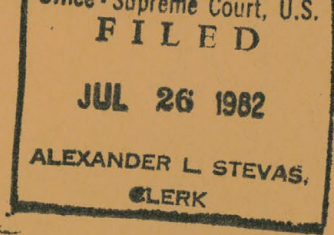


NO. 93, ORIGINAL



IN THE
Supreme Court Of The United States
OCTOBER TERM, 1981

THE STATE OF OKLAHOMA,

Plaintiff,

V.

THE STATE OF ARKANSAS, ET AL.,

Defendants.

**RESPONSE TO MOTION FOR LEAVE TO FILE
COMPLAINT AND COMPLAINT**

MICHAEL H. MASHBURN
P.O. Box 1400
Springdale, Arkansas 72764
(501) 751-5222

*Attorney for Separate Defendants,
Hudson Foods, Inc., Forrest Park
Canning Company, Springdale
Farms, Inc., Steele Canning
Company, Parsons Feed & Farm
Supply, Inc., Kelley Canning
Company and Tyson Foods, Inc.*

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IN THE
Supreme Court Of The United States
OCTOBER TERM, 1981

STATE OF OKLAHOMA,

Plaintiff,

vs.

STATE OF ARKANSAS, ET AL.,

Defendants.

**ON MOTION FOR LEAVE TO FILE COMPLAINT
IN ORIGINAL ACTION**

Brief of Separate Defendants, Hudson Foods, Inc.,
Forrest Park Canning Company, Springdale
Farms, Inc., Steele Canning Company, Parsons
Feed & Farm Supply, Inc., Kelley Canning
Company and Tyson Foods, Inc. In Opposition
To Motion For Leave To File Complaint

ENTRY OF APPEARANCE

Pursuant to Rule 28.1 of the Rules of the Supreme Court of the United States, Michael H. Mashburn, attorney at law, enters his appearance as counsel of record for the separate defendants, Hudson Foods, Inc., Forrest Park Canning Company, Springdale Farms, Inc., Steele Canning Company, Parsons Feed & Farm Supply, Inc., Kelley Canning Company and Tyson Foods, Inc.

/s/ Michael H. Mashburn

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas;
City of Rogers, Arkansas; City of Gentry,
Arkansas; City of Prairie Grove, Arkansas; City
of Siloam Springs, Arkansas; City of Fayetteville,
Arkansas; Ashland Warren, Inc. (formerly
d/b/a and a/k/a Arkhola Sand & Gravel
Company); Earl A. Harris, Inc. (formerly d/b/a
and a/k/a Harris Baking Company); Hillbilly
Enterprises, Inc. (d/b/a Hillbilly Smokehouse);
Hudson Foods, Inc.; War Eagle Mill; Arkansas
Vinegar Company, Inc. (formerly d/b/a and
a/k/a Rogers Vinegar Company and Speas Com-
pany); Cargill, Inc.; Foremost Foods Company,
Inc.; Forrest Park Canning Company; Sav-Mor
Feeder Company; Seymour Foods, Inc.; Spring-
dale Farms, Inc.; Steele Canning Company;
Parsons Feed & Farm Supply, Inc.; Kelley Can-
ning Company; Simmons Industries, Inc.; Iversen
Baking Company; Hardcastle Foods, Inc.; Rogers
Coca-Cola Bottling Company; Tyson's Foods,
Inc.; and Delco Manufacturing Company *Defendants*

**RESPONSE TO MOTION FOR LEAVE
TO FILE COMPLAINT**

Comes now Hudson Foods, Inc., Forrest Park Canning
Company, Springdale Farms, Inc., Steele Canning Com-
pany, Parsons Feed & Farm Supply, Inc., Kelley Canning
Company and Tyson Foods, Inc. and for their response to

the motion of the State of Oklahoma for leave to file its complaint against these separate defendants state:

The motion of the State of Oklahoma for leave to file a complaint in the United States Supreme Court as against these separate defendants should be denied for the following reasons:

I. The proposed claim of the State of Oklahoma, based on state law and federal common law, does not state a claim upon which relief may be granted because these bodies of law have been preempted by Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C.A., Section 1251 et seq.

II. These separate defendants are neither necessary nor proper parties to this litigation.

I.

THE PREEMPTION ISSUE

The complaint which plaintiff would file with this Court sets out six separate claims. Claims 1, 2 and 3 present causes of action arising out of the federal common law. Claims 4, 5 and 6 present claims arising out of the law of the State of Oklahoma. None of these claims present a claim upon which relief may be granted as against these separate defendants. *City of Milwaukee, et al v. Illinois and Michigan*, 451 U.S. 304 (1981).

The Federal Water Pollution Amendments of 1972, 33 U.S.C.A., Sections 1251 et seq. have displaced both federal common law and state law in the field of water pollution litigation. *Id.*

In *City of Milwaukee v. Illinois and Michigan*, *supra*, this Court summarized the relationship between the 1972 amendments to the Federal Water Pollution Act and federal common law in the following language:

“We conclude that, at least so far as concerns the claims of respondents, Congress has not left the formulation of appropriate federal standards to the courts through application of often vague and indeterminate nuisance concepts and maxims of equity jurisprudence, but rather has occupied the field through the establishment of a comprehensive regulatory program supervised by an expert administrative agency. The 1972 amendments to the Federal Water Pollution Control Act were not merely another law “touching interstate waters” of the sort surveyed in *Illinois v. Milwaukee*, 406 U.S., at 101-103, 92 S.Ct., at 1391-1392, and found inadequate to supplant federal common law. Rather, the amendments were viewed by Congress as a “total restructuring” and “complete rewriting” of the existing water pollution legislation considered in that case. 1 Leg. Hist. 350-351 (remarks of Chairman Blatnik of the House Committee which drafted House version of the amendments); *id.*, at 359-360 (remarks of Rep. Jones). See S. Rep. No. 92-414, at 95, 2 Leg. Hist. 1511; 2 Leg. Hist. 1271 (remarks of Chairman Randolph of the Senate Committee which drafted Senate version of amendments); see also *EPA v. State Water Resources Control Board*, 426 U.S., at 202-203, 96 S.Ct., at 2023-24. Congress’ intent in enacting the amendments was clearly to establish an

all-encompassing program of water pollution regulation. Every point source discharge is prohibited unless covered by a permit, which directly subjects the discharger to the administrative apparatus established by Congress to achieve its goals."

These separate defendants respectfully submit that the proposed complaint of the State of Oklahoma, founded as it is, on the concept of federal common law and state law, does not state a claim upon which relief may be granted in this Court or any other court. For this reason alone, the request of the State of Oklahoma for leave to file its complaint with this Court should be denied.

II.

THE PROPER PARTY ISSUE

These separate defendants further respectfully submit that they are not proper parties nor are they necessary parties to this litigation. Each of the defendants listed in this response are, or were at one time, privately owned businesses located in Northwest Arkansas. None are public agencies. None have any control whatever as to the point or manner of discharge of "nutrients" as complained of in the complaint of the State of Oklahoma. Rather, each of these defendants is required by municipal ordinance to discharge its sewage into the city sewage treatment system for the city in which it is located. (See, e.g., City of Rogers Ordinance, 525 Sect. 5; City of Springdale Municipal Code, Chapter 33, Act III, Section 33-46; City of Prairie Grove Ordinance, Chapter 10.08, Section 10.08.03).

These separate defendants have no control over the point of discharge of these nutrients once they leave their plant, nor do they have any control over the method or manner of treatment or the level of treatment of these nutrients before they are discharged by the sewer systems for the municipalities which are co-defendants in this case. For each municipality the point of discharge and the level of treatment is determined by the Arkansas Department of Pollution Control and Ecology in conjunction with the Environmental Protection Agency. (Ark. Stat. Ann. Sect. 82-1901 et seq.) None of these defendants have any control whatever over these agencies, nor can the responsibility or liability incurred by these agencies in performing our actions, if any, be imputed back to these defendants.

Some of these defendants are no longer in business. Of the defendants that still survive in the marketplace, all discharge wastes generated at their operations into either a permitted municipal sewage system or in a manner independently permitted by the appropriate governmental agency under the 1972 amendments to the Federal Water Pollution Control Act Amendments of 1972. (See Appendix I through VII attached as a portion of this response).

These defendants have simply complied with the appropriate municipal, state and federal law and regulations. Each of these defendants is clearly one step removed from the decision making process which effects this litigation. They can neither control nor be held responsible for the actions complained of in plaintiff's complaint. For this reason, even if this Court grants the State of Oklahoma permission to file its complaint, that permission should only be granted as to the State of Arkansas and the political

subdivisions named as defendants in this case. *Commonwealth of Kentucky v. State of Indiana*, 281 U.S. 163 (1930).

Respectfully submitted,

HUDSON FOODS, INC., FORREST PARK
CANNING COMPANY, SPRINGDALE
FARMS, INC., STEELE CANNING
COMPANY, PARSONS FEED & FARM
SUPPLY, INC., KELLEY CANNING
COMPANY AND TYSON FOODS, INC.

By: CYPERT & ROY
P.O. Box 1400
Springdale, Arkansas 72764
(501) 751-5222

By: MICHAEL H. MASHBURN

Attorney for separate defendants

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon: Mr. Michael Scott Fern, Assistant Attorney General, State of Oklahoma, State Capitol, Oklahoma City, Oklahoma 73105, and Mr. James M. McHaney, Sr., Owens, McHaney & Calhoun, 1902 First National Building, Little Rock, Arkansas 72201 with a copy of this pleading by depositing in the United States mail a copy properly addressed with adequate postage thereon.

This 23rd day of July, 1982.

/s/ Michael H. Mashburn

Appendix

APPENDIX "I"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas;
City of Rogers, Arkansas; City of Gentry,
Arkansas; City of Prairie Grove, Arkansas; City
of Siloam Springs, Arkansas; City of Fayetteville,
Arkansas; Ashland Warren, Inc. (formerly
d/b/a and a/k/a Arkhola Sand & Gravel
Company); Earl A. Harris, Inc. (formerly d/b/a
and a/k/a Harris Baking Company); Hillbilly
Enterprises, Inc. (d/b/a Hillbilly Smokehouse);
Hudson Foods, Inc.; War Eagle Mill; Arkansas
Vinegar Company, Inc. (formerly d/b/a and
a/k/a Rogers Vinegar Company and Speas Com-
pany); Cargill, Inc.; Foremost Foods Company,
Inc.; Forrest Park Canning Company; Sav-Mor
Feeder Company; Seymour Foods, Inc.; Spring-
dale Farms, Inc.; Steele Canning Company;
Parsons Feed & Farm Supply, Inc.; Kelley Can-
ning Company; Simmons Industries, Inc.; Iversen
Baking Company; Hardcastle Foods, Inc.; Rogers
Coca-Cola Bottling Company; Tyson's Foods,
Inc.; and Delco Manufacturing Company *Defendants*

AFFIDAVIT

Comes now Glenn Parsons, after having first been duly
sworn upon oath states as follows:

1. That my name is Glenn Parsons.

A-2

2. That I am employed by Parsons Feed and Farm Supply, Inc.

3. I am fully familiar with the waste disposal operations of my company. These operations, for the past several years, have consisted of a bathroom with a toilet used by employees.

4. Our operation is basically a feed and farm supply store. We do not manufacture or process any poultry or other products. The disposal of wastes through our employee bathroom is the same as in any home in Springdale, Arkansas. We simply hook on to the Springdale Municipal Sewer System.

FURTHER AFFIANT SAITH NOT.

/s/ Glenn Parsons

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ Michael H. Mashburn,
Notary Public

My Commission Expires:
7/9/82

APPENDIX "II"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas; City of Rogers, Arkansas; City of Gentry, Arkansas; City of Prairie Grove, Arkansas; City of Siloam Springs, Arkansas; City of Fayetteville, Arkansas; Ashland Warren, Inc. (formerly d/b/a and a/k/a Arkhola Sand & Gravel Company); Earl A. Harris, Inc. (formerly d/b/a and a/k/a Harris Baking Company); Hillbilly Enterprises, Inc. (d/b/a Hillbilly Smokehouse); Hudson Foods, Inc.; War Eagle Mill; Arkansas Vinegar Company, Inc. (formerly d/b/a and a/k/a Rogers Vinegar Company and Speas Company); Cargill, Inc.; Foremost Foods Company, Inc.; Forrest Park Canning Company; Sav-Mor Feeder Company; Seymour Foods, Inc.; Springdale Farms, Inc.; Steele Canning Company; Parsons Feed & Farm Supply, Inc.; Kelley Canning Company; Simmons Industries, Inc.; Iversen Baking Company; Hardcastle Foods, Inc.; Rogers Coca-Cola Bottling Company; Tyson's Foods, Inc.; and Delco Manufacturing Company *Defendants*

AFFIDAVIT

Comes now Gary C. George, after having been first duly sworn upon oath states as follows:

1. That my name is Gary C. George.

A-4

2. That I am employed by Springdale Farms, Inc. I am fully familiar with the waste disposal operations of my company, including all aspects of disposal of human, agricultural and industrial waste products.

3. My company does not currently, nor has it at any time relevant to this litigation discharged any such waste except by depositing the same as required by law in a municipal sewage system permitted by the Arkansas Department of Pollution Control and Ecology and/or through the rights of such discharge granted by permit issued by the Department of Pollution Control and Ecology for the State of Arkansas.

FURTHER AFFIANT SAITH NOT.

/s/ Gary C. George

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ Foy M. Coker
Notary Public

My Commission Expires:
8/1/83

APPENDIX "III"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma Plaintiff

v.

State of Arkansas; City of Springdale, Arkansas; City of Rogers, Arkansas; City of Gentry, Arkansas; City of Prairie Grove, Arkansas; City of Siloam Springs, Arkansas; City of Fayetteville, Arkansas; Ashland Warren, Inc. (formerly d/b/a and a/k/a Arkhola Sand & Gravel Company); Earl A. Harris, Inc. (formerly d/b/a and a/k/a Harris Baking Company); Hillbilly Enterprises, Inc. (d/b/a Hillbilly Smokehouse); Hudson Foods, Inc.; War Eagle Mill; Arkansas Vinegar Company, Inc. (formerly d/b/a and a/k/a Rogers Vinegar Company and Speas Company); Cargill, Inc.; Foremost Foods Company, Inc.; Forrest Park Canning Company; Sav-Mor Feeder Company; Seymour Foods, Inc.; Springdale Farms, Inc.; Steele Canning Company; Parsons Feed & Farm Supply, Inc.; Kelley Canning Company; Simmons Industries, Inc.; Iversen Baking Company; Hardcastle Foods, Inc.; Rogers Coca-Cola Bottling Company; Tyson's Foods, Inc.; and Delco Manufacturing Company Defendants

AFFIDAVIT

Comes now Walter Turnbow, after having first been duly sworn upon oath states as follows:

1. That my name is Walter Turnbow.

A-6

2. That I am familiar with the past operations of Steele Canning Company of Lowell, Arkansas.

3. That on or about July 17, 1971, Steele Canning Company sold its canning plant in Lowell, Arkansas and has not had a canning operation since that time.

FURTHER AFFIANT SAITH NOT.

/s/ Walter Turnbow

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ H. Sue Preece
Notary Public

My Commission Expires:
March 1, 1984

APPENDIX "IV"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma Plaintiff

v.

State of Arkansas; City of Springdale, Arkansas; City of Rogers, Arkansas; City of Gentry, Arkansas; City of Prairie Grove, Arkansas; City of Siloam Springs, Arkansas; City of Fayetteville, Arkansas; Ashland Warren, Inc. (formerly d/b/a and a/k/a Arkhola Sand & Gravel Company); Earl A. Harris, Inc. (formerly d/b/a and a/k/a Harris Baking Company); Hillbilly Enterprises, Inc. (d/b/a Hillbilly Smokehouse); Hudson Foods, Inc.; War Eagle Mill; Arkansas Vinegar Company, Inc. (formerly d/b/a and a/k/a Rogers Vinegar Company and Speas Company); Cargill, Inc.; Foremost Foods Company, Inc.; Forrest Park Canning Company; Sav-Mor Feeder Company; Seymour Foods, Inc.; Springdale Farms, Inc.; Steele Canning Company; Parsons Feed & Farm Supply, Inc.; Kelley Canning Company; Simmons Industries, Inc.; Iversen Baking Company; Hardcastle Foods, Inc.; Rogers Coca-Cola Bottling Company; Tyson's Foods, Inc.; and Delco Manufacturing Company Defendants

AFFIDAVIT

Comes now Walter Turnbow, after having been first duly sworn upon oath states as follows:

1. That my name is Walter Turnbow.

A-8

2. That I am a director of Forrest Park Canning Company. I am fully familiar with the waste disposal operations of my company, including all aspects of disposal of human, agricultural and industrial waste products.

3. My company does not currently, nor has it at any time relevant to this litigation discharged any such waste except by depositing the same as required by law in a municipal sewage system permitted by the Arkansas Department of Pollution Control and Ecology and/or through the rights of such discharge granted by permit issued by the Department of Pollution Control and Ecology for the State of Arkansas.

FURTHER AFFIANT SAITH NOT.

/s/ Walter Turnbow

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ H. Sue Preece
Notary Public

My Commission Expires:
March 1, 1984

APPENDIX "V"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas; City of Rogers, Arkansas; City of Gentry, Arkansas; City of Prairie Grove, Arkansas; City of Siloam Springs, Arkansas; City of Fayetteville, Arkansas; Ashland Warren, Inc. (formerly d/b/a and a/k/a Arkhola Sand & Gravel Company); Earl A. Harris, Inc. (formerly d/b/a and a/k/a Harris Baking Company); Hillbilly Enterprises, Inc. (d/b/a Hillbilly Smokehouse); Hudson Foods, Inc.; War Eagle Mill; Arkansas Vinegar Company, Inc. (formerly d/b/a and a/k/a Rogers Vinegar Company and Speas Company); Cargill, Inc.; Foremost Foods Company, Inc.; Forrest Park Canning Company; Sav-Mor Feeder Company; Seymour Foods, Inc.; Springdale Farms, Inc.; Steele Canning Company; Parsons Feed & Farm Supply, Inc.; Kelley Canning Company; Simmons Industries, Inc.; Iversen Baking Company; Hardcastle Foods, Inc.; Rogers Coca-Cola Bottling Company; Tyson's Foods, Inc.; and Delco Manufacturing Company *Defendants*

AFFIDAVIT

Comes now Emery E. Phillips, after having been first duly sworn upon oath states as follows:

1. That my name is Emery E. Phillips.

A-10

2. That I am employed by Kelley Canning Company, Inc. of Prairie Grove, Arkansas. I am familiar with the waste disposal operations of my company.

3. My company does not currently, nor has it at any time relevant to this litigation discharged any such waste except by depositing the same as required by law in a municipal sewage system permitted by the Arkansas Department of Pollution Control and Ecology and/or through the rights of such discharge granted by permit issued by the Department of Pollution Control and Ecology for the State of Arkansas.

4. That Kelley Canning Company, Inc. of Prairie Grove, Arkansas has not engaged in commercial canning operations since the calendar year 1979.

FURTHER AFFIANT SAITH NOT.

/s/ Emery E. Phillips

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ H. Sue Preece
Notary Public

My Commission Expires:
March 1, 1984

APPENDIX "VI"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas; City of Rogers, Arkansas; City of Gentry, Arkansas; City of Prairie Grove, Arkansas; City of Siloam Springs, Arkansas; City of Fayetteville, Arkansas; Ashland Warren, Inc. (formerly d/b/a and a/k/a Arkhola Sand & Gravel Company); Earl A. Harris, Inc. (formerly d/b/a and a/k/a Harris Baking Company); Hillbilly Enterprises, Inc. (d/b/a Hillbilly Smokehouse); Hudson Foods, Inc.; War Eagle Mill; Arkansas Vinegar Company, Inc. (formerly d/b/a and a/k/a Rogers Vinegar Company and Speas Company); Cargill, Inc.; Foremost Foods Company, Inc.; Forrest Park Canning Company; Sav-Mor Feeder Company; Seymour Foods, Inc.; Springdale Farms, Inc.; Steele Canning Company; Parsons Feed & Farm Supply, Inc.; Kelley Canning Company; Simmons Industries, Inc.; Iversen Baking Company; Hardcastle Foods, Inc.; Rogers Coca-Cola Bottling Company; Tyson's Foods, Inc.; and Delco Manufacturing Company *Defendants*

AFFIDAVIT

Comes now Kent Doss, after having been first duly sworn upon oath states as follows:

1. That my name is Kent Doss.

A-12.

2. That I am employed by Hudson Foods, Inc. I am fully familiar with the waste disposal operations of my company, including all aspects of disposal of human, agricultural and industrial waste products.

3. My company does not currently, nor has it at any time relevant to this litigation discharged any such waste except by depositing the same as required by law in a municipal sewage system permitted by the Arkansas Department of Pollution Control and Ecology and/or through the rights of such discharge granted by permit issued by the Department of Pollution Control and Ecology for the State of Arkansas.

FURTHER AFFIANT SAITH NOT.

/s/ Kent A. Doss

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day of July, 1982.

/s/ Michael H. Mashburn
Notary Public

My Commission Expires:
10/1/82

APPENDIX "VII"

BEFORE THE UNITED STATES SUPREME COURT

State of Oklahoma *Plaintiff*

v.

State of Arkansas; City of Springdale, Arkansas;
City of Rogers, Arkansas; City of Gentry,
Arkansas; City of Prairie Grove, Arkansas; City
of Siloam Springs, Arkansas; City of Fayetteville,
Arkansas; Ashland Warren, Inc. (formerly
d/b/a and a/k/a Arkhola Sand & Gravel
Company); Earl A. Harris, Inc. (formerly d/b/a
and a/k/a Harris Baking Company); Hillbilly
Enterprises, Inc. (d/b/a Hillbilly Smokehouse);
Hudson Foods, Inc.; War Eagle Mill; Arkansas
Vinegar Company, Inc. (formerly d/b/a and
a/k/a Rogers Vinegar Company and Speas Com-
pany); Cargill, Inc.; Foremost Foods Company,
Inc.; Forrest Park Canning Company; Sav-Mor
Feeder Company; Seymour Foods, Inc.; Spring-
dale Farms, Inc.; Steele Canning Company;
Parsons Feed & Farm Supply, Inc.; Kelley Can-
ning Company; Simmons Industries, Inc.; Iversen
Baking Company; Hardcastle Foods, Inc.; Rogers
Coca-Cola Bottling Company; Tyson's Foods,
Inc.; and Delco Manufacturing Company *Defendants*

AFFIDAVIT

Comes now Bill Moeller, after having been first duly
sworn upon oath states as follows:

1. That my name is Bill Moeller.

A-14

2. That I am employed by Tyson Foods, Inc. I am fully familiar with the waste disposal operations of my company, including all aspects of disposal of human, agricultural and industrial waste products.

3. My company does not currently, nor has it at any time relevant to this litigation discharged any such waste except by depositing the same as required by law in a municipal sewage system permitted by the Arkansas Department of Pollution Control and Ecology and/or through the rights of such discharge granted by permit issued by the Department of Pollution Control and Ecology for the State of Arkansas.

FURTHER AFFIANT SAITH NOT.

/s/ Bill Moeller

STATE OF ARKANSAS)
) ss
COUNTY OF WASHINGTON)

SUBSCRIBED AND SWORN to before me this 9th day
of July, 1982.

/s/ Michael H. Mashburn
Notary Public

My Commission Expires:
10/1/82

