

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

**IN RE METHYL TERTIARY BUTYL ETHER
PRODUCTS LIABILITY LITIGATION**

Master File No. 1:00-1898
MDL 1358 (SAS)

This Document Relates To:

The Honorable Shira A. Scheindlin

City of Fresno v. Chevron U.S.A. Inc., et al.
Case No. 04 Civ. 04973 (SAS)

**SUPPLEMENTAL DECLARATION OF JEREMIAH J. ANDERSON IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT BASED ON THE STATUTE
OF LIMITATIONS OR, ALTERNATIVELY, FOR LACK OF INJURY**

Declaration of Jeremiah J. Anderson

I, Jeremiah J. Anderson, hereby declare:

1. I am a member of the bar of the State of Texas and a partner in the law firm of King & Spalding, LLP, counsel of record for Defendants Chevron U.S.A. Inc. and Union Oil Company of California in this litigation. I make this Supplemental Declaration in support of Defendants' Motion for Summary Judgment Based on the Statute of Limitations or, Alternatively, for Lack of Injury. During the course of this litigation, I have actively participated in pretrial matters, including discovery, document review, and motion practice. This Supplemental Declaration is based on my personal knowledge and, if called as a witness, I could testify competently thereto.

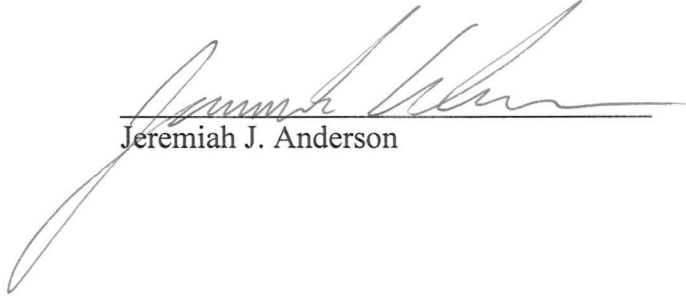
2. Attached hereto as Exhibit A are true and correct copies of excerpts from: (1) a document produced by the City in this litigation; (2) a public record available on the City of Fresno's website; (3) a deposition transcript from this litigation; and (4) California historical statutes, including:

- a. Fresno/Clovis Metropolitan Water Resources Management Plan, Phase I Report, Existing Water Supply System Assessment (January 1992) (FRESNO-MTBE-13508, 13518, 13524-13526);
- b. 2010 Urban Water Management Plan, Chapter 4.1.2.2 (Prepared for City of Fresno November 2012),
<http://www.fresno.gov/Government/DepartmentDirectory/PublicUtilities/Watermanagement/importantdocuments.htm> (last visited March 20, 2013);
- c. True and correct copies of pages 367-68 of the reporter's official transcript of the deposition of Brock Buche, the City of Fresno's Federal Rule of Civil Procedure 30(b)(6) witness, which was taken in this matter on April 1, 2011; and

d. California Historical Statutes, Water Code §§ 10610.4, 10631.

I declare under penalty of perjury that the foregoing is true and correct.

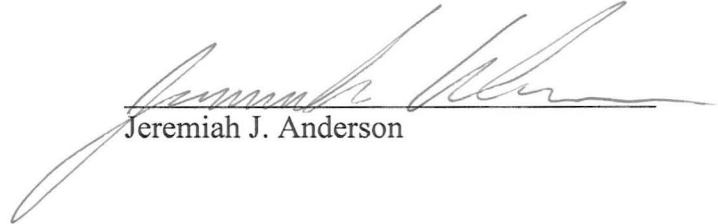
Executed in Houston, Texas on this 22nd day of March, 2013.



Jeremiah J. Anderson

Certificate of Service

I hereby certify that on March 22, 2013 a true, correct, and exact copy of the foregoing document was served on all counsel via LexisNexis File & Serve.



Jeremiah J. Anderson