

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
ONE BEACON STREET
BOSTON, MASSACHUSETTS 02108-3194

TEL: (617) 573-4800
FAX: (617) 573-4822
www.skadden.com

FIRM/AFFILIATE OFFICES

CHICAGO
HOUSTON
LOS ANGELES
NEW YORK
PALO ALTO
WASHINGTON, D.C.
WILMINGTON
BEIJING
BRUSSELS
FRANKFURT
HONG KONG
LONDON
MOSCOW
MUNICH
PARIS
SÃO PAULO
SHANGHAI
SINGAPORE
SYDNEY
TOKYO
TORONTO
VIENNA

DIRECT DIAL
617-573-4880
DIRECT FAX
617-573-4822
EMAIL ADDRESS
PETER.SIMSHAUSER@SKADDEN.COM

August 3, 2011

Charles M. Crout, Esq.
Andrews Kurth LLP
1350 I Street, NW
Suite 1100
Washington, DC 20005

RE: NJDEP, et al. v. Occidental Chemical Corporation, et al., Docket No. ESX-L-009868-05 (PASR)

Dear Mr. Crout:

We represent third-party defendant News America, Inc. in the above-referenced matter. Pursuant to the January 31, 2011 Consent Order and your letter to Eric Rothenberg dated July 6, 2011, enclosed please find News America, Inc.'s Supplemental Third-Party Disclosure.

Please call me if you have any questions

Sincerely,



Peter Simshauser

Enclosure

cc: Eric B. Rothenberg, Esq. (with enclosure)
Lee D. Henig-Elona, Esq. (with enclosure)
John M. Scagnelli, Esq. (with enclosure)
Peter J. King, Esq. (with enclosure)
Michael Gordon, Esq. (with enclosure)
Robert T. Lehman, Esq. (with enclosure)
Gregg H. Hilzer, Esq. (with enclosure)
William L. Warren, Esq. (with enclosure)
Domenick Carmagnola, Esq. (with enclosure)
All Counsel of Record (via CT Summation)

Robert J. Del Tufo
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Four Times Square
New York, New York 10036
Telephone: (212) 735-3000
Facsimile: (212) 735-2000

Peter Simshauser (Admitted Pro Hac Vice)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Beacon Street
Boston, Massachusetts 02108
Telephone: (617) 573-4800
Facsimile: (617) 573-4822

Counsel for Third-Party Defendant
News America, Inc.

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

Plaintiffs,

v.

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

Defendants.

MAXUS ENERGY CORPORATION and TIERRA
SOLUTIONS,
INC.,

Third-Party Plaintiffs,

v.

3M COMPANY, *et al.*,

Third-Party Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO. ESX-L-9868-05 (PASR)

CIVIL ACTION

**SUPPLEMENTAL THIRD-PARTY
DISCLOSURE OF THIRD-PARTY
DEFENDANT NEWS AMERICA,
INC.**

Comes now Third-Party Defendant News America, Inc. ("NAI"), and for its its Supplement to Initial Disclosure pursuant to Case Management Order ("CMO") XII provides the following statement.


NAI respectfully submits that it has been named inappropriately as a third-party defendant in this action and ought to be dismissed. NAI apparently has been named a defendant on the theory that it is a successor-by-merger to Chris-Craft Industries, Inc. NAI is not such a successor, however; nor has it ever been. News Publishing Australia Limited ("NPAL") is the successor-by-merger to Chris-Craft. NPAL is separately submitting supplemental third-party disclosures on this date.

In light of the above, NAI respectfully submits that it ought to be dismissed from this action and that no supplemental disclosures should be required of it. To the extent that, despite the foregoing, supplemental disclosures may be required, NAI adopts and joins in those submitted this date by NPAL, in their entirety, including without limitation all reservations of rights.

Dated: August 3, 2011

Respectfully submitted,

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
Attorney for Third-Party Defendant
News America, Inc.



Peter Simshauser, Esq.