

5/8/84

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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NICOLINA SIRECI, as Executrix of
the Estate of JOSEPH E. SIRECI,
Deceased,

Plaintiff,

-against-

CHEMCO, INC., ROMAN HASS, INC.,
MONSANTO, INC., UNION CARBIDE, INC.,
and AMERICAN CYANAMID, INC.,
AMERICAN CYANAMID, MONSANTO, INC.,

Defendants.

RESPONSE TO NOTICE
FOR DISCOVERY AND
INSPECTION

Index No.: 13411/83

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Plaintiff as and for her answer to the notice for
plaintiff to produce and permit the inspection and copying of
documents alleges upon information and belief as follows:

1. Plaintiff has no statements of Monsanto.
2. Plaintiff does not have copies of all medical
records but will supply duly executed authorizations to permit
Monsanto secure same as set forth in 3 below.
3. Will be supplied upon receipt from plaintiff.
4. None are in plaintiff's possession at this time.
5. The only witnesses known to decedent's widow are
the co-employees, employers and the agents, servants or employees
of the defendants, including Monsanto, their distributors, whole-
salers, suppliers and retailers.
6. None.

UCC 087833

7. Flushing Hospital & Medical Center
Parsons Boulevard and 45th Avenue
Flushing, New York 11355

Admitted 4-2-81, Discharged 4-23-81
Admitted 5-6-81, Discharged 5-31-81
Bill for 4-2-81 admission \$8,356.00
Bill for 5-6-81 admission \$9,138.80

To clarify bill of particulars previously sent.

8. Cancer Research, P. Viola 3, 516 71
Mutation Res. 31, 163, 1975, Ducatman
Lancet 1 459 1975; Fuses
Lancet 2 410 1975; Purchase

9. Plaintiff has none in possession.

10. Copies of W-2 for 1978, 1979, 1980 and 1981 attached.

Copy of 1977 tax return attached. Tax returns requested
will be supplied when served.

Dated: New York, New York
May 8, 1984

Yours, etc.,

MANGIATORDI & CORPINA, ESQS.
Attorneys for Plaintiffs
Office & P.O. Address
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New York, New York 10017
(212) 697-0700

TO: SIFF & NEWMAN, P.C.
Attorneys for Defendant
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(212) 349-3990

UCC 087834