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Cox v. Georgia
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DONALD A. COCKRILL, P.A.
PARTNER

June 27, 1988

Peter F. Davey, Esquire (Union Carbide)
John Endicott, Esquire (Maxus Energy)
Beverly Gholson, Esquire (Georgia Gulf)
Gary A. Jones, Esquire (B.F. Goodrich)
Richard J. Lorenz, Esquire (Tenneco Oil)
Robert D. Luss, Esquire (Occidental)
Amy Ng, Esquire (Conoco)

Re: Wanda Cox v. Georgia Gulf Corporation, et al.
Civil Action Nos. 8:88-1399-3 and 8:88-1400-3

Ladies and Gentlemen:

Enclosed is a letter from the plaintiff's attorney, Bob Ariail, which is self-explanatory.

It is somewhat inaccurate inasmuch as Mr. Ariail did not orally offer to settle the case in a previous conversation. While he casually alluded to that possibility, he did not make any offer.

At any rate, he has now made a written offer and we need to consider it. I suggest that we not respond until we have an opportunity to complete our analysis of some of the preliminary legal issues. In the meantime, we will proceed with filing answers by August 1, 1988.

Sincerely,

OGLETREE, DEAKINS, NASH,
SMOAK AND STEWART

Don Cockrill
Donald A. Cockrill

DAC:vmt
Enclosure

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June 13, 1988

Mr. Donald A. Cockrill
Ogletree, Deakins, Nash, Smoak & Stewart
P. O. Box 2757
Greenville, SC 29602

Re: Cox -vs- Georgia Gulf, et al

Dear Don:

This is to confirm in writing the proposal which I made to you orally early in your involvement in this matter. The proposal is that if a settlement can be reached within a short period of time, my client would be willing to settle the claim for \$450,000.00. Furthermore, my client would be willing to settle with each Defendant for their prorata share of \$450,000.00 with that share being determined by the number of total Defendants. By that I mean that if there are ultimately nine (9) Defendants involved in this action, she would settle with each for the sum of \$50,000.00 provided all agreed to pay \$50,000.00. If there are eight Defendants ultimately, then the prorata share would change accordingly.

By copy of this letter I am advising Brad Martin who represents Sumitomo of this proposal. I look forward to your response.

Yours very truly,



Robert M. Ariail

RMA/fkb
c/ Mr. Brad Martin

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