and OLI 5812 - 5815, is the "Draft Final Report" of Foster D. Snell, Inc., Contract No. L/A 74-167, which apparently was filed in the OSHA record on or about September 13, 1974, as part of the vinyl chloride hearings. The remainder of the production consists primarily of memos relating to monitoring at Olin's Assonet, Massachusetts plant in 1974, in efforts to comply with the emergency vinyl chloride standard. There is some duplication of documents previously produced.

We reiterate our statement made in Ms. Bermel's letter of April 7, 1997, that raw monitoring data (including area, personnel and perimeter monitoring) and memoranda regarding employee notifications of monitoring results have not been bates numbered or produced as a result of Mr. Baggett, Jr.'s statements that plaintiffs do not want copies of such records.

Very truly yours,


Carol A. Rutter

STL-591270.01

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cc: All counsel of record w/out, encls.
Case Master A.R. Johnson IV, Esq., w/out encls.

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