



NO. 6954330
VANCOUVER REGISTRY

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 HEALTHCARE INTERNATIONAL INC.,
BAXTER HEALTHCARE CORPORATION and MENTOR CORPORATION
BRISTOL-MEYERS SQUIBB COMPANY, MEDICAL ENGINEERING
CORPORATION, THE COOPER COMPANIES INC.

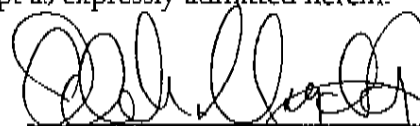
DEFENDANTS

STATEMENT OF DEFENCE
OF THE DEFENDANT,
BAXTER HEALTHCARE CORPORATION

1. The Defendant, Baxter Healthcare Corporation, denies any allegation of fact contained in the Amended Statement of Claim except as expressly admitted herein.

March 9, 2001

Dated


Solicitor for the Defendant,
Baxter Healthcare Corporation

This STATEMENT OF DEFENCE is filed and delivered by the law firm of Miller Thomson LLP, Barristers and Solicitors, (Attention: Oleh W. Ilnycky; File Number BAX6021) solicitors for the Defendant, Baxter

Healthcare Corporation herein, whose place of business and address for delivery is Robson Court,
1000 Howe Street, Vancouver, British Columbia, V6Z 2M1. Telephone: 687-2242.

NO.
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
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CARBIDE CHEMICALS
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CORPORATION,
BAXTER HEALTHCARE INTERNATIONAL INC.;
BAXTER HEALTHCARE CORPORATION and MENTOR
CORPORATION
BRISTOL-MEYERS SQUIBB COMPANY, MEDICAL
ENGINEERING
CORPORATION, THE COOPER COMPANIES INC.

DEFENDANTS

STATEMENT OF DEFENCE

BAX6021

Oleh W. Ilnyckyj

SWINTON & COMPANY
Barristers and Solicitors

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