PLAINTIFF'S EXHIBIT

UC-4134

UNION CARBIDE CORPORATION
270 PARK AVENUE, NEW YORK, N. Y. 10017
LAW DEPARTMENT

August 25, 1976

RECEIVED
AUG 25 1976

Mr. W. J. Burdett
Insurance Department
44th Floor

Re: Bruce A. Nave, et ux. v. Combustion Engineering, Inc., et al.

Robert R. Dugger, et ux. v. Combustion Engineering, Inc., et al.

Dear Mr. Burdett:

Attached hereto for further handling are a summons and complaint in each of the above-captioned lawsuits in which Union Carbide is a named defendant. Both suits have been filed in the Circuit Court of Knox County, Tennessee.

In the first lawsuit, plaintiff, Bruce A. Nave was an insulation installer and claims personal injury resulting from handling asbestos and asbestos insulation materials of the corporation and the other defendants. Mr. Nave seeks $750,000 in compensatory damages for his personal injuries, and $1,000,000 punitive damages, plus costs, against the corporation and each of the other defendants. Mr. Nave's wife is also a plaintiff in this lawsuit and she seeks $250,000 compensatory damages for loss of her husband's consortium and $1,000,000 punitive damages, plus costs.

The facts in the Dugger lawsuit are substantially the same as the Nave lawsuit. Plaintiff, Robert Ray Dugger seeks $750,000 in compensatory damages for his personal injuries, and $1,000,000 in punitive damages, plus costs, against the corporation and each of the other defendants. Mr. Dugger's wife, also a plaintiff, seeks $250,000 in compensatory damages, plus $1,000,000 in punitive damages, plus costs.

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Please arrange to have these lawsuits referred to Erma G. Greenwood, Esq. of Kramer, Johnson, Rayson, Greenwood & McVeigh, Valley Fidelity Bank Building, Knoxville, Tennessee 37901, telephone (615) 525-5134. This law firm is representing Union Carbide in the other asbestos cases pending in eastern Tennessee.

Very truly yours,

Charles F. Raeburn

CFR/lg
Att.

cc: R.L. Doan
J.E. Geoghan
F.C. Kroft, Jr.
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