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Attorneys for Third-Party Defendant  
Borough of Glen Ridge

NEW JERSEY DEPARTMENT OF  
ENVIRONMENTAL PROTECTION, THE  
COMMISSIONER OF THE NEW JERSEY  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION 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,

and

MAXUS ENERGY CORPORATION and  
TIERRA SOLUTIONS. INC.,

Third-Party Plaintiffs,

vs.

BAYONNE MUNICIPAL UTILITIES  
AUTHORITY, BOROUGH OF CARTERET,  
BOROUGH OF EAST NEWARK, BOROUGH  
OF EAST RUTHERFORD, BOROUGH OF  
ELMWOOD PARK, BOROUGH OF  
FAIRLAWN. BOROUGH OF FANWOOD,  
BOROUGH OF ERANKLIN LAKES,  
BOROUGH OF GARWOOD, BOROUGH OF  
GLEN RIDGE, BOROUGH OF GLEN ROCK,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - ESSEX COUNTY

DOCKET NO. ESX-L-9868-05 (PASR)

CIVIL ACTION

INITIAL DISCLOSURE STATEMENT OF  
THE BOROUGH OF GLEN RIDGE  
PURSUANT TO CASE MANAGEMENT  
ORDER VIII

BOROUGH OF HALEDON, BOROUGH OF HASBROUCK HEIGHTS, BOROUGH OF HAWTHORNE, BOROUGH OF KENILWORTH, BOROUGH OF LODI, BOROUGH OF MOUNTAINSIDE. BOROUGH OF NEW PROVIDENCE, BOROUGH OF NORTH ARLINGTON, BOROUGH OF NORTH CALDWELL, BOROUGH OF NORTH HALEDON, BOROUGH OF PROSPECT PARK, BOROUGH OF ROSELLE PARK, BOROUGH OF ROSELLE. BOROUGH OF RUTHERFORD, BOROUGH OF TOTOWA, BOROUGH OF WALLINGTON, BOROUGH OF WEST PATERSON, BOROUGH OF WOOD-RIDGE, CITY OF BAYONNE, CITY OF CLIFTON, CITY OF EAST ORANGE, CITY OF ELIZABETH, CITY OF GARFIELD, CITY OF HACKENSACK, CITY OF JERSEY CITY, CITY OF LINDEN, CITY OF NEWARK, CITY OF ORANGE, CITY OF PASSAIC, CITY OF PATERSON, CITY OF RAHWAY, CITY OF SUMMIT, CITY OF UNION CITY, HOUSING AUTHORITY OF THE CITY OF NEWARK, JERSEY CITY MUNICIPAL UTILITIES AUTHORITY, JOINT MEETING OF ESSEX AND UNION COUNTIES, LINDEN ROSELLE SEWERAGE AUTHORITY, PASSAIC VALLEY SEWERAGE COMMISSIONERS, PORT AUTHORITY OF NEW YORK AND NEW JERSEY, RAHWAY VALLEY SEWERAGE AUTHORITY, THE NEW JERSEY DEPARTMENT OF AGRICULTURE, THE NEW JERSEY DEPARTMENT OF TRANSPORTATION, THE STATE OF NEW JERSEY, TOWN OF BELLEVILLE, TOWN OF HARRISON, TOWN OF KEARNY, TOWN OF NUTLEY, TOWN OF WESTFIELD, TOWN OF WOODBRIDGE, TOWNSHIP OF BERKELEY HEIGHTS, TOWNSHIP OF BLOOMFIELD, TOWNSHIP OF CEDAR GROVE, TOWNSHIP OF CLARK, TOWNSHIP OF CRANFORD, TOWNSHIP OF HILLSIDE, TOWNSHIP OF IRVINGTON, TOWNSHIP OF LITTLE FALLS, TOWNSHIP OF LIVINGSTON, TOWNSHIP OF LYNDBURST, TOWNSHIP OF MAPLEWOOD, TOWNSHIP OF MILBURN,

TOWNSHIP OF MONTCLAIR, TOWNSHIP OF ORANGE, TOWNSHIP OF SADDLE BROOK, TOWNSHIP OF SCOTCH PLAINS, TOWNSHIP OF SOUTH HACKENSACK, TOWNSHIP OF SOUTH ORANGE VILLAGE, TOWNSHIP OF SPRINGFIELD, TOWNSHIP OF UNION, TOWNSHIP OF WEST ORANGE, TOWNSHIP WINFIELD PARK, TOWNSHIP OF WYCKOFF, VILLAGE OF RIDGEWOOD,

Third-Party Defendants,

To: ALL PARTIES VIA ELECTRONIC PLATFORM FOR SERVICE

The Borough of Glen Ridge hereby serves its Initial Disclosure Statement as required by Case Management Order VIII. The Borough of Glen Ridge will amend and/or supplement the Initial Disclosure Statement as additional information is obtained through investigation and discovery.

#### **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").

#### **ANSWER:**

Third-Party defendant, the Borough of Glen Ridge, through its attorneys, objects to this request in so far as it is overly broad, burdensome, vague, harassing and not reasonably limited in scope or duration. Notwithstanding the aforesaid objections, the Borough of Glen Ridge denies that it discharged or released, or caused and/or permitted a discharge or release of any such hazardous substances, pollutants or contaminants. Subject to the discovery of any additional parties that may be revealed during the course of pretrial discovery, the Borough of Glen Ridge identifies any and all parties named during the course of discovery by any other party to this action. Furthermore, the Borough of Glen Ridge identifies the following borough officials and/or divisions that may possibly maintain certain relevant knowledge and/or documentation:

1. Michael J. Rohal, Borough Clerk and Engineer  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400

2. Jay Weisenbach, Superintendent of the Department of Public Works  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400
3. Ronald Young, Construction Official  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400

The Borough of Glen Ridge reserves the right to amend this response in the event additional discoverable information is subsequently identified.

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).

**ANSWER:**

Third-Party defendant, the Borough of Glen Ridge, through its attorneys, objects to this request in so far as it is overly broad, burdensome, vague, harassing and not reasonably limited in scope or duration. Notwithstanding the aforesaid objections, the Borough of Glen Ridge denies that it discharged or released, or caused and/or permitted a discharge or release of any such hazardous substances, pollutants or contaminants. Furthermore, see the Borough of Glen Ridge's response to a. above.

The Borough of Glen Ridge reserves the right to amend this response in the event additional discoverable information is subsequently identified.

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.

**ANSWER:**

Third-Party defendant, the Borough of Glen Ridge, through its attorneys, objects to this request in so far as it is overly broad, burdensome, vague, harassing and not reasonably limited in scope or duration. Notwithstanding the aforesaid objections, the

Borough of Glen Ridge is presently unaware of any past or present owners, lessees or operators.

The Borough of Glen Ridge reserves the right to amend this response in the event additional discoverable information is subsequently identified.

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.

**ANSWER:**

Third-Party defendant, the Borough of Glen Ridge, through its attorneys, objects to this request in so far as it is overly broad, burdensome, vague, harassing and not reasonably limited in scope or duration. Notwithstanding the aforesaid objections, the Borough of Glen Ridge is presently unaware of any individuals who are unable to testify due to age, infirmity or incompetency.

The Borough of Glen Ridge reserves the right to amend this response in the event additional discoverable information is subsequently identified.

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 Exempted Information.

**ANSWER:**

Third-Party defendant, the Borough of Glen Ridge, through its attorneys, objects to this request in so far as it is overly broad, burdensome, vague, harassing and not reasonably limited in scope or duration. Notwithstanding the aforesaid objections, the Borough of Glen Ridge denies that it discharged or released, or caused and/or permitted a discharge or release of any such hazardous substances, pollutants or contaminants. To the extent that any relevant documents or information may be available, the same are maintained by the following officials of the Borough of Glen Ridge:

1. Michael J. Rohal, Borough Clerk and Engineer  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400

2. Jay Weisenbach, Superintendent of the Department of Public Works  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400
  
3. Ronald Young, Construction Official  
Municipal Building  
825 Bloomfield Avenue  
Glen Ridge, New Jersey 07028  
973-748-8400

The Borough of Glen Ridge expressly reserves the right to amend and/or supplement the foregoing responses to conform to continuing investigation and discovery, including at the time of trial, as may be permitted by the Rules of Court and/or subsequent Orders of the Court.

MEYNER AND LANDIS, LLP  
Attorneys for Third-Party Defendant  
The Borough of Glen Ridge



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JOHN N. MALYSKA, ESQ.

Dated: April 29, 2010

MEYNER AND LANDIS LLP  
One Gateway Center  
Suite 2500  
Newark, New Jersey 07102  
Attorneys for Third-Party Defendant  
Borough of Glen Ridge

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

Plaintiffs,

vs.

OCCIDENTAL CHEMICAL CORPORATION,  
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YPF. S.A., YPF HOLDINGS. INC., AND CLH  
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BOROUGH OF FRANKLIN LAKES,  
BOROUGH OF GARWOOD, BOROUGH OF  
GLEN RIDGE, BOROUGH OF GLEN ROCK,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - ESSEX COUNTY

DOCKET NO. ESX-L-9868-05 (PASR)

CIVIL ACTION

THIRD PARTY DEFENDANT, THE  
BOROUGH OF GLEN RIDGE'S  
CERTIFICATE OF SERVICE OF ITS  
INITIAL DISCLOSURE and RESPONSE  
TO THE ESI QUESTIONNAIRE

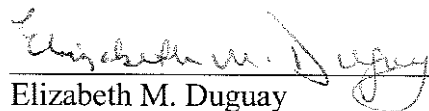
BOROUGH OF HALEDON, BOROUGH OF HASBROUCK HEIGHTS, BOROUGH OF HAWTHORNE, BOROUGH OF KENILWORTH, BOROUGH OF LODI, BOROUGH OF MOUNTAINSIDE, BOROUGH OF NEW PROVIDENCE, BOROUGH OF NORTH ARLINGTON, BOROUGH OF NORTH CALDWELL, BOROUGH OF NORTH HALEDON, BOROUGH OF PROSPECT PARK, BOROUGH OF ROSELLE PARK, BOROUGH OF ROSELLE, BOROUGH OF RUTHERFORD, BOROUGH OF TOTOWA, BOROUGH OF WALLINGTON, BOROUGH OF WEST PATERSON, BOROUGH OF WOOD-RIDGE, CITY OF BAYONNE, CITY OF CLIFTON, CITY OF EAST ORANGE, CITY OF ELIZABETH, CITY OF GARFIELD, CITY OF HACKENSACK, CITY OF JERSEY CITY, CITY OF LINDEN, CITY OF NEWARK, CITY OF ORANGE, CITY OF PASSAIC, CITY OF PATERSON, CITY OF RAHWAY, CITY OF SUMMIT, CITY OF UNION CITY, HOUSING AUTHORITY OF THE CITY OF NEWARK, JERSEY CITY MUNICIPAL UTILITIES AUTHORITY, JOINT MEETING OF ESSEX AND UNION COUNTIES, LINDEN ROSELLE SEWERAGE AUTHORITY, PASSAIC VALLEY SEWERAGE COMMISSIONERS, PORT AUTHORITY OF NEW YORK AND NEW JERSEY, RAHWAY VALLEY SEWERAGE AUTHORITY, THE NEW JERSEY DEPARTMENT OF AGRICULTURE, THE NEW JERSEY DEPARTMENT OF TRANSPORTATION, THE STATE OF NEW JERSEY, TOWN OF BELLEVILLE, TOWN OF HARRISON, TOWN OF KEARNY, TOWN OF NUTLEY, TOWN OF WESTFIELD, TOWN OF WOODBRIDGE, TOWNSHIP OF BERKELEY HEIGHTS, TOWNSHIP OF BLOOMFIFID, TOWNSHIP OF CEDAR GROVE, TOWNSHIP OF CLARK, TOWNSHIP OF CRANFORD, TOWNSHIP OF HILLSIDE, TOWNSHIP OF IRVINGTON, TOWNSHIP OF LITTLE FALLS, TOWNSHIP OF LIVINGSTON, TOWNSHIP OF LYNDHURST, TOWNSHIP OF MAPLEWOOD, TOWNSHIP OF MILBURN,



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TOWNSHIP OF SCOTCH PLAINS,  
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TOWNSHIP OF SOUTH ORANGE VILLAGE,  
TOWNSHIP OF SPRINGFIELD, TOWNSHIP  
OF UNION, TOWNSHIP OF WEST ORANGE,  
TOWNSHIP WINFIELD PARK, TOWNSHIP  
OF WYCKOFF, VILLAGE OF RIDGEWOOD,

Third-Party Defendants,

The undersigned hereby certifies that a true and correct copy of the Third-Party Defendant, The Borough of Glen Ridge's Response to the ESI Questionnaire and Initial Disclosure Statement of the Borough of Glen Ridge pursuant to Case Management Order VIII was served electronically on all parties which have provided email addresses as of this date.



Elizabeth M. Duguay  
Legal Secretary to  
JOHN N. MALYSKA, ESQ.  
MEYNER AND LANDIS, LLP

Dated: April 29, 2010