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LOS ANGELES

875 Third Avenue
New York, New York 10022
Telephone 212: 906-2000
Telex 97-1696
Facsimile 212: 906-2021

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FACSIMILE TRANSMITTAL

TOTAL PAGES (INCLUDING COVER SHEET): 2

DATE: January 04, 1995

TO: Gregory D. Winfree
Union Carbide Corporation
FAX #: 912037946269

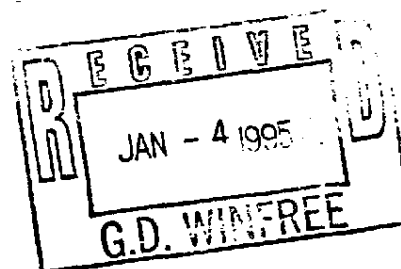
FROM: Theodore J. Theophilos
SIDLEY & AUSTIN NY
212-906-2380

SUBJECT:

COMMENTS:

IF THIS FAX IS UNCLEAR OR INCOMPLETE, PLEASE CONTACT
Theodore J. Theophilos AT 212-906-2380.

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VIA FACSIMILE

Gregory D. Winfree, Esq.
Union Carbide Law Dept. - E3-282
39 Old Ridgebury Road
Danbury, CT 06817-0001

Re: Eirven v. UCC&P

Dear Greg:

Enclosed are the Notices of Deposition for Bob Schrull, Joe Morullo, Phil Mazor, Dr. Marvin Legator, Dr. Frank H. Gardner, and John M. Dement. I need to obtain an expert to the extent that Carbide would like to coordinate the retaining of experts in vinyl chloride cases to include possible testimony in other matters. Please let me know. We are obliged to disclose our experts by the 20th of February in the Eirven case. Thank you.

Sincerely,

Theodore J. Theophilos

TJT/sr
(Enclosures by Mail)

UCC 073257