

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

MARY A. DENDINGER, et al.,
and ETTA W. WALLACE, et al.,

Plaintiffs,

vs.

CHRYSLER PLASTIC PRODUCTS
CORPORATION, et al.,

Defendants.

CASE NO.: C87-7117
Hon. Nicholas J. Walinski

REQUEST FOR PRODUCTION
OF DOCUMENTS DIRECTED TO
DEFENDANTS

-000-

Now come plaintiffs, by and through their attorneys, pursuant to Federal Rule of Civil Procedure 34, and request that defendants produce the following documents for inspection and copying at the offices of Murray & Murray Co., L.P.A., 300 Central Avenue, Sandusky, Ohio, 44870, on or before the 10th day of November, 1988, at 10:00 a.m. The time for inspection will continue until plaintiff's counsel has had an opportunity to carefully examine and inspect all documents. Plaintiffs' counsel will identify those documents he wishes either to have released to his custody for copying or to have copied by defendants

MURRAY & MURRAY
A LEGAL PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
MURRAY BUILDING
300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

RECEIVED FOR FILE

DATE 10/19/88
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pursuant to a court order designating a reasonable charge for copying.

101. All correspondence and documents sent to or received from the Manufacturing Chemists Association or any committee thereof, prior to 1975, pertaining to vinyl chloride or polyvinyl chloride.

102. All correspondence and documents sent to or received from any other polyvinyl manufacturer, or any employee thereof, prior to 1975, regarding vinyl chloride or polyvinyl chloride.

103. All internal (within your company) communications, bulletins and memoranda, authored prior to 1975, concerning the actual or potential chronic health effects, including cancer, in animals or humans, of exposure to vinyl chloride.

104. All documents in your possession relating to the tentative, preliminary and final results of any studies, surveys, reports, articles, tests or analyses pertaining to the actual or potential chronic health affects, including cancer, in animals or humans, of exposure to vinyl chloride which have not appeared in published medical or scientific journals.

105. All documents in your possession inconsistent with or refuting the sworn deposition testimony in this case of your designated representative(s) regarding RVCM concentrations in your resins.

106. All documents pertaining to the RVCM concentrations in your resins prior to 1980, which you have not previously produced.

107. Each and every document you intend or expect to introduce into evidence at the trial of this action.

108. Each and every document reviewed or examined by any of your witnesses in the course of preparing for trial testimony.

109. Each and every document which will be used by any of your witnesses in the course of giving trial testimony.

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110. Each and every document upon which any of your witnesses will rely or base his or her trial testimony.



Dennis E. Murray, Esq.
Kirk J. Delli Bovi, Esq.
MURRAY & MURRAY CO., L.P.A.
Attorneys at Law
300 Central Avenue
Sandusky, OH 44870
Telephone: (419) 627-9700

Attorneys for Plaintiff

UPL 06488

CERTIFICATION

This is to certify that a copy of the foregoing was served upon all counsel of record by mailing said copy, postage prepaid, addressed as follows:

Robert A. Bunda, Esq.
FULLER & HENRY
One SeaGate, 17th Floor
P. O. Box 2088
Toledo, Ohio 43603
Attorneys for Defendants

this 6th day of October, 1988.



Kirk J. Delli Bovi

URL 06489