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February 28, 1992
By Telecopier and 1st Class Mail

Michael H. Malin, Esquire
White & Williams
One Liberty Place, Ste. 1800
1650 Market Street
Philadelphia, PA 19103-7301

Re: Paoli Railyard PCB Litigation

Dear Mr. Malin:

Throughout this week, you have advised Arnold Cohen that Dr. Kaley will not be available to be deposed next week. As late as 3:00 this afternoon, you informed me and Arnold Cohen in separate telephone conversations that you were moving for a protective order respecting this deposition, which was noticed on February 24, 1992 to take place on March 2, 1992. Today, at 5:00 p.m., you advised me by telecopied letter that Dr. Kaley will be produced on Monday. Even worse, durng our just completed telephone conversation, you advised me that Dr. Kaley may only be available at that time. As I advised you, it is no longer possible for plaintiffs to depose Dr. Kaley on Monday, March 3, 1992. We look forward to deposing him soon thereafter.

Sincerely,

Martin J. D'Urso

MJD:jmb

EXHIBIT
P-1
LL 3-2-92