

FILE NAME: Johns-Manville (JMA)

DATE: 1982 Apr 2

DOC#: JMA076

DOCUMENT DESCRIPTION: Letter between Lawfirms RE Deposition of B.J. Biggs & Location of AIA Minutes with BC Notes

RE: AIA

Per Jim Reis, Director
of Asbestos Policy,
he is our rep to AIA
(since Feb, 1980). There
are no J-M people
presently serving on AIA
formal committees.

Jim has a complete
set of minutes in his
office

PRIVILEGED
J-M 10/14/80
63

Cadwalader, Wickersham & Taft

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1333 New Hampshire Ave., N.W.

Washington, D.C. 20036

Telephone: (202) 293-6300

ONE WALL STREET
NEW YORK, N.Y. 10005
(212) 785-1000
CABLE: LABELLUM
TELEX: 128146/887465

240 ROYAL PALM WAY
PALM BEACH, FLA. 33480
(305) 855-9500
TWX: 510-952-7528

TWX: 710-622-1834

RAPIDFAX: (202) 293-6290

XEROX: (202) 387-1417

April 2, 1982

RECEIVED

APR 5 1982

SEAWELL, DALTON, BUGHES
& THOMAS, ATTORNEYS

Robert R. Hatten, Esquire
14749 Warwick Boulevard
Newport News, Virginia 23602

Re: Asbestos Cases CP-77-1
Deposition of B.J. Pigg

Dear Mr. Hatten:

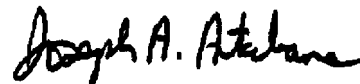
At the deposition of B. J. Pigg, Executive Director, Asbestos Information Association/North America ("AIA/NA") you requested copies of the minutes of all AIA/NA Annual Meetings, Board of Directors Meetings, Executive Committee Meetings and Technical Committee Meetings. The deposition transcript will record my objection to the timing of your request. I explained that counsel would have to go through hundreds of pages of minutes representing over a ten-year period to identify and redact any Attorney-Client and/or Work Product privileged material. I also informed you that AIA/NA budgetary material was irrelevant to any issue in your cases nor was it likely to lead to the discovery of relevant or admissible evidence.

The long process of reviewing the minutes is now complete. Attached at tab 1 is a copy of all AIA/NA Annual Meeting Minutes. Attached at tabs 2 through 4, respectively, are the minutes of the Board, Executive Committee and Technical Committee. The appropriate redactions have been made and are clear from the copies provided.

Robert R. Hatten, Esquire
April 2, 1982
Page Two

I have been informed by the Asbestos International Association that they do not object to the release of their Recommended Code of Practice entitled "Repair and Removal of Asbestos Insulation." I am forwarding a copy of that document to the Court Reporter and to you under separate cover. A bill for duplication expenses will be included with that document.

Sincerely yours,



Joseph A. Artabane
Counsel for Deponent
B. J. Pigg and AIA/NA

Attachments
JAA/mw