



D. G. S.
INTRA-COMPANY CORRESPONDENCE

RECEIVERS LOCATION **Cleveland**

DATE **June 14, 1978**

TO (INDIVIDUALS NAME) **D. G. Sarvadi**

SENDER'S LOCATION AND DEPARTMENT **Coffeyville
Safety**

REFER TO LETTER OF

SUBJECT **Deposition of James Douglas
Case, Coffeyville #30 Plant**

Dave, this is to confirm telephone conversation with you this morning, June 14, 1978.

Request that arrangements be made to make a deposition on the James Douglas case which has been in the hands of Liberty Mutual for approximately a year. Also, another case which is very similar in nature requires a deposition and this person is

In talking to the lawyer for Liberty Mutual, Mr. Jack Lively, yesterday, he stated that they are really not in a big hurry to do this, but he did state that we should prepare this deposition in order to be ready. Mr. Lively said that late July or early August would be the earliest that he could meet with you; therefore, it may be wise to give him a call before setting up your date to come to Coffeyville.

Contact: Mr. Jack L. Lively, Attorney
815 Union Street
Coffeyville, KS 67337
316 + 251-1300

You asked about records there in Cleveland. Information may be obtained at Mr. Jack Kull's office, and the person to contact would be Mr. Tom Locker.

Please call myself or Bill Howard if you need any other information.

M. R. Unruh
M. R. Unruh
Safety Director

MRU:ew

cc: J. R. Aid
W. O. Howard

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