

IN THE SUPREME COURT OF INDIA

CIVIL APPELLATE JURISDICTION

CIVIL APPEAL NOS. 3187-88 OF 1988

IN THE MATTER OF

UNION CARBIDE CORPORATION

(Appellant)

Versus

UNION OF INDIA

and

VICE VERSA

(Respondent)

**AFFIDAVIT ON BEHALF OF
UNION CARBIDE CORPORATION (UCC)**

I, Joseph E. Geoghan, Vice President and General Counsel of Union Carbide Corporation, with offices at 39 Old Ridgebury Road, Danbury, Connecticut, USA do hereby solemnly affirm and state as follows :

1. I am fully familiar with all of the settlement offers leading to the final settlement of all of the claims arising out of the Bhopal gas tragedy.
2. I have read the affidavit of John Macdonald dated April 24, 1989, submitted herewith, with respect to the history of such settlement offers. All of the statements contained therein are true.

DEPONENT

VERIFICATION

I, Joseph E. Geoghan, the deponent above-named do hereby verify that the facts stated in paragraphs 1 and 2 of the foregoing affidavit are true on personal knowledge. No part of it is false, and nothing material has been concealed therefrom.

Verified at Danbury, Connecticut on this 24 day of April, 1989.

DEPONENT