

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANNE ANDERSON et al.,)	
)	
Plaintiffs)	
)	Civil Action
v.)	
)	
W. R. GRACE & CO., INC. et al.,)	No. 82-1672-S
)	
Defendants)	

PLAINTIFFS' MOTION TO COMPEL DEFENDANT,
W. R. GRACE & CO., INC. TO PRODUCE DOCUMENTS

Plaintiffs move to compel defendant, W. R. Grace & Co., Inc. to produce the following documents forthwith:

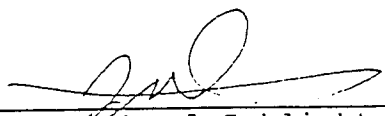
1. Any documents or records evidencing any corporate policy or knowledge concerning waste disposal or pollution control issues at the plants of the Cryovac division, including but not limited to any memoranda, notes, agenda, minutes, or the like referring to such between the years 1960 to date.
2. Any documents or records indicating the corporate policy of W. R. Grace regarding pollution control and the

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environmental impact of industrial waste disposal issues
affecting its plants between the years 1960 to date.

Dated: February 14, 1986

Respectfully submitted
by their attorney,



Jan Richard Schlichtmann
Schlichtmann, Conway & Crowley
171 Milk Street
Boston, MA 02109
(617)423-9777