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June 12, 1986

Mr. Joe Ledvina
Vista Chemical Company
P. O. Box 19029
Houston, Texas 77024

Re: Dendinger and Wallace v. Chrysler Plastic Products

Dear Joe:

Phil Carey suggested that we list your name under Plaintiff's Interrogatory No. 20 in the above-named PVC lawsuits against Conoco.

Please review the enclosed copy of the Interrogatories and let us have your response by June 25, 1986.

Best personal regards,

lk
Enc.
cc: Phil Carey

VVV 000015248

LET

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

HERMAN A. DENDINGER, et al.,

Plaintiffs,

-VS-

CHRYSLER PLASTIC PRODUCTS
CORPORATION, et al.,

Defendants.

INTERROGATORIES
DIRECTED TO ALL DEFENDANT
PVC MANUFACTURERS

Case No. C 84-7854
Judge Nicholas J. Walinski

-oOo-

Pursuant to Ohio Rule of Civil Procedure 33, plaintiffs propound the following interrogatories to be answered in writing and under oath by each defendant PVC Manufacturer, within thirty (30) of the date of service. It is understood that these interrogatories shall be of a continuing nature and must be supplemented as soon as new or additional information is available.

INTERROGATORY NO. 1: Are you a manufacturer of polyvinyl chloride (PVC) resin?

ANSWER:

INTERROGATORY NO. 2: When did you first begin manufacturing
PVC resin?

ANSWER:

INTERROGATORY NO. 3: Have you manufactured PVC resin
continuously since the date indicated in your answer to interrogatory number
2?

ANSWER:

INTERROGATORY NO. 4: Indicate the percentage of all PVC resin
manufactured by you in calendar year 1967 that was the result of the
following processes: (a) suspension; (b) emulsion; (c) bulk; or,
(d) solution.

ANSWER:

INTERROGATORY NO. 5: Indicate the extent to which the percentages of your total PVC resin output attributed to any of the four processes identified in the prior interrogatory have changed since calendar year 1967, by indicating the specific changes made and dates of all such changes.

ANSWER:

INTERROGATORY NO. 6: Did you sell any PVC resin to Chrysler during calendar year (a) 1967; (b) 1968; (c) 1969; (d) 1970; (e) 1971; (f) 1971; (g) 1972; (h) 1973; (i) 1974; (j) 1975; (k) 1976; (l) 1977; (m) 1978; (n) 1979; and, (o) 1980.

ANSWER:

(a)

(b)

(c)

(d)

(e)

(f)

(g)

(h)

(i)

(j)

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10K & MURRAY CO., L.P.A.
A LEGAL PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
MURRAY BUILDING
300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

(k)

(l)

(m)

(n)

(o)

INTERROGATORY NO. 7: If your answer to the preceding interrogatory is, in any part, "yes," indicate the total volume of PVC sold to Chrysler during every year that you sold PVC resin to Chrysler.

ANSWER:

INTERROGATORY NO. 8: For every calendar year between 1967 and 1980, inclusive, that you sold PVC resin to Chrysler, indicate the percentage of such resin which was manufactured by the following processes: (a) suspension; (b) emulsion; (c) bulk; and, (d) solution.

ANSWER:

INTERROGATORY NO. 9: Did you at any time conduct any testing to determine the concentration of vinyl chloride monomer contained in your PVC resin at any time following manufacturing?

ANSWER:



INTERROGATORY NO. 10: If your answer to the preceding interrogatory is "yes," indicate: (a) what testing was done; (b) when such testing was done; (c) who conducted the testing; and, (d) what the results were.

ANSWER:



INTERROGATORY NO. 11: For every calendar year in which you sold PVC resin to Chrysler, indicate what percentage of the PVC resin sold was: (a) homopolymer; (b) copolymer; or, (c) terpolymer.

ANSWER:

INTERROGATORY NO. 12: With respect to every sale of PVC resin from you to Chrysler, indicate the date on which such resin was manufactured and the date on which such resin was shipped to Chrysler.

ANSWER:

INTERROGATORY NO. 13: Did you, at any time, notify Chrysler of any studies indicating that vinyl chloride monomer was: (a) hazardous to human health or (b) that vinyl chloride monomer was a suspected carcinogen?

ANSWER:

X

INTERROGATORY NO. 14: If your answer to the prior interrogatory is "yes," state in full, the date and substance of every such notification to Chrysler.

ANSWER:

X

INTERROGATORY NO. 15: When did you first become aware of any study indicating that vinyl chloride monomer was a suspected carcinogen; or, (b) hazardous to human health?

ANSWER:

*

INTERROGATORY NO. 16: What steps were taken by you prior to, or during the course of, your sales of PVC resin to Chrysler to determine the concentration of residual vinyl chloride monomer in said resin.

ANSWER:

*

INTERROGATORY NO. 17: What steps were taken by you prior to, or during the course of, your sales of PVC resin to Chrysler, to determine whether any component of that resin was an actual or potential carcinogen?

ANSWER:

INTERROGATORY NO. 18: Did Chrysler, at any time, ever ask you whether you were aware of any studies indicating that exposure or overexposure to vinyl chloride monomer posed any actual or potential human health hazard?

ANSWER:



INTERROGATORY NO. 19: Describe the steps taken by you subsequent to January, 1967 to reduce the concentration of residual vinyl chloride monomer in PVC resin manufactured by you.

ANSWER:

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INTERROGATORY NO. 20: State the full name, home address and business address of your employee who is most knowledgeable concerning the residual concentrations of vinyl chloride monomers in the PVC resins manufactured by you between January 1, 1967 and December 31, 1980.

ANSWER:



Kirk J. Delli Bovi
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300 Central Avenue
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Telephone: (419) 627-9700

Attorneys for Plaintiffs

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