General Headquarters
September 19, 1941.

(Personal & Confidential)
Mr. E. R. Williams,
Manville Research Laboratories,
Manville, N.J.

Liberty Mutual Life Ins. Co.
and
Hopeman Brothers,
EX - 16

Confirming our various telephone conversations, I have discussed this matter with Mr. Hoff and he feels we should cooperate in the defense of the action brought by a former employee of Hopeman Brothers, not only because Liberty Mutual and Hopeman Brothers are and have been good customers but also because of our natural interest in seeing that there is no Court decision establishing our material as a hazardous product.

Mr. Geisenberger will be required to testify as to the chemical composition, and someone from Alexandria factory to testify as to the ingredients and also to the fact that none of the workmen engaged in the manufacturing and handling of the material at the factory has ever contracted any occupational disease as a result. In discussing this with Mr. H. J. O'Brien by telephone this morning, he stated he thought he, himself, was the best person qualified to testify on these points.

The Liberty Mutual legal department has already communicated with you and Mr. Geisenberger and their Indianapolis Office will get in touch with Mr. O'Brien for a preliminary conference.

I am informed by Messrs. Hallett and Daughterty that the jury which will try the case in the Newark Federal District Court will be selected on Wednesday, September 24th. They do not anticipate our witnesses will be required before the following week, that is the week beginning September 29th. However, there is at least a possibility they may be required on Thursday or Firday, the 25th or 26th. Accordingly, Mr. Geisenberger and Mr. O'Brien should arrange their appointments so as to permit attendance at Court on fairly short notice.