UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ANNE ANDERSON, et al.,

Plaintiffs,

v.

CIVIL ACTION No. 82-1672-S

CRYOVAC, INC., et al.,

Defendants.

MOTION OF W. R. GRACE & CO. FOR SUMMARY JUDGMENT (AND REQUEST FOR ORAL ARGUMENT THEREON)

Pursuant to Federal Rule of Civil Procedure 56, W. R. Grace & Co. ("Grace") doing business as Cryovac Division moves for entry of summary judgment dismissing plaintiffs' claims that they or their decedents either contracted leukemia or face an increased risk of leukemia as a result of exposure to (1) trichloroethylene, (2) tetrachloroethylene, and (3) 1, 2 trans-dichloroethylene.

In support of its motion, Grace relies upon its Memorandum of Law, the Affidavits of James H. Jandl, M.D., and William C. Moloney, M.D., filed herewith, and upon the entire record in this action, including plaintiffs' answers to Grace's interrogatories.

Grace believes that oral argument with respect to this motion may be of assistance to the Court and, therefore, requests



such argument and estimates that one hour will be necessary for both sides to be heard.

By its attorneys,

William J. Cheeseman / by

William J. Cheeseman
Robert S. Sanoff
Foley, Hoag & Eliot
One Post Office Square
Boston, Massachusetts 02109
(617) 482-1390

Dated: May 18, 1984