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DEC 29 1995
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ATTORNEYS FOR Plaintiff
GAF Corporation

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GAF CORPORATION, a Delaware corporation,	:	
Plaintiff,	:	Civil Action No.: 95-1150(AMW)
v.	:	
HARTFORD ACCIDENT & INDEMNITY COMPANY, et al.a Connecticut corporation; INSURANCE COMPANY OF NORTH AMERICA, a Pennsylvania corporation; INDEMNITY INSURANCE COMPANY OF NORTH AMERICA, a New York corporation; GREAT AMERICAN INSURANCE COMPANY, a New York corporation; AMERICAN MUTUAL LIABILITY INSURANCE COMPANY, a Massachusetts corporation; CHUBB INDEMNITY INSURANCE COMPANY, a New York corporation; COMMERCIAL UNION INSURANCE COMPANY OF NEW YORK, a New York corporation; NORTHBROOK INSURANCE COMPANY, an Illinois corporation; ZURICH GENERAL ACCIDENT AND LIABILITY INSURANCE COMPANY, a Swiss corporation; TRENWICK REINSURANCE COMPANY, LTD., a Bermuda corporation; and CERTAIN UNDERWRITERS AT LLOYD'S, LONDON AND LONDON MARKET COMPANIES,	:	**AMENDED COMPLAINT**
Defendants.	:	

Plaintiff GAF Corporation including its predecessors, successors, subsidiaries and other related corporate entities (hereinafter referred to as "GAF"), by way of Amended Complaint against defendants states as follows:

1. GAF filed a Complaint in this action on March 8, 1995.

2. Case Management Order Number 1 ("CMO 1") was filed on October 4, 1995.

3. Pursuant to the terms of CMO 1, Paragraph I.D., GAF is permitted to amend its Complaint to add additional sites without need to file a motion for leave up and through December 31, 1995.

4. Pursuant to CMO 1, GAF hereby amends Exhibit A of its Complaint to include the following seven (7) additional sites:

PB & S CHEMICAL COMPANY INC.
(Knoxville, TN)

On or about December 11, 1995, correspondence was forwarded by counsel for PB & S Chemical Company purportedly giving notice under CERCLA of a claim based upon certain alleged environmental conditions at a facility in Knoxville, Tennessee sold by GAF, as successor to Burkart Schier by merger, to PB & S Chemical Company on or about August 27, 1977. The claim relates to alleged contamination at the facility allegedly resulting from solvent and other material handling practices of GAF and Burkart Schier Chemical Company.

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LOEFFEL LANDFILL
(Nassau, New York)

On July 18, 1995, the Attorney General of the State of New York forwarded correspondence alleging that GAF is a PRP at the Loeffel Landfill in Nassau, Rensselear County, New York. It is alleged that used oil may have been collected from a GAF owned facility which was disposed of at the landfill site on unspecified dates in unspecified quantities.

INTERNATIONAL PAPER CORPORATION
(Binghamton, New York)

In 1991 GAF sold to Anitec Imaging Corp. a facility in Binghamton, NY on which is alleged to have existed a variety of environmental conditions. On or about March 12, 1995, an action was commenced against GAF by International Paper Corporation, as successor in interest by way of merger to Anitec, in U.S. District Court for the Northern District of New York seeking reimbursement for environmental investigation and cleanup costs.

SC HOLDINGS INC. V. AAA REALTY CO., et al.
(Cinnaminson Landfill, Cinnaminson, NJ)

On or about December 8, 1995, GAF was served with a third party complaint naming it and numerous other parties as PRP's in a cost recovery action relating to unspecified environmental conditions at the Cinnaminson Landfill, also referred to as the Cinnaminson Groundwater Contamination Site.

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MIDDLESEX LANDFILL
(Middlesex, New Jersey)

In or about March, 1995, GAF was informally contacted regarding allegations by several PRP's, including the municipality of Middlesex, New Jersey, that to the extent such PRP's may be liable for conditions at the Middlesex Landfill, they would be asserting a claim against GAF for contribution for such liabilities.

HINSON CHEMICAL SUPERFUND SITE
(Lake Wylie, South Carolina)

On or about June 28, 1995, GAF received notice that USEPA considers GAF a PRP at Hinson Chemical Superfund Site located in Lake Wylie, SC. It is alleged that materials were sent by GAF through SEPCCO of Charlotte, North Carolina for disposal or recycling at the Hinson facility and that there was a subsequent release or threat of release of hazardous substance at the Hinson facility, necessitating removal and other response actions and resulting in pollution of groundwater and the environment.

LCP PROPERTY
(Linden, New Jersey)

On or about November 16, 1995, GAF received a telephone call from counsel for Hanlin PLC and was advised that Hanlin PLC is in bankruptcy and that creditors of the bankrupt estate, including the U.S. Department of Justice, may be pursuing a claim on

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behalf of the estate against GAF relating to conditions or liabilities arising from the former LCP property in Linden, New Jersey.

PITNEY, HARDIN, KIPP & SZUCH
Attorneys for Plaintiff,
GAF Corporation

By: _____
ROBERT G. ROSE
A Member of the Firm

DATED: December 29, 1995

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the within Amended Complaint of Plaintiff was served upon:

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by regular mail, postage prepaid at Morristown, New Jersey within the time provided by the Federal Rules of Civil Procedure and Case Management Order 1, filed October 4, 1995.

ROBERT G. ROSE

Dated: December 29, 1995

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