

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE : UNION CARBIDE
CORPORATION PLANT
DISASTER AT BHOPAL,
INDIA IN DECEMBER 1984**

**MDL No. 626
Misc. No. 21—38 (JFK)
ALL CASES**

NOTICE OF APPEAL

The Plaintiffs in all cases which have been consolidated into this proceeding by order of the Judicial Panel on Multidistrict Litigation dated February 6, 1985, and Order of this Court dated April 25, 1985, together with those Plaintiffs in all other related actions which may be consolidated subsequent to the filing of this notice of appeal, (including, but not limited to, all those cases attached as "Exhibit A" which are all those tort cases filed in this Court which the undersigned are aware of), except *The Union of India v. Union Carbide Corporation*, No. 85 Civ. 2696 and except those cases consolidated as shareholder or derivative cases (the captions of which are attached as "Exhibit B"), by Executive Committee Members, Stanley M. Chesley and F. Lee Bailey, hereby appeal to the United States Court of Appeals for the Second Circuit, from the Court's Order of May 12, 1986 (as amended by the Court's Order of May 28, 1986) which was entered as a final order on June 24, 1986, dismissing the above actions on the ground of *forum non conveniens* and from paragraph 4 of the Court's Order of May 28, 1986, which denied Individual Plaintiffs' Counsel's motion for a fairness hearing.

**BHOPAL DISASTER EXECUTIVE
COMMITTEE MEMBERS:**

**F. LEE BAILEY AND
STANLEY M. CHESLEY**

BY: Sd/-

Stanley M. Chesley

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