

JONES, DAY, COCKLEY & REAVIS
1750 UNION COMMERCE BUILDING

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November 19, 1974

Peter J. Brennan, Esq.
Secretary of Labor
14th and Constitution Avenue, N.W.
Washington, D. C. 20210

Re: The B. F. Goodrich Company v. Peter
J. Brennan, Sec. of Labor, et al.

Dear Mr. Brennan:

Enclosed please find a copy of Petitioner's Motion for Consolidation and for Adoption of Record, Joint Appendix and Brief and supporting Affidavit which have been filed in the above matter.

Very truly yours,

James A. Rydzal

Enclosures

cc: John H. Stender
Occupational Safety and Health Commission
Solicitor of Labor
Martin I. Shelton
Jerome H. Heckman
Steven F. Eilperin
Allan J. Topol
William V. Kane
John J. Cassidy, Jr.
Walter B. Connolly, Jr.
J. Albert Woll
George H. Cohen
Donald L. Morgan

GENC 009399

IN THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

THE B. F. GOODRICH COMPANY,	)	
	)	CASE NO. 74-2345
Petitioner	)	
	)	
v.	)	
	)	
PETER J. BRENNAN, Secretary of	)	
Labor, et al.,	)	
	)	
Respondents	)	

MOTION FOR CONSOLIDATION
AND FOR ADOPTION OF RECORD,
JOINT APPENDIX, AND BRIEF

The B. F. Goodrich Company ("Goodrich"), petitioner herein, hereby moves that this case be consolidated with a related case, The Society of the Plastics Industry, Inc. v. Occupational Safety and Health Administration, Case No. 74-2284 (the "SPI case"). The instant case and the SPI case both involve the same respondents and ask the Court to review the same administrative regulation promulgated by respondents regulating occupational exposure to vinyl chloride, 29 C.F.R. §1910.93q (39 F.R. 35890; October 4, 1974.)

Goodrich also asks that the Record and Joint Appendix filed in the SPI case be adopted in the instant case and that Goodrich be permitted to adopt as its brief the brief filed by SPI on November 12, 1974.

GENC 009400

This Motion is supported by the attached Affidavit of James A. Rydzell.

THE B. F. GOODRICH COMPANY

By Patrick F. McCartan
Patrick F. McCartan

And J. A. Rydzell
James A. Rydzell

And James E. Young
James E. Young

1750 Union Commerce Building
Cleveland, Ohio 44115
(216) 696-3939
Its Attorneys

Of Counsel:

Jones, Day, Cockley & Reavis
1750 Union Commerce Building
Cleveland, Ohio 44115

Richard A. Heuerman
William C. Becker
Harold J. Fast
500 South Main Street
Akron, Ohio 44318

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