

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

PENNSYLVANIA DEPARTMENT OF GENERAL
SERVICES, PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION, PENNSYLVANIA PUBLIC
UTILITY COMMISSION, PENNSYLVANIA
EMERGENCY MANAGEMENT AGENCY, AND
PENNSYLVANIA DEPARTMENT OF STATE

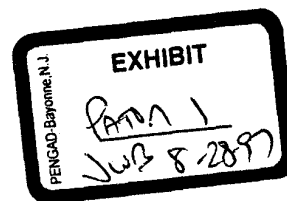
Plaintiffs,

vs.

UNITED STATES MINERAL PRODUCTS
COMPANY, CERTAINTIED CORPORATION,
COURTAULDS AEROSPACE, INC.,
CHEMREX, INC., PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION, ADVANCE
TRANSFORMER COMPANY and
MONSANTO COMPANY

Defendants.

NO. 284 M.D. 1990



DEPOSITION NOTICE

TO: Thomas M. Goutman, Esq.
WHITE & WILLIAMS
1800 One Liberty Place
Philadelphia, PA 19103-7395
Counsel for Monsanto

PLEASE TAKE NOTICE that pursuant to Pa.R.C.P. No. 4007.1(e), defendant is
requested to produce the person most knowledgeable about:

1. the manufacture of PCBs during period 1950-1982; and
2. the sale or supply of PCBs or PCB containing materials during the years 1950
until 1986 inclusive, to any of the following entities:

- A. Certainteed Corporation;
- B. Gustin Bacon Manufacturing Company;
- C. Courtaulds Aerospace, Inc.;
- D. Products Research and Chemical Company;
- E. Products Research Corp.;
- F. Chemrex, Inc.;
- G. Sonneborn Building Products Division;
- H. Philips Electronics North America Corporation; and
- I. Advance Transformer Company.

3. the sale or supply of PCBs or PCB containing materials to distributors or suppliers who sold or supplied PCBs or PCB containing materials to any of the following entities:

- A. Certainteed Corporation;
- B. Gustin Bacon Manufacturing Company;
- C. Courtaulds Aerospace, Inc.;
- D. Products Research and Chemical Company;
- E. Products Research Corp.;
- F. Chemrex, Inc.;
- G. Sonneborn Building Products Division;
- H. Philips Electronics North America Corporation; and
- I. Advance Transformer Company.

4. The purpose of PCBs in the product or manufacturing process of any product manufactured by one of the following companies:

- A. Certainteed Corporation;
- B. Gustin Bacon Manufacturing Company;
- C. Courtaulds Aerospace, Inc.;
- D. Products Research and Chemical Company;
- E. Products Research Corp.;
- F. Chemrex, Inc.;
- G. Sonneborn Building Products Division;
- H. Philips Electronics North America Corporation; and
- I. Advance Transformer Company.

The deposition will take place before a notary public or some other person authorized to administer oaths at the offices of Thomas W. Henderson, Suite 3975, One Oxford Centre, 301 Grant St., Pittsburgh, Pennsylvania, 15219. The deposition will begin at 9:00 a.m. on Friday, July 25, 1997, and will continue thereafter from day to day, until completed or adjourned.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of _____, 1997, I caused to be served a true and correct copy of the foregoing upon all counsel of record as listed below via first-class United States mail, postage prepaid:

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