

EXHIBIT 22

From: Christina Skubic
To: RPoole@braytonlaw.com
Date: 3/23/2006 9:34 AM
Subject: Re: Fwd: URGENT MATTER- KANANIAN CASE

Please get the default brief and the newly proposed amended form to arb and cea to approve. thanks

>>> Ryan Poole 03/23/06 9:26 AM >>>

We didn't refer to HPNSY, but we did use the POPE, based on it being built and FEDSHI.

>>> Christina Skubic 3/22/2006 9:27 PM >>>

Attached is the default prove up brief. We relied deposition testimony from Harry that got on the General John Pope at Hunters Point where to go to the Philippines and his testimony regarding exposure from pipes overhead his sleeping berth.

If I am remembering your information collected correctly, we didn't put this in the revised draft of the Manville claim because we couldn't find evidence of the POPE actually undergoing any repairs at HPNSY. Can you please confirm and we can respond to the group. Thanks

>>> Chris Andreas 3/22/2006 8:57:19 PM >>>

Has anyone cross referenced what we submitted for the WMAC default in this case? I have to assume that the defense has gone and copied whatever is in the file at SFSC.

>>> Al Brayton 3/22/2006 7:22 PM >>>

this is OK by me

>>> Ryan Poole 3/22/2006 7:19:19 PM >>>

Attached is the updated MANVLL claim form for Kananian. I have included the depo excerpt of Peter Cerka, an apprentice pipefitter at FEDSHI (builder of the ADM JOHN POPE), in which he states that he distributed MANVLL products to all shipyard workers from a store room at the facility. I could not locate testimony of anyone installing the products directly on board the ship. The Cohen re-entrainment dec is also included. CCS has reviewed.

CEA- Please review and approve before I send to the trust. Thanks.

>>> Christina Skubic 3/22/2006 4:01:56 PM >>>

MANVILLE: An amended claim can be filed w/ the new information- we will have to rely on exposure on the General John Pope although CEA says:
"He shipped out on a troop transport ship (JOHN POPE) from HPNSY in March of 1945 to the Philippines, spending no time in the shipyard and certainly doing no work on the ship. He was exposed to insulation on the ship by virtue of sleeping below insulated pipes that rattled. The voyage to the Philippines was 10 days in duration."

Our best shot is to use the Cohen reentrainment declaration but there is no guarantee that it will work. I want to confirm that you want to proceed w/ the amended claim or consider withdrawing.

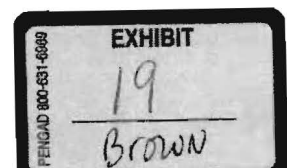
BETHST. I filed a form 10 and the debtor filed an omnibus objection that I responded to. In response I submitted the face page of the complaint, his verified SACROGS, the MPID report w/ ID of the General John Pope at Beth Steel Shipbuilding and HPNSY and the SPH report. The omnibus objection was continued and the liquidating trustee settled. We are to get the funds sometime in April. Is there anything we need to fix here? If so, how on earth would we go about it? Jack Kananian was not questioned about the response to the objection at his depo, only the Form 10.

>>> Al Brayton 3/22/2006 1:51 PM >>>

On Manville, simply re-do the old claim form with the new answers and submit with a cover letter. Do not call them. Do not do under new TDP. Type "Amended" on the top of the old claim form.

Western Default -

Fraud to try
& cover up
Western Fraud



>>> Christina Skubic 3/22/2006 1:08 PM >>>

Re: MANVILLE: We will do the amended Manville form today once we identify the inaccuracies. The new claim form is completely different and governed by an entirely new TDP. We can re-do the old claim form with the new answers and submit w/ a cover letter or call them and find out how they want to run a new CDT and get us a new offer based on the new info. The payment percentage is also different than in 2000 (then 10%, now 5%).

Re: BETHST CEA- please confirm what exactly they are offering as far as a BETHST "claim form" My records show that we only submitted a Form 10 (attached) and that after the liquidating trust pays out (which they haven't done yet) he will only get approx \$80.00. I don't see any inaccuracies on the BETHST Form 10. Let me know if they have additional documentation.

>>> Al Brayton 3/22/2006 12:51 PM >>>

I want to do an amended claim form for JM and BETHST that is painstakingly accurate, send it to the Trusts, and tell them that if it changes their analysis or award we will remit any excess payment. They say I signed JM and you signed BETHST.

Jim Early is going to do the same thing. Can you have someone email him the deposition transcript in this case this afternoon?

>>> Christina Skubic 3/22/2006 12:45 PM >>>

Ryan and I are reviewing the JM claim form now for inaccuracies line by line. The claim form was filed in April of 2000. The staff person that filed this claim is no longer with us. All BK staff have been extensively briefed on drafting job descriptions since the defendants began obtaining these claim forms last year. No one is making descriptions up and the "generic" language that was incorporated into claim forms in the past is no longer used

We will get you the details of the Manville claim shortly

>>> Al Brayton 3/22/2006 11:37 AM >>>

These are serious allegations.

Please let me know, if you can, how the inaccurate information got into the claim forms that we prepared, and where it came from.

Immediately brief all personnel preparing claim forms or deficiency responses that they are not to "make up" information to make a claim qualify. If we can't qualify by arguing on the legitimate inferences (including reentrainment and exposure from pipes in berthing spaces while being transported on a ship) we won't file a claim. I know it was probably someone just trying to help, but we don't need this kind of help, and we will not tolerate it.

>>> Chris Andreas 3/22/2006 9:52 AM >>>

Al,

I need to speak with you asap about Kananian.

Some weeks back, I advised that the bankruptcy claim forms submitted by Early Ludwick & Sweeney, as well as the JM and BETH claim forms submitted by BP were coming into evidence in this case as adoptive admissions. I sent a lengthy e-mail on the subject attaching the claim forms at issue.

I advised at that time that the ELS claim forms are rife with outright fabrications regarding the decedent Harry Kananian's exposure to asbestos. The JM form we submitted is not as bad, but also inaccurate, describing Mr. Kananian as a laborer and shipyard worker during certain periods of WWII, when in reality he was a US Army rifleman.