

(UPDATED 07/09/2014)

**IN THE CIRCUIT COURT OF
PUTNAM COUNTY, WEST VIRGINIA**

ZINA G. BIBB, et al.,

Plaintiffs,

v.

CIVIL ACTION NO. 04-C-465

MONSANTO COMPANY, et al.,

Defendants.

**NOTICE OF REGISTRATION TO PARTICIPATE
IN MEDICAL MONITORING PROGRAM**

ATTENTION: IF YOU WORKED FULL TIME, ATTENDED SCHOOL FULL TIME OR LIVED FULL TIME WITHIN A CERTAIN GEOGRAPHIC AREA IN PUTNAM AND KANAWHA COUNTIES, NEAR THE CITY OF NITRO, WEST VIRGINIA, *BETWEEN JANUARY 1, 1948, AND SEPTEMBER 30, 2010*, PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS MAY BE AFFECTED. YOU MAY BE ENTITLED TO FREE MEDICAL TESTING, KNOWN AS “MEDICAL MONITORING” OVER THE NEXT 30 YEARS.

*The Circuit Court of Putnam County, West Virginia authorized this Notice.
This is not a solicitation from a lawyer.*

On January 23, 2012, the Circuit Court of Putnam County, West Virginia, entered a Final Order Approving Settlement, in the case of *Bibb et al v. Monsanto Company et al.* Under the terms of the settlement, you may be entitled to receive free medical testing, known as medical monitoring, every five years for the next 30 years. In order to participate in this Medical Monitoring Program you will be required to complete a Registration Questionnaire so that your eligibility may be determined. Please read the following carefully.

1. WHAT THIS LAWSUIT IS ABOUT:

Certain persons living, working, or attending school in and around Nitro, West Virginia filed this lawsuit in 2004 alleging that that their property and persons were contaminated by dioxins released from the old Monsanto chemical plant located in Nitro, West Virginia, which is no longer operational (the “Plant”). Specifically, Plaintiffs in the lawsuit alleged that waste disposal practices at the Plant between 1948 and 1969 resulted in widespread dioxin contamination in the Class Area. The Defendants deny that any such contamination occurred. Nonetheless, the Parties to the lawsuit have reached a preliminary Settlement. As part of the Settlement, persons who worked full time, attended school full time, or lived within the geographic area in Putnam and

Kanawha Counties, West Virginia known as the “Class Area” between January 1, 1948 to September 30, 2010, and meet certain specific eligibility criteria, are permitted to participate in a Medical Monitoring Program, which will be offered every five years for the next 30 years, that is, in 2014, 2019, 2024, 2029, 2034, 2039 and 2044.

Before the Medical Monitoring Program begins, you will be required to complete a Registration Questionnaire to determine if you are in fact eligible to participate. The registration period for 2014 will last for 120 days commencing July 3, 2014, and ending October 31, 2014.

You must complete the Registration Questionnaire and submit it to the Registration Administrator on or before October 31, 2014, or you will not be eligible to participate in the Medical Monitoring Program.

Additional details regarding the Registration Questionnaire are provided below.

2. WHAT IS THE MEDICAL MONITORING PROGRAM:

If you are eligible to participate in the Medical Monitoring Program, you will be entitled to receive, free of charge, the following tests to be administered in cooperation with Thomas Health Care System, located in South Charleston, West Virginia:

- History and physical examination
- Serum dioxin test
- Fasting Glucose
- Hemoglobin A1C
- Fasting Lipid Profile
- Erythrocyte Sedimentation Rate
- CBC with Differential
- Repeat testing of any test if the initial results are positive
- A report summarizing the results and attaching supporting data

The Medical Monitoring Program is designed to screen for certain asymptomatic conditions and to communicate the results of the authorized testing to the participants and/or his/her primary care physician. It is not designed: (1) to test for, or render treatment for or advise about symptomatic or previously diagnosed conditions; (2) as a research vehicle; or (3) to make determinations of whether participants’ conditions or Laboratory results are caused by or in any way related to alleged dioxin exposure.

3. HOW TO DETERMINE IF YOU QUALIFY FOR MEDICAL MONITORING:

To qualify for participation in the Medical Monitoring Program, you must meet certain entry criteria. These are: (1) you never worked at the old Monsanto plant, either directly for Monsanto or for another company or employer, and (2) you have reasonable proof that you resided full time, worked full time or attended school full time within the area designated as Exhibit A for one or more of the time periods described in Eligibility Criteria Groups One to Nine as described in Exhibit B. Both Exhibit A and Exhibit B are attached. In addition, you can view and print these documents by going to the Settlement website address: www.BibbClass.com.

In order to Register, you must **complete the Registration Questionnaire and return it to the Registration Administrator** by (1) mailing it to **Nitro Class Action Settlement Administrators LLC, P.O. Box 11778, Charleston, WV 25339**, with a postmark no later than **October 31, 2014**; or (2) hand-delivering it to the Registration Administrator's office, located at **2303 1st Avenue, Nitro, WV 25143** on or before **October 31, 2014**, during the hours the office is opened, Tuesday through Friday from 10:00 A.M. to 6:00 P.M. and on Saturdays from 9:00 A.M. to 12:00 P.M. The office will be opened and staffed beginning on Tuesday, July 8, 2014.

If you do qualify to participate in the Medical Monitoring Program you will be required at a later date to sign an informed consent/release form before any of the testing is conducted and to cooperate with the Registration Administrator to have the testing completed no later than March 30, 2015.

Please do not call the Court or the Judge about this Notice

Complete and Return to:
Nitro Class Action Settlement Administrators LLC
2303 1st Avenue, Nitro, WV 25143

MEDICAL MONITORING CLASS SETTLEMENT QUESTIONNAIRE

Your answers to the following questions will help determine whether you qualify for periodic medical testing under the Medical Monitoring Class Settlement.

In answering these questions, you must follow these guidelines:

- A. The area referred to in the questions below as the “Monitoring Area” is the geographic area depicted on the attached Exhibit A. You must determine whether you lived, worked or attended school within the boundaries of Exhibit A in responding to these questions.
- B. For purposes of these questions, the term “resided full time” means that you resided for at least 11 months out of any given year within the boundaries of Exhibit A. The term “worked full time” means that you worked (40 hours a week) for at least 11 months out of any given year within the boundaries of Exhibit A. The term “attended school full time” means you attended school for the entire school year (typically at least nine months) within the boundaries of Exhibit A.
- C. Although some of the questions may appear to be repetitious it is important that you answer each and every question.
- D. If you are unable to answer the questions, even with the help of family and/or friends, or if you have any questions about the Questionnaire or need other assistance, you may appear in person at the Registration Administrator’s office, located at 2303 1st Avenue, Nitro, WV 25143 during the hours the office is opened, Tuesday through Friday from 10:00 A.M. to 6:00 P.M. and on Saturdays from 9:00 A.M. to 12:00 P.M. The office will be opened and staffed beginning on Tuesday, July 8, 2014. You may also telephone the office at 1(877) 673-5049.

By completing and submitting this form, you are making a preliminary decision that you wish to participate in the Medical Monitoring Program. If you are eligible, you may, however, elect to withdraw at a later date.

Preliminary Information

1. Name: _____

Current Address: _____

Email address: _____

Telephone: Home _____

Work _____

Mobile _____

D.O.B.: _____

2. Did you ever work for Monsanto Company, Monsanto Chemical Company, Pharmacia Corporation, Solutia, Inc. and/or any of the companies known as Flexsys at its/their chemical manufacturing plant formerly located in Nitro, West Virginia (“the Plant”)?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) you worked at the Plant:

_____/_____/_____ to ____/____/_____

_____/_____/_____ to ____/____/_____

_____/_____/_____ to ____/____/_____

3. Did you ever work at the Plant, even if you did not work directly for one of the companies listed in the previous question)?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) you worked at the Plant and then name of the company, contractor, business or individual you were working for at the time:

_____ to _____ for _____

_____ to _____ for _____

_____ to _____ for _____

NOTE: If you answered "Yes" to either Question 2 or Question 3 above, you are not required to complete the remainder of the Questionnaire and should return the questionnaire with just this preliminary information filled-in. You will be notified if any additional information is needed.

Criteria for Group One:

4. Did you **reside full time for at least three years** within the Monitoring Area during the years **1948 to 1968** and were between the **ages of one year and seven years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Two:

5. Did you **reside full time for at least six years** within the Monitoring Area during the years **1948 to 1968** and were between the **ages of one year and 31 years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Three:

6. Did you **reside full time for at least six years** within the Monitoring Area during the years **1948 to 1968** and were **18 years of age or older** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Four:

7. Did you attend **school full time for at least 13 years** within the Monitoring Area during the years **1948 to 1968** and were between the **ages 1 year and 18 years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and name of the school(s) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Five:

8. Did you **work full time for at least six years within the** Monitoring Area during the years **1948 to 1968** and were **18 years of age or older** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es)/location(s) of your worksite/company below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Six:

9. Did you **reside full time for at least six years** within the Monitoring Area during the years **1969 to September 30, 2010** and were between the **ages of one year and seven years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Seven:

10. Did you **reside full time for at least 30 years** within the Monitoring Area during the years **1969 to September 30, 2010** and were between the **ages of one year and 31 years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Eight:

11. Did you **reside full time for at least 3 months** within the Monitoring Area during the years **1948 to 1968** and were between the **ages of one year and seven years** at the time?

a. Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

AND

Did you **reside full time for at least three years** within the Monitoring Area during the years **1969 to 1976** and were between the ages of **one year and seven years** at the time?

a Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

Criteria for Group Nine:

12. Did you **reside full time for at least 18 months** within the Monitoring Area during the years **1948 to 1968** and were **18 years of age or older** at the time?

a Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

AND

Did you **reside full time at least 10 years** within the Monitoring Area during the years **1969 to September 30, 2010** and were **18 years of age or older** at the time?

a Yes _____ No _____

b. If yes, please indicate the dates (month/year) and address(es) below:

_____ to _____ at _____

_____ to _____ at _____

_____ to _____ at _____

VERIFICATION

I, _____ (print name), hereby verify that the information contained in the foregoing ***BIBB* MEDICAL MONITORING CLASS SETTLEMENT QUESTIONNAIRE** is true and accurate to the best of my knowledge, information and belief.

DATED this _____ day of _____, 2014

(Signature)

EXHIBIT A

BIBB MEDICAL MONITORING CLASS ACTION SETTLEMENT AREA MAP

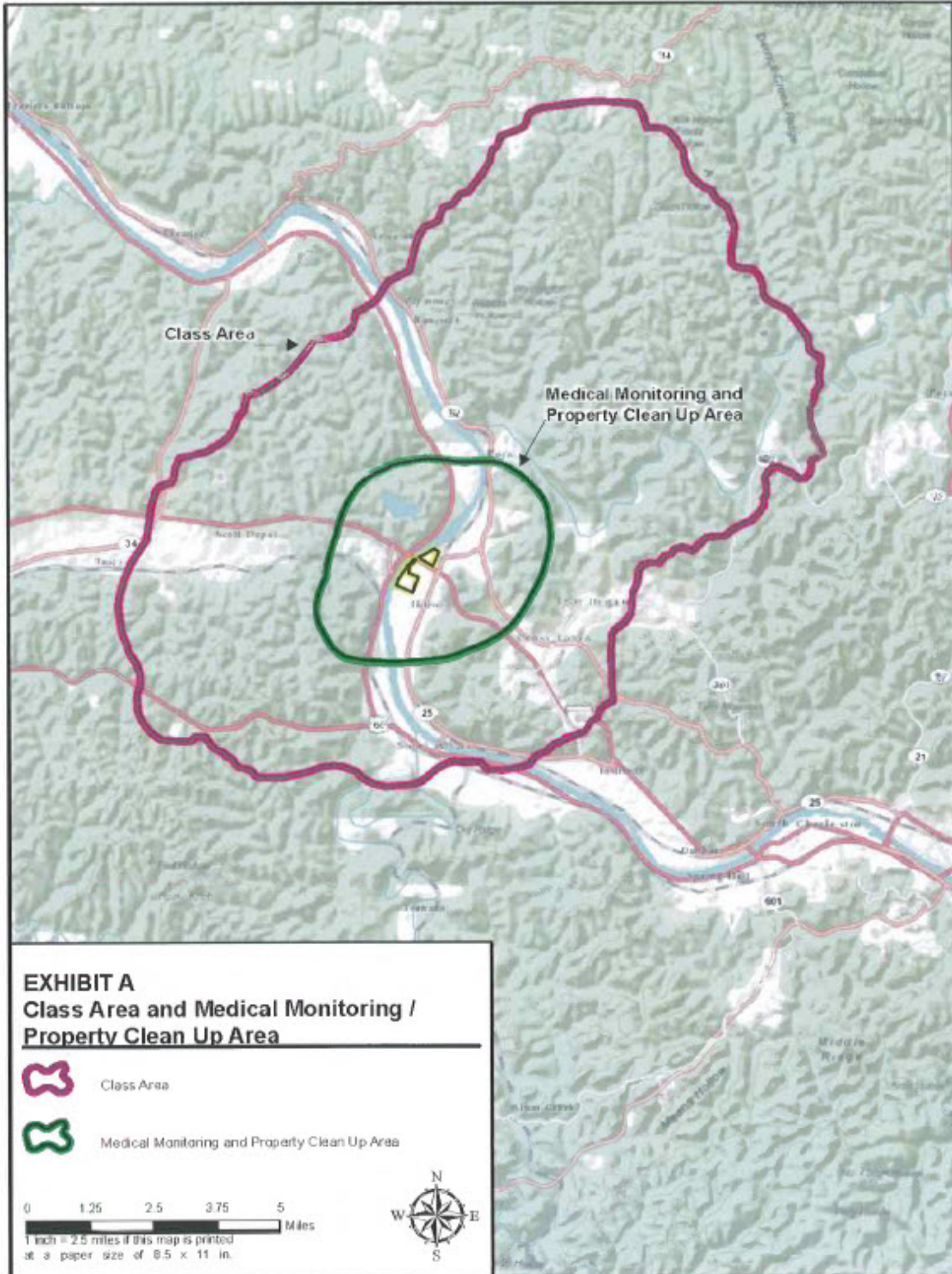


EXHIBIT B

BIBB MEDICAL MONITORING CLASS ACTION SETTLEMENT ELIGIBILITY CRITERIA GROUPS

1. Children full time residents for at least 3 years (1948 - 1968): All class members who resided full time (for at least 11 months of any given year) for at least three years within the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 1 to 7 at the time.
2. Combined Children/Adult full time residents for at least 6 years (1948 - 1968): All class members who resided full time (for at least 11 months of any given year) for at least six years in the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 1 to 31 at the time.
3. Adult full time residents for at least 6 years (1948 - 1968): All class members who resided full time (at least 11 months of any given year) at least six years in the geographical area delineated in Exhibit A between the years 1948-1968 and were ages 18 years and older at the time.
4. Children Attending Nitro Schools full time for at least 13 years (1948 - 1968): All class members who attended schools full time (for the full school year) for at least 13 years within the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 1-18 at the time.
5. Workers who worked full-time at least six years (1948 - 1968): All class members who worked full time (at least 40 hours per week) for at least six years within the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 18 and older at the time.
6. Children who resided full time for at least 6 years (1969 - September 30, 2010): All class members who resided full time (at least 11 months of any given year) for at least six years within the geographic area delineated in Exhibit A between the years 1969 to September 30, 2010 and were ages 1-7 at the time.

7. Children and Adults who resided full time for at least 30 years (1969 - September 30, 2010): All class members who resided full time (at least 11 months of any given year) for at least 30 years within the geographical area delineated in Exhibit A between the years 1969 - September 30, 2010, and were ages 1-31 at the time.

8. Children and Adults who resided full time (pre-1969 and later years): All class members who meet both of these criteria: (1) resided full time for at least 3 months in the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 1-7 at the time; and (2) resided full time (at least 11 months of any given year) for at least 3 years in the geographic area delineated in Exhibit A between the years 1969-1976 and were ages 1-7 at the time.

9. Adults who resided full time (pre-1969 and later years): All class members who meet both of these criteria: (1) resided full time for at least 18 months within the geographic area delineated in Exhibit A between the years 1948-1968 and were ages 18 years and older at the time; and (2) resided full time (at least 11 months of any given year) for at least 10 years in the geographic area delineated in Exhibit A between the years 1969 - September 30, 2010 and were 18 years and older at the time.