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November 1, 1988

David S. McCrea, Esq.
McCrea & McCrea
119 S. Walnut Street
P.O. Box 1310
Bloomington, Indiana 47402

Dear Mr. McCrea:

Your letter dated August 15, 1988 to Jan Feldman has been referred to me due to my familiarity with the situation involving Dr. Munson. As discussed below, your accusations regarding our actions are utterly baseless.

As you know, Dr. Munson is a former Westinghouse employee. Long before your proposal to employ Dr. Munson, Westinghouse had produced documents authored by Dr. Munson and we had had discussions with him. When we first learned that you had proposed to employ Dr. Munson as a consultant or expert we were -- and still remain -- highly skeptical of your actual intentions because, among other things, Dr. Munson's views concerning such fundamental matters as the toxicity of PCBs conflict directly with the claims you have asserted in lawsuits against Westinghouse, and which you persist in bringing.

Dr. Munson stated to us that you had proposed an arrangement whereby you would pay him, and that although he was inclined to accept your offer, he had not yet accepted it. Dr. Munson explained that, as long as he was going to be involved in this litigation anyway, he thought he might as well be paid by you. He also said that he would be willing to speak with us further, but that once he accepted your offer, our future contacts with him should probably go

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David S. McCrea, Esq.

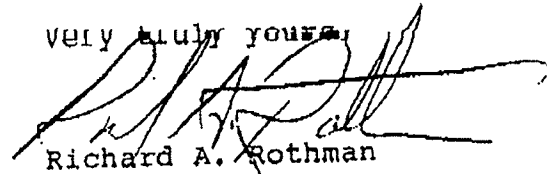
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through you. Although, you are not entitled to bar us from speaking with Dr. Munson, we have had no further contact with him.

Your recent threats regarding this subject to Peter Gillon of our firm are utterly frivolous. Our conversation with Dr. Munson was absolutely proper. I suggest that before you continue with such irresponsible accusations, you would be well advised to reconsider your threats as well as your own conduct regarding this matter.

Very truly yours,



Richard A. Rothman

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