

216 781 0714

Docket S030
Ex. 14-1-6-2ZIEGLER, METZGER & MILLER LLP
ATTORNEYS AT LAW

ROBERT L. METZGER
WILLIAM L. SPRING
STEPHEN M. DARLINGTON
RICHARD T. SPOTZ, JR.
PAUL S. KLUG
HOWARD E. HENDERSHOTT, JR.
STEPHEN M. BALES
JOHN E. REDEKER
ANTHONY J. DAMELIO, JR.
JEFFREY L. KOBERG
CHRISTOPHER E. SOUKUP
JOSEPH W. KAMPHAN
MEGAN MADIGAN ROCHE
GLEN H. GARRETT
BRIAN J. GREEN

925 EUCLID AVENUE, SUITE 2020
CLEVELAND, OHIO 44115-1441
18001628-3300
12161781-5470
FAX 12161781-0714

HAROLD O. ZIEGLER (1899-1980)
ROGER L. METZGER (1907-1981)

OF COUNSEL:
WILLIAM L. ZIEGLER

RETIRED:
IVAN L. MILLER

PEPPER PIKE OFFICE
30100 CHAGRIN BLVD., SUITE 222
PEPPER PIKE, OHIO 44124-5705

February 10, 1999

VIA FACSIMILE 011 44 117 925-4555

Mr. Hugh Pratt
Load Monitor, Ltd.
Commercial Road
Bristol BS1 6TG ENGLAND

RE: Load Insulator

Dear Hugh:

Per our telephone conversation of Tuesday, February 9, 1999, I wanted to reiterate in writing the thoughts which I expressed to you in that conversation.

Now that the Load Insulator is available on the market, the failure of crane manufactures, crane operators, or other crane users to use and employ the Load Insulator may result in litigation being filed, not only based on claims of negligence but based upon claims of intentional tort. Since this safety device is now available and crane manufacturers and users are aware of its availability each has chosen to make an assertive decision not to use this device. That knowing decision could form the basis of a claim for an intentional tort. An intentional tort action, if successful, would not be underwritten by an insurance company and the payment of any damages arising from the intentional tort would have to be paid by the manufacturer/owner operator. Additionally, this award would not be dischargeable in bankruptcy.

This situation may be similar to litigation spawned 20-25 years ago against major car manufacturers for their failure to install seatbelts in all automobiles. I hope that the industry accepts the Load Insulator as readily as the automobile industry accepted seatbelts.

Very truly yours,



John E. Redeker

JER/cmh

216 781 0714

ZIEGLER, METZGER & MILLER LLP

ATTORNEYS AT LAW

THE HUNTINGTON BUILDING

925 EUCLID AVENUE, SUITE 2020

CLEVELAND, OHIO 44115-1441

1800) 528-3300

(216) 781-5470

FAX (216) 781-0714

HAROLD O. ZIEGLER (1899-1980)
ROGER L. METZGER (1907-1981)

RETIRED:
WILLIAM L. ZIEGLER
IVAN L. MILLER

PEPPER PIKE OFFICE
30100 CHAGRIN BLVD., SUITE 222
PEPPER PIKE, OHIO 44124-3705

ROBERT L. METZGER
WILLIAM L. SPRING
STEPHEN M. DARLINGTON
RICHARD T. SPOTZ, JR.
PAUL S. KLUG
HOWARD E. HENDERSHOTT, JR.
STEPHEN M. BALES
JOHN E. REDEKER
ANTHONY J. DAMELIO, JR.
JEFFREY L. KOBERG
CHRISTOPHER E. SOUKUP
JOSEPH W. KAMPMAN
MEGAN MADIGAN ROCHE
GLEN H. GARRETT
BRIAN J. GREEN
SUZANNE E. ARNOLD

June 1, 1999

VIA FACSIMILE 011 44 117 925-4555

Mr. Hugh Pratt
Load Monitor, Ltd.
Commercial Road
Bristol BS1 6TG ENGLAND

RE: Load Monitor, Inc.

Dear Hugh:

Per our telephone conversation, this letter will confirm my belief that there exists more potential liability for the sale of industrial tires than for the sale of your Load Insulator. My conclusion is primarily based upon the number of units available in the market place, the close proximity to which people may be to tires which could explode, and the numerous opportunities for improper, incorrect, installation, inflation or maintenance of those tires.

If you have any questions, please call me.

Very truly yours,

John E. Redeker

JER/cmh