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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	:	SUPPLEMENTAL DISCLOSURE
HOLDINGS, INC. and CLH HOLDINGS,	:	OF THREE COUNTY
INC.,	:	VOLKSWAGEN
Defendants.	:	CORPORTATION

MAXUS ENERGY CORPORATION and
 TIERRA SOLUTIONS,
 INC.,
 Third-Party Plaintiffs,

vs.

3M COMPANY, *et al.*,
 Third-Party Defendants.

Comes now Third-Party Defendant Three County Volkswagen Corporation,
 ("Respondent"), by way of Supplementing its Initial Disclosure of January 15, 2010,

states as follows:

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").

Supplemental Response:

Three County Volkswagen objects to the form of the question to the extent that it assumes there was an "alleged discharge or release of pollutants, contaminants and/or hazardous substances" to the Newark Bay Complex from the Three County Volkswagen property. Upon information and belief, the below identified individuals do not have personal knowledge of any alleged release of hazardous substances. Subject to and without waiving the foregoing objections and the reservations stated in Three County Volkswagen's Initial Disclosure dated January 15, 2010, Mr. Senior is likely to have operational information for the Three County Volkswagen facility; Mr. Tompkins is likely to have information about tank and lift upgrades at the property; and Ms. Ercoliani is likely to have information about laboratory data related to samples taken from the Three County Volkswagen property in connection with those upgrades.

Name/Address/Phone	Subject
Robert A. Senior – 701 Riverside Avenue Lyndhurst, NJ 07071 (201) 933-8383	Operations
Ted Tompkins – NJ Lubrication Equipment Co. Plainsfield, NJ 07094 (908) 561-8861 (office)	Tank and hydraulic lift upgrade
Sharon Ercoliani – Townley Laboratories, Inc. 1750 West Front Street Plainfield, NJ 07063 (908) 757-1137	Laboratory data

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:

Name	Address	Telephone Number
Robert A. Senior	701 Riverside Avenue Lyndhurst, NJ 07071	(201) 933-8383

Supplemental Response:

Name	Address	Telephone Number
Ted Tompkins	NJ Lubrication Equipment Co. Plainsfield, NJ 07094	(908) 561-8861
Sharon Ercoliani	Townley Laboratories, Inc. 1750 West Front Street Plainfield, NJ 07063	(908) 757-1137

Three County Volkswagen acknowledges its duty to supplement its Disclosure Statements as additional information is obtained through investigation and discovery.

Dated: June 4, 2010

Respectfully submitted,

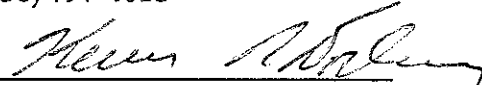
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Three County Volkswagen Corporation**

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Signed: 
Kevin R. Dochney

and

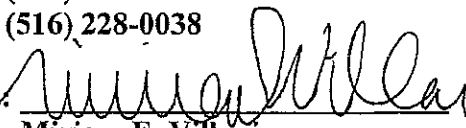
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Signed: 
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