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BY HAND

January 5, 1981

James Turnbow, Ph.D

BERNARD D. ATWOOD
SPECIAL PARTNER

J. WARD O'NEILL
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Charles Berry, M.D.
2537 South Gessner
Suite 238
Houston, TX 77063

Harry Gibbons, M.D.
Department of Health
610 South 200 East
Salt Lake City, UT 84111

James Gaume, M.D.

Patricia O Quinn, M.D.

FFAC/ Kurth v Lockheed Aircraft Corporation
Our file 2041.1278.2S, 6S

Dear Doctors:

To keep you current with all United States Air Force
medical materials produced to us, please find enclosed Volume
VIII of USAF production.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

John J. Connors

John J. Connors

/j1w
Enclosures

James Turnbow
August 5, 1981
Page 2

If you have not already done so, please forward to us a copy of your latest curriculum vitae so that we can circulate it prior to the meeting.

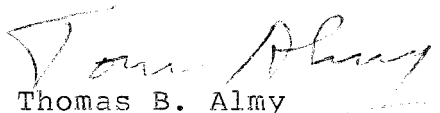
If we can be of any assistance to you or if you have any questions, please do not hesitate to contact myself or John Connors, Esq., of this office. Thank you for your cooperation in this matter.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

Enclosure
/dh

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August 7, 1981

Mr. James Turnbow

FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-2S

Dear Dr. Turnbow:

Please find enclosed a copy of John Edwards' most recent calculations relating to vertical G-forces felt by the C-5A survivors.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

Tom Almy
Thomas B. Almy

/dh

Enclosure

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August 12, 1981

James Turnbow

KURTH/MARCHETTI V. LOCKHEED AIRCRAFT CORPORATION
2041-1278-6S/5C

Dear Dr. Turnbow:

Because of the renovation now taking place in our offices, we have decided to hold the meeting of aerospace experts and examining experts at the University Club of Washington, 1135 16th Street, N.W., Washington, D.C., beginning at 9:00 a.m. on August 15, 1981.

We look forward to meeting with you on the 15th.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/js

JAMES M. ESTABROOK
EDWARD H. MAHLA
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August 19, 1981

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*ADMITTED TO D.C. BAR

James Turnbow

FFAC v. Lockheed Aircraft Corporation Our file 2041-1278-2S

Dear Dr. Turnbow:

We enclose the documents listed in the attached appendix and write to express our appreciation for your participation in the conference on August 15, 1981 and to confirm our request for your assistance in certain specific areas relating to these cases.

As we previously discussed with you, we would appreciate your calculations with regard to the peak and average G-forces involved in this accident as well as your calculations relating to the time of decompression. Your independent calculations, of course, are needed because those of Mr. John Edwards are subject to attack because he is a Lockheed employee. We understand that you are only now receiving various documents which will enable you to make these calculations, but we would appreciate receiving the results as soon as possible.

In addition, due to the need to produce our evidence to the other side prior to the trial date, we will need your draft opinion, if humanly possible, by September 1, 1981. We suggest use of Federal Express (for which we will gladly reimburse you) rather than ordinary mail because of time limitations. This opinion should contain your calculations and be in a form suitable for submission to the court as an exhibit and contain reference to substantiating data from appropriate sources. It should also contain your opinion with reasonable scientific

August 19, 1981

certainty or probability with respect to the probability of injury to infants seated in rearward facing seats in the troop compartment and comparisons or analogies to substantiate such opinion. For your information, the court is considering the use of a court-appointed expert in addition to the experts engaged by the parties and your written opinion might very well be submitted to such expert for his consideration.

As you know, the first trial is scheduled to commence on September 21, 1981, and we have tentatively set a final briefing for our witnesses at our office on September 26, 1981. You would probably testify during the week of September 28, 1981.

Please call myself or John Connors or Thomas Almy of this office if you have any questions.

Thank you for your cooperation in this matter.

Best regards.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Carroll E. Dubuc".

Carroll E. Dubuc

/dh

Enclosures

Appendix

1. Deposition and trial testimony for the following witnesses:

Regina Aune
Tilford Harp
Christine Lieverman
Keith Malone
Harriett (Goffinet) Neill
Merritt Stark
Marcia (Wirtz) Tate
Dennis Traynor

2. Sworn statements of:

Regina Aune
Tilford Harp
Christine Lieverman
Keith Malone
Marcia (Wirtz) Tate

3. Dimensional Overhead and Cutaway Views of C-5A Aircraft (cutaway view in 2 sizes)
4. Photocopies of photographs taken at crash site, troop compartment, etc.
5. "Human Exposure to Linear Deceleration, Part 2. The Forward-Facing Position and the Development of a Crash Harness", John Paul Stapp, Major, USAF (MC). ["Rocket Sled" studies].
6. Collateral Report, Vols. I, II and III of III.

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*ADMITTED TO D. C. BAR

September 10, 1981

James Turnbow, Ph.D.

FFAC/Kurth/Marchetti v. Lockheed Aircraft Corporation
Our files 2041-1278-2S/6S/5C

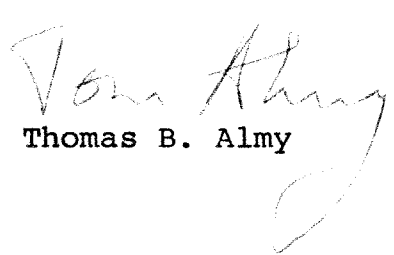
Dear Dr. Turnbow:

Enclosed for your review are the first of our aerospace experts' reports including those of Dr. James Gaume (D 1302) and John Edwards (D 1298).

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By:


Thomas B. Almy

/da
Enclosure

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September 16, 1981

Dr. James Turnbow

Kurth/Marchetti v. Lockheed Aircraft Corporation
Our files 2041-1278-6S/5C

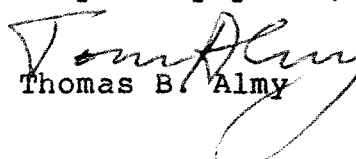
Dear Mr. Turnbow:

We write to confirm that the Kurth v. Lockheed Aircraft Corporation trial has been rescheduled to commence on October 13, 1981. The Marchetti v. Lockheed Aircraft Corporation trial remains secondary to the Kurth trial.

Therefore, the witness conference originally scheduled for Sunday, September 27, 1981, per your discussion with John J. Connors, Esq. of this office, has been rescheduled for Saturday, October 17, 1981.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


Thomas B. Almy

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October 7, 1981

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OF COUNSEL WASHINGTON

*ADMITTED TO D. C. BAR

James Turnbow

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Mr. Turnbow:

Enclosed is Dr. John J. Downes' recently received expert report numbered as Kurth trial exhibit D1310.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By: *Thomas Almy*
Thomas B. Almy

Enclosures

/gs

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October 16, 1981

James Turnbow, M.D.

Marchetti v. Lockheed Aircraft Corporation
Our file 2041-1278-5C

Dear Dr. Turnbow:

We write to confirm our telephone conversations in which we advised you that the Court has postponed the Kurth case and in its place scheduled the trial of Melissa Marchetti to begin on October 26, 1981, and would also like to confirm at this time that we have scheduled a meeting for all of the experts who will testify in what is now the Marchetti case for Sunday, November 1, 1981. We will contact you by telephone to give you the exact place and time. We expect our witnesses to testify during the first two weeks of November. Please advise us immediately if you have any problems with any of these dates.

Thank you for your cooperation in this matter.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


John J. Connors

/dh

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November 1, 1981

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*ADMITTED TO D. C. BAR

James Turnbow, M.D.

FFAC/Marchetti v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/5C

Dear Dr. Turnbow:

Enclosed for your review are the deposition, resume and deposition exhibits of Charlie Turner, Ph.D., aerospace engineer and newly listed plaintiff's expert.

Dr. Turner testified, beginning at p. 78 of his deposition, that he was relying on the following listed portions of two Lockheed Reports:

- A. Vol. I LGI-US-46-2.2, see specifically "Summary of Critical Conditions" p. 2.1 and "Limit Loads", p. 2.2 - 2.7.
- B. Vol. I LGI-US-54-12.2, see specifically "Bullet" Section 2.3 (p. 2.3 (1-4)); "Horizontal Tail" Section 2.4 (p. 2.4 (1-4)); "Vertical Tail" Section 2.5 (p. 2.5 (1-4)); "Table 2.3-I Bullet and Contents Mass Data" (p. 2.3-4).

We have enclosed the entire reports for your review and would like to talk to you about the approach taken by Dr. Turner in formulating his opinion on the G-forces involved in the accident by calculating the force supposedly needed to separate

November 1, 1981

the empennage from the fuselage. Additionally, Dr. Turner noted that he is specifically not using wing loading weight data because it is too complex an issue.

We look forward to discussing this matter with you.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

John J. Connors

/kwm

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*ADMITTED TO D. C. BAR

November 2, 1981

Mr. James Turnbow

FFAC/Marchetti v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/5C

Dear Mr. Turnbow:

Enclosed for your review are the following aerospace experts' depositions and exhibits taken recently, divided generally into the following groupings:

A. Crash Reconstruction/G-Forces

John Edwards	9/23/81
James Turnbow	10/8/81
John Carroll	10/28/81
William Timm, P.E.	10/20/81
Robert Gromack, P.E.	10/27/81
Charlie Turner	10/31/81

B. Hypoxia/Decompression/G-Forces

James Gaume, M.D.	9/25/81
Charles Berry, M.D.	10/2/81

C. Hypoxia-Children

John Downes, M.D.	10/7/81
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D. Photo Interpretation

Stanley Morain	10/26/81
----------------	----------

Mr. James Turnbow

-2-

November 2, 1981

E. Chamber Studies

Robert McMeekin, M.D. 10/6/81

F. FAA

Andrew Horne, M.D. 9/23/81

Very truly yours,

HAIGHT, GARDNER, POOR, & HAVENS

By


John J. Connors

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James Turnbow, Ph.D.

FFAC/Marchetti v. Lockheed Aircraft Corporation
Our files 2041-1278-2S/5C

Dear Dr. Turnbow:

Enclosed are the bulky materials that we decided to send to you this week instead of having you carry them home from last weekend's meeting.

Best wishes.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By:

John J. Connors
John J. Connors

/gs
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BY HAND

November 25, 1981

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Harry Gibbons, M.D.
Department of Health
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Charles Berry, M.D.
Suite 238
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Houston, TX 77063

FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-2S

Dear Doctors:

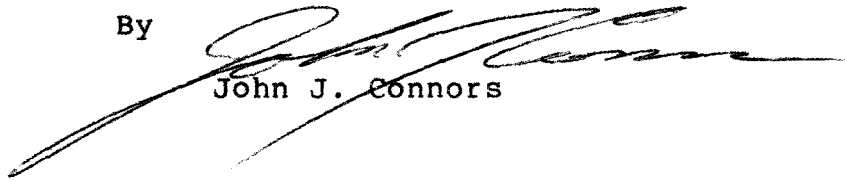
Enclosed are additional Survivors' medical records and Decedents' Autopsy reports produced to us recently by the Air Force.

These volumes, labeled Vol. IV-VI, supplement those sent to you previously on November 2, 1981.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


John J. Connors

/dm
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James Turnbow, Ph.D.

FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-2S

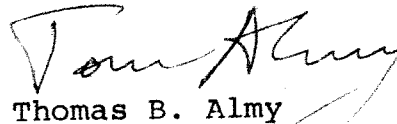
Dear Dr. Turnbow:

Enclosed for your review are the expert reports of Drs. Stanley Morain and Charlie Turner produced to us recently by plaintiffs' counsel.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/dm
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December 23, 1981

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James Turnbow

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Mr. Turnbow:

Enclosed for your review are the deposition transcripts of
John Carroll on November 25, 1981 and Douglas E. Busby, M.D. on
December 8, 1981.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By: *Hella D. Mizrahi*
Hella D. Mizrahi
Legal Assistant

/da
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December 23, 1981

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James Turnbow

Otto/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-6C/5C

Dear Dr. Turnbow:

This is to confirm various telephone calls you may have received concerning the trial dates for the Kurth and Otto trials. Yesterday evening we learned the Otto trial has been postponed with no new date set. We are, therefore, relatively certain the Kurth trial will begin on January 11, 1982 before Judge Oberdorfer.

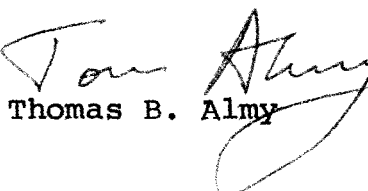
Assuming the Kurth trial begins on schedule as we believe it will, we could begin putting on our case as early as January 20, 1982. So that we can coordinate all our witnesses and accomodate your schedule to the extent we are able, we would appreciate your advising us of your availability between January 20, 1982 and February 12, 1982.

Thank you for your help.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/js

cc: James P. Piper, Esq.

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December 30, 1981

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*ADMITTED TO D. C. BAR

James Turnbow

FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-25

Dear Mr. Turnbow:

We enclose a copy of the December 23, 1981 letter (Christmas present) from the Chief Judge and Calendar Committee for the United States District Court for the District of Columbia setting the trial schedule for C-5A cases for 1982 and 1983.

For planning purposes we expect that the plaintiff's case in each trial should take seven to ten days with defendant's case following for a like period. In the ideal situation we would put our witnesses on in the following order: (1) fact witnesses including USAF and civilian personnel; (2) accident investigation personnel; (3) photographic analysis experts; (4) aerospace, engineering and nonexamining medical experts; (5) teachers, therapists, etc.; (6) examining doctors and psychologists; and (7) economic expert. This program will vary where necessary to accomodate individual schedules and witnesses giving substantially repetitive testimony will be videotaped as soon as possible so that their live testimony will not be necessary at every trial.

December 30, 1981

We are sure that you realize that the Calendar Committee was acting optimistically when it attempted to schedule this many cases over such a long period and that some changes must be anticipated. In addition it is always possible that these cases might be settled as a group or individually. However, we must plan our trial preparations based on the schedule as it now stands and request that our witnesses do likewise. Please contact us immediately if you foresee any problems with your availability for the trials listed.

Thank you for your cooperation in this matter.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By



John J. Connors

/dm
Enclosure

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January 6, 1982

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FFAC/ Kurth v Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Experts:

To supplement our deliveries to you on November 2 and December 23, 1981 of aerospace experts' depositions and exhibits for review, we enclose the following additional materials we would like you to look at:

(A) Crash Reconstruction/G Forces

1. Dr. Charlie Turner Dep. (cont'd) 11/24/81
& Exhibits

2. Dr. John Carroll Exhibits (only) 11/25/81
(You received the deposition by cover
letter dated December 23)

3. Dr. Y. King Liu Dep 11/30/81 and Exhibits

(B) Hypoxia/Decompression/G-Forces

1. Dr. Busby Exhibits (only) 12/18/81
(You received the deposition by cover
letter dated December 23.) Please note
especially Busby Exhibit Nos. 3, 4 and
6. These are his notated copies of
defendant's witnesses Downes, Gaume and
Edwards' expert reports. We would
appreciate any comments from the
respective authors of these reports
concerning Mr. Busby's notations.

(C) Photo Interpretation

1. Dr. Stanley Morain Dep. (cont'd) 11/24/81
& Exhibits

(D) Fact Witnesses/Passengers

1. Christie Lievermann Dep. 11/3/81 & Exhibits
2. Harriett Goffinet Neil Dep. 11/25/81 &
Exhibits

(E) Memory Distortion of Eye Witnesses

1. Dr. Emanuel Tanay Dep. (only) 12/21/81

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

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January 8, 1982

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James Turnbow, M.D.

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Dr. Turnbow:

Enclosed is the recently taken deposition and exhibits of
Dr. J. Kenyon Mason, plaintiffs' aerospace pathologist.

Thank you for your cooperation in this matter.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

John J. Connors

John J. Connors

/dh
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January 11, 1982

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James Turnbow, Ph.D.

FFAC/Kurth v. Lockheed Aircraft Corporation Our file 2147-1278-2S/6S

Dear Dr. Turnbow:

Plaintiff has questioned the accuracy of the C-5A Wreckage Diagram (D9) and the distances noted therein, therefore, we have asked Robin Welch, Ph.D. and Arland Atkins to make a photo analysis of the crash site. It would appear from this study that the original Wreckage Diagram dimensions are correct.

Therefore, enclosed for your review are the following materials from defendant's photo experts:

1. Dr. Robin Welch's expert report, curriculum vitae, and recent deposition and exhibits marked January 8, 1982; and
2. Arland Atkins' curriculum vitae and deposition and exhibits marked January 7, 1982.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

John J. Connors
John J. Connors

Enclosure

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January 11, 1982

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James Turnbow, Ph.D.

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2147-1278-2S/6S

Dear Dr. Turnbow:

Enclosed for your review is defendant's photo expert Dr. Robin Welch's expert report and curriculum vitae.

Because the plaintiff has questioned the accuracy of the Wreckage Diagram (D9) and the distances noted therein, we asked Mr. Welch to do a photo analysis. It would appear from this analysis that the original Wreckage Diagram dimensions are correct.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

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John J. Connors
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January 15, 1982

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FFAC/ Kurth v Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Doctors:

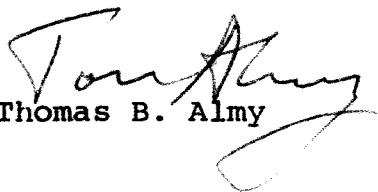
Enclosed is Volume XI of United States Air Force medical documents received here this week. Contained within are medical records for William Willis and William Parker, and the autopsy report for Parker.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/jlw
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February 18, 1982

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James Turnbow, Ph.D.

FFAC/ Bosi v Lockheed Aircraft Corporation
Our file 2041-1278-5H

Dear Dr. Turnbow:

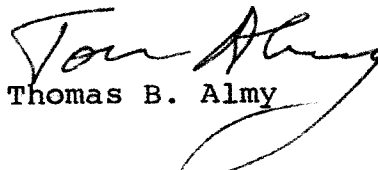
As we discussed, please find enclosed a copy of the transcript of your testimony and of Charlie Turner. Please review Turner's for errors, problems or other ways we might attack his testimony.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/jlw
Enclosures
cc: James P. Piper, Esq.
(w/o enclosures)

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March 2, 1982

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James Turnbow, Ph.D.

FFAC/Bosi v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/5H

Dear Dr. Turnbow:

In response to your request, I enclose a copy of your trial testimony in Kurth along with that of Mr. Turner.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

Enclosures
/jllw

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James Turnbow, Ph.D.

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Dr. Turnbow:

We have now seen the plaintiffs' case as presented during the recent Kurth trial. For your review and preparation for future trials we enclose a copy of the Kurth trial testimony of Messrs. Morain, Busby, Carroll, Bandy, Edwards and Welch. You have previously received from us a copy of Dr. Turner's and your own testimony.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By

John Connors

John J. Connors

/jw
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HAIGHT, GARDNER, POOR & HAVENS

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RALPH E. CASEY*
JOHN W. MCCONNELL, JR.*
OF COUNSEL WASHINGTON

*ADMITTED TO D. C. BAR

March 18, 1982

James Turnbow, Ph.D.

FFAC/Camenga v. Lockheed Aircraft Corporation
Our file 2041-1278-7A

Dear Dr. Turnbow:

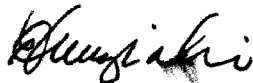
This letter is to inform you that the Camenga trial has been scheduled to begin April 13, 1982. We expect that our witnesses may be called to testify as early as the week of April 19, 1982. Please advise us immediately if you foresee any scheduling problems during that time.

We will inform you immediately should there be any changes with this current trial schedule.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By



Hella D. Mizrahi
Legal Assistant

/jw

JAMES M. ESTABROOK
EDWARD H. MAHLA
JOHN C. MOORE
MAC DONALD DEMING
GORDON W. PAULSEN
M. E. DEORCHIS
DAVID R. H. WATSON
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March 30, 1982

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* ADMITTED TO D. C. BAR

Dr. James W. Turnbow

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6S

Dear Dr. Turnbow:

Enclosed please find Check No. 482 in the amount of \$94.22 in payment of defendant Lockheed's one-half share (\$2,594.22) of your March 14, 1982 bill, less the \$2,500 retainer given to you by Check No. 220 dated August 3, 1982.

We have previously requested payment of third-party defendant United States' one-half share of this bill and will forward it to you as soon as possible after receipt of their check.

Sincerely yours,


Carroll E. Dubuc

mg
Enclosures

JAMES M. ESTABROOK
EDWARD H. MAHLA
JOHN C. MOORE
MAC DONALD DEMING
GORDON W. PAULSEN
M. E. DEORCHIS
DAVID P. H. WATSON
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FEDERAL EXPRESS

May 11, 1982

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RALPH E. CASEY*
JOHN W. McCONNELL, JR.*
OF COUNSEL WASHINGTON

* ADMITTED TO D. C. BAR

James Turnbow, Ph.D.

t

FFAC/Otto v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/6C

Dear Dr. Turnbow:

Enclosed are seven (7) recent video-taped deposition transcripts of the crew aboard the C-5A (Major Traynor, Colonel Keith Malone, Captain Tilford Harp, Regina Aune, Captain Marcia Tate, and Harriet Neill) and of CBS journalist Murray Fromson.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

BY



Anne M. Kundert
Paralegal

/jlw
Enclosures

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May 11, 1982

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OF COUNSEL WASHINGTON

* ADMITTED TO D. C. BAR

James Turnbow, Ph.D.

Otto v. Lockheed Aircraft Corporation
Our file 2041-1278-6C

Dear Dr. Turnbow:

This is to confirm our telephone conversation concerning the Otto v. Lockheed trial, scheduled to begin May 18, 1982. As I indicated we anticipate that we may need your testimony sometime late in the week of May 24th or early the following week. I will contact you in Idaho when I can be more specific as to the date.

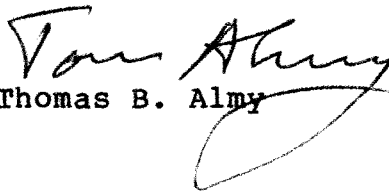
I am also checking on your fee which is due from the government. I will let you know what I find out.

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

/tkd

cc: Peter Waldmier, Esquire

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November 3, 1982

James W. Turnbow, Ph.D.

FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-2S

Dear Dr. Turnbow:

In response to your question about what to do with your files we ask that you retain them for now. Although we are in the process of completing the settlement of all the U.S. surviving infant plaintiffs, there still remains some 70 non-U.S. surviving infant plaintiffs (mostly European). Those cases are presently on appeal concerning Judge Oberdorfer's refusal to order the cases returned to their local forums. If the Court of Appeals affirms Judge Oberdorfer's refusal, the foreign cases would become active and we would need your services again. However, we do not expect any action from the Court of Appeals until early next spring.

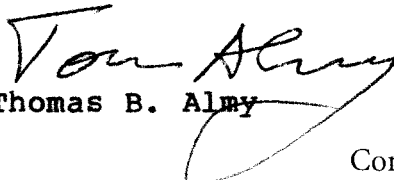
Relative to your bill please find enclosed check number 614 for \$468.75 which is our share of your most recent bill. Checks from the government have been arriving in groups in recent weeks and we, therefore, expect a check relating to your outstanding bills. However, to ensure proper attention is given to the account, we have sent a letter to the government attorney overseeing the C-5A case, Mr. Bagni, asking that he expedite payment (A copy of that letter is enclosed.)

Best regards.

Very truly yours,

HAIGHT, GARDNER, POOR & HAVENS

By


Thomas B. Almy

Enclosures

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November 3, 1982

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Bruce Bagni, Esq.
Department of Justice
Safeway Building
Room 1104
521 12th Street, N.W.
Washington, D.C.

Re: FFAC v. Lockheed Aircraft Corporation
Our file 2041-1278-2S

Dear Bruce:

Dr. James Turnbow has expressed some concern over the delayed payment of an outstanding invoice by third-party defendant United States. It has been six months since the request for a payment of Dr. Turnbow's invoice was made. Another copy of this billing is attached for your review.

Would you please do whatever is necessary to expedite payment of this long overdue invoice. And, please call Dr. Turnbow to advise him of when he may expect a check. His number is (602) 840-4305.

Best regards.

Sincerely yours,



Carroll E. Dubuc

/mc

cc: James Turnbow, M.D.

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November 16, 1982

Dr. James W. Turnbow

FFAC/Camenga/Otto v. Lockheed Aircraft Corporation
Our file 2041-1278-2S/7A/6C

Dr. Turnbow:

Enclosed please find Check No. 679 in the amount of \$468.75 in payment of defendant Lockheed's one-half share of your invoice for the period February 1, 1982 through October 30, 1982.

We have previously requested payment of third-party defendant United States' one-half share of this bill and will forward it to you as soon as possible after receipt of their check.

Sincerely yours,


Carroll E. Dubuc

/cjw
Enclosures

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY

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FINLEY, KUMBLE, WAGNER, HEINE & UNDERBERG
777 BRICKELL AVENUE
MIAMI, FLORIDA 33131
(305) 371-2600

March 29, 1983

James Turnbow, Ph.D.

FFAC/Kurth v. Lockheed Aircraft Corporation
Our file 68843.1036/1091

Dear Dr. Turnbow:

As the letterhead on this letter probably suggested to you, I left Haight, Gardner and joined Finley, Kumble, Wagner, Heine, Underberg, Manley & Casey on March 15, 1983. Several personnel key to the C-5A cases have joined me at Finley, Kumble. Aidan Jones is now a partner at Finley, Kumble; John Connors and Tom Almy have joined Finley, Kumble as associates; and Anne Kundert has moved over as the paralegal in charge of the C-5A cases. Mr. Almy continues to be the associate currently assigned to the C-5A cases.

In an effort to bring everyone up-to-date on the status of the C-5A surviving orphan cases, I am writing to each of our experts. As you are probably aware, we have settled all the remaining U.S. resident orphan cases as a group (except one) which is referred to as the "global" settlement. The foreign surviving orphan cases remain on appeal and, therefore, we do not know when there will be activity on those cases.

Dr. Turnbow
March 29, 1983
Page 2

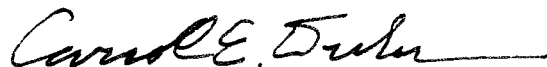
The one remaining U.S. case is the Kurth case. You may recall that there was a jury verdict for Lockheed in this case in February, 1982 and, as a result, it is not included in the global settlement. Judge Oberdorfer has now set this verdict aside and granted a new trial largely because he felt it was unfair to exclude Carly Kurth from the global settlement. However, Judge Oberdorfer also made certain evidentiary rulings which we and the government believe violate the clear agreement contained in the global settlement, thereby making it difficult, if not impossible, to individually settle or include Carly Kurth in the global settlement. The result is that Judge Oberdorfer has set a trial date of September 19, 1983 to retry the case. A re-examination of Carly Kurth and depositions of her teachers will occur after school lets out sometime in June.

Preparation and trial of this case will likely be done by Bruce Bagni, Esq. of the Justice Department and Thomas Almy, Esq. of my office. If you have not yet talked to one or both of these attorneys, they will be contacting you as trial preparations commence or if the circumstances change such that a settlement results. If you have any questions, please contact Mr. Almy at (202) 857-4000.

In the future, please direct all correspondence (including bills) to me at the above address.

Best regards.

Sincerely,



Carroll E. Dubuc

/tkd

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG & CASEY

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777 BRICKELL AVENUE

MIAMI, FLORIDA 33131

(305) 371-2600

June 1, 1983

Dr. James W. Turnbow

FFAC v. Lockheed Aircraft Corporation

Our file 68843-1036

Dear Dr. Turnbow:

Enclosed please find Check No. 52,746,592 in the amount of \$1,250.00 in payment of third-party defendant United States' one-half share of your bill dated January 16, 1982.

Defendant Lockheed's one-half share of this bill has previously been sent to you.

Best regards.

Sincerely yours,

Deborah A. MacDougall for CED

Carroll E. Dubuc

/dm

Enclosure

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG, MANLEY & CASEY

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777 BRICKELL AVENUE
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(305) 371-2600

August 16, 1983

Dr. James W. Turnbow

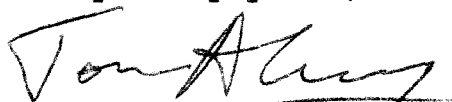
Kurth v. Lockheed Aircraft Corporation
Our file 68843.1091

Dear Dr. Turnbow:

Pursuant to our telephone conversation of October 16, 1983, please find enclosed a retainer check in the amount of \$1,000.00 in order to cover your expenses for the scheduled meeting on September 1, 1983, to discuss your testimony.

Best regards.

Very truly yours,


Thomas B. Almy
For the Firm

/dlm

Enclosure

cc: Bruce Bagni, Esq.

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG, MANLEY & CASEY

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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August 23, 1983

James Turnbow, Ph.D.

Kurth v. Lockheed Aircraft Corporation
Our file 68843.1091

Dear Dr. Turnbow:

Enclosed for your review are the recent depositions of three of Plaintiff's experts scheduled to testify at the upcoming Kurth trial: 1) Dr. Ta Liang (photogrammetrist); 2) John Carroll; and 3) Elwood Driver.

It is not necessary to bring these or any other bulky background items with you for your meeting here on Thursday morning, September 1, as we will have file copies available for your reference. I have made reservations for you at the Mayflower Hotel across the street at 1124 Connecticut Avenue for the nights of August 31 and September 1, guaranteed late arrival.

Very truly yours,

FINLEY, KUMBLE, WAGNER, HEINE,
UNDERBERG, MANLEY & CASEY

By *Anne Kundert*

Anne M. Kundert
Paralegal

/dlm
Enclosures

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG, MANLEY & CASEY

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September 13, 1983

James Turnbow, Ph.D.

Kurth v. Lockheed Aircraft Corporation
Our file 68843.1091

Dear Dr. Turnbow:

As promised by Tom Almy, enclosed are 5 x 7 prints of
Defendant's Exhibits D1364 and D1371.

Very truly yours,

FINLEY, KUMBLE, WAGNER, HEINE,
UNDERBERG, MANLEY & CASEY

By



Anne M. Kundert
Paralegal

/dlm
Enclosures

FINLEY, KUMBLE, WAGNER, HEINE, UNDERBERG, MANLEY & CASEY

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March 20, 1984

Edward Peter Bertero, Esq.
Senior Vice President
United States Aviation
Underwriters, Inc.
110 William Street
New York, New York 10038

Re: FFAC v. Lockheed: Guardian Ad Litem
Our File 68843.1036

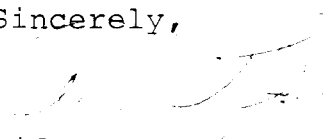
Dear Ed:

Enclosed is the Court of Appeals' Order denying rehearing of the January 13, 1984 guardian ad litem decision in these cases.

Rich Sharp will be writing you shortly concerning the merits, if any, of a petition for certiorari.

Best regards.

Sincerely,


Aidan D. Jones

Enclosure

cc: Robert P. Barton, Esq.
Mrs. Louis Turnbull