

February 5, 1996

MEMORANDUM OF SERVICES

Our services to the Chemstar Vinyl Chloride Panel in November and December 1995 included the following.

On November 6, we met with Has Shah and Steve Russell to discuss strategies for obtaining damages from ENSR. We reviewed a letter from ENSR indicating some willingness to initiate settlement discussions.

We reviewed a letter from ATSDR soliciting the submission of a Memorandum of Understanding (MOU) to conduct a reproductive and developmental study of vinyl chloride, and spoke with Has Shah. We then marked up a draft MOU and provided a redlined version to Shah for circulation to the Panel. We also spoke with Bill Cibulas of ATSDR to clarify ATSDR's position on collaborative testing as discussed in the letter.

On November 30, we participated in a conference call to discuss the ENSR matter, the draft MOU, and comments on the draft ATSDR toxicological profile for vinyl chloride.

Following the conference call, we drafted a letter to ENSR outlining the Panel's views and a settlement proposal. We spoke with Steve Russell and with Has Shah and thereafter provided a revised letter. Following further discussions, we got out a final version of the letter to ENSR.

We met briefly with Steve Russell to go over suggested changes to the draft MOU. We revised the MOU to reflect these changes.

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