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From: E3-287
M. J. Friar Ext. 5019

May 28, 1985

L. A. Crisorio - P2-608
E. D. DeLoughy - B4-155
~~B. J. DeLoughy - B4-155~~ - South Charleston

Re: Fred Wallace
Herman Dendinger

For your information.

MJF:mh
Attachment

Martha J. Friar

**PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"**

UCC
043904

X

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT. 06817
LAW DEPARTMENT

May 22, 1985

Louis E. Tosi, Esquire
Fuller & Henry
P.O. Box 2088
Toledo, Ohio 43603

Re: Herman Dendinger, et al. v. Chrysler Plastics Products,
et al.
Fred A. Wallace, et al. v. Chrysler Plastics Products
Corporation, et al.
U. S. District Court, Northern District of Ohio,
Western Division

Dear Mr. Tosi:

This is to confirm that you will represent Union Carbide Corporation in the above-captioned litigation as part of a joint defense effort with B. F. Goodrich, Goodyear, Uniroyal, Firestone, Conoco and Diamond Shamrock.

I look forward to working with you on these cases.

Very truly yours,

Martha J. Friar

Martha J. Friar

MJF:mh

cc: Mr. Harold J. Fast
The BF Goodrich Company

Mr. James Rigrish
Goodyear Tire & Rubber

Mr. Robert Walter
Firestone Tire & Rubber

Ms. Rosemary Sheppard
Conoco

Mr. Robert D. Luss
Occidental

Mr. John Endicott
Diamond Shamrock

Mr. Eugene Feit
Uniroyal

Mr. Martin Liebman
Monsanto

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Louis E. Tosi, Esquire
May 22, 1985
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bc: R. A. Butler - E3-262
L. A. Crisorio - P2-608
E. D. DeLoughy - B4-155
R. M. ~~Wooler~~ - South Charleston

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INTERNAL
CORRESPONDENCE

RWW

UNION CARBIDE CORPORATION OLD RIDGEBURY ROAD, DANBURY, CT 06817

To (Name) **Martha J. Friar Esq.**
Division **E3287**
Location **Danbury**
Area

Date **May 10, 1985**

Originating Dept. **HS&EA**

Area

Copy to **Mr. L. A. Crisorio**

Subject **Herman Dendinger vs. UCC
et al, (Chrysler Plastics
Products Company)**

I have reviewed the UCC Sales Accounting Records as regards to the sale of PVC to Chrysler Plastic Products, Sandusky, Ohio for the years 1968 through 1980. Recorded PVC resin sales are:

<u>Year</u>	<u>Comment</u>
1968	No sales recorded.
1969	Flexol plasticizers sold.
1970	Flexol plasticizers and Glycol Fluids.
1971	Plasticizers, Glycol Fluids and Methyl Ethyl Ketone.
1972	Suspension PVC Homopolymer - 40,500 lbs. in November and 40,450 lbs. in December. Solution Vinyl (PVC) VYHH - 2,000 lbs.
1973	Nonsolvent (PVC) Copolymer VYNW-5 - 11,000 lbs. Solution Vinyl (PVC) VYHH - 16,000 lbs.
1974	Nonsolvent Copolymer VYNW-5 - 9,000 lbs. Solution Vinyl VYHH - 12,000 lbs.
1975	Nonsolvent Copolymer VYNW-5 - 3,800 lbs. Solution Vinyl VMCH - 50 lbs.
1976	Nonsolvent Copolymer VYNW-5 - 17,000 lbs. Solution Vinyl VMCH - 2,750 lbs. Solution Vinyl VYNS-3 - 200 lbs. Solution Vinyl VYHH - 6,750 lbs.
1977	Nonsolvent Copolymer VYNW-5 - 11,000 lbs. Solution Vinyl VYNS-3 - 2,250 lbs.

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<u>Year</u>	<u>Comment</u>
1978	Flycol fluids only.
1979	Latexes and glycol fluids.
1980	Solvents, latexes and glycol fluids.

Union Carbide Corporation did not manufacture nonsolvent copolymer after September 5, 1977.

Chrysler Plastic Products at Sandusky, Ohio is recorded as Chrysler Corporation by EPA and is said to be a coated fabrics plant with four calendar lines.

I think the nonsolvent copolymer and the solution vinyl resins were used to apply a glossy finish to the coated fabric using some form of solvent coating system. If UCC had not gotten what is obviously a trial run at Chrysler using its suspension PVC resin in 1972, we could make a good case for separate consideration in the litigation. A trial run of suspension PVC resin is a step toward being accepted as a reliable supplier. Since we sold no suspension PVC resin after that, we were apparently not an acceptable supplier.


R. N. Wheeler, Jr.

RNW, Jr./maw

03806

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