

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

ALICE L. WARREN, ADMINISTRATRIX )  
OF THE ESTATE OF JOHN H. WARREN, )  
DECEASED, )  
Plaintiff, )  
v. )  
THE DOW CHEMICAL COMPANY, )  
THE B.F. GOODRICH COMPANY, )  
UNION CARBIDE COMPANY, AND )  
CONTINENTAL OIL COMPANY, )  
Defendants. )

C.A. No. 89-30201-F

JOINT MOTION  
TO FURTHER MODIFY PRE-TRIAL SCHEDULING ORDER

The parties jointly move this Court for an order modifying its Pre-Trial Scheduling Order.

The Court's order, modified in response to a motion of the parties, currently allows up to and including June 15, 1990 for plaintiff to file a motion to amend its complaint and for any of the defendants to file a motion for permission to file a third-party complaint. It also sets August 1, 1990 as the date for a further scheduling conference.

The purpose of the order's modification was to allow the parties an additional thirty days within which to complete the

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suspended depositions of Monsanto Company and of Ruth Griffith, a former employee of Monsanto Company. Unfortunately, because of the difficulty in coordinating the schedules of the parties' counsels, it has not been possible to complete the above-mentioned depositions within the allotted time. (The completion of Ruth Griffith's deposition is now tentatively scheduled for July 23, 1990. Communications between counsel for Defendant B.F. Goodrich Company and counsel for Monsanto Company indicate that it may be necessary to travel to Monsanto's headquarters in St. Louis, Missouri, to complete the deposition. No date has yet been selected for the completion of the latter deposition.)

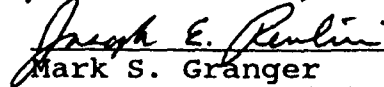
Therefore, in order that the parties may have adequate time to complete the above-mentioned depositions, which are necessary to determine if Monsanto Company or other chemical products manufacturers should be added as defendants or third-party defendants, the parties request that the deadline for amendment be extended up to and including September 10, 1990 and that the date of the scheduling conference be changed to one of the

following dates: September 10, 11 or 12, 1990.

Date: June 15, 1990

Respectfully submitted,

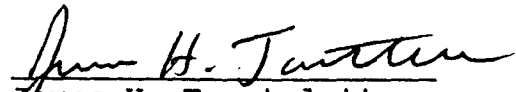




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I hereby certify that a true copy of the  
above document was served upon (each  
party appearing pro se and) the attorney  
of record for each (other) party by mail  
(by hand) on June 15, 1990.

