

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 89-30201-F

ALICE L. WARREN, Administratrix)
of the Estate of JOHN H. WARREN,)
Plaintiff.)
VS.)
THE DOW CHEMICAL COMPANY, THE)
B.F. GOODRICH COMPANY, UNION)
CARBIDE COMPANY and CONTINENTAL)
OIL COMPANY,)
Defendants)

PLAINTIFF'S RESPONSE TO DEFENDANT,
CONOCO, INC.'S, REQUEST FOR PRODUCTION OF DOCUMENTS

1. The plaintiff agrees to produce documents responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel. Please also refer to documents produced at the deposition of Monsanto Chemical Company.
2. OBJECTION. This request is overly broad and unduly burdensome; seeks documents which are protected by the attorney-client privilege; which constitute the work product of the plaintiff or the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff. Without waiving the foregoing objection, plaintiff agrees to produce those documents which are in her possession, custody or control and will make them available for inspection and copying at the offices of plaintiff's counsel. Without waiving this objection, plaintiff refers to documents marked as exhibits during the deposition of Ruth Griffith identifying Conoco, Inc. as a supplier. Plaintiff will supplement this response as required following further discovery.
3. OBJECTION. This request is overly broad and unduly burdensome; seeks documents which are protected by the attorney-client privilege; which constitute the work product of the plaintiff or the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff. Without waiving the foregoing objection, please refer to documents produced at the deposition of Monsanto Chemical Company.

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13. OBJECTION. This request seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or of the plaintiff's attorney; which constitute information prepared in anticipation of litigation; and seeks documents which are not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection, the plaintiff agrees to make available for inspection and copying at the offices of plaintiff's counsel those documents not otherwise privileged.
14. OBJECTION. This request seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or the plaintiff's attorney, and which constitute information prepared in anticipation of litigation.
15. OBJECTION. This request seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or the plaintiff's attorney, and which constitute information prepared in anticipation of litigation.
16. OBJECTION. This request seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute documents prepared in anticipation of litigation; and is beyond the scope of Rules 26 and 34 of the Federal Rules of Civil Procedure.
17. The plaintiff agrees to produce documents in her possession, custody or control responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel. In addition, medical records have been previously furnished to the defendant.
18. OBJECTION. This request seeks documents which are not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection, the plaintiff agrees to produce documents in her possession, custody or control responding to this request and not otherwise privileged and will make them available for inspection and copying at the offices of plaintiff's counsel.
19. OBJECTION. This request is beyond the scope of Rule 26 of the Federal Rules of Civil Procedure. Without waiving the foregoing objection, the plaintiff agrees to produce the Federal Income Tax Returns for the years requested.

20. The plaintiff agrees to produce documents in her possession, custody or control responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
21. The plaintiff agrees to produce documents in her possession, custody or control responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
22. OBJECTION. This request is overly broad, vague and unduly burdensome and is not limited in time and scope, and seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or of the plaintiff's attorney; and which constitute information prepared in anticipation of litigation. Without waiving the foregoing objection, please refer to tax returns we have agreed in #19 to produce.
23. The plaintiff agrees to produce documents responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
24. OBJECTION. This request is overly broad, vague and unduly burdensome and is not limited in time and scope; seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or of the plaintiff's attorney; and which constitute documents prepared in anticipation of litigation.
25. OBJECTION. This request is overly broad, vague and unduly burdensome; seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or the plaintiff's attorney; and which constitute documents prepared in anticipation of litigation.
26. The plaintiff agrees to produce documents responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
27. OBJECTION. This request is overly broad, vague and unduly burdensome; seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or the plaintiff's attorney; which are subject to the attorney/client privilege; and which constitute information prepared in anticipation of litigation. Without waiving the foregoing objection the plaintiff agrees to produce those documents not otherwise privileged.

28. The plaintiff agrees to produce documents responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
29. The plaintiff agrees to produce documents responding to this request and will make them available for inspection and copying at the offices of plaintiff's counsel.
30. None.
31. **OBJECTION.** This request is overly broad, vague and unduly burdensome; seeks documents which constitute the work product of the plaintiff or of the plaintiff's attorney; which constitute the mental impressions, conclusions, opinions or legal theories of the plaintiff or the plaintiff's attorney; and which constitute information prepared in anticipation of litigation. Without waiving this objection, to the extent any such documents are specifically relied upon by experts whom plaintiff expects to testify at trial, this response will be supplemented if appropriate.

THE PLAINTIFF
ALICE L. WARREN

By _____
James H. Tourtelotte, Esq., of
Robinson Donovan Madden
& Barry, P.C.
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CERTIFICATE OF SERVICE

I, James H. Tourtelotte, Esq., hereby certify that on this day of _____, 1991, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to all couns l of record.

Subscribed under the penalties of perjury.

James H. Tourtelotte, Esq.

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