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

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UNITED STATES OF AMERICA,
Plaintiff,

vs.

Case No.: C80-1858

CHEMICAL RECOVERY SYSTEMS,
INC.,

Defendant and Third-Party
Plaintiff,

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.

MURPHY, BURNS
& MCINERNEY, P.C.
ATTORNEYS AT LAW
SUITE 4000 CAMPAU SQUARE
BUILDING
180 MONROE, N.W.
GRAND RAPIDS, MICHIGAN
49503

BY: [Signature]
For Gary J. McInerney (P17439)
Attorneys for Defendant

MURPHY, BURNS & MCINERNEY, P.C.

BY:

Richard A. Stevens

Richard A. Stevens (P30516)
Attorneys for Defendant

DAVID C. LONG COMPANY, LPA

BY:

Richard A. Stevens

FOR

David C. Long
Attorney for Defendant



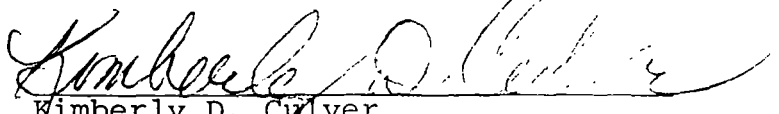
J. Edgar Hoover
 Director

MURPHY BURNS
& MCINERNEY P C
ATTORNEYS AT LAW
SUITE 4000 CAMPAU SQUARE
BUILDING
180 MONROE, N W
GRAND RAPIDS MICHIGAN
49503

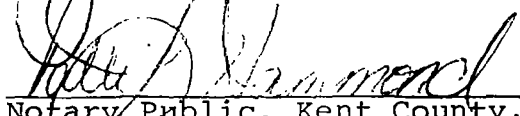
Anthony B. Giardini
522 Broadway
P. O. Box 164
Lorain, Ohio 44052

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

by first class mail, postage fully prepaid thereon.


Kimberly D. Cyver

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


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