

SCHEDULE 3

ITEM	DATE	PARTICIPANTS	LOCATION	COMMENTS	SOURCE (references are to page numbers within those documents)
1.	20 March 1995	<ul style="list-style-type: none"> • Crompton / Uniroyal, • Bayer • Flexsys 		To discuss agreed upon price increase	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 16-17
2.	May/June 1995	<ul style="list-style-type: none"> • Glyn Nichols, Flexsys • Bayer • Crompton 	Meetings and telephone calls	To discuss a July 1995 rubber chemicals price increase in the United States; sensible price levels.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 8, Lines 19-28
3.	Fall 1995	<ul style="list-style-type: none"> • Crompton • Flexsys • Bayer 	Various	To discuss the increase of prices of rubber chemicals worldwide in January 1996.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 9, Lines 19-23
4.	Fall 1995	<ul style="list-style-type: none"> • Glyn Nichols, Flexsys • Volker Holitsch, Bayer 	Leverkusen, Germany	To discuss the proposed January 1996 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 10-17
5.	Fall 1995	<ul style="list-style-type: none"> • Glyn Nichols, Flexsys • Michael J Duchesne, Crompton 	London, England	To discuss the global 1996 January price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 23-28 Pages 11, Lines 1-6 and <i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 14-15
6.	10 October 1995	<ul style="list-style-type: none"> • David A. Hammersley, Flexsys • Glyn Nichols, Flexsys • Volker Holitsch, Bayer • Konigshofen, Bayer 	Flexsys headquarters, Brussels, Belgium	To discuss pricing and technical issues relating to a patent dispute. Flexsys told Bayer that it would increase rubber chemical prices on a worldwide basis	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 9, Lines 24-28; Page 10, Lines 1-9 and <i>European Commission</i>

				and ask Bayer to follow. Flexsys likely expressed this price increase in percentage terms. There likely was also some discussion of minimum prices. Volker Holitsch expressed doubt about whether customers would be willing to follow a price increase but nevertheless agreed that Bayer would follow a price increase that was led by Flexsys.	<i>Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 19, Paragraph (70)</i>
7.	31 October 1995	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	To discuss the 1996 January global price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 18-22</i>
8.	16 November 1995	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	January 1996 global price increase	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 18-22</i>
9.	8 December 1995	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	January 1996 global price increase	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 18-22</i>
10.	11 December 1995	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch; Bayer 	Telephone call	January 1996 global price increase	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 10, Lines 18-22</i>
11.	1996	<ul style="list-style-type: none"> Crompton Flexsys Bayer 	Various	To discuss and encourage implementation of the January 1996 price increase and verify the prices that were being	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 12, Lines 22-26</i>

				charged to particular rubber chemicals customers	
12.	1996 (every 2-3 weeks throughout the year)	<ul style="list-style-type: none"> David A. Hammersley, Flexsys Volker Holitsch, Bayer 	Telephone calls	To discuss rubber chemicals price increase; to confirm increases in rubber chemical prices at various customers.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 12, Lines 27-28 Page 13, Lines 1-8
13.	18 January 1996	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	To discuss the issues concerning the Asian market and also the 1996 January rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 9-12
14.	19 January 1996	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	To discuss the issues concerning the Asian market and also the 1996 January rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 9-12
15.	9 February 1996	<ul style="list-style-type: none"> Uniroyal/Crompton Flexsys 		To discuss the January 1996 price increase.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 21, Paragraph (75)
16.	12 March 1996	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	To discuss the issues concerning the Asian market and also the 1996 January rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 9-12
17.	26 March 1996	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Telephone call	To discuss the issues concerning the Asian market and also the 1996 January rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 9-12

18.	30 April 1996	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Volker Holitsch, Bayer 	Cologne, Germany	To discuss the issues concerning the Asian market and also the 1996 January rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 12-13
19.	March or April 1996	<ul style="list-style-type: none"> Crompton / Uniroyal Bayer Flexsys 	Bayer's headquarters, Leverkusen, Germany	To discuss agreed upon price increases.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 18-19
20.	First 6 months of 1996	<ul style="list-style-type: none"> Glyn Nichols, Flexsys Volker Holitsch, Bayer 	Telephone calls	To discuss pricing at a particular account. For example, when a customer reported receiving a lower price from Bayer than what Flexsys expected, Glyn Nichols would call Volker Holitsch to see if this was true or if the customer was lying.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 13, Lines 14-18
21.	26 November 1996	<ul style="list-style-type: none"> Glyn Nichols, Flexsys Ian Kirkwood, Flexsys Vincent Calarco, Crompton Joseph B. Eisenberg, Crompton 	Crompton's offices, Connecticut, USA	To discuss the January 2006 global increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 14, Lines 7-10 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 23, Paragraph (82)
22.	5 December 1996	<ul style="list-style-type: none"> Uniroyal/Crompton Flexsys 		Flexsys provided information on its current pricing commitments to certain customers and discussed the	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 –

				possibility of further price increases.	Rubber chemicals) Page 23, Paragraph (83)
23.	1997	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Jürgen Ick, Bayer Wolfgang Koch, Bayer 	Brussels, Belgium	To discuss the effectiveness of the worldwide 1996 rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 12-22
24.	1997	<ul style="list-style-type: none"> David A. Hammersley, Flexsys Jürgen Ick, Bayer Wolfgang Koch, Bayer 	Jürgen Ick's office, Bayer's headquarters, Leverkusen, Germany	To discuss the effectiveness of the worldwide 1996 rubber chemicals price increase. They agreed to increase cooperation between the companies.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 12-22
25.	23 January 1997	<ul style="list-style-type: none"> Uniroyal Bayer 	Leverkusen, Germany	To discuss the recent events in the rubber chemicals pricing.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 24, Paragraph (86)
26.	20 February 1997	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Ed Hagen, Crompton 		To discuss frustrations of Flexsys towards Crompton.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 18, Lines 19-25
27.	27 March 1997	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Michael J Duchesne, Crompton 	Telephone call	Michael J Duchesne told Ian Kirkwood that Crompton has retaliated against Bayer at Michelin and Cooper, because Bayer lowered some prices at Goodyear.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 16, Lines 22-28 Page 17, Lines 1-2
28.	5 April 1997	<ul style="list-style-type: none"> Joachim Reinart, Flexsys John Serakowski, Crompton 		The rubber chemicals business in Asia and specific customers and contacts there.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 18, Lines 26-28 Page 19, Line 1
29.	9 June 1997	<ul style="list-style-type: none"> Crompton / Uniroyal 		To discuss rubber chemicals price	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-

		<ul style="list-style-type: none"> Flexsys 		increases and who would lead the increases.	<p>cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 20-21 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 26, Paragraph (92)</p>
30.	17 June 1997	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Harry Walsh, Bayer 	Singapore	To discuss the Asian market and concerned price trends generally as well as specific customers.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 27-28 Page 16, Lines 1-3</p>
31.	7 July 1997	<ul style="list-style-type: none"> Enrique J. Bolanos, Flexsys Crompton 	Crompton's office, New York, USA	To discuss rubber chemicals sales and market issues.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 25-28 Page 18, Lines 1-4</p>
32.	22 July 1997	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Vincent Calarco, Crompton 	Four Seasons Hotel, London, England	To discuss that it was not the right time for a price increase.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 3-8</p>
33.	28 - 29 July 1997	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Wolfgang Koch, Bayer 	Cologne, Germany	To discuss the 1996 rubber chemicals price increase among other things.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 23-26 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 25, Paragraph (89)</p>
34.	September 1997	<ul style="list-style-type: none"> Glyn Nichols, Flexsys 	Eaton	To introduce David A.	<p><i>In Re Rubber Chemicals Antitrust</i></p>

		<ul style="list-style-type: none"> • David A. Hammersley, Flexsys • Michael J Duchesne, Crompton • Joe Gatto, Crompton 		Hammersley to Michael J Duchesne and Joe Gatto as Glyn Nichols was retiring.	<i>Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 9-11
35.	25 September 1997	<ul style="list-style-type: none"> • Uniroyal • Flexsys 	London, England	To discuss Flexsys' willingness to increase the price of TMQ and it Uniroyal leads, Flexsys will follow.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 27, Paragraph (94)
36.	29 September 1997	<ul style="list-style-type: none"> • Ian Kirkwood, Flexsys • Jürgen Ick, Bayer 	Vermeer room, Barbizon Palace Hotel, Amsterdam, Netherlands	Ian Kirkwood informed Jürgen Ick that Glyn Nichols would be leaving Flexsys; they discussed their rubber chemicals capacity expansion plans.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 16, Lines 4-8
37.	2 October 1997	<ul style="list-style-type: none"> • Enrique J. Bolanos, Flexsys • Joseph B. Eisenberg, Crompton 	Hartford Airport, Connecticut, USA	To discuss the deal between Flexsys and Goodyear which caused Crompton to lose volume; the purchase of PPD.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 12-24
38.	9 November 1997	<ul style="list-style-type: none"> • Enrique J. Bolanos, Flexsys • Crompton 	Crompton's office, New York, USA	To discuss rubber chemicals sales and market issues.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 25-28 Page 18, Lines 1-4
39.	23 November 1997	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • John Serakowski, Crompton 		To discuss the rubber chemicals business in Asia and specific customers and contacts there.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 18. Lines 26-28 Page 19, Line 1
40.	14 December 1997	<ul style="list-style-type: none"> • David A. Hammersley, Flexsys • Wolfgang Koch, Bayer 	Verviers, Belgium	To discuss and confirm prices that were being offered to individual rubber	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006

				chemicals customers.	Page 16, Lines 9-14
41.	27 January 1998	<ul style="list-style-type: none"> • Uniroyal • Flexsys 	Telephone call	To discuss Flexsys agreeing to a price floor of 3.7 for CIS.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Pages 27-28, Paragraph (97(a))</i>
42.	11 February 1998	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • Ed Hagen, Crompton 	Telephone call	To discuss Asian market.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 18, Lines 12-18</i>
43.	18 February 1998	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • Harry Walsh, Bayer 	Singapore	To discuss the Asian market and concerned price trends generally as well as specific customers.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 27-28 Page 16, Lines 1-3</i>
44.	18 February 1998	<ul style="list-style-type: none"> • Enrique J. Bolanos, Flexsys • Crompton 	Mexico	To meet other CEOs about an e-commerce joint venture called Elastomer Solutions.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 17, Lines 25-28 Page 18, Lines 1-4</i>
45.	March 1998 (2-day meeting)	<ul style="list-style-type: none"> • Jürgen Ick, Bayer • Wolfgang Koch, Bayer • Joseph B. Eisenberg, Crompton • Peter D. Welch, Crompton • Bob Bailey, Crompton 	Crompton's headquarters, Middlebury, Connecticut, USA	To discuss and consider whether Crompton and Bayer should enter into a joint venture concerning the anti-degradant rubber chemical TMQ.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 12, Lines 1-15</i>
46.	11 March 1998	<ul style="list-style-type: none"> • Bayer • Uniroyal 	Restaurant, Middlebury, Connecticut, USA	To discuss the failure of the 1996 price increase.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 28, Paragraph (97(b))</i>
47.	26 March 1998	<ul style="list-style-type: none"> • Bayer • Flexsys 	Verviers, Belgium	To discuss the timing and	<i>European Commission Decision of 21</i>

				scope of a possible joint price increase.	<i>December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 28, Paragraph (97)</i>
48.	April 1998	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal 	Crompton / Uniroyal headquarters, Middlebury, Connecticut, USA	To discuss agreed upon prices.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 22-23</i>
49.	29 April 1998	<ul style="list-style-type: none"> • Uniroyal • Flexsys 	Telephone call	To discuss a price increase for primary accelerators for Europe and USA.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 28, Paragraph (97(d))</i>
50.	24 July 1998	<ul style="list-style-type: none"> • Uniroyal • Flexsys • Bayer 	Brussels, Belgium	To discuss an agreement to raise prices of rubber chemicals worldwide.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 24-25 And European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 28, Paragraph (98)</i>
51.	17 August 1998	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • Ed Hagen, Crompton 		To discuss frustrations of Flexsys towards Crompton.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 18, Lines 19-25</i>
52.	23 August 1998	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • Harry Walsh, Bayer 	Singapore	To discuss the Asian market and concerned price trends generally as well as specific customers.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 27-28</i>

					Page 16, Lines 1-3
53.	11 September 1998	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Enrique J. Bolanos, Flexsys David A. Hammersley, Flexsys Jürgen Ick, Bayer Wolfgang Koch, Bayer Günter Monn, Bayer 	Leverkusen, Germany	To discuss the supply agreements between Flexsys and Bayer; potential rubber chemicals joint venture in China.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 16, Lines 15-21 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i>, (COMP/F/C.38.443 – Rubber chemicals) Page 29, Paragraph (100)</p>
54.	8 October 1998	<ul style="list-style-type: none"> Uniroyal Flexsys 		To discuss competitors, pricing and capacity.	<p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i>, (COMP/F/C.38.443 – Rubber chemicals) Page 29, Paragraph (101)</p>
55.	12 October 1998	<ul style="list-style-type: none"> Uniroyal Bayer 		To discuss pricing strategies.	<p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i>, (COMP/F/C.38.443 – Rubber chemicals) Page 30, Paragraph (102)</p>
56.	3 November 1998	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Enrique J. Bolanos, Flexsys Vincent Calarco, Crompton 	Crompton's headquarters, Connecticut, USA	To introduce Enrique J. Bolanos to Vincent Calarco.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 19, Lines 2-6</p>
57.	3 November 1998	<ul style="list-style-type: none"> Ian Kirkwood, Flexsys Enrique J. Bolanos, Flexsys Michael J Duchesne, Crompton Joseph B. Eisenberg, Crompton 		Discussed rubber chemicals market conditions and pricing issues.	<p><i>In Re Rubber Chemicals Antitrust Litigation</i>, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 19, Lines 2-6</p>

		<ul style="list-style-type: none"> Peter D. Welch, Crompton 			
58.	11 November 1998	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Harry Walsh, Bayer 	Singapore	To discuss the Asian market and concerned price trends generally as well as specific customers.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 15, Lines 27-28 Page 16, Lines 1-3
59.	17 November 1998	<ul style="list-style-type: none"> Bayer Flexsys 		To discuss the failure of the latest price increase and further steps to be taken.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 30, Paragraph (103)
60.	17 November 1998	<ul style="list-style-type: none"> Uniroyal Bayer Flexsys 	Düsseldorf airport, Germany	To discuss the rubber chemicals prices.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 30, Paragraph (103)
61.	End of 1998/early 1999	<ul style="list-style-type: none"> Various co-conspirators (unnamed) 	Flexsys headquarters, Brussels, Belgium	To discuss the details of a European price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 12, Lines 16-20
62.	1999 (two meetings in the first half of the year)	<ul style="list-style-type: none"> Flexsys Bayer Uniroyal 	Belgium	To discuss the participants' common intentions to increase prices for rubber chemicals.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 15, Lines 26-28
63.	2 January 1999	<ul style="list-style-type: none"> Bayer Crompton / Uniroyal Flexsys 	Flexsys offices, Brussels, Belgium	To discuss the participants' common intentions to increase prices for rubber chemicals and stabilise market shares.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 30, Paragraph (106)
64.	2 February 1999	<ul style="list-style-type: none"> Enrique J. Bolanos, Flexsys 	Heathrow Airport,	To discuss recent rubber	<i>In Re Rubber Chemicals Antitrust</i>

		<ul style="list-style-type: none"> • David A. Hammersley, Flexsys • Joseph B. Eisenberg, Crompton 	London, England	chemicals price offer that Crompton had made to Goodyear, forcing Flexsys to lower its price.	<i>Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 19, Lines 21-28
65.	March 1999	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal • Flexsys 	Restaurant, Brussels, Belgium	To discuss the agreed categories of rubber chemicals covered by price increases to be implemented on 1 January 2000 and 1 July 2000.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 30, Paragraph (106)
66.	3 September 1999	<ul style="list-style-type: none"> • Bayer • Uniroyal 	Telephone call	To discuss Bayer's intention to increase PPD prices by 7% and accelerator prices by 9%, effective 1 October 1999 in Europe and Turkey, but not in North America.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 31, Paragraph (109)
67.	27 September 1999	<ul style="list-style-type: none"> • Bayer • Crompton 	Middlebury, Connecticut, USA	To discuss Crompton's support for the rubber chemicals price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 16, Lines 1-2 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 32, Paragraph (110)
68.	1 October 1999	<ul style="list-style-type: none"> • Bayer • Flexsys 		To discuss and coordinate price increases.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 33, Paragraph

					(116)
69.	18 November 1999	<ul style="list-style-type: none"> • Bayer • Uniroyal 		To discuss and coordinate price increases.	<p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i></p> <p>Page 33, Paragraph (116)</p>
70.	3 December 1999	<ul style="list-style-type: none"> • Bayer • Flexsys 	Verviers, Belgium	To discuss the implementation of the price increase and product swap arrangements.	<p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i></p> <p>Page 33, Paragraph (119)</p>
71.	28 January 2000	<ul style="list-style-type: none"> • William Woodyard, Flexsys • Wolfgang Koch, Bayer 	Verviers, Belgium	To discuss a proposed worldwide rubber chemicals price increase to be effective in July 2000.	<p><i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006</i></p> <p>Page 20, Lines 19-27</p> <p>And</p> <p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i></p> <p>Page 34-35, Paragraph (122)</p>
72.	2 February 2000	<ul style="list-style-type: none"> • Flexsys • Crompton / Uniroyal 		To discuss Crompton offering its support for the coming rubber chemicals price increase.	<p><i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007</i></p> <p>Page 16, Lines 3-4</p> <p>And</p> <p><i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i></p>

					Page 35, Paragraph (123)
73.	9 February 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Peter D. Welch, Crompton 	Admiral's Club, Hopkins Airport, Cleveland, Ohio, USA	To discuss a swap between the companies of a chemical intermediate used to make certain rubber chemicals; to discuss rubber chemicals pricing issues.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 21, Lines 4-9
74.	29 February 2000	<ul style="list-style-type: none"> Wolfgang Koch, Bayer Peter D. Welch, Crompton 	Cologne, Germany	To discuss the results of the January 2000 European price increase, and possible July 2000 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 21, Lines 10-13 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 35, Paragraph (124)
75.	3 March 2000	<ul style="list-style-type: none"> Bayer Crompton / Uniroyal 		To discuss and coordinate price increases.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 33, Paragraph (116)
76.	4 March 2000	<ul style="list-style-type: none"> Bayer Crompton / Uniroyal 	Telephone call	Bayer informed Crompton / Uniroyal about its intention to send letters to customers announcing a price increase in Europe.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 35, Paragraph (124)
77.	20 March 2000	<ul style="list-style-type: none"> Joachim Reinart, Flexsys Enrique J. Bolanos, Flexsys Dr Koller, Duslo 	Frankfurt, Germany	Informed Koller of July 2000 global rubber chemicals price increase; Duslo agreed to support it.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006

					Page 21, Lines 14-17
78.	30 March 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Brussels, Belgium	To discuss the July 2000 price increase; PPDs to be included in the price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 21, Lines 18-24
79.	4 April 2000	<ul style="list-style-type: none"> Bayer Crompton / Uniroyal 	Telephone call	Bayer informed Crompton / Uniroyal about its intention to send letters to customers announcing a price increase in Europe.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 35, Paragraph (124)
80.	24 April 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Telephone call	To inform Bayer that Flexsys were increasing rubber chemicals prices globally.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 21, Lines 25-27
81.	1 May 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Verviers, Belgium	To discuss the July 2000 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 21, Lines 27-28 Page 22, Line 1 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 34-35, Paragraph (122)
82.	12 May 2000	<ul style="list-style-type: none"> Enrique J. Bolanos, Flexsys James J. Conway, Crompton 		To discuss the July 2000 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 2-3
83.	15 May 2000	<ul style="list-style-type: none"> Bayer Crompton / Uniroyal 		Bayer advised Crompton / Uniroyal of its intention to shortly advise its sales forces of the price increase and to	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> ,

				send out the price announcement out to its customers.	(COMP/F/C.38.443 – Rubber chemicals) Page 36, Paragraph (126)
84.	25 May 2000	<ul style="list-style-type: none"> Wolfgang Koch, Bayer Peter D. Welch, Crompton 	Cologne, Germany	To discuss the July 2000 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 4-6 And <i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 16, Lines 5-7
85.	26 May 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Verviers, Belgium	To discuss the July 2000 price increase and customer reactions to the announcement	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 7-11 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 36, Paragraph (129)
86.	Late June 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Telephone call	To discuss rubber chemicals prices that were being offered or charged to particular customers.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 12-13
87.	July 2000	<ul style="list-style-type: none"> Eddy Pintens, Flexsys Zaphir Khwaja, Bayer 	Telephone calls	To verify rubber chemicals prices that were being charged to particular customers.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 14-18
88.	July 2000	<ul style="list-style-type: none"> Eddy Pintens, Flexsys Robert Pimentle, Crompton 		To inquire about Crompton's pricing at Michelin and other customers.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 14-18

89.	10 August 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Wolfgang Koch, Bayer 	Verviers, Belgium	To discuss the July 2000 rubber chemicals price increase and how it had been implemented in the market.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 19-21 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 37, Paragraph (135)
90.	31 August 2000	<ul style="list-style-type: none"> Flexsys Bayer 	Verviers, Belgium	To discuss the outcome of the price increase	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 37, Paragraph (135)
91.	29 September 2000	<ul style="list-style-type: none"> Enrique J. Bolanos, Flexsys Jürgen Ick, Bayer Wolfgang Koch, Bayer 	Bayer's headquarters, Leverkusen, Germany	To discuss how the July 2000 price increase had been implemented in the market.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 22-24
92.	18 October 2000	<ul style="list-style-type: none"> William Woodyard, Flexsys Bob Bailey, Crompton Chris Exton, Crompton 		To discuss general rubber chemicals market conditions.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Lines 25-27
93.	25 October 2000	<ul style="list-style-type: none"> Joachim Reinart, Flexsys William Woodyard, Flexsys Chris Exton, Crompton 	Rugby Club, Brussels, Belgium	To discuss rubber chemicals market conditions and supply issues; and price increase in 1996	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 22, Line 28 Page 23, Lines 1-2
94.	31 October 2000	<ul style="list-style-type: none"> Flexsys Bayer 	Telephone call	To discuss and coordinate price increases.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement</i> ,

					(COMP/F/C.38.443 – Rubber chemicals) Page 39, Paragraph (141)
95.	31 October 2000	<ul style="list-style-type: none"> • Bayer • Uniroyal 		To discuss and coordinate price increases.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 39, Paragraph (141)
96.	3 November 2000	<ul style="list-style-type: none"> • James J. Conway, Crompton • Enrique J. Bolanos, Flexsys 	CEO Summit	James J. Conway proposed a global rubber chemicals price increase at a percentage in the mid-to-high scale digits; they discussed the results of the July 2000 price increase; Flexsys would support another global price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006</i> Page 23, Lines 11-13
97.	13 December 2000	<ul style="list-style-type: none"> • James J. Conway, Crompton • Enrique J. Bolanos, Flexsys 		James J. Conway proposed a global rubber chemicals price increase at a percentage in the mid-to-high scale digits; they discussed the results of the July 2000 price increase; Flexsys would support another global price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006</i> Page 23, Lines 11-13
98.	Late December 2000 or early January 2001	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal 	Telephone call	To discuss prices and accounts.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007</i> Page 16, Lines 8-9
99.	12 January 2001	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal 		To discuss a price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007</i> Page 16, Lines 10-11

100.	February 2001	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal 		To discuss Bayer's support for the price increase.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals) Page 40, Paragraph (145)</i>
101.	March 2001	<ul style="list-style-type: none"> • Martin Petersen, Bayer • James J. Conway, Crompton 	Telephone call	To discuss rubber chemicals prices but Martin Petersen did not want to discuss over the phone.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 23, Lines 20-23</i>
102.	1-2 March 2001	<ul style="list-style-type: none"> • Bayer • Crompton / Uniroyal 	Connecticut, USA	To discuss price increases.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 573; Filed 09/07/2007 Page 16, Lines 12-13</i>
103.	4 March 2001	<ul style="list-style-type: none"> • Martin Petersen, Bayer • James J. Conway, Crompton 		James J. Conway advised that he wanted to increase prices but unsure if Flexsys would go along with it; Martin Petersen advised that Bayer would support a global price increase and he would meet with Enrique J. Bolanos to obtain the support of Flexsys.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 23, Lines 23-24</i>
104.	5 March 2001	<ul style="list-style-type: none"> • Martin Petersen, Bayer • James J. Conway, Crompton 	Crompton's headquarters, Middlebury, Connecticut, USA	James J. Conway advised that he wanted to increase prices but unsure if Flexsys would go along with it.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 23, Lines 24-27 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 –</i></i>

					Rubber chemicals) Page 40, Paragraph (145)
105.	19 March 2001	<ul style="list-style-type: none"> • Crompton / Uniroyal • Bayer 	Telephone call	Bayer promised not to use the price increase to get "additional quantity" in the market but insisted that Crompton / Uniroyal provide documentation that Flexsys would participate.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 40, Paragraph (145)
106.	3 May 2001	<ul style="list-style-type: none"> • Martin Petersen, Bayer • Enrique J. Bolanos, Flexsys • William Woodyard, Flexsys 	Brussels, Belgium	Enrique J. Bolanos advised that he had been in contact with James J. Conway regarding a July 2001 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006</i> Page 24, Lines 4-21 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 41, Paragraph (149)
107.	16 May 2001	<ul style="list-style-type: none"> • Flexsys • Bayer 	Telephone call	To inform Bayer of its price increase.	<i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the EEA Agreement, (COMP/F/C.38.443 – Rubber chemicals)</i> Page 42, Paragraph (153)
108.	16 July 2001	<ul style="list-style-type: none"> • Wolfgang Koch, Bayer • Peter D. Welch, Crompton • Robert Pimentle, Crompton 	Frankfurt, Germany	To discuss the July 2001 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation, Case M:04-cv-01648-MMC, Document 346-11, Filed 05/17/2006</i> Page 24, Lines 22-24 And <i>European Commission Decision of 21 December 2005 relating to a proceeding under Article 81 of the Treaty and Article 53 of the</i>

					<i>EEA Agreement</i> , (COMP/F/C.38.443 – Rubber chemicals) Page 43, Paragraph (159)
109.	6 September 2001	<ul style="list-style-type: none"> • Joachim Reinart, Flexsys • Jim O'Hearn, Crompton 		Jim O'Hearn asked to discuss a competitively sensitive topic but Joachim Reinart refused to discuss.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04- cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 24, Lines 26-28
110.	19 June 2002	<ul style="list-style-type: none"> • Wolfgang Koch, Bayer • Peter D. Welch, Crompton 	Sheraton, Frankfurt airport, Germany	To discuss the July 2001 price increase.	<i>In Re Rubber Chemicals Antitrust Litigation</i> , Case M:04- cv-01648-MMC, Document 346-11, Filed 05/17/2006 Page 24, Line 28 Page 25, Lines 1-2

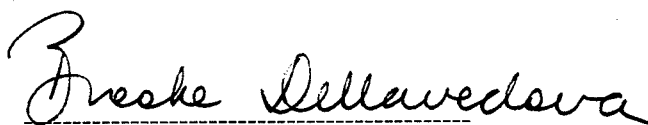
FORM 15B CERTIFICATION

(pursuant to Order 11 Rule 1B of the Rules)

I, **BROOKE WENDY DELLAVEDOVA**, certify to the Court that the factual and legal material available to me at present provides a proper basis for:

- (a) each allegation in the pleading; and
- (b) each denial in the pleading; and
- (c) each non-admission in the pleading.

Date: 2 August 2010



Legal Representative for the Applicant



Maurice Blackburn Pty Ltd