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 Attorney for Third-Party Defendant Goody Products, Inc.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION and THE ADMINISTRATOR OF THE NEW JERSEY SPILL COMPENSATION FUND,	:	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: ESSEX COUNTY
	:	
Plaintiffs	:	
v.	:	DOCKET NO. L-9868-05
	:	
	:	CIVIL ACTION
	:	
OCCIDENTAL CHEMICAL CORPORATION, TIERRA SOLUTIONS, INC., MAXUS ENERGY CORPORATION, REPSOL YPF, S.A., YPF, S.A., YPF HOLDINGS, INC. and CLH HOLDINGS, INC.,	:	CMO V SUPPLEMENT TO THIRD-PARTY INITIAL DISCLOSURE BY GOODY PRODUCTS, INC.
Defendants.	:	
	:	
MAXUS ENERGY CORPORATION and TIERRA SOLUTIONS, INC.,	:	
Third-Party Plaintiffs,	:	
	:	
vs.	:	
	:	
3M COMPANY, <i>et al.</i> ,	:	
Third-Party Defendants.	:	

Comes now Third-Party Defendant Goody Products, Inc. (“Respondent” or “Goody”) and for this supplement to its Initial Disclosure, in accordance with Case Management Orders V and XII, provides the following specific information:

Reservations

Goody reasserts the reservations stated in its Initial Disclosure, filed with this Court on February 18, 2010.

Supplement to Initial Disclosure

a. The name, address and telephone number, as may be known of each individual likely to have discoverable information, along with the subjects of that information, that relates to any alleged discharge or release of pollutants, contaminants and/or hazardous substances ("Pollutants") into the Newark Bay Complex (as these terms are defined in the Second Amended Complaint and the Third-Party Complaints) from the site(s) and/or properties with which the disclosing party is associated in the Third-Party Complaint ("Alleged Discharges");

Response:

Goody incorporates and restates its response to section (a) contained in its February 18, 2010, Initial Disclosure. Goody is supplementing its February 18, 2010, Initial Disclosure to correct the address for Environmental Protection Agency Region 2. Goody is correcting the address as follows:

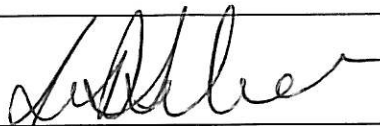
**Environmental Protection Agency Region 2
290 Broadway
New York, NY 10007-1866
Phone: (212) 637-3000**

Goody's supplement to its Initial Disclosure is made without prejudice to its right to change or supplement its responses, its right to assert privileges or objections with respect to any subsequent requests for discovery, or its right to introduce at trial additional evidence and documents as warranted by the development of the facts underlying this litigation.

Dated: July 29, 2010

Respectfully submitted,

Gerald R. Salerno, Esq.
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Attorneys for Third-Party Defendant Goody Products, Inc.

NEW JERSEY DEPARTMENT OF
ENVIRONMENTAL PROTECTION, THE
COMMISSIONER OF THE NEW JERSEY
ENVIRONMENTAL PROTECTION AGENCY,
and THE ADMINISTRATOR OF THE NEW
JERSEY SPILL COMPENSATION FUND,

Plaintiffs,

vs.

OCCIDENTAL CHEMICAL CORPORATION,
TIERRA SOLUTIONS, INC., MAXUS ENERGY
CORPORATION, REPSOL YPF, S.A., YPF, S.A.,
YPF HOLDINGS, INC. and CLH HOLDINGS,

Defendants,

MAXUS ENERGY CORPORATION and
TIERRA SOLUTIONS, INC.,

Third-Party Plaintiffs,

vs.

3M COMPANY, et al.,

Third-Party Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY

DOCKET NO. L-9868-05 (PASR)

CIVIL ACTION

CERTIFICATION OF SERVICE

I, GERALD R. SALERNO, hereby certify as follows:

1. I am a member of the law firm of Aronsohn Weiner & Salerno, PC, attorneys for Third Party Defendant, Goody Products, Inc. ("Goody"), in connection with the above-captioned matter.

2. On July 29, 2010, I caused Goody's CMO V Supplement to Third Party Initial Disclosure to be served electronically on all parties that have consented to service by posting on www.sfile.com/njdepvocc. The following counsel of record were served on that same date via regular mail.

Richard J. Dewland
Coffey & Associates
465 South Street
Morristown, NJ 07960

John P. McGovern
Assistant City Attorney
City of Orange Township
29 North Day St.
Orange, NJ 07050

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 29, 2010

Respectfully submitted,



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