Defendant Pharmacia Corporation's Preliminary Exhibit List
Marty Paulson, et al., v. Pharmacia Corporation, et al.

Fergus County Cause No. DV-05-55

Defendant Pharmacia Corporation ("Pharmacia") submits the following list of exhibits, which may be used in the trial of this case. The identification of any document on this list does not constitute a waiver by Pharmacia of objections to authenticity or admissibility. Pharmacia specifically reserves the right to use demonstrative exhibits at the trial of this action in conjunction with certain witnesses.

Moreover, certain discovery has not been provided to Pharmacia; namely the deposition of Plaintiffs' expert witness Michael Nicklin and certain documents requested in Pharmacia's Third Request for production of Documents, served on November 5, 2007. Due to this ongoing discovery, Pharmacia reserves the right to supplement this exhibit list to include any potential documents related to this discovery.

Finally, depending upon the pre-trial submissions of Plaintiffs and Defendant Montana Department of Fish Wildlife & Parks, and depending upon any further rulings of this Court, Pharmacia reserves the right to supplement this exhibit list depending upon the remaining issues for trial. Pharmacia further reserves the right to use or seek introduction into evidence any document listed by any other party.

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
		Documents from Papageorge Notebook A								
1001	May 1982	PCB Production History Fact Sheet	MONS 002321 – MONS 002323							
1002	1965	LKB 9000 Gas Chromatograph – Mass Spectrometer	MON-MT-008538 - MON-MT-008545	Same as P's 41						
1003	1966	What's new about the CH4B	MON-MT-008546 – MON-MT-008547							
1004	12/01/66	Memo re letter received from Ola Palm in Stockholm	MON-MT-008548							
1005	11/28/66	Letter to D. Wood, Monsanto Europe	MONS 090078; MONS 0900521; MONS 090080	Same as P's 45						
1006	12/08/66	Memo	MON-MT-008549							
1007	12/29/66	Letter	MONS 089196; MON-MT-008550 – MON-MT-008552	Letter is the same as Ps 42						
1008	02/13/67	Memo to R. Emmet Kelly, M.D. with attachments	MONS 097089 – MONS 097090; MONS 030213; MONS 031518							
1009	02/20/67	Letter to The Government Chemist, London	MON-MT-008553							
1010; 1010.1	02/21/67	Memo to Dr. R. Emmet Kelly, St. Louis attaching Organochlorine Pesticides in th Atmosphere	MONS 096494; MON-MT-008554 – MON-MT-008558							
1011, 1011.1; 1011.2	02/22/67	Memo with attachments (Rising & Strand letter & Jensen's presentation notes.)	MON-MT-008559; MONS 090516 – 518; MONS 049048 – MONS 049073							
1012	02/23/67	Memo to Monsanto Europe D.V.N. Hardy	MON-MT-008560							
1013	02/27/67	Letter to Gene Wilde, Monsanto US	MONS 088147 – MONS 088149							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1014	02/27/67	Memo to D.V.N. Hardy Monsanto Europe	MON-MT-008561							
1015	03/03/67	Memo	MONS 097917							
1016	03/31/67	Outbound Shipping Report	MON-MT-008562							
1017	10/67	Article	MON-MT-008563 – MON-MT-008569							
1018	10/67	Chlorinated Hydrocarbons in British Wildlife	MON-MT-003220 - 003222							
1019	11/06/67	Letter to Monsanto Europe, D.V.N. Hardy	MONS 088145							
1020	Est. 01/68	Memo	MON-MT-008570 – MON-MT-008575							
1021	07/18/68	Memo	MONS 035945 – MONS 035946							
1022	01/08/68	Memo	MONS 096496 – MONS 096497							
1023, 1023.1	01/16/68 02/15/68	Correspondence	MONS 089193; MON-MT-008576	First letter is same as P's 46						
1024	02/68 – 06/68	Correspondence	MON-MT-008577 – MON-MT-008593							
1025	June 1968	Correspondence	MON-MT-008594 – MON-MT-008597							
1026	07/29/68 08/12/68	Letter to Dr. Joseph C. Calandra Memo	MON-MT-008598 – MON-MT-008601							
1027	Aug./Sept. 1968	Memos, Purchase Order	MONS 034702 – MONS 034704; MON-MT-008602 – MON-MT- 008604							
1028	10/09/68	Memo	MON-MT-008605							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1029	Dec. 1968	Memo Correspondence to Dr. Joseph C. Calandra	MONS 096503; MON-MT-008606 – MON-MT-008607							
1030, 1030.1	03/03/69	Correspondence	DSW 009612 – DSW 009614; MCL000004							
1031	03/03/69	Statement from Monsanto Company, St. Louis, MO	MON-MT-008608 – MON-MT-008611							
1032	03/07/69	Memo	MONS 096515 – MONS 096516							
1033	03/18/69	Correspondence to Professor Gunnar Widmark	MON-MT-008612 – MON-MT-008613							
1034	04/15/69	Correspondence to Dr. Joseph Calandra	MONS 087804; MONS 072197							
1035	04/30/69	Memo re Biodegradation of Aroclors	MONS 097696 – MONS 097697							
1036	06/12/69	Notes from part of European Trip	MONS 034748 – MONS 034758							
1037	08/19/69	Correspondence to Monsanto, Elmer Wheeler	MON-MT-008614 – MON-MT-008616							
1038	08/25/69	Memo	MON-MT-003319							
1039	10/27/69	Memo	MON-MT-003393							
1040	10/30/69	Memo	MON-MT-003394; MON-MT-003397 – MON-MT-003400							
1041	11/24/69	11/17/69 Meeting minutes	ADM 006027 – ADM 006029							
		Documents from Papageorge Notebook B								

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1042	02/09/70	Letters to dielectric, Pydraul & Therminol FR customers	MCL000005 – MCL000012							
1043	02/19/70 02/27/70	Letters to plasticizer distributors and direct plasticizer customers & memo re mailing	MONS 089789 – MONS 089790; MCL000108 – MCL000118 MCL000120 MON-MT-008730 MCL000119 MCL000121 - MCL000129							
1044	03/70	Letter, Agenda, Attendance List	MON-MT-008617 – MON-MT-008623							
1045	03/70	Technical Bulletin O/PL-306A	MON-MT-000844 – MON-MT-000860							
1046	04/01/70	March Summary	MON-MT-008624							
1047	04/10/70	News for Release	MON-MT-008731 – MON-MT-008733							
1048	04/20/70	Minutes of Meeting of the Corporate Management Committee	MON-MT-008625 – MON-MT-008627							
1049	04/29/70	April Summary	MON-MT-008628 – MON-MT-008629							
1050	04/29/70	Correspondence	MCL000168 – MCL000175							
1051	04/13/70 04/30/70 05/01/70 05/04/70	Memos/ Environmental stick-on label Environmental Warning labels	DSW 280762; MON-MT-008630 – MON-MT-008635 MONS 087540 MON-MT-008736							
1052	05/11/70	Minutes of Meeting of the Corporate Management Committee	MON-MT-003504 – MON-MT-003505							
1052A.1	5/11/70	Letter to American Mineral Spirits	MON-MT-008737 – MON-MT-008739							
1052A.2	5/11/70	Letter to Central Solvents	MON-MT-008740 – MON-MT-008742							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1053	05/25/70 06/01/70	Letters to plasticizer distributors and customers & memo re mailing	MON-MT-008734 – MON-MT-008735 MCL000202 – MCL000212							
1054	05/27/70	May Summary	MON-MT-008636 – MON-MT-008637							
1055	06/08/70	Correspondence re Therminol	MCL000224 – MCL000225							
1056	06/30/70	June Summary	MON-MT-008638							
1057	07/14/70	Memo	MON-MT-008639							
1058	07/16/70	News for Release	DSW 011906 – DSW 011909							
1059	08/06/70	Correspondence re MCS 1016	MCL000392 – MCL000396							
1060	08/14/70	Correspondence re plasticizers	MCL000440 – MCL 000461 MCL000209 – MCL000212							
1061	08/27/70	Memo with attached letter from EDF dated 08/24/70	MON-MT-008640 – MON-MT-008641							
1062	09/14/70	Minutes of Meeting of the Corporate Management Committee	MON-MT-008642 – MON-MT-008644							
1063	03/08/71	Minutes of Meeting of the Corporate Management Committee	MON-MT-003541 – MON-MT-003543							
1064	09/05/71	For Release	MON-MT-008645 – MON-MT-008647							
1065	09/27/71	Correspondence re plasticizers	MON-MT-008648							
1066	09/29/71	Memos	MON-MT-008649 – MON-MT-008659							
1067	10/04/71	FDA Opposes PCB Ban, Takes Issue to the Press	MONS 031870 – MONS 031875							
1068	12/06/71	Action Plans for PCBs	MON-MT-008660 – MON-MT-008662							
1069	12/71	List of Attendees; Agenda	MON-MT-008663 – MON-MT-008676							

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Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1070	04/72	Report – Oak Ridge National Laboratory	MON-MT-008677 – MON-MT-008698							
1071	10/13/76	Memo	MON-MT-008699							
1072	05/72	Report	DSW 010011 – DSW 010203							
1073	03/18/75	Article	MON-MT-008700 – MON-MT-008708							
1074	12/26/75	Correspondence	MCL003071 – MCL003079							
1075	10/04/76	Correspondence	MCL003093 – MCL003101							
		Documents from Papageorge Notebook C								
1076	1967	Documents under the tab labeled 1967 in Notebook C are duplicates of documents also included in Notebook A and are listed above as documents 1009, 1014, 1015, 1016, and 1019, 1022, 1023, 1024, 1025, 1028, 1032, and 1037								
1077	1968	Documents under the tab labeled 1968 in Notebook C are duplicates of documents also included in Notebook A and are listed above as documents, 1022, 1023 , 1024, 1025, 1028 , 1032, and 1037								
1078	1969	Documents under the tab labeled 1969 in Notebook C are duplicates of documents also included in Notebook A and are listed above as documents 1032, and 1037								
1078A	04/10/69	Samples enclosed	MON-MT-008709							
1079	01/28/70	Letter sending method for analysis of water & sediment	MONS 089201							
1079.1	02/12/70	Samples enclosed	MON-MT-008710							
1079.2	03/18/70	Nationwide program	MONS 098460							

PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1079.3	March/April 1970	Correspondence	MON-MT-008711 – MON-MT-008712							
1079.4	04/27/70	Methods enclosed	MON-MT-008713							
1079.5	05/15/70	Aroclor information enclosed	MON-MT-008714							
1079.6	06/01/70	Methods enclosed	MON-MT-008715							
1079.7	06/05/70	Samples enclosed	MON-MT-008716							
1079.8	09/17/70	Chronic toxicity & reproductive studies	MON-MT-008717							
1079.9	09/22/70	Shipment of Aroclor	MONS 090705							
1079.10	09/30/70	Receipt of analytical methodology	MON-MT-008718							
1079.11	10/26/70	Isomers enclosed	MON-MT-008719							
1079.12	11/10/70	Receipt of isomers	MON-MT-008720							
1080	12/06/71	News releases & articles enclosed	DSW 09979 – DSW 09980							
1081	03/06/72	Sample enclosed	DSW 171889							
1081.2	03/07/72	Response to invitation to work session	DSW 010005							
1081.2	05/24/72	Sample enclosed	DSW 010334							
1081.3	05/31/72	Methodology enclosed	DSW 010335							
1081.4	06/01/72	Sample enclosed	DSW 010336							
1081.5	06/02/72	Sample enclosed	DSW 010337							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1081.6	07/10/72	Sample enclosed	DSW 010350							
1081.7	07/11/72	Articles enclosed	MON-MT-008721							
1081.8	07/19/72	Samples enclosed	MON-MT-008722							
1081.9	08/31/72	Response to request for information	DSW 010356 – DSW 010357							
1081.10	11/16/72	Sample enclosed	DSW 010366							
1081.11	11/28/72	Sample enclosed	DSW 010367							
1081.12	11/30/72	Information enclosed	DSW 010368							
1082	01/25/73	Sample enclosed	DSW 010373							
1082.1	02/15/73	Request for sample	DSW 010374							
1082.2	03/12/73	Request for sample	DSW 010379							
1082.3	03/12/73	Information enclosed	DSW 010378							
1082.4	03/20/73	Request for sample	DSW 010380							
1082.5	04/02/73	Incineration information	DSW 010383							
1082.6	06/22/73	Information enclosed	DSW 010388							
1082.7	09/05/73	Literature enclosed	DSW 010733							
1082.8	12/18/73	Request for sample	DSW 011345							
1083	01/10/74	Request for sample	DSW 011346							
1083.1	06/17/74	Information enclosed	MON-MT-008723							
1083.2	07/30/74	Report enclosed	DSW 011739							

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1084	01/29/75	Information enclosed	MON-MT-008724							
1084.1	06/05/75	Information enclosed	DSW 011758							
1084.2	06/05/75	Information enclosed	MON-MT-008725							
1084.3	08/29/75	Information enclosed	DSW 011805							
1084.4	09/04/75	Information enclosed	DSW 011834							
1084.5	10/02/75	Information enclosed	MON-MT-008726							
1084.6	10/07/75	Sample Request form enclosed	DSW 011893							
1084.7	10/08/75	Information enclosed	MON-MT-008727							
1084.8	10/16/75	National Conference	DSW 011899							
1084.9	10/17/75	Information enclosed	MON-MT-008728							
1084.10	11/05/75	Information enclosed	DSW 011927							
1084.11	11/06/75	Information enclosed	MON-MT-008729							
1085	01/14/76	Opening remarks	MCL003078 – MCL003079							
1086	03/28/77	Information enclosed	DSW 012822 – DSW 012823							
1086.1	04/13/77	Information enclosed	DSW 012824							
		Documents from Papageorge Notebook D								
1087	02/09/70	Monsanto (Donald A. Olson) letter to Distribution list	MCL 000005 – 12; MCL000013 – 92							
1088	02/19/70	Monsanto (W.E. Schalk) letter to Great Western Chemical Company Monsanto (W.E. Schalk) letter to plasticizer distributors and memo	MONS 089789 – 089790; MCL000108 - 118; MCL000119							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1089	04/29/70	Monsanto (W.E. Schalk) letter to Great Western Chemical Company	MCL000168 – 169							
1090	05/11/70	Monsanto (W.E. Schalk) letter to plasticizer distributors	MON-MT-008737 – 39; MON-MT-008740 – 42							
1091	05/25/70	Monsanto (W.E. Schalk) letter to Great Western Chemical Company; Monsanto letter to plasticizer distributors; memo	MON-MT-008734 – 735; MCL000202 – 207; MCL000208							
1092	06/11/70	Monsanto letter (N.T. Johnson) re Pydrauls containing PCBs and distribution list	MCL000311 – 312; MCL000313 – 391							
1093	07/31/70	Monsanto (A.W. Hempelmann) letter to Great Western Chemical Company	MON-MT-008744							
1094	08/14/70	Monsanto (Walter E. Schalk) letter to plasticizer distributors with attachments, memo; Monsanto (Walter E. Schalk) letter to direct plasticizer customers with attachment and distribution list	MCL000440 – 441; MCL000461; MCL000397 – 415; MCL000416 – 439.							
1095	08/27/70 09/23/70	Monsanto (Walter F. Waychoff) letter re plasticizers with attachments and distribution lis	MCL000544 – 586; MCL000587 – 610							
1096	01/04/71	Monsanto (Frances Stupfell) memo	MON-MT-008745							
1097	02/01/71	Monsanto (C.L. Baradford) letter re Pydrauls & distribution list.	MCL000723, MCL000724 - 798							
1098	09/27/71	Monsanto (W.E. Schalk) letter to Great Western Chemical Co. with attachment; Monsanto (W.E. Schalk) letter to Aroclor customers; distribution list.	MON-MT-008743; MCL000861, MCL000862 - 882							
1099	12/31/71	Monsanto (W.E. Schalk), letter re plasticizers; distribution list	MCL001313; MCL001314 - 1342							
1100	12/07/72	Monsanto (W.N. Maddox) letter to Great Western Chemical	MON-MT-008746 - 8747							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
		Other Documents from Papageorge Deposition 05/17/07								
1101	1953	The Aroclor Compounds	DSW 263701-763754							
1102	10/11/1971	The Menace of PCB	MONS 031710							
1103	9/28/1970	Memo listing analyses on PCB & analysis by the Bureau of Commercial Fisheries	MON-MT-008748 - 8767							
		Additional Exhibits								
1104	4/12/04	Todd Phillips Opinion of Value for Burleigh Angus Ranch								
1105	3/18/06	Barta Appraisal for Burleigh Angus Ranch	MTPLF-004608 - 004699							
1106		Witness drawing of property								
1107	10/17/95	Barta Appraisal for Burleigh Angus Ranch	MTPLF-001595 - 001729							
1108		Montana Cadastral Mapping Information for Paulson property								
1109	4/30/04	Loan documents for Paulson property								
1110		Photo of 915 3rd Avenue South								
1111		Photo of 913 3rd Avenue South								
1112		Photo of boundary line between 913 & 915 3rd Avenue								
1113	9/22/04	Class representative response to Pharmacia's First Interrogatories								
1114		List of proposed class members								
1115	9/30/04	Class representative response to Pharmacia's First Requests for Production								
1116	9/7/04	Class Action Agreement								
1117	4/30/2004	Refinance/Settlement Statement								
1118	4/30/04	Uniform Residential Loan Application								
1119	3/10/06	Plaintiffs' Reply in Support of Motion for Protective Order								
1120		Montana Cadastral Mapping Information for Felton property								
1121	12/5/97	Felton's Title Insurance Policy								

PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1122	4/18/04	Great Falls Tribune – Hatchery Cleanup to put dent in fish populations statewide								
1123	7/27/04	Plaintiffs' Motion for Order for Class Certification								
1124		Montana Cadastral Mapping Information for Haugen property								
1125		Haugen buy/sell Agreement; title insurance documents								
1126		Robison buy/sell Agreement; title insurance documents								
1127		Witness drawing of property								
1128	5/9/2001	Summary of Facts & Conclusion from Appraisal of Brevig Ranch								
1129	11/1/2003	Pages from Barta Appraisal of 264 Fox Farm Road	MT-PLF-002797; MT-PLF-002808; MT-PLF-002814							
1130	4/18/2004	Article from Great Falls Tribune – "Hatchery cleanup to put dent in fish populations statewide"								
1131	11/8/2005	Robin Fleming Refinance documents								
1132		Fleming Financial Documents; sale agreement; appraisal for 436 Fish Hatchery Road								
1133		Gorman's Spreadsheet of expenditures								
1134	2/17/2006	Urick Appraisal of Stilson Ranch	MT-PLF-004749 - 004847							
1135	2/10/2005	Buy/Sell Agreement for 264 Fox Farm Road								
1136		Buy/Sell Agreement between Waite & the Hedricks for 26 Willow Lane								
1137		Buy/Sell Agreement between Waite & the Hedricks for 26 Willow Lane								
1138	4/30/2003	Listing Contract for 34 Fox Farm								
1139	9/11/2001	Tilleman Settlement Statement								
1140	9/24/2001	Barta appraisal of 34 Fox Farm Road provided for Wells Fargo								

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1141	1958	Annual Report Calendar Year 1958 – Big Springs Hatchery								
1142	1960	Annual Report Calendar Year 1960 – Big Springs Hatchery								
1143		Witness drawing of Lower Hatchery (Snyder)								
1144		Photos of hatchery								
1145	1/9/2007	Second amended notice of 30b6 deposition of FWP								
1146	12/7/2006 1/10/2007	Email & Letter from Paul Johnson to Cathy Laughner re designated witnesses for FWP 30b6 deposition								
1147	4/6/2004	Email from Anne Tews to Pete Schade re: PCB sediments in Big Spring Creek	5659							
1148		Newspaper article about PCB Advisory								
1149	10/31/1991	Proposal Lake Water Quality Assessment Grant								
1150	5/1994	Final Report Lake Water Quality Assessment & Contaminant Monitoring of Fishes & Sediments from Montana waters								
1151	7/29/1994	Press release: MDHES Releases Results of Fish Contamination Study								
1152	8/1/2002	Email from Anne Tews to Carole Mackin re PCBs in Big Spring Creek								
1153	8/18/2004	Article from billingsgazette.com re hatchery water within safe limits								
1154	8/19/2004	News-Argus article re PCB cleanup efforts								
1155	1/12/2004	Email from Anne Tews to Don Skaar re test results, green paint	5676							
1156	7/19/2006	Report of Analytical Results from paint samples								
1157		Tews Fish Data								
1158	8/20/02	Barta Appraisal for 34 Fox Farm Road								
1159	9/19/2001	Barta Appraisal of 34 Fox Farm Road								
1160	10/8/2004	Barta Appraisal of 436 Fish Hatchery Road								
1161	6/16/06	Buy/Sell Agreement between AA Corporation & Alex & Trudy Smith	MT-PLF-005262 – MT-PLF-005272							
1162	12/17/04	Memo from Darlene Edge to Anne Tews	20838							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1163	4/6/04	Barta Appraisal of 917 Third Avenue South	WF-000165 - 000184							
1164	3/3/2006	Thomas Appraisal for 26 Willow Lane								
1165	8/11/2006	Affidavit of HH Larison								
1166		FWP document – Cooperation with other agencies; Construction & Repairs; Recommendations for future improvement	7457							
1167	8/16/1966	FWP Logbook entry	9798							
1168	8/2/1969	FWP Logbook entry	9799							
1169		Handwritten notes	9964							
1170		FWP Logbook entry	9969							
1171		FWP Logbook entry re paint	9984							
1172		FWP Logbook entry re Jorgensen Paint Prices	11027							
1173		FWP Logbook entry re paints & varnishes	11047							
1174		FWP Logbook entry	9876							
1175	2/15/1952	Military Specification, Paint, Anti-fouling, Vinyl-Red	COL-0051 – COL-0057							
1176	8/15/2006	Columbia Paint & Coating's First Supplemental Responses to Plaintiffs' First Requests for Production								
1177	5/21/1970	Monsanto shipping record for sale of Aroclor from Great Western to Columbia Paint	MON-MT-008532							
1178	4/1/2006	News-Argus Letter to the Editor								
1179		Charts indicating PCB results in fish	24518 - 24521							
1180	1972	Webb, RG and AC McCall, Industrial Chemicals - Identities of PCB Isomers in Aroclors, Journal of the AOAC 55(4):746-752								
1181	4/1/72	Nisbet, ICT and AF Sarofim, Rates & Routes of Transport of PCBs in the Environment, Environ Health Perspective 21-38								
1182	9/1/70	Peakall, DB and JL Lincer, PCBs: Another Long-Life Widespread Chemical in the Environment, BioScience 20(17):958-964								
1183	10/1/72	Broadhurst, MG, Use & Replaceability of PCBs, Environ Health Perspective 81-102								

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

Trial Exhibit	Date	Document	Bates Number	Stipulated Admissible	Stipulated Authentic	Plaintiff Objection	FWP Objection	Date Offered	Date Admitted	Date Refused
1184	1970	Anderson, DW, Chlorinated Hydrocarbons: Their Dynamics & Eggshell Effects on Herring Gulls & Other Species								
1185	1970	Friend, M, Pesticide - Infections Disease Interaction Studies in the Mallard								
1186	6/24/88	Department Purchase Order from BSTH to Kustom City for Sand Blast tanks with additional bid requests	5685-5691							
1187	5/15/1972	Presentation to the Interdepartmental Task Force on PCBs	DSW 010264							
1188	5/1/1972	PCBs & the Environment, Interdepartmental Task Force on PCBs	DSW 010011							
1189	2/1/1970	Spectroscopy Method 70-1 - Identification of PCBs by Gas Chromatography/Mass Spectrometry	0145136-0145145							
1190	3/27/69	Letter to Regional Water Quality Board re responses to questions concerning PCBs	DSW 280813-DSW 280816							
1191	2/24/69	A Menacing New Pollutant, S.F. Chronicle	MONS 030310							
1192	12/8/66	New Scientist - Report of a new chemical hazard								
1193	1/1/70	More letters in the wind, Environment 12(1):16-27	MONS 083156 - 083166							
1194	2/25/76	PCBs in The United States Industrial Use and Environmental Distribution, Task I, Final Report	ADAD10 00005-491							
1195	12/71	Seidensticker, JC and HV Reynolds, The Nesting, Reproductive Performance, and Chlorinated Hydrocarbon Residues in the Red-Tailed Hawk and Great Horned Owl in South-Central Montana, The Wilson Bulletin 83(4(:408-418								
1196	5/57	AROCLOR – Resins and Plasticizers for Chlorinated Rubber, Technical bulletin O-124	MONS 074312, 074320							
1197	12/73	Draft – Market Input/Output Profile, Process Technology Assessment and Entry Into the Environment of Polychlorinated Biphenyls (PCBs) – Task Order Number 1	0494185-0494314							
1198	10/11/71	The PCB Crisis, Newsweek	MONS 070302							

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

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1199	1/1/1974	American National Standard - Guidelines for handling & disposing of capacitor & transformer grade askarels containing PCBs	0071019-0071054							
1200	9/1/1975	Poisoned Fish, Troubled Waters, Sports Illustrated	DSW 195302-195305							
1201	1976	Burger, EJ, A Case Study: PCBs, J. Intern'l Society for Techn Assessment	DSW 184835-184842							
1202	5/1/1970	Memo re additional statement to be added to warning labels	MON-MT-008631							
1203	5/18/1970	Aroclor 1254 Warning Label	MON-MT-008633							
1204	7/1/1970	Letter to Koppers re discontinuing sale of Aroclors	MONS 089525							
1205	10/1/70	PCBs - prevalent & persistent	MON-MT-003186 - 003191							
1206	9/17/71	Monsanto's PCB Program	ADM 007693-007708							
1207		Paint History at Big Spring Trout Hatchery	5574							
1208		Analytical Chemistry Method 70-1 Analysis of Biological Materials for PCBs	0273303-0273314							
1209	4/13/70	Letter to USDA re presence of PCB in the environment	MONS 088491 – 492							
1210	1954	Organic Coating Technology, Vol. I, Oils, Resins, Varnishes, and Polymers								
1211	1941	Protective and Decorative Coatings – Paints, Varnishes, Lacquers, and Inks								
1212	5/11/1971	Monsanto Call Report – Organic Division re Interview of Rich Ross	DSW 474416							
1213		Technical Bulletin O/PL-306A – Aroclor Plasticizers – A series of inert, chemically-resistant, fire-retarding plasticizers compatible with wide variety of resins	MON-MT-000829-000843							
1214		Communications list re Samples Sent to Laboratories	0111193-0111197							
1215	1968	Technology of Paints, Varnishes and Lacquers								
1216	7/1990	Straight Talk About PCBs, Reader's Digest								
1217	1967	Film-Forming Compositions, Treatise on Coatings, Vol. 1, Part 1								

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

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1218		Montana Fish, Wildlife & Parks, http://fwp.mt.gov/insidefwp/goals/default.html								
1219		The Forensic Examination of Paints and Pigments								
1220	8/1972	The PCB Story, AMBIO 1(4):123-131	DSW 280873-280882							
1221	10/26/1970	Poison Roams on our Coastal Seas, Time								
1222	11/20/1971	The polychlorobiphenyls, their occurrence and significance: a review, Chemistry and Industry 1340-1348								
1223	1/2005	CDM Draft Risk Assessments								
1224	10/1/2005	CDM Final Risk Assessments	9526 - 9789							
1225	4/20/2006	CDM Draft Addendum to Final Risk Assessments	12975 – 13021							
1226	11/18/2004	ATSDR Preliminary Findings – Lewistown, MT	MTDPH-000379 - 000382							
1227	2004	Montana Environmental Public Health Tracking	MTDPH-000383 - 000386							
1228	11/19/2004	Article - Tests Ease Lewistown PCB Worries	MTPLF-002236 - 002237							
1229	2003	Agius, C. and R.J. Roberts. 2003. Melano-macrophage centers and their role in fish pathology. Journal of Fish Disease 26:499-509.								
1230	1/31/03	Federal Register, Vol., 64 , NO. 237, p 69357-69364, OPPTS-66009F. ttp://www.epa.gov/fedrgstr/EPATOX/ 2003/January/Day-31/t2344.htm								
1231	2003	Horton, T.B. and A.E. Tews. 2005. Northcentral Montana Coldwater Stream Ecosystems: 2003 Annual Report. Prepared by the Montana department of Fish, Wildlife and Parks.								

HARTOLDMON0004677

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1232	2005	MDEQ, 2005. Big Spring Creek Watershed Water Quality Restoration Plan and Total Maximum Daily Loads. Montana Department of Environmental Quality, Water Quality Planning Bureau. Helena, MT								
1233	2004	MDEQ. 2004. Big Spring Creek Watershed Water Quality Restoration Plan and Total Maximum Daily Loads.								
1234	2001	National Research Council (NRC), 2001. A Risk-Management Strategy for PCB-contaminated Sediments. Committee on Remediation of PCB-contaminated sediments. National Research Council.								
1235	1983	National Research Council (NRC). *Risk Assessment in the Federal Government: Managing the Process.* Washington D.C.: National Academy Press, 1983.								
1236	1997	Presidential/Congressional Commission on Risk Assessment and Risk Management (PCCRARM). 1997. *Risk Assessment and Risk Management in Regulatory Decision-Making –Volumes I & II.* http://www.riskworld.com/riskcommission/Default.html								

HARTOLDMON0004678

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1237	2003	Reiss, Paul. "Implementation Techniques for an Optimized Catch and Release Sport Fishery as a Tool for Sustainable Development". acuteangling.com. 2003.								
1238	2005	Robbins, C. 2006. The Flyfisher's Guide to Montana. Wilderness Adventures Press, Inc.								
1239	2005	Tews, A.E. 2005. Lewiston Area Fisheries Management: 2004 Annual Report. Prepared by the Montana Department of Fish, Wildlife and Parks.								
1240	1992	United States Environmental Protection Agency (USEPA). 1992. *Guidelines for Exposure Assessment.* Risk Assessment Forum, EPA/600/Z-92/001. May 1992.								
1241	2005	United States Environmental Protection Agency (USEPA). 2005. Draft Contaminated Sediment Remediation Guidance for Hazardous Waste Sites.								
1242		United States Environmental Protection Agency (USEPA). Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites.								

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PHARMACIA'S TRIAL EXHIBIT LIST – PAULSON v. MONSANTO & MONTANA FISH WILDLIFE & PARKS

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1243	2000	United States Environmental Protection Agency (USEPA)/ 2000. A Guide for Developing and Documenting Cost Estimates During the Feasibility Study								
1244	4/10/1969	Letter to Robert Z. Rollins from Robert Keller re Aroclor 1242, 1254 and 1260 and work of Dr. Risebrough	0111887							
1245	10/27/1971	Washington Newsletter, Watch for further Food and Drug Administration action, Chemical Week	0590729							
1246	7/22/1970	Business Newsletter, Scratch another chemical because of pollution charges, Chemical Week	0407734							
1247	10/13/1971	Top of the News, PCB under scrutiny, Chemical Week	0171310							
1248	4/21/1971	Pollution cop's lot not 'appy, Chemical Week	0206872-0206874							
1249		Any discovery response provided to Pharmacia by plaintiffs during the course of this litigation								
1250		Any discovery response provided to Pharmacia by FWP during the course of this litigation								
1251		Any exhibit listed by plaintiffs								
1252		Any exhibit listed by FWP								

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