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Lit.
Warren
CT.
UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC.
LAW DEPARTMENT
39 Old Ridgebury Road
Danbury, CT 06817-0001

November 5, 1990

R. N. Wheeler, Jr.
1912 Shady Branch Trail
Richmond, Virginia 23233

Re: Alice L. Warren v. Union Carbide, et al.

Dear Mr. Wheeler:

Union Carbide has been involved in being named as a defendant in a lawsuit involving a fellow who worked for Monsanto in Springfield, Massachusetts, allegedly handling PVC from 1947 to 1987. Unfortunately, he died allegedly due to his exposure to vapors which caused his angiosarcoma of the liver.

You may recall that we previously had discussed this case in a conference call with Attorney Lane McGovern and Pierce Cray of Rop s & Gray in Boston. Union Carbide has selected other counsel in place of that firm. Sharon Burger of Nutter, McClennan Fish is handling the matter for Union Carbide.

I would appreciate it if you could review the interrogatories that I have enclosed with this letter, along with the production requests. We have sought an extension of time, and have objected to some of the interrogatories. Nevertheless, we need to obtain information which would be of assistance to us in responding to these interrogatories.

I will be working with Dick Wise, who is our Product Safety Manager for PVC. I will also be asking Dottie Von Ehrenberg, our paralegal, to follow up with you in regard to obtaining information which might be of some assistance to you. I will ask her to provide you with a copy of interrogatory and production responses that we have previously submitted in prior lawsuits concerning PVC.

If you would be so kind as to review the interrogatory and production requests and provide suggested responses to us by November 27th, I would be very grateful. Of course, we would compensate you for your services in that regard, as per our consultancy relationship with you.

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If you have any questions, please feel free to contact me or
Dottie Von Ehrenberg.

Yours very truly,

John R. Downey

John R. Downey

JRD/es

cc: Sharon R. Burger, Esq.
Dottie Von Ehrenberg
Betty-Lynn White, Esq.

Letter dictated by Mr. Downey; signed and sent in his absence
by secretary.

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