

INITIAL DISCLOSURE OF PRECISION MANUFACTURING GROUP, LLC

Third-Party Defendant Precision Manufacturing Group, LLC (“Precision” or “Respondent”), by and through its undersigned counsel, and in accordance with Case Management Order V, provides the following specific information for its Initial Disclosure:

Reservations

1. These disclosures are not intended to prejudice or waive any privileges or objections Respondent may have with respect to any outstanding or subsequent requests for discovery. Respondent reserves the right to object to the production of any documents or other information on any ground, including relevance and undue burden, and to assert any applicable privilege or protection, including the attorney-client privilege, the work product doctrine, and the common interest doctrine.

2. The time period covered by the allegations in the Plaintiffs’ Second Amended Complaint spans at least six decades. The geographic scope of the Second Amended Complaint is also overly broad, covering the “Newark Bay Complex,” which spans the “lower 17 miles of the Passaic River, Newark Bay, the lower reaches of the Hackensack River, the Arthur Kill, the Kill van Kull, and into adjacent waters and sediments.” Second Amended Complaint, ¶ 1. The scope of inquiry required by Plaintiffs and Third-Party Plaintiffs is accordingly overly broad and unduly burdensome. In addition, Respondent reserves the right to supplement, clarify, and revise these disclosures to the extent additional information becomes available or is obtained through discovery. Further, Respondent reserves the right to amend these disclosures to the extent the claims brought by or alleged against Respondent in this litigation are amended.

Initial Disclosures

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: The Third-Party Complaint alleges incorrectly that Precision is responsible for discharges of hazardous substances from the Servometer Site. Precision never owned or operated the Servometer Site and has no personal knowledge of the information requested in this Initial Disclosure. Precision also is not the successor to the alleged liability of the former Servometer Corporation or the alleged Servodot Corporation. Subject to this clarification, Precision identifies the following individuals who may have discoverable knowledge or information indicating that Precision is neither responsible nor liable for any discharge of hazardous substances from the Servometer Site because of the provisions of a relevant asset purchase agreement:

Name and Contact Information If Known	Role
Anatole Penchuk	Chairman, Precision Manufacturing Group, LLC
Israel Lipschitz, Esq. 1528 Montgomery Avenue Rosemont, PA 19010	Corporate Counsel to Precision Manufacturing Group, LLC

Notice: Precision is represented by counsel and requests that notice be given to the undersigned counsel before any of the individuals identified above are contacted in this matter.

b. *The name, address and telephone number, as may be known, of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses (unless the use would be solely for impeachment):*

Response: See Response a. above.

- c. *The name, address and telephone number, as may be known, of any and all past or present owners, lessees or operators at the site(s) and/or properties with which it is associated in the Third-Party Complaint and the dates of such ownership, lease or operation, as may be known;*

Response: Servometer Corporation and its former shareholders as identified in Precision's Answer to Third Party Complaint: c/o their counsel, Arthur Chagaris, Esquire, Beattie Padavano, LLC, 50 Chestnut Road, Montvale, New Jersey 07645.

- d. *With respect to any individual identified pursuant to paragraph (a), (b) or (c) above, (or any other individual known to have material knowledge of an alleged discharge or release of a Pollutant at or from a site and/or property, or into the Newark Bay Complex), any known inability to testify due to age, infirmity, or incompetency within 12 months following the date of the Initial Disclosure;*

Response: None known

- e. *A description by category and location (or copy at the discretion of the Third-Party Defendant) of all documents or electronically stored information that the disclosing party has in its possession, custody, or control with respect to Alleged Discharges including disclosure of the extent to which such documents or electronically stored information may fall within the Excepted Information.*

Response: As noted above, Precision never owned or operated the Servometer Site and the company's only alleged nexus with that site is its (incorrectly) alleged predecessor's action in 1973-74. Precision has no documentation or electronically stored information responsive to this Initial Disclosure. The documentation in Precision's possession is maintained at Precision's offices, located at 501 Little Falls Road, Cedar Grove, New Jersey 07009, or at the offices of Precision's above named corporate counsel.

Respondent's Initial Disclosures are 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: February 11, 2010

Respectfully submitted,

STEVENS & LEE, P.C.



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Attorneys for Third Party Defendant
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CERTIFICATION OF SERVICE

I, BRADLEY L. MITCHELL, ESQUIRE, an attorney-of-law of the State of New Jersey, do hereby state upon my oath that I have served the Initial Disclosures of Precision Manufacturing Group, LLC electronically via posting on the proprietary website created for the above case, upon all parties which have consented to service by posting, and upon the attached list of counsel of record by depositing the same with the United States Postal Service.

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



Bradley L. Mitchell
Attorney for Third-Party Defendant
Precision Manufacturing Group, LLC

Dated: February 11, 2010

THIRD-PARTY DEFENDANTS SERVICE LIST

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