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125th
Anniversary
1866-1991

February 15, 1995

CONFIDENTIAL
ATTORNEY WORK PRODUCT

VIA FEDERAL EXPRESS

Dr. Carlo H. Tamburro, M.D., M.P.H.
Professor of Medicine, Pharmacology
and Toxicology
School of Medicine, 119A
University of Louisville
319 Abraham Flexner St.
Louisville, KY 40292

Re: Robert Eirven

Dear Dr. Tamburro:

Enclosed are three volumes of medical records on Robert Eirven from:

Humana Hospital, Clear Lake (Tabs 1 and 8)
Gary B. Weiss, M.D. (Tabs 2 and 6)
Beeler-Manske Clinic (Tab 3)
LaMarque Independent School District (Tab 4)
Burton Hink, Jr., M.D. (Tab 5)
Walgreen's Pharmacy (Tab 7)
Miscellaneous Billing Statements (Tab 9)
UCC Employee and Medical Records (Tab 10)
Aetna Life & Casualty (Tab 11)

Under separate cover, you will be receiving additional volumes of Mr. Eirven's medical records from Danforth Memorial Hospital, Mainland Center Hospital and Kalyanam Subra-Manyam, M.D.

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As of today's date, we have yet to receive any of the slides or blocks prepared from Mr. Eirven's needle liver biopsy performed on or about February 4, 1992. We are still hopeful that this material will be found.

I do wish to draw your attention to the records from Danforth Hospital. In September of 1983, Mr. Eirven was treated at Danforth Hospital. Among other things, he was evaluated for pancreatitis. Despite an inconclusive ultrasound and amylase levels within normal range, Mr. Eirven's treating physician stated as his final diagnosis "cluster headaches, vascular type; adult onset diabetes mellitus, mild; essential hypertension out of control; and pancreatitis."

I will be sending to you the industrial hygiene documentation regarding vinyl chloride from the Texas City plant under separate cover.

I do also wish to confirm that this information can be retained by you pursuant to our understanding that the material will remain strictly confidential and that the data or records will not in any way be attributed to Robert Eirven or Union Carbide Corporation.

I would appreciate it if you could confirm your billable hourly rate. I do also wish to confirm that on February 20th, I will be disclosing your name as a testifying expert in this matter. Thank you.

Sincerely,

Ted Theophilos (SR)

Theodore J. Theophilos

TJT/sr

Enclosures

cc: Robert Golden (w/out encl.)

Gregory Winfree, Esq., UCC Legal Dept. (w/out encl.)

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