

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

KATHLEEN McHUGH and
DEANNA SCHNEIDER, Individually
and on behalf of all persons similarly
situated ,

Plaintiffs,

v.

MADISON-KIPP CORPORATION,
CONTINENTAL CASUALTY COMPANY,
COLUMBIA CASUALTY COMPANY,
UNITED STATES FIRE INSURANCE
COMPANY and ABC INSURANCE
COMPANIES 1 – 50,

Defendants,

--and--

MADISON-KIPP CORPORATION,

Cross-Claimant,

v.

CONTINENTAL CASUALTY COMPANY,
COLUMBIA CASUALTY COMPANY and
UNITED STATES FIRE INSURANCE
COMPANY,

Case No. 11-cv-724-bbc

Cross-Claim Defendants,

--and--

CONTINENTAL CASUALTY COMPANY and
COLUMBIA CASUALTY COMPANY,

Cross-Claimants/Third-Party Plaintiffs,

v.

MADISON-KIPP CORPORATION,

Cross-Claim Defendant,

and

LUUMBERMENS MUTUAL CASUALTY
COMPANY, AMERICAN MORTORISTS
INSURANCE COMPANY, and JOHN DOE
INSURANCE COMPANIES 1-20,

Third-Party Defendants.

DECLARATION OF ALBERT BIANCHI, JR.

I, Albert Bianchi, Jr., declare under penalty of perjury that the following is true and correct:

1. I am an associate with the law firm Michael Best & Friedrich LLP and one of the attorneys representing Defendant Madison-Kipp Corporation in this matter.

2. I make this declaration based upon my personal knowledge.

3. Attached hereto as Exhibit 1 is a true and correct copy of Class Member's (Julie Sheahan) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

4. Attached hereto as Exhibit 2 is a true and correct copy of Class Members' (Peter Uttech and S. Louise Loehnertz Uttech) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

5. Attached hereto as Exhibit 3 is a true and correct copy of Class Member's (Anita Van Amber) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

6. Attached hereto as Exhibit 4 is a true and correct copy of Class Member's (Kate Thompson) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

7. Attached hereto as Exhibit 5 is a true and correct copy of Class Members' (Patrick Hannon and Julia Cosgrove) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

8. Attached hereto as Exhibit 6 is a true and correct copy of Class Member's (Julie Friesler) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

9. Attached hereto as Exhibit 7 is a true and correct copy of Class Members' (Richard and Kate Amdahl) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

10. Attached hereto as Exhibit 8 is a true and correct copy of Class Member's (Carrie Pomije) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

11. Attached hereto as Exhibit 9 is a true and correct copy of Class Member's (Amy Crikelair) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

12. Attached hereto as Exhibit 10 is a true and correct copy of Class Member's (Ken Hennrick) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

13. Attached hereto as Exhibit 11 is a true and correct copy of Class Members' (Eric and Elaina Bott) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

14. Attached hereto as Exhibit 12 is a true and correct copy of Class Members' (Brent and Carol Wilder) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

15. Attached hereto as Exhibit 13 is a true and correct copy of Class Member's (Leslie Bellais) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

16. Attached hereto as Exhibit 14 is a true and correct copy of Class Members' (Brandi Rogers and Chad Goolbis) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

17. Attached hereto as Exhibit 15 is a true and correct copy of Class Member's (Anne Chacon) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

18. Attached hereto as Exhibit 16 is a true and correct copy of Class Members' (Prentice and Doris Berge) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

19. Attached hereto as Exhibit 17 is a true and correct copy of Class Member's (Daniel Pape) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

20. Attached hereto as Exhibit 18 is a true and correct copy of Class Member's (Karsten Schilling) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

21. Attached hereto as Exhibit 19 is a true and correct copy of Class Member's (Dianne Booth) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

22. Attached hereto as Exhibit 20 is a true and correct copy of Class Members' (Barry Carlsen and Marja Barger) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

23. Attached hereto as Exhibit 21 is a true and correct copy of Class Member's (Nicole Rafferty) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

24. Attached hereto as Exhibit 22 is a true and correct copy of Class Members' (Corbin and Elizabeth Reynolds) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

25. Attached hereto as Exhibit 23 is a true and correct copy of Class Members' (Dan and Pamela Stevens) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

26. Attached hereto as Exhibit 24 is a true and correct copy of Class Members' (Sharon Helmus and Carla Mills) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

27. Attached hereto as Exhibit 25 is a true and correct copy of Class Members' (Neil Stalboerger and Judith James) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

28. Attached hereto as Exhibit 26 is a true and correct copy of Class Member's (Telluria Ucan, Inc.) Answers to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

29. Attached hereto as Exhibit 27 is a true and correct copy of Class Member (George Gilbertsen) Answer's to Defendant Madison-Kipp Corporation's First Set of Interrogatories.

30. Attached hereto as Exhibit 28 is a true and correct copy of excerpts from Exhibit 1 from the January 9, 2013 Deposition of Leslie Bellais.

31. Attached hereto as Exhibit 29 is a true and correct copy of excerpts from Exhibit 1 from the January 9, 2013 Deposition of Prentice Berge.

32. Attached hereto as Exhibit 30 is a true and correct copy of Exhibit6 from the January 9, 2013 Deposition of Prentice Berge.

33. Attached hereto as Exhibit 31 is a true and correct copy of excerpts from Exhibit 1 from the January 9, 2013 Deposition of Dianne Booth.

34. Attached hereto as Exhibit 32 is a true and correct copy of excerpts from Exhibit 1 from the December 12, 2012 Deposition of Elaina Bott.

35. Attached hereto as Exhibit 33 is a true and correct copy of excerpts from Exhibit 1 from the December 12, 2012 Deposition of Barry Carlson.

36. Attached hereto as Exhibit 34 is a true and correct copy of Exhibit 1 from the December 17, 2012 Deposition of Kevin Florek.

37. Attached hereto as Exhibit 35 is a true and correct copy of excerpts from Exhibit 1 from the January 21, 2013 Deposition of Julie Friesler.

38. Attached hereto as Exhibit 36 is a true and correct copy of excerpts from Exhibit 1 from the January 21, 2013 Deposition of George Gilbertsen.

39. Attached hereto as Exhibit 37 is a true and correct copy of excerpts from Exhibit 1 from the December 17, 2012 Deposition of Patrick Hannon.

40. Attached hereto as Exhibit 38 is a true and correct copy of excerpts from Exhibit 1 from the December 17, 2012 Deposition of Sharon Helmus.

41. Attached hereto as Exhibit 39 is a true and correct copy of excerpts from Exhibit 1 from the January 9, 2013 Deposition of Kenneth Hennrick.

42. Attached hereto as Exhibit 40 is a true and correct copy of Exhibit 1 from the January 8, 2013 Deposition of Judith James.

43. Attached hereto as Exhibit 41 is a true and correct copy of excerpts from Exhibit 1 from the January 8, 2013 Deposition of Carrie Pomije.

44. Attached hereto as Exhibit 42 is a true and correct copy of excerpts from Exhibit 1 from the December 19, 2012 Deposition of Elizabeth Reynolds.

45. Attached hereto as Exhibit 43 is a true and correct copy of excerpts from Exhibit 1 from the January 9, 2013 Deposition of Brandi Rogers.

46. Attached hereto as Exhibit 44 is a true and correct copy of excerpts from Exhibit 1 from the January 8, 2013 Deposition of Karsten Schilling.

47. Attached hereto as Exhibit 45 is a true and correct copy of excerpts from Exhibit 1 from the December 17, 2012 Deposition of Julie Sheahan.

48. Attached hereto as Exhibit 46 is a true and correct copy of excerpts from Exhibit 1 from the January 8, 2013 Deposition of Daniel Stevens.

49. Attached hereto as Exhibit 47 is a true and correct copy of excerpts from Exhibit 1 from the January 21, 2013 Deposition of Kate Thompson.

50. Attached hereto as Exhibit 48 is a true and correct copy of excerpts from Exhibit 1 from the January 8, 2013 Deposition of Peter Uttech.

51. Attached hereto as Exhibit 49 is a true and correct copy of excerpts from Exhibit 1 from the December 12, 2012 Deposition of Anita Van Amber.

52. Attached hereto as Exhibit 50 is a true and correct copy of excerpts from Exhibit 1 from the December 12, 2012 Deposition of Brent Wilder.

53. Attached hereto as Exhibit 51 is a true and correct copy of American Society for Testing and Materials 1962 version of the *Handbook of Vapor Degreasing*, ASTM Special Technical Publication No.310.

54. Attached hereto as Exhibit 52 is a true and correct copy of the American Society for Testing and Materials 1976 version of the *Handbook of Vapor Degreasing*, ASTM Special Technical Publication 310A.

55. Attached hereto as Exhibit 53 is a true and correct copy of the 1971 Manufacturing Chemists' Association, Inc. Chemical Safety Data Sheet SD-24 for Perchloroethylene.

56. Attached hereto as Exhibit 54 is a true and correct copy of 1956 Manufacturing Chemists' Association, Inc. Chemical Safety Data Sheet SD-14 for Trichloroethylene.

57. Attached hereto as Exhibit 55 is a citation to a true and correct copy of the United States Environmental Protection Agency's February 2012 "Toxicological Review of Tetrachloroethylene (Perchloroethylene)".

58. Attached hereto as Exhibit 56 is a true and correct copy of Rivett, Michael O., Feenstra, Stanley and Clark, Lewis (2006) article titled "Lyne and McLachlan (1949): *Influence of the First Publication on Groundwater Contamination by Trichloroethene*", Environmental Forensics, 7:4,313-323.

59. Attached hereto as Exhibit 57 is a true and correct copy of Folkes, David J., et al., *Vapor Intrusion – EPA's New Regulatory Initiative and Implications for Industry* (January 18, 2003).

60. Attached hereto as Exhibit 58 is a true and correct copy of Ledbetter, George H., *Used Oil and Its Regulation in the United States* (September 30, 1988).

61. Attached hereto as Exhibit 59 is a true and correct copy of *Waste Oil: Technology, Economics, and Environmental, Health, and Safety Considerations* (prepared by Mueller Associates, Inc. for U.S. Department of Energy, Office of Environmental Analysis, January 1987).

62. Attached hereto as Exhibit 60 is a true and correct copy of *Evaluation of Health and Environmental Problems Associated With the Use of Waste Oil as a Dust Suppressant* (prepared by PEI associates, Metzler, S. and Jarvis, C. for U.S. Environmental Protection Agency, Office of Solid Waste, February 1984).

63. Attached hereto as Exhibit 61 is a true and correct copy of *Composition and Management of Used Oil Generated in the United States*, U.S. Environmental Protection Agency, Office of Solid Waste (1984).

64. Attached hereto as Exhibit 62 is a true and correct copy of the Wisconsin Department of Natural Resources, *Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin*, PUB-RR-800 (December 2010).

65. Attached hereto as Exhibit 63 is a true and correct copy of the U.S. Environmental Protection Agency, *EPA's Vapor Intrusion Database: Evaluation and Characterization of Attenuation Factors for Chlorinated Volatile Organic Compounds and Residential Buildings*, EPA 530-R-10-002 (March 16, 2012).

66. Attached hereto as Exhibit 64 is a true and correct copy of U.S. Environmental Protection Agency, *OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)*, EPA530-D-02-004 (November 2002).

67. Attached hereto as Exhibit 65 is a true and correct copy of Kram, et al., *Dynamic Subsurface Explosive Vapor Concentrations: Observations and Implications* (Winter 2011).

68. Attached hereto as Exhibit 66 is a true and correct copy of U.S. Environmental Protection Agency, *Background Indoor Air Concentrations of Volatile Organic Compounds in North American Residences (1990-2005): A Compilation of Statistics for Assessing Vapor Intrusion*, EPA530-R-10-001 (June 2011).

69. Attached hereto as Exhibit 67 is a true and correct copy of The Interstate Technology & Regulatory Council Dense Nonaqueous-Phase Liquids Team Technical/Regulatory Guidelines, *Strategies for Monitoring the Performance of DNAPL Source Zone Remedies* (August 2004).

70. Attached hereto as Exhibit 68 is a true and correct copy of The Interstate Technology & Regulatory Council LNAPLs Team Technical/Regulatory Guidance, *Evaluating LNAPL Remedial Technologies for Achieving Project Goals* (December 2009).

71. Attached hereto as Exhibit 69 is a true and correct copy of U.S. Environmental Protection Agency, *Assessment and Delineation of DNAPL Source Zones at Hazardous Waste Sites*, by Kueper, et al., Ground Water Issue (2009).

72. Attached hereto as Exhibit 70 is a true and correct copy of U.S. EPA Technical Support Project, Ground Water Forum Business Session Summary, May 24-28, 2004.

73. Attached hereto as Exhibit 71 is a true and correct copy of McGuire, et al., *Performance of DNAPL Source Depletion Technologies at 59 Chlorinated Solvent-Impacted Sites* in Groundwater Monitoring & Remediation, 26:(1), (2006).

74. Attached hereto as Exhibit 72 is a true and correct copy of Carpenter, C.P., *The Chronic Toxicity of Tetrachlorethylene*, *J. Ind. Hyg. Toxicol.* 19:323-336 (1937).

75. Attached hereto as Exhibit 73 is a true and correct copy of von Oettingen, W.F., “*Tetrahalogenated ethylene derivatives: Tetrachloroethylene*” in *The Halogenated Aliphatic, Olefinic, Cyclic, Aromatic, and Aliphatic-Aromatic Hydrocarbons Including the Halogenated Insecticides, Their Toxicity and Potential Dangers*, U.S. Public Health Service (1955).

76. Attached hereto as Exhibit 74 is a true and correct copy of von Oettingen, *The Halogenated Aliphatic, Olefinic, Cyclic, Aromatic, and Aliphatic-Aromatic Hydrocarbons Including the Halogenated Insecticides, Their Toxicity and Potential Dangers*, U.S. Public Health Service, Publication No. 414 (1955).

77. Attached hereto as Exhibit 75 is a true and correct copy of Kaplan, S.D., *Dry Cleaners Workers Exposed to Perchloroethylene*, Report to the National Institute for Occupational Safety and Health (August 1980).

78. Attached hereto as Exhibit 76 is a true and correct copy of Foot, et al., *Tetrachlorethylene as an Anesthetic Agent*, in *Anesthesiology* (May 1943).

79. Attached hereto as Exhibit 77 is a true and correct copy of Garrison, H. F., *A Comparative Study of the Value of Tetrachlorethylene as a Means of Ultimate Control and Eradication of Hookworm Disease in Children*, in *South. Med. J.* (January 1934).

80. Attached hereto as Exhibit 78 is a true and correct copy of U.S. Environmental Protection Agency, *Toxicological Review of Tetrachloroethylene (Perchloroethylene) In Support of Summary Information on the Integrated risk Information System (IRIS)* (June 2008).

81. Attached hereto as Exhibit 79 is a citation to a true and correct copy of the Agency for Toxic Substances and Disease Registry, *"Toxicological Profile for Tetrachloroethylene (Update)*, (September 1997).

82. Attached hereto as Exhibit 80 is a true and correct copy of excerpts from the book *Industrial Hygiene and Toxicology, Volume II – Toxicology (Second Revised Edition)*, Patty, F. A. (1963).

83. Attached hereto as Exhibit 81 is a true and correct copy of U.S. Environmental Protection Agency, *Health Assessment Document for Tetrachloroethylene (Perchloroethylene) Final Report* (July 1985).

84. Attached hereto as Exhibit 82 is a citation to a true and correct copy of International Agency for Research on Cancer, *IARC Monographs on the Evaluation of*

Carcinogenic Risks to Humans: Dry Cleaning, Some Chlorinated Solvents and other Industrial Chemicals, Volume 63 (1995).

85. Attached hereto as Exhibit 83 is a true and correct copy of page 43 of the Expert Report of Lorne G. Everett.

86. Attached hereto as Exhibit 84 is a true and correct copy of NR 679.82, Wisconsin Administrative Code.

87. Attached hereto as Exhibit 85 is a true and correct copy of a July 18, 1994 Letter from M. Jahnke to J. Schroeder produced in this case, bearing the Bates number PLF_WDNR1_011032.

88. Attached hereto as Exhibit 86 is a true and correct copy of a February 7, 2007 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF000516.

89. Attached hereto as Exhibit 87 is a true and correct copy of a March 23, 2006 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF000774.

90. Attached hereto as Exhibit 88 is a true and correct copy of a March 25, 2005 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001104.

91. Attached hereto as Exhibit 89 is a true and correct copy of an April 17, 2003 Letter Report from K. Mattfield to C. Tsois produced in this case, bearing the Bates number PLF001338.

92. Attached hereto as Exhibit 90 is a true and correct copy of an April 12, 2004 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001453.

93. Attached hereto as Exhibit 91 is a true and correct copy of a October 31, 2002 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001501.

94. Attached hereto as Exhibit 92 is a true and correct copy of an August 30, 2002 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001590.

95. Attached hereto as Exhibit 93 is a true and correct copy of a December 27, 2001 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001677.

96. Attached hereto as Exhibit 94 is a true and correct copy of a March 21, 2000 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF001718.

97. Attached hereto as Exhibit 95 is a true and correct copy of a June 17, 1999 Letter Report from R. Nauta to L. Lester produced in this case, bearing the Bates number PLF001836.

98. Attached hereto as Exhibit 96 is a true and correct copy of a May 30, 1997 Letter Report from R. Nauta to P. McCutcheon produced in this case, bearing the Bates number PLF001873.

99. Attached hereto as Exhibit 97 is a true and correct copy of a March 18, 1997 Letter Report from R. Nauta to P. McCutcheon produced in this case, bearing the Bates number PLF001945.

100. Attached hereto as Exhibit 98 is a true and correct copy of a March 20, 1996 Letter Report from R. Nauta to P. McCutcheon produced in this case, bearing the Bates number PLF002075.

101. Attached hereto as Exhibit 99 is a true and correct copy of an April 20, 1995 Site Investigation Report produced in this case, bearing the Bates number PLF002139.

102. Attached hereto as Exhibit 100 is a true and correct copy of a February 21, 2012 Email from T. Evanson to M. Schmoller, et al. produced in this case, bearing the Bates number PLF002526.

103. Attached hereto as Exhibit 101 is a true and correct copy of a June 6, 2007 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF007284.

104. Attached hereto as Exhibit 102 is a true and correct copy of a May 20, 2005 Memo from C. Tsois to file produced in this case, bearing the Bates number PLF007300.

105. Attached hereto as Exhibit 103 is a true and correct copy of a November 11, 2004 Letter from R. Nauta to the residents of 154 South Marquette Street produced in this case, bearing the Bates number PLF007309.

106. Attached hereto as Exhibit 104 is a true and correct copy of a November 11, 2004 Letter from R. Nauta to the resident of 162 South Marquette Street produced in this case, bearing the Bates number PLF007313.

107. Attached hereto as Exhibit 105 is a true and correct copy of a July 21, 2004 Letter from C. Tsois to M. Meunier produced in this case, bearing the Bates number PLF007325.

108. Attached hereto as Exhibit 106 is a true and correct copy of a May 7, 2004 Letter from C. Tsois to M. Meunier produced in this case, bearing the Bates number PLF007341.

109. Attached hereto as Exhibit 107 is a true and correct copy of a November 11, 2004 Letter from R. Nauta to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF007681.

110. Attached hereto as Exhibit 108 is a true and correct copy of a May 11, 2005 Letter from R. Nauta to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF007684.

111. Attached hereto as Exhibit 109 is a true and correct copy of a November 9, 2006 Letter from R. Nauta to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF007763.

112. Attached hereto as Exhibit 110 is a true and correct copy of a June 25, 2009 Letter from P. Richardson to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF007770.

113. Attached hereto as Exhibit 111 is a true and correct copy of an April 3, 2003 Fax from C. Tsoris to H. Nehls-Lowe produced in this case, bearing the Bates number PLF008276.

114. Attached hereto as Exhibit 112 is a true and correct copy of an October 13, 2003 Fax from C. Tsoris to H. Nehls-Lowe produced in this case, bearing the Bates number PLF008314.

115. Attached hereto as Exhibit 113 is a true and correct copy of a January 3, 2003 Letter from URS to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF008318.

116. Attached hereto as Exhibit 114 is a true and correct copy of a January 7, 2003 Letter from URS to the resident of 154 South Marquette Street produced in this case, bearing the Bates number PLF008320.

117. Attached hereto as Exhibit 115 is a true and correct copy of a January 7, 2003 Letter from URS to the resident of 162 South Marquette Street produced in this case, bearing the Bates number PLF008322.

118. Attached hereto as Exhibit 116 is a true and correct copy of a June 21, 2004 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF008416.

119. Attached hereto as Exhibit 117 is a true and correct copy of a December 7, 1999 Letter from C. Tsois to Madison Residents in the Vicinity of the Madison Kipp Corporation produced in this case, bearing the Bates number PLF008970.

120. Attached hereto as Exhibit 118 is a true and correct copy of a March 16, 2011 printout of a fundinguniverse.com webpage produced in this case, bearing the Bates number PLF009546.

121. Attached hereto as Exhibit 119 is a true and correct copy of a March 3, 2010 Letter from R. Nauta to M. Schmoller produced in this case, bearing the Bates number PLF010514.

122. Attached hereto as Exhibit 120 is a true and correct copy of a January 19, 2007 Letter from C. Tsois to M. Meunier produced in this case, bearing the Bates number PLF010682.

123. Attached hereto as Exhibit 121 is a true and correct copy of an October 15, 2004 Email from C. Tsois to R. Nauta produced in this case, bearing the Bates number PLF010705.

124. Attached hereto as Exhibit 122 is a true and correct copy of an October 8, 2004 Letter Report from R. Nauta to C. Tsois produced in this case, bearing the Bates number PLF010707.

125. Attached hereto as Exhibit 123 is a true and correct copy of a December 4, 2003 Letter from K. Kapfhammer to M. Meunier produced in this case, bearing the Bates number PLF010736.

126. Attached hereto as Exhibit 124 is a true and correct copy of a July 8, 2003 Letter from K. Mattfield to the resident of 150 South Marquette Street produced in this case, bearing the Bates number PLF010748.

127. Attached hereto as Exhibit 125 is a true and correct copy of a July 8, 2003 Letter from K. Mattfield to the resident of 154 South Marquette Street produced in this case, bearing the Bates number PLF010763.

128. Attached hereto as Exhibit 126 is a true and correct copy of a July 8, 2003 Letter from K. Mattfield to the resident of 162 South Marquette Street produced in this case, bearing the Bates number PLF010774.

129. Attached hereto as Exhibit 127 is a true and correct copy of a December 5, 2002 Fax from R. Nauta to C. Tsoris produced in this case, bearing the Bates number PLF010793.

130. Attached hereto as Exhibit 128 is a true and correct copy of a November 5, 2002 Memo from C. Tsoris to file produced in this case, bearing the Bates number PLF010810.

131. Attached hereto as Exhibit 129 is a true and correct copy of a November 1, 2002 document titled "Fact Sheet and Frequently Ask Questions - Soil Remediation at Madison-Kipp Corporation" produced in this case, bearing the Bates number PLF010814.

132. Attached hereto as Exhibit 130 is a true and correct copy of a September 14, 1999 Letter Report from R. Nauta to L. Lester produced in this case, bearing the Bates number PLF010865.

133. Attached hereto as Exhibit 131 is a true and correct copy of an April 6, 1998 Letter Report from Dames & Moore to L. Lester produced in this case, bearing the Bates number PLF010895.

134. Attached hereto as Exhibit 132 is a true and correct copy of a May 30, 1996 Letter Report from R. Nauta to P. McCutcheon produced in this case, bearing the Bates number PLF011011.

135. Attached hereto as Exhibit 133 is a true and correct copy of a September 14, 1994 Letter Report from R. Nauta to M. Jahnke produced in this case, bearing the Bates number PLF011023.

136. Attached hereto as Exhibit 134 is a true and correct copy of a December 14, 1994 Letter Report from R. Nauta to M. Jahnke produced in this case, bearing the Bates number PLF011029.

137. Attached hereto as Exhibit 135 is a true and correct copy of an August 24, 1994 Letter from J. Schroeder to M. Jahnke produced in this case, bearing the Bates number PLF011047.

138. Attached hereto as Exhibit 136 is a true and correct copy of a February 11, 2009 Letter Report from R. Nauta to C. Tsoris produced in this case, bearing the Bates number PLF011115.

139. Attached hereto as Exhibit 137 is a true and correct copy of WDNR's PUB-RR-931, Review of Vapor Sampling Results for the Neighborhood Surrounding the Madison Kipp Corporation dated December 2012.

140. Attached hereto as Exhibit 138 is a true and correct copy of the Wisconsin Department of Natural Resources, Neighborhood Update, Madison Kipp Corporation Investigation & Cleanup, regarding “DNR Responses to Neighborhood Questions”.

141. Attached hereto as Exhibit 139 is a true and correct copy of an Indoor Air Vapor Action Levels for Various VOCs Quick Look-Up Table dated December 11, 2012.

142. Attached hereto as Exhibit 140 is a true and correct copy of the Madison Water Utility 2011 Drinking Water Quality Annual Report.

143. Attached hereto as Exhibit 141 is a true and correct copy of December 13, 2012 Email from C. Kubacki to L. Hanefeld and M. Schmoller, WDNR.

144. Attached hereto as Exhibit 142 is a true and correct copy of the Madison Water Utility Unit Well # 8 Report dated May 2, 2011.

145. Attached hereto as Exhibit 143 is a true and correct copy of the Comparison of Remedial systems Employed at Drycleaner Sites.

146. Attached hereto as Exhibit 144 is a true and correct copy of Ecology and Environment, Inc. May 26, 1983 Memo to EPA.

147. The relevant information is found at: Citizens for Safe Water Around Badger (CSWAB). 2005. Road Oil at Badger AAP. <http://cswab.org/road-oil-at-badger-aap-a-report-and-call-to-action-by-citizens-for-safe-water-around-badger/> . Last visited February 19, 2013.

Dated this 19th day of February, 2013.

s/ Albert Bianchi, Jr.
Albert Bianchi, Jr.