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July 12, 1989

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**PRIVILEGED AND  
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ORDER"**

Re: Peterson v. Union Carbide Corporation

Dear John:

This will confirm my recent advice to you that I have been informed by Alfred Levinson, Esq., counsel for the plaintiffs in this matter, that he has filed another lawsuit arising from PVC exposure to an employee of the Amboy Terminating Company. The employee's name is Bernadino (phonetic), who apparently was a co-worker of Mr. Peterson. Mr. Bernadino allegedly died from his PVC exposure.

It is Mr. Levinson's intention to move to consolidate the Bernadino and Peterson cases on the obvious ground that they arise from the same set of facts, same exposure, same time frame, etc. His purpose in calling me was to alert me to the filing of the Bernadino complaint so I might arrange for a prompt answer in order to have the cases consolidated as soon as possible, particularly for discovery purposes. Accordingly, if you could arrange to have the complaint forwarded to me as soon as it is received, it would be appreciated.

This will also confirm our recent conversation regarding the 1989 budget which was forwarded to you on May

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J. R. DOWNEY

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John Downey, Esq.  
July 12, 1989  
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8. You have inquired as to whether we still anticipate that the case will proceed to trial in 1989, as projected in the budget. Although the case has recently received a trial date of September 25, 1989, I think it is unlikely that it will be tried at that time due to the status of discovery, the recent amendment to the complaint and the likely consolidation with the Bernadino case. Hence, the budget entries for Trial and Trial Preparation can be deleted from the 1989 budget.

If you have any questions concerning the above or if I can be of any other assistance, please let me know.

Sincerely,



ROBERT L. HOLLINGSHEAD

RLH:lh

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