

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN  
DEC 2 1982  
U.S. DISTRICT COURT  
DISTRICT OF MASS

.....  
ANNE ANERSON, et al.,  
Plaintiffs,  
v.  
CRYOVAC, INC., et al.,  
Defendants.  
.....

CIVIL ACTION  
No. 82-1672-S

MEMORANDUM OF DEFENDANT W. R. GRACE & CO.  
IN OPPOSITION TO PLAINTIFFS' FIRST MOTION  
TO COMPEL ANSWERS TO INTERROGATORIES AND  
MOTION FOR A PROTECTIVE ORDER

INTRODUCTION

This is a personal injury action to recover damages for serious illnesses, allegedly suffered or threatened as a result of contamination of a municipal water supply in Woburn. The contamination was allegedly caused by the supposed disposal of hazardous wastes by the Cryovac Division of W. R. Grace & Co. ("W. R. Grace") and another defendant. Both defendants have answered, denying the allegations of the Amended Complaint.

W. R. Grace has filed a motion to dismiss the action under Rule 11, charging the plaintiffs, through counsel, with having no good ground to believe that the allegations against W. R. Grace are supportable. A number of bases for the Rule 11 motion have been asserted, principally an article published in a Providence, Rhode Island, newspaper when the suit was filed. The article was