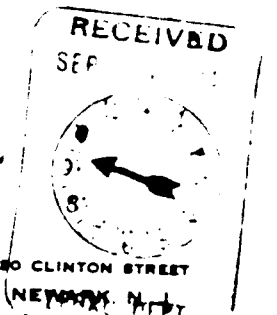
LIBERTY MUTUAL
INSURANCE COMPANY
HOME OFFICE BOSTON



September 19, 1941

Johns-Manville Corp.
22 East 40th Street
New York City

Attention: Mr. Vandiver Brown

In Re: Joseph Silva vs Hopeman Brothers, Inc. E24-142

Gentlemen:

The above captioned case involves a claim wherein the plaintiff alleges that during the course of employment in 1938 and 1939 he had to spend much of this time putting up insulation material in the accommodations and refrigerators of various ships under construction at the Federal Shipyard in Kearny, New Jersey. He alleges that as a result of his contact with this insulation material that he has been rendered ill to the extent of being unable to work for the rest of his natural life. No definite disease is alleged but various symptoms have been set forth such as headaches, dizziness, bloody sputum, expectoration, tachycardia, anemia, nasal discharge, insomnia.

Our assured, the Hopeman Brothers located at 19 East 47th Street, New York City advises us that during the course of this man's employment he did work with Johns-Manville BX 18 and also with another product called Tuco Zerocel put out by the National Gypsum Company.

A jury is to be picked for this trial on Wednesday, September 24, 1941 and the trial will be held in the United States District Court, Newark, New Jersey. The case undoubtedly will require at least three or four days inasmuch as both sides will present many expert witnesses. We are not at all certain when the plaintiff's case will be finished but feel that the defense will not get under way much before Friday, September 26, 1941 and possibly not before Monday, September 29, 1941.

A number of phone calls have resulted in discussion with your Mr. Brown of the possibility of obtaining one or two men from your organization who can testify relative to your plant operation in Alexandria, Indiana and also relative to the qualitative analysis of your product. We are particularly interested in showing that during a number of years of normal plant operation wherein numerous workmen have come in contact with your product that there has never been any problem of an industrial hazard.

We understand that your Mr. O'Brien is the plant manager at Alexandria,

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Indiana and we are today making arrangements for one of our men to interview Mr. O'Brien relative to his coming east to testify for us. We naturally will not keep your men away from the plant any longer than is absolutely necessary if you are willing that someone may testify for us.

We will keep you closely posted as to all developments and will not call on you any sooner than is absolutely necessary.

We would at this time like to make known our deep appreciation for your whole hearted cooperation as evidenced through Mr. Brown and also as shown by Mr. Williams of your Manville, New Jersey plant.

Very truly yours,

R. C. DAUGHERTY
CHIEF ADJUSTER
LIABILITY CLAIMS

F W Hallett

BY: F. W. Hallett

FWH:ML