

LAWRENCE MADEKSHO
ATTORNEY & COUNSELLOR AT LAW
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HOUSTON, TEXAS 77087

(713) 641-0251

December 8, 1987

Mr. Danny Van Winkle
Vinson & Elkins
Attorneys at Law
3300 First City Tower
1001 Fannin
Houston, Texas 77002-6760

Re: William R. Chattman vs. Owens-Corning Fiberglas et al
Civil Action File No. H-87-1007 - In the U. S. District
Court for the Southern District of Texas - Houston Division

Dear Mr. Van Winkle:

Enclosed herewith please find Plaintiff's Request for Production directed to the Bendix Corporation. By copy hereof, a copy of same is being forwarded to all interested counsel of record.

I remain,

Very truly yours,

LS
Lawrence Madeksho

LM:em

Enclosure: RFP

CERTIFIED MAIL - R.R.R. #252420

cc: Mr. Robert E. Ballard

All interested counsel of record

No. 252420
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED--
NOT FOR INTERNATIONAL MAIL

(See Reverse)

SENT TO <i>Danny Van Winkle</i> STREET AND NO. <i>Vinson & Elkins</i>		P.O. STATE AND ZIP CODE <i>1001 Fannin</i>	
POSTAGE		\$	
CERTIFIED FEE		\$	
SPECIAL DELIVERY		\$	
RESTRICTED DELIVERY		\$	
SHOW TO WHOM AND DATE DELIVERED		\$	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY		\$	
SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		\$	
SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		\$	
CONSULT POSTMASTER FOR FEES		\$	
OPTIONAL SERVICES		\$	
RETURN RECEIPT SERVICE		\$	
TOTAL POSTAGE AND FEES		\$	
POSTMARK OR DATE		12-8-87	

PS Form 3800, Apr. 1976



PS Form 3811, July 1982

- SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETURN TO"
space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).

☐ Show to whom and date delivered \$
☒ Show to whom, date, and address of delivery .. \$

2. ☐ RESTRICTED DELIVERY \$
(The restricted delivery fee is charged in addition
to the return receipt fee.)

TOTAL \$

3. ARTICLE ADDRESSED TO:

Mr. Danny Van Winkle, Attorney
Union of Elks
3300 First City Tower
1001 Fannin
Houston, TX 77002-6760

4. TYPE OF SERVICE

☐ REGISTERED ☐ INSURED
☒ CERTIFIED ☐ COO
☐ EXPRESS MAIL

ARTICLE NUMBER

252420

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY ELKINS

Suite 3300 First City Tower
1001 Fannin

ADDRESSER'S ADDRESS Houston, TX 77002-6760

Signature of Addressee

UNABLE TO DELIVER BECAUSE:

72. EMPLOYEE'S
INITIALS

RETURN RECEIPT

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

WILLIAM R. CHATTMAN

VS.

OWENS-CORNING FIBERGLAS
CORPORATION ET AL

§
§
§
§
§
§

CIVIL ACTION FILE NO. H-87-1007

REQUEST FOR PRODUCTION

TO: BENDIX CORPORATION and its attorney of record, Mr. Danny
Van Winkle, Vinson & Elkins, 3300 First City Tower, 1001
Fannin, Houston, Texas 77002-6760.

Pursuant to Rule 34 of the Federal Rules of Civil
Procedure, the Plaintiff requests this Defendant, Bendix Corpora-
tion, to produce for inspection and/or copying by the Plaintiff's
attorney during regular business hours, Monday through Friday, in
Houston, Texas, all documentation in possession of this Defendant,
or subject to its control, concerning its items listed below.
Notice is given that the original of this Request is not being
filed with the District Clerk pursuant to the Local Rules of Civil
Procedure.

The subjects, items, and categories covered by this
Request are as follows:

1. The Canadian Health Department report of May 30, 1949,
wherein asbestos or asbestos-related diseases was discussed in
whole or in part.

2. Copies of all correspondence from Mr. E. A. Martin, director of purchases, to Canadian Johns Manville Company, Ltd., Johns Manville and other suppliers of asbestos to this Defendant wherein asbestos, asbestos products, asbestos diseases, or the consequences of asbestos exposure are discussed in whole or in part.

3. Copies of all corporate memos prepared by Mr. E. A. Martin, director of purchases, wherein asbestos-related diseases are discussed in whole or in part.

4. Copies of all memos, correspondence, and reports of this Defendant's safety directors wherein asbestos-related diseases or the health effects of asbestos exposure are discussed in whole or in part.

5. Copies of this Defendant's annual reports for the years 1950 to 1975.

6. Copies of all of this Defendant's record retention policies.

7. A list of the names and addresses of any and all custodians of this Defendant's corporate records regarding asbestos or asbestos litigation.

8. A complete listing of all names of individuals who participated in responding to this Request for Production, their address, title and employer.

9. Copies of all reports to or prepared for this Defendant by its own medical doctors or consultants, or outside medical

consultants, wherein asbestos diseases, or the diagnosing of asbestos diseases is discussed in whole or in part. This Request is for reports prepared specifically for Bendix Corporation and does not relate to the individual medical reports prepared on specific claimants who have filed suit against this Defendant. This Request is for the period of time from 1970 to the present time.

10. The complete files of this Defendant's own employees who have filed claims or lawsuits against this Defendant for asbestos-related diseases between the years 1955 and 1975. This Request is for this Defendant's own employees working in the manufacturing facilities of this Defendant.

11. Complete copies of all documents furnished to ICF, Incorporated since 1985 regarding the survey of asbestos processors.

12. A complete copy of this Defendant's products catalogued for the year 1950, 1955, 1960, 1965, 1970, 1975, 1980, and 1985.

13. A complete list of names, addresses, and employer of all persons who, between the years 1966 to the present time, have participated or have knowledge of, the shredding of documents that were in the custody or control of this Defendant. This Request is addressed to documents which relate in whole or in part to asbestos or asbestos-related diseases.

14. A complete listing of all trade associations to which this Defendant was a member between the years 1940 and 1975.

Respectfully submitted,

LAW OFFICES OF LAWRENCE MADEKSHO

By LS/

LAWRENCE MADEKSHO
8320 Gulf Freeway, Suite 218
Houston, Texas 77017
(713) 641-0251 TBC #12797500
Admissions ID No. 4949

AND

ROBERT E. BALLARD
ABRAHAM, WATKINS, NICHOLS, BALLARD,
ONSTAD & FRIEND
800 Commerce Street
Houston, Texas 77002
(713) 222-7211 TBC #01651000
Admissions ID No. 4946

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Request for Production has been forwarded to Mr. Danny Van Winkle, Vinson & Elkins, Attorneys at Law, 3300 First City Tower, 1001 Fannin, Houston, Texas 77002-6760, on this 8th day of December, 1987, by certified mail, return receipt requested.

LS/
LAWRENCE MADEKSHO