

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

Greenpeace, Inc.)	
)	
)	
Plaintiff,)	Case No. 1:10-CV-02037-RMC
)	The Hon. Rosemary M. Collyer
v.)	
)	
The Dow Chemical Company, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**PLAINTIFF’S STATEMENT OF UNDISPUTED FACTS IN OPPOSITION TO
DEFENDANT FERRIS’S MOTION FOR
SUMMARY JUDGMENT**

1. Defendant Ferris is a resident of Maryland. Complaint, ¶ 15. Answer, ¶ 15.
2. Defendant Ferris was employed by Beckett Brown International, Inc. (“BBI”).

Affidavit of George Ferris in Support of his Motion for Summary Judgment (“Ferris Aff.”), ¶ 2.
Def. George Ferris’s Mot. for Summ. J. (“Ferris Mot.”) at 5.

Dated: March 25, 2011

By: /s/ Victoria S. Nugent

Victoria S. Nugent (D.C. Bar No. 470800)
Kit A. Pierson (D.C. Bar No. 398123)
George F. Farah (D.C. Bar No. 992638)
Emmy L. Levens (D.C. Bar No. 997826)
Robert Cacace (D.C. Bar No. 999006)
COHEN, MILSTEIN, SELLERS & TOLL
P.L.L.C.
1100 New York Avenue, N.W.
Suite 500, West Tower
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699

John P. Relman
Reed N. Colfax
RELMAN, DANE & COLFAX PLLC
1225 19th Street, N.W.
Washington, DC 20036

Telephone: (202) 728-1888
Facsimile: (202) 728-0848

Attorneys for Plaintiff Greenpeace, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Plaintiff's Statement of Undisputed Facts in Opposition to Defendant Ferris's Motion for Summary Judgment was served on counsel of record who have appeared in this action through the electronic filing system for the U.S. District Court for District of Columbia on March 25, 2011.

/s/ Victoria S. Nugent