

Complete List of Defendants

1. Allied Chemical Corporation
2. American Home Products Corporation d/b/a American Cyanamid Company
3. Atofina Chemicals, Inc f/k/a Elf Atochem North America, Inc
4. Aventis Pharmaceuticals f/k/a Rhone Poulenc, Inc
5. BASF Corporation d/b/a Delaware Mew Corporation
6. Chevron Chemical Company, LLC
7. Dow Chemical
8. E.I Du Pont De Nemours Company
9. Earth Tech, Inc f/k/a The Earth Technology Corp
10. FMC Corporation
11. Hayes-Sammons Company, FMC Corporation, Hayes-Sammons Chemical, Company, Hayes-Sammons Hardware, Brazeal-Sammons Bonded Warehouse, Inc and Mission Chemical Company
12. Helena Chemical Company
13. Hercules Incorporated
14. Kerr-McGee Chemical LLC a/k/a Kerr-McGee Chemical Corp
15. Maxus Energy Corporation f/k/a Diamond Shamrock Corporation
16. Monsanto Company f/k/a Monsanto Agricultural Company
17. Novartis Pharmaceuticals Corporation f/k/a Ciba-Geigy Corporation
18. Occidental Chemical Corporation f/k/a Hooker Chemical Corporation
19. Pharmacia Corporation f/k/a Monsanto Chemical Company
20. Rohm and Haas Company
21. Shell Chemical LP f/k/a Shell Chemical Company
22. Shell Oil Company
23. Tex-Ag Company
24. Tex-Ag Properties Company
25. Union Carbide Corporation
26. Union Pacific Railroad Company f/k/a Missouri Pacific Railroad Company
27. Urs Corporation d/b/a Urs Greiner Woodward Clyde
28. Velsicol Chemical Corporation

Over 2,000 Plaintiffs

The lawsuit is being held in the

Hidalgo County 332nd Court
Judge Mario Ramirez
Cause No. C-4885-99-F

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CHARGES

1. 5 Counts of Negligence
2. Sudden and Accidental Release
3. Design Defect
4. Negligent Misrepresentation
5. Intentional Infliction of Emotional Distress
6. Nuisance
7. Trespass
8. Malice
9. Fraud
10. Intentional Conduct
11. Res Ipsa Loquitur – contamination
12. Assault and Battery
13. Gross Negligence
14. Joint and Several Liability

DAMAGES

1. Bodily injury in the past
2. Bodily injury in the future
3. Physical pain and mental anguish in the past
4. Physical pain and mental anguish in the future
5. Emotional distress in the past
6. Emotional distress in the future
7. Increased risk of disease and other ailments
8. Reasonable compensatory damages for the costs of medical testing, monitoring, treatment and prevention that will be required in the future as a proximate result of Defendants' pollution, including, but not limited to the costs of making appropriate specialized services and expert advice available to primary health care providers in the community
9. Payment of the costs of a reasonable adequate study of the extent of pollution caused by Defendants and to monitor and limit the extend of future pollution
10. Payment of the costs of a reasonable program to advise people affected by DEFENDANTS' pollution, of risks associated with such pollution and of measure available to reduce such risks
11. Payment of the costs of such studies as may be required to adequately assess the health effects of the past, present and future pollution on those who live, study and work in the affected community
12. Medical expense and services in the past
13. Medical expense and services in the future
14. Loss of wage earning capacity earning in the future
15. Devaluation and/or loss of use and enjoyment of personal property
16. Devaluation and/or loss of use of personal real property
17. Devaluation and/or loss of enjoyment of personal real property
18. Loss of consortium
19. Punitive Damages