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Warren
Cor.

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC.

Law Department

39 Old Ridg bury Road
Danbury, CT 06817-0001

November 13, 1989

MEMORANDUM

To: R. C. Wise
K4-440

From: J. R. Downey, Esq.

Re: Alice L. Warren v. The Dow Chemical Company, et al.

I enclose a copy of the November 8, 1989 letter from Attorney John Tourtelotte, counsel to the plaintiff's estate. The information I enclose is self-explanatory.

We are involved in a joint defense now with Dow Chemical.

My suggested strategy is that we try to put together a resolution of this matter by way of a joint settlement proposal. I will discuss some of my thoughts with our outside counsel prior to finalizing a proposal. In the meantime, I will attempt to contact Barbara Hensley to see if in fact there were sales of PVC and/or VCM to Monsanto, the plaintiff's employer.


John R. Downey

JRD/es

Enclosure

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 082401