

**PHILIP MORRIS U.S.A.**

**INTER-OFFICE CORRESPONDENCE**  
**120 PARK AVENUE, NEW YORK, NY 10017-5592**

**ABC Litigation: Privileged and Confidential -- Prepared for litigation**

**TO:** FSF Records Retention Coordinators **DATE:** March 8, 1995  
**FROM:** Norm Nembhard/Sales Administration  
**SUBJECT:** **Court Ordered Document Review -**  
**Response Required NLT March 9, 1995 at 11:00 am**

**Current Situation**

Under a court order in the Philip Morris vs. ABC case, the Company must make every effort to quantify the volume of documents relating to any nicotine-containing substances, including tobacco (but excluding unprocessed leaf tobacco). The court has ordered Philip Morris to reply on March 10, 1995. In order for our attorneys to meet this deadline, we need information from you **by 11:00 am tomorrow, March 9, 1995.**

**Key Issues**

How can we obtain the information our attorneys need by tomorrow?

**The Plan**

Here's what you need to do:

- Measure active Department records (excluding Human Resources files), in inches, for paper records.
- For other records (i.e., video tapes, diskettes, CDs), count each as one record.

Use the following items to obtain the measurement:

- 1) A ruler.
- 2) Your Record Retention Schedule.
- 3) The attached Record Volume by Category Form.

Then complete the Record Volume by Category Form to report the following information:

- A) Date.
- B) Number of man hours used **both to measure your files and complete the attached form.**
- C) Any costs associated with gathering this information (i.e., temporary help, faxes, copying, etc.)
- D) ALL category codes and titles from your Records Retention Schedule.
- E) The number of inches of active records.

When you have completed the Record Volume by Category form, please enter totals at the bottom of the form. Completed forms should be returned to my attention via MS Mail. **All forms must be received no later than Thursday, March 9, 1995, at 11:00 am EST.**

Please note that it is not necessary to copy any documents at this time.

We appreciate your efforts and thank you in advance for cooperating with this request under such short leadtime. If you require any further assistance or information, please call me at (212) 878-2033.

cc: F. Alfieri  
W. Iler

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