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October 30, 1987

Ms. Beverly Gholson
Legal Counsel
Georgia Gulf
P. O. Box 105197
Atlanta, Georgia 30348

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

Re: Estate of Michael Wayne Cox

Dear Ms. Gholson:

I enclose herewith for your review the following:

- Filed Separately*
1. Deposition of Michael Wayne Cox.
 2. Affidavit of Dr. Reginald Brooker prepared in connection with the Worker's Compensation claim in South Carolina on behalf of Michael Wayne Cox.
 3. Affidavit of Dr. Nicasio P. Marullo prepared in connection with the Worker's Compensation claim in South Carolina on behalf of Michael Wayne Cox.
 4. Medical records on Michael Wayne Cox concerning his hospitalization between March 17 and April 6, 1986 including the pathology report of Dr. J. Thomas Latham, Jr. dated March 22, 1986 setting forth the finding of angiosarcoma following a liver biopsy.
 5. Letter of Dr. H. Northrop, Director, Occupational Medicine Department, Stauffer Chemical Company, dated March 4, 1987 to Dr. J. Thomas Latham, Jr.
 6. Evaluation of the economic loss of Michael Wayne Cox prepared by Dr. Charles L. Alford, III.

The above items would provide the basis of our claim against the various suppliers of polyvinyl chloride resin to Stauffer Chemical Company during the period of time in which my client was employed. In addition to the above I have several witnesses, including an expert in the area of the relationship between exposure to vinyl chloride monomer and the occurrence of angiosarcoma.

As background information, Mr. Cox was 30 years of age, married, with two young children under the age of 10 at the time of his death.

In addition to the actual economic loss of \$307,830.00 as is reflected in the economic evaluation of Dr. Alford, there are several other areas of damage which I will seek under the applicable law here in South Carolina. They are as follows:

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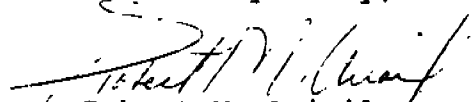
Y
Ms. Gholson
October 30, 1987
Page 2

1. The damages for the physical pain and suffering plus mental anguish and distress of Mr. Cox under a survival action. This would cover the nine month period between March 15 and the date of his death on December 14, 1986 and would include the fact that he was aware of his impending demise.

2. The grief, sorrow, deprivation of society, and mental anguish suffered by Mrs. Cox and the parties' two children as the result of Mr. Cox's deteriorating condition and ultimate death.

Based upon the foregoing, I would evaluate the settlement value of this case to be in the range of \$450,000.00. My client's acceptance of a settlement in this amount would be conditioned upon a satisfactory arrangement with Stauffer Chemical in regard to their lien on any settlement proceeds. In addition, there are a number of other factors which must be resolved prior to the consumation of a settlement and therefore this evaluation should not be considered as an offer to settle. This evaluation is submitted to you for the sole purpose of advising you of the value of this case as I see it at this time so that you can communicate with the other potential defendants in determining if a settlement in this range is possible. If this amount is too high to pursue further settlement discussions, then I will certainly understand but would request that you advise me as soon as possible so that I may proceed with filing a legal action in the Federal Court.

Yours very truly,


Robert M. Ariail

RMA/fkb
enclosures

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