IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHEMICAL RECOVERY SYSTEMS, INC.,

Defendant and Third-Party Plaintiff,

Case No.: C80-1858

SECOND REQUEST FOR PRODUCTION OF DOCU-MENTS

vs.

HARSHAW CHEMICAL COMPANY, RUSSELL W. OBITTS and DOROTHY OBITTS,

Third-Party Defendants.

NOW COMES the Defendant, Chemical Recovery Systems, Inc., by and through its attorneys, Murphy, Burns & McInerney, P.C., and David C. Long Company, LPA, and respectfully requests Plaintiff to produce and permit Defendant to inspect and copy any and all documents reflecting scientific data obtained, the results of analysis done, and reports summarizing the type of analysis done and the results thereof resulting from testing by Plaintiff of samples taken from Defendant's premises after August 2, 1981, as well as any other times that Plaintiff, or its agents, may have obtained samples from Defendant's premises.

This request is made pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure.

Respectfully submitted,

Dated: October 19, 1981 MURPHY, BURNS & McINERNEY, P.C.

BY: Cary J. McInerney (P17439)
Attorneys for Defendant

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MURPHY, BURNS & McINERNEY, P.C.

Richard A. Stevens (P30516) Attorneys for Defendant

DAVID C. LONG COMPANY, LPA

BY: / David C. Long
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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

Case No.: C80-1858

vs.

PROOF OF SERVICE

CHEMICAL RECOVERY SYSTEMS, INC.,

Defendant and Third-Party Plaintiff,

vs.

HARSHAW CHEMICAL COMPANY, RUSSELL W. OBITTS and DOROTHY OBITTS,

Third-Party Defendants.

STATE OF MICHIGAN)

COUNTY OF KENT)

KIMBERLY D. CULVER being duly sworn, deposes and says that she is a legal secretary for the law firm of Murphy, Burns & McInerney, P.C., and that on Monday, October 19, 1981, she mailed a copy of the Second Request for Production of Documents to the following:

Clerk United States District Court Northern District of Ohio Eastern Division 400 U. S. Courthouse Cleveland, Ohio 44144

Kathleen Ann Sutula Assistant U. S. Attorney 400 U. S. Courthouse P. O. Box 427 Elyria, Ohio 44036

Eben H. Cockley 1700 Union Commerce Building Cleveland, Ohio 44115

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Anthony B. Giardini 522 Broadway P. O. Box 164 Lorain, Ohio 44052

David C. Long 300 Fourth Street P. O. Box 427 Elyria, Ohio 44036

by first class mail, postage fully prepaid thereon,

Kimberly D. Cylver

Subscribed and sworn to before me, this 19th day of October, 1981

Notary Public, Kent County, MI My Commission Expires: 12/03/84

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& MCINERNEY P C
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