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700 BROADWAY • NEW YORK, N.Y. 10003

TEL. 212-558-5500

FAX 212-344-5461

WWW.WEITZLUX.COM

PERRY WEITZ  
ARTHUR M. LUXENBERG  
ROBERT J. GORDON II

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WEINTRAUB II JOSEPH R.  
WILLIAMS NICHOLAS  
WISE DENA YOUNG +  
ALLAN ZELIKOVIC  
GLENN ZUCKERMAN

\* Of Counsel  
Also admitted in CT \*  
Also admitted in FL #  
Also admitted in MA 11  
Also admitted in NJ §  
Also admitted in DC  
✓ Also admitted in NJ and CT  
\*\* Also admitted in NJ and PA  
+ Also admitted in DC, VA  
AA Also admitted in NJ and ME  
o Also admitted in DC, VA  
= Also admitted in CO  
\* Also admitted in TX  
0 Admitted only in CA  
Admitted only in NJ and PA  
+ Admitted only in NJ  
\* Admitted only in DC, MD, PA and VA  
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BY E-Mail  
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December 16, 2011

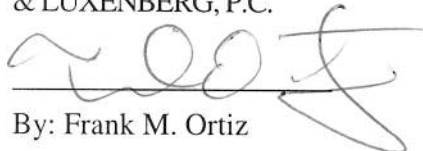
ATTN: Laraine Pacheco, Esq.  
Special Discovery Master, New York City Asbestos Litigation

Re: *All Asbestos Cases*, Index N<sup>2</sup> 40000/1988

Dear Ms. Pacheco:

I write pursuant to Paragraphs III(B) of the Amended Case Management Order governing the above-referenced litigation, to notify the Special Master and all other interested parties of plaintiffs' intention to raise an objection to, and appeal from, the Special Master's written recommendation dated December 14, 2011, concerning the discoverability of bankruptcy trust-related documents, and the scope of settlement, attorney-client and work product privileges in such context.

Respectfully submitted, WEITZ  
& LUXENBERG, P.C.

  
By: Frank M. Ortiz

cc: \*Defense Liaison Counsel

\*Any Defendant who does not accept service of this Notice by posting on nycal.net and e-mail to Defense Liaison Counsel may contact us for a copy by mail.

200 Lake Drive East, Suite 205 • Cherry Hill, NJ 08002 • (856) 755-1115 9025  
Wilshire Boulevard, 5th Flom; Beverly Hills, CA 90211 • (310) 689-6483 215  
South Monarch Street, Suite 202 • Aspen, CO 81611 • (970) 925-6101