

No. C954330 Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

HELEN HARRINGTON, as representative Plaintiff

PLAINTIFF

AND:

DOW CORNING CORPORATION
DOW CORNING CANADA INC.
THE DOW CHEMICAL COMPANY
DOW CORNING-WRIGHT CORPORATION

McGHAN MEDICAL CORPORATION
McGHAN NUSIL CORPORATION
MINNESOTA MINING AND MANUFACTURING COMPANY (3M)
INAMED CORPORATION
UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC.
UNION CARBIDE CORPORATION

BAXTER INTERNATIONAL INC. BAXTER HEALTHCARE CORPORATION MENTOR CORPORATION, and

BRISTOL-MYERS SQUIBB COMPANY MEDICAL ENGINEERING CORPORATION THE COOPER COMPANIES, INC.

DEFENDANTS

Proceeding under the CLASS PROCEEDINGS ACT, 1995

STATEMENT OF DEFENCE OF

MINNESOTA MINING AND MANUFACTURING COMPANY (3M)

 The Defendant Minnesota Mining and Manufacturing Company (3M) denies each and every allegation in the Amended Statement of Claim herein.

Wherefore the Defendant 3M requests that the action herein be dismissed with costs.

March 9, 2001

Dated Solicitor for the Defendant 3M

THIS STATEMENT OF DEFENCE is filed and delivered by J. Kenneth McEwan of the firm Farris, Vaughan, Wills & Murphy, Barristers & Solicitors, whose place of business and address for service is 2600 - 700 West Georgia Street, Vancouver, British Columbia, V7Y 1B3. Telephone: (604) 684-9151. Facsimile: (604) 661-9349.

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DEFENDANTRESPONDENTS

STATEMENT OF DEFENCE

JKM/sc File no.: 18988-001

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