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Plaintiff's #1

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COUNSEL
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March 6, 1980



Dr. David Ozonoff
Boston University School of Medicine
Boston, Massachusetts

Dear Dr. Ozonoff:

We are the national coordinating counsel for Raybestos-Manhattan, Inc., a manufacturer of asbestos textile and friction products, which has been named as a defendant in a number of personal injury actions around the country. In those cases, the plaintiffs are alleging that they have contracted asbestosis and other pulmonary diseases as a result of occupational exposure to asbestos. These suits have not been instituted by Raybestos' own employees. Instead, they involve actions both by shipyard workers and various other types of insulation mechanics who handle a variety of asbestos products in a number of different occupational settings. Many of these plaintiffs were exposed to asbestos containing products during World War II while in the employ of the United States or in private shipyards under government contract. All to often, it appears that the exigencies of the war effort took priority over consideration of working conditions.

We are currently in the process of attempting to locate a medical historian to testify on behalf of the company. In this regard, Professors Barbara Rosencrantz and Benjamin G. Ferris, Jr. of the Harvard University School of Public Health have indicated that you have outstanding qualifications in this field.

Specifically, we are desirous of developing testimony concerning the general state of occupational medicine as it existed in this country during the 1930's into the World War II

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years. On the basis of the information which has come to light in this litigation, we would expect to be able to demonstrate that Raybestos-Manhattan has always acted as a responsible member of the corporate community in undertaking to insure the health and safety of those individuals known to have been at risk from asbestos exposure.

I would very much appreciate an opportunity to meet with you for the purpose of discussing your possible participation in the litigation. Please let me hear from you at your earliest convenience.

Sincerely,

CLYDE A. SZUCH

CAS/tlm

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