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Attorneys For Third-Party Defendant
Siemens Water Technologies Corp.

NEW JERSEY DEPARTMENT OF	:	SUPERIOR COURT OF NEW
ENVIRONMENTAL PROTECTION and	:	JERSEY
THE ADMINISTRATOR OF THE NEW	:	LAW DIVISION: ESSEX
JERSEY SPILL COMPENSATION FUND,	:	COUNTY
	:	
Plaintiffs	:	DOCKET NO. L-9868-05
v.	:	
	:	
OCCIDENTAL CHEMICAL	:	CIVIL ACTION
CORPORATION, TIERRA SOLUTIONS,	:	
INC., MAXUS ENERGY CORPORATION,	:	CMO V THIRD-PARTY
REPSOL YPF, S.A., YPF, S.A., YPF	:	DEFENDANT SUPPLEMENT TO
HOLDINGS, INC. and CLH HOLDINGS,	:	INITIAL DISCLOSURE
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 Siemens Water Technologies Corp.,
("Siemens") and supplements its Initial Disclosure in accordance with Case Management
Order V by providing the following information:

Reservations

Siemens repeats and incorporates by reference its reservations stated in its Initial Disclosure herein.

Disclosures

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);

Supplemental Disclosure:

1. Kevin Kinback, Director, Sustaining Engineering USA, Siemens Industry INC. Water Technologies, Vineland, NJ. Prior to January, 1977, he was employed by Wallace & Tiernan, Inc. (referred to as "Wallace II" in Third Party Complaint B). Mr. Kinback is familiar with the operations of Wallace & Tiernan, Inc. at the Belleville, New Jersey, facility, the move of operations to Vineland, New Jersey, and the operations of Siemens Water Technologies Corp, formerly known as U.S. Filter/ Wallace & Tiernan, Inc.
2. Rodney G. Huerter (Counsel, Veolia Water North America, Houston, Texas) and/or Brian J. Clarke (General Counsel, WASCO LLC, Chicago, Illinois) may have knowledge as to the authenticity of business records and transactional documents associated with the sale of assets by United Utilities PLC to United States Filter Corporation.

Dated: August 30, 2011

Respectfully submitted,

HUSCH BLACKWELL LLP.
Attorney for Third-Party Defendant
Siemens Water Technologies Corp.

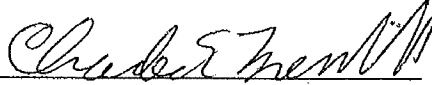


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CERTIFICATE OF SERVICE

I hereby certify that CMO V Third-Party Defendant Supplement To Initial Disclosure on behalf of Siemens Water Technologies Corp. was served on all counsel of record by posting to CT Summation Website.


Charles E. Merrill