

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

----- x  
In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88  
ECF Case

----- x  
**This document relates to the following case:**

*City of New York, et al. v. Amerada Hess Corp., et al.*  
Case No. 04 Civ. 3417

----- x  
**DECLARATION OF SUSAN E. AMRON**

Susan E. Amron declares:

1. I am an attorney licensed to practice in the State of New York and a member of the Bar of this Court. I work in the Office of the Corporation Counsel of the City of New York. I have personal knowledge of the matters set forth therein and if called as a witness I could and would competently testify thereto under oath.

2. On August 11, 2009 I spoke on the telephone with Dr. Kathleen Burns, her attorney Scott Browning and Robert Chapman. In that conversation, Dr. Burns stated that she was unwilling to change her personal and professional schedule in order to accommodate the trial's scheduling in this case. Dr. Burns also said that she lacked confidence in the attorneys representing the City in this matter and indicated that she did not intend to come to New York to prepare for trial.

3. In my opinion, the relationship between the City of New York and Dr. Kathleen Burns has totally broken down and a new expert toxicologist needs to be substituted for the City's rights to be protected in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 13<sup>th</sup> day of August, 2009

/s/ Susan E. Amron

Susan E. Amron  
Environmental Law Division  
New York City Law Department  
100 Church Street  
New York, New York 10007  
Telephone: (212) 788-1578  
E-Mail: samron@law.nyc.gov