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<u>TAB NO.</u>	<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>
1	9, pp. 21-45	Doctors warned Monsanto and Westinghouse of toxicity of PCBs.
2	9, pp. 46-56	Monsanto knew of the toxic effects of PCBs and that its employees had exhibited symptoms of toxic exposure thereto.
3	9, pp. 57-58	Monsanto knew that Aroclors (PCBs) were "toxic" and expressed concern of its liability if an action were to reach a jury.
4	9, pp. 78-79	Despite knowledge of PCBs' toxicity, Monsanto's corporate development committee set a target of a twenty-fold increase for the sale of Therminol (PCB heat transfer fluid) within the next four years.
5	9, pp. 80-82	Despite knowledge of PCBs' toxicity, Monsanto disparages environmental reports that PCBs are "a menacing new pollutant" and unjustly criticizes Swedish and American scientists who characterize PCBs as "highly toxic."
6	9, pp. 83-84	Monsanto begins a campaign to "disguise" the serious ramifications of PCB exposure and the problems related to disposal to satisfy the "pollution people."
7	9, pp. 85-86	Despite knowledge of PCBs' toxicity, Monsanto's Corporate Development Committee expanded facilities in Anniston, Alabama for solid PCB production.
8	10, pp. 88-89	Monsanto and Westinghouse knew that chloracne "could be an indication of more serious systematic injury if exposure was allowed to continue."

- 9 9, pp. 90-91 Monsanto's own medical director, Dr. R. Emmet Kelly, writes in an internal letter: "This brings us to a very serious point. When are we going to tell our customers not to use any Aroclor in any paint formulation that contacts food, feed, or water for animals or humans? I think it is very important that this be done. It may be that some of the customers will assure themselves on the basis of nonextractability that a particular formulation might be safe but I think we should make a blanket recommendation against these uses. All in all, this could be quite a serious problem, having legal and publicity overtones." (Emphasis added.)
- 10 9, pp. 100-115 Monsanto recognizes the persistence of PCBs in the environment as "a very real problem."
- 11 9, pp. 130-140 In January 1972, Monsanto took the unprecedented step of selling PCBs to Westinghouse and GE only if they agreed to fully indemnify and hold Monsanto harmless from any and all claims relating to PCB liability.
- 12 9, pp. 143-145 In March 1972, Monsanto's Japanese affiliate informs Monsanto in the United States that the "grand funeral of PCB in Japan is close at hand."
- 13 9, pp. 148-153 Despite its knowledge of the toxicity of PCBs, Monsanto informs the EPA that PCBs pose less of an acute toxic health hazard than many substances not proposed on the EPA's list.
- 14 9, pp. 154-173 Defendants meet and manipulate data in an effort to achieve their purpose of forestalling the regulation of PCBs. Attending the meeting was Monsanto's manager of toxicology Paul L. Wright who discussed acute and chronic toxicity of PCBs (and who now takes the fifth amendment when asked about PCBs.)

23	10, pp. 86-87	Westinghouse knew that respirators should be used to protect workers when PCB vapors exceed the Maximum Allowable Concentrations.
24	10, pp. 88-89	Monsanto and Westinghouse knew that chloracne "could be an indication of more serious systemic injury if exposure was allowed to continue."
25	11, PP. 25-26	GE fraudulently instructed its utility customers that "[t]ransformer Pyranol (PCBs) may be handled in the same manner as mineral oil."
26	11, pp. 62-72 <i>Exhibit 2 A 3</i>	Letter reveals GE's full awareness of toxicological problems of PCBs in minute (pico-gram) quantities.
27	11, pp. 73-79	While continuing to maintain that Pyranol "can be handled in the same manner as mineral oil," GE nonetheless acknowledges that Pyranol is "highly toxic" if ingested and moderately toxic if inhaled.
28	24	Westinghouse's position that there is no contamination.
29	26	Paul Wright refuses to testify re: falsification.
30	29	Monsanto's suit versus its insurance carriers.
31	30	Westinghouse's Complaint against its insurers (its insurance carriers); see especially ¶ 101 in this document which shows Westinghouse conducted sophisticated tests re: PCB contamination that spread from its plants and disposal sites and determined that PCBs could be getting into the human food chain. Westinghouse hid this information from local, state and federal agencies who conducted their own PCB investigation in 1976.
32	36	This is supposed to relate to Exhibit 30 above (tab no. 31), but it appears to be an unrelated affidavit of John McCarthy.

33	pp. 25-25	General Electric fraudulently instructs that Pyranol may be handled in the same manner as PCBs.
34	pp. 62-72 <i>Removed from file in 1981. 12 1 80</i>	Letter revealing General Electric's full awareness of toxicological problems of PCBs in minute quantities.
35	pp. 73-79	General Electric still says Pyranol can be handled as a mineral oil but says it is highly toxic if ingested, moderately toxic if inhaled.
36	13	Monsanto falsified toxicological tests.
37	pp. 7-21	General Electric's interrogatory to Nevada Power Company requesting identification and explanation of expenses for the removal, replacement refitting and/or disposal of all PCB transformers, PCB capacitors and other PCB electrical equipment owned by Nevada Power Company.
38	pp. 1 - 4 ; article	Notes to September 1937 article by Drinker, et al.; article which appeared in The Journal of Industrial Hygiene and Toxicology entitled "The Problem of Possible Systemic Effects from Certain Chlorinated Hydrocarbons."