

LAW OFFICES
OGLETREE, DEAKINS, NASH, SMOAK AND STEWART

A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS AND PROFESSIONAL CORPORATIONS

ONE THOUSAND EAST NORTH
POST OFFICE BOX 2757
GREENVILLE, SOUTH CAROLINA 29602
(803) 242-1410

August 17, 1988

OTHER OFFICES
ATLANTA, GEORGIA
WASHINGTON, D. C.
RALEIGH, NORTH CAROLINA
COLUMBIA, SOUTH CAROLINA
NASHVILLE, TENNESSEE
ALBANY, GEORGIA
SPARTANBURG, SOUTH CAROLINA
SCHENECTADY, NEW YORK

Richard J. Lorenz, Esquire (Tenneco Oil)
Beverly V. Gholson, Esquire (Georgia Gulf)
Peter F. Davey, Esquire (Union Carbide)
Amy Ng, Esquire (Conoco)
John Endicott, Esquire (Maxus Energy)
Gary A. Jones, Esquire (BFGoodrich)
Robert D. Luss, Esquire (Occidental)

RE: *Cox vs. Georgia Gulf Corporation, Et Al*
C. A. 8:88-1399-3 (Wrongful Death Action)
C. A. 8:88-1400-3 (Survival Action)

RECEIVED
AUG 22 1988
P. F. DAVEY

Ladies and Gentlemen:

Enclosed are drafts of the answer to the complaint and answers to the Rule 16(b) interrogatories. Please review both documents carefully and contact me immediately with any questions, concerns, or corrections.

If your interrogatory answers are incomplete, please contact me with the information. You must each (except for Mr. Luss) execute the verification, and return the original verification to me as soon as possible.

The answers need to be served and filed no later than September 1, 1988.

Yours very truly,

OGLETREE, DEAKINS, NASH, SMOAK
AND STEWART

Mary Lou Hill
Mary Lou Hill

MLH/sj

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 079543

copy made for
cham

Wanda Gail Cox
v. UCC car

UNION CARBIDE CORPORATION
Law Department

39 Old Ridgebury Road
Danbury, CT 06817

BY HAND

August 23, 1988

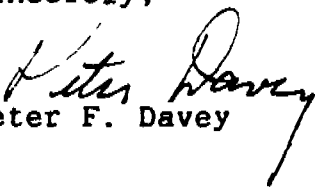
Mr. E. DeLoughy

Re: Wanda Gail Cox v. Union Carbide et al.

Dear Ed:

Attached is a copy of interrogatory (g) in referenced case. Also attached is a copy of the LDS which briefly describes the case. Please provide the insurance information requested this week. If you have any questions, let me know.

Sincerely,


Peter F. Davey

PFD/els

cc: Betty Lynn White - with attachment
R. C. Wise - with attachment

delivered to
sent 8/25

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 079544

KEEP ON TOP OF FILE

LAW DEPARTMENT DATA SHEET

LITIGATION (JUDICIAL AND ADMINISTRATIVE)

TITLE OF ACTION: Wanda Paul Cox v. Union Carbide & Co.

FORUM (COURT OR AGENCY): _____

DOCKET NUMBER: _____

DATE FILED: _____ DATE SERVED: _____ DATE REC'D: _____

UNFAVORABLE OUTCOME IS: POSSIBLE: _____ PROBABLE: _____ REMOTE: _____

NATURE OF ACTION:

- ALLEGED CAUSE OF ACTION: Union Carbide and Co. other companies sold PVC to Stauffer. That PVC contains some VCM when the PVC was heated at Stauffer, VCM was released and that VCM caused Mr. Cox's angiosarcoma. Apparently the exposure was from 1978-1986.

- DAMAGES CLAIMED: _____
- OTHER RELIEF SOUGHT: _____

OUTCOME (INCLUDE DATE AND BRIEF STATEMENT OF TERMS):

- SETTLED: DATE: _____ TERMS: _____
- TRIAL VERDICT: DATE: _____ TERMS: _____
- APPEALED: YES _____ NO: _____
- APPEAL: VERDICT SUSTAINED: _____ REVERSED: _____ DATE: _____
TERMS: _____
- FURTHER APPEAL: PRIOR APPEAL DECISION SUSTAINED: _____
REVERSED: _____

INSURANCE COVERAGE: Kemper Group * 555 AN 137011 N
Plaintiff's Attny: _____

PLAINTIFF'S ATTORNEY: Mitchell & Acorn 119 Williams Street
Greenville, S. Carolina 29601

UCC TRIAL COUNSEL:

- FIRM: _____
- PARTNER IN CHARGE: _____
- ADDRESS: _____
- PHONE: _____

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

LAW DEPARTMENT ATTORNEY IN CHARGE: Peter Davey UCC 079546

Litigation (Judicial and Administrative)

Title of Action: Michael Wayne Cor V. Union Carbide Corp.

Forum (Court or Agency): _____

Docket Number: _____

Date Filed: _____ Date Served: _____ Date Rec'd: _____

Unfavorable outcome is: possible: _____ probable: _____ remote: _____

Nature of Action:

-Alleged Cause of Action: Union Carbide & Co. after comparing said PVC to Stauffer; that PVC contains some VCM - trapped in PVC; that when the PVC was heated at Stauffer, VCM was released & that VCM caused Mr. Cor's angiosarcoma. Apparently the exposure was from 1978-86

-Damages Claimed: _____

-Other Relief Sought: _____

Outcome (include date and brief statement of terms):

-Settled: Date: _____ Terms: _____

-Trial Verdict: Date: _____ Terms: _____

-Appealed: Yes: _____ No: _____

-App al: Verdict Sustained: _____ Reversed: _____ Date: _____

Terms: _____

-Further Appeal: Prior Appeal Decision Sustained: _____ Reversed: _____

Insurance Coverage: _____

UCC Trial Counsel:

-Firm: _____

-Partner in Charge: _____

-Address: _____

-Phone: _____

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

Law Department Attorney in Charge: _____

UCC 079547

Law Department Attorney