

# EXHIBIT 16



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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

**This document relates to:**

*New Jersey Department of Environmental  
Protection v. Atlantic Richfield Co., et al.*  
No. 08 Civ. 00312

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

**PLAINTIFFS' OBJECTIONS AND RESPONSES TO  
DEFENDANTS' REQUESTS FOR ADMISSION RELATED TO THE  
CAMP PEDRICKTOWN TRIAL SITE**

PLEASE TAKE NOTICE that, pursuant to Rule 36 of the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York, Plaintiffs New Jersey Department of Environmental Protection, Commissioner of the New Jersey Department of Environmental Protection, and the Administrator of the New Jersey Spill Compensation Fund (collectively, "Plaintiffs") hereby respond to the Defendants' Requests for Admission Related to the Camp Pedricktown Trial Site (the "Requests for Admission"), as follows:

**GENERAL OBJECTIONS AND LIMITATIONS**

1. Plaintiffs object to the Requests for Admission to the extent they seek information covered by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity. Plaintiffs' responses are not intended as, nor should they be construed as, a waiver or relinquishment of any part of the protections afforded by the attorney-client privilege, the work product doctrine, or any other applicable privileges or immunities. Plaintiffs reserve the right to withdraw and recover any information covered by such privileges or

**RESPONSE:**

After reasonable investigation (review of files), plaintiffs are unable to admit or deny the truth of this allegation. Plaintiffs believe that at least one or more of the defendants named in Plaintiffs' Fourth Amended Complaint have supplied GASOLINE to the SITE. The files reviewed by plaintiffs have been produced in discovery.

11. Admit that the SITE was formerly owned and operated by the DOD. *See, e.g.,* NJMTBE-DSSR-000-435624-25.

**RESPONSE:**

Admitted.

12. Admit that the SITE was transferred to the Camp Pedricktown Reuse Authority in the spring of 2005. *See, e.g.,* NJ-MTBE-DSSR-000-435625.

**RESPONSE:**

Admitted.

13. Admit that the DOD has been identified by YOU as the responsible party for the SITE.

**RESPONSE:**

Admitted that DOD has been identified by NJDEP as a responsible party for the SITE, although the admission is not meant to imply that DOD is the only Responsible Party.

14. Admit that the DOD is responsible for implementing any required remedial action at the SITE. *See, e.g.,* NJDEP-SITE449-026332, NJDEP-SITE449-026369.

**RESPONSE:**

Admitted that DOD, as a responsible party, is responsible for implementing required remedial action at the SITE, although the admission is not meant to imply that DOD is the only Responsible Party.