

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

PLAINTIFF'S EXHIBIT

DOW-2888

Dale and Emily Owen,	)	C.A. No: 8:96-360-3
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	AFFIDAVIT OF WILLIAM A.
The Dow Chemical Company,	)	GROENING, JR.
	)	
Defendant.	)	

AFFIDAVIT OF WILLIAM A. GROENING, JR.

I, William A. Groening, Jr., being sworn, state the following:

1. My name is William A. Groening, Jr. I am older than 18 years of age and I am, in all ways, qualified to testify. I am testifying from my own personal knowledge.
2. I was employed by The Dow Chemical Company ("Dow") and worked in Dow's Legal Department as an attorney continuously from January 4, 1937 until I retired on November 30, 1977. I served as Dow's General Counsel from January 1968 until May 1977.
3. In 1958, in my capacity as Dow's Assistant General Counsel, I participated in drafting the agreement between Dow and BASF Overseas N.V. ("BASF") to form The Dow-Badische Chemical Company, Inc. ("Dow-Badische"). From 1958 until I retired in 1977, I received and was responsible for maintaining for Dow copies of Dow-Badische's Board of Director and Shareholder meeting minutes. To the best of my

