

BAKER & BOTTS
ONE SHELL PLAZA
HOUSTON, TEXAS 77002

TELEPHONE (713) 229-1234
TELECOPIER (713) 229-1730
TELEX 76-2779

RECEIVED

JAN 21 1985

P. F. DAVEY

1701 PENNSYLVANIA AVE., N.W.
WASHINGTON, D. C. 20006

1410 UNITED BANK TOWER
400 WEST FIFTEENTH STREET
AUSTIN, TEXAS 78701

D-25,854

January 10, 1985

~~Dorothy Bell~~ v. Union
Carbide Corporation, et al.

Mr. Peter F. Davey
Union Carbide Corporation
Old Ridgebury Road
Danbury, CT 06817

Dear Peter:

Pursuant to Union Carbide's request for quarterly billings, enclosed is a statement for the services rendered in this case through December 31, 1984. If you find the statement in order, we request that it be placed in line for payment at your convenience.

Sincerely yours,

Walter Conrad
Walter Conrad

FWC:118

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 071750

BAKER & BOTTS
ATTORNEYS AT LAW
ONE SHELL PLAZA
HOUSTON, TEXAS 77002

January 10, 1985

Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

Re: Dorothy Bell v. Union Carbide Corporation, et al.

To fee for services rendered through December 31, 1984 including the following particulars:

Preparation of motion to extend discovery schedule; preparation for and attendance at hearing in Galveston on discovery schedule; preparation for and oral deposition of Dr. Borne in Dickinson, Texas; conference with Dr. Glenn and Mr. Davey at Union Carbide Plant in Texas City; meeting with Dr. McCormick in Galveston to review medical bibliography; and various telephone calls and correspondence necessary to the representation of Union Carbide Corporation in this matter through December 31, 1984.

Fee	\$ 5,238.00
Expenses (itemized on attachment)	\$ 169.09
Total	\$ 5,407.09

Partners' Time	17.5 Hours	\$ 3,675.00
Associates' Time	5.0 Hours	\$ 487.50
Paralegal Time	23.9 Hours	\$ 1,075.50

ch to pay
P. Harvey
1/22/85
Schwartz & Co. Inc.

PRIVILEGED AND
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UCC 071751

BAKER & BOTTS
ATTORNEYS AT LAW
ONE SHELL PLAZA
HOUSTON, TEXAS 77002
Federal ID# 74-1195457

Union Carbide Corporation
Old Ridgebury Road
Danbury, Connecticut 06817

January 10, 1985

Statement No. 28986

Dorothy Bell vs. Union Carbide Corporation, et al.

Expenses incurred by Mr. Pike for trip to
Galveston, Texas on 11/2/84

\$ 30 00

Expenses incurred by Ms. Peake for trip to
Galveston, Texas on 12/19/84

36 25

Boland, O'Neal, Richer, Barnhart & Probst -
Deposition of Dr. Borne

73 22

Telephone calls

29 62

Total Expenses Carried to Fee Statement

\$ 169 09

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UCC 071752

November 14, 1984

12/18 + 12/19

PFD -- Re Texas City Plant Mtg (Dorothy Bell, et al. v. UCC)

713-229-1234 Walter Conrad available: Dec 10-14

Dec 17-21 18, 19

PFD available: Dec 13-14

Dec 17-21 18, 19

8-527-5582 D. H. Glenn, M.D.: *

Dec 17, 18, 19

*Having people from Danbury-
Dick Wise & Mr. Schneider.

2901 Cutty Cunningham:

Dec 17, 18, 19

~~(Left word w/sec'y to
have him return call)~~

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Olga

*Mr. Conrad just finished a trial - this
is his first day back in office -*

PFD -- WHICH TWO OF THE THREE DATES - 12/17, 12/18, 12/19 -
WILL YOU WANT THE MTG? (Or are 3 days needed?)

I have to get back to the others ASAP.

Olga

Mr. Cunningham said that he & Dick Wise will be at the
Texas City Plant on Dec 11 (and Dec 12 possibly for Mr.
Cunningham). Said he will give an update to Mr. Wise
when he returns from mtg of Dec 18 & 19. (Told him what
Doctor Glenn had said.)

EVERYONE HAS BEEN INFORMED OF THE MTG 12/18 & 12/19.

Olga

UCC 071753

Dorothy Bell Keefe
UCC

12/17/84

Walter Conrad said that he will call you this evening at the Hyatt Regency (downtown - close to their offices), 1200 Louisiana, Houston. HE WILL CALL AROUND 8:00 p.m. (telephone at Hyatt 713-654-1234). He said he usually leaves the office around 6:30 and then drives home - quite a little drive. So he will call you this evening. He will meet you tomorrow morning, 12/18, in front of the Hyatt Regency. He will be driving a blue Lincoln. Drive to Texas City Plant should take about 45 minutes to 1 hour. HE WILL PICK YOU UP AT 8:15.

WHAT ABOUT HOTEL NEAR TEXAS CITY PLANT - CLEAR LAKE?

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UCC 071754

Mon, 12/17/84

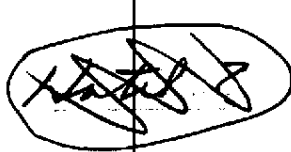
Hertz Reserved for 12 Noon

LGA

Houston

4:20 (Continental 123)

6:54



12/17

Wyatt Registry - Houston

713-654-1234

Tues & Wed - 12/17 & 12/18

Texas City Plant

12/18

Clew Lake Hilton, Clew Lake, TX

Wed, 12/19/84

Houston

LGA

3:55 (Continental 124)

8:00

Reserved Hertz

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UCC 071755

(203) 794-6255

I think the 4²⁰ flight to
Houston, but I'll check with
the 2³⁰ on 2901
Cunningham. What hotel Mon.
(let's say I'm staying in Allen L. Lee)
in Houston, Tues in Tx City

5 or 6 ? ?

10130

UCC 071756

Monday 1/17 -

Call direct flts

LGA

Houston

12 Noon (Continental)

2:25

2:35 (Delta)

5:19

4:20 (Continental)¹²³

6:54

(The others are connecting flts)

12/13/84

Call W. Conrad re travel plans -
713-229-1234

Plan to stay in Houston
Mon night & drive w/Conrad
to Texas City Tues. morning?

Looks like Conrad may have to
be in Beaumont on the 19th -
Will meet only for 1 day - Tues -

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UCC 071757

1922
law files
UCC
B/22

Bell v UCC

12/8/84

[A] Tr City Leonard Galt

not bad out.

1. Berne Salveston Tx, Clear Lake
2. Nanta

A Testimony per UCC on no overexposed

B Ex William Mc Cormick

C Epidemiology - Susan Austin
Burdett Ott

Ret Schwartz - Luvit

actual knowledge { gross neg - willful wanton
intentional tort reckless damage

* State of Art

1974 Anglo perfume Vinyl Cl

Jim Desmont
Jim Lloyd

Case Control Study
Mortality Study

Sore Brown - no records available on supplies

Joe Blane &
Marvella

at lunch will search files

Milton Johnson

Terry Adcock

1700 copies
340 pages
500 pages

UCC 071758

Robert Wagner

Warren Petter Perata

Depo of Dr Glenn

Supervisor of Highway
Elgin (70-75) fuel gas / Beacon
LA

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