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STATE OF ILLINOIS  
Pollution Control Board

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

PEOPLE OF THE STATE OF ILLINOIS, )  
 )  
 Complainant, )  
 )  
 v. ) PCB No. 03-22  
 ) (Enforcement)  
 SAINT-GOBAIN CONTAINERS, INC., )  
 a Delaware corporation, )  
 )  
 Respondent. )

**AFFIDAVIT OF WRAY C. HISER**

Wray C. Hiser, being first duly sworn, deposes and states as follows:

1. I am Associate General Counsel for Saint-Gobain Containers, Inc.
2. Saint-Gobain Containers, Inc., is a wholly-owned subsidiary of Saint-Gobain Corporation, a holding company for the American businesses of the French parent company, Compagnie de Saint-Gobain. As such, Saint-Gobain Containers, Inc. does not prepare any type of reports or filing regarding its financial information.
3. The financial information about Saint-Gobain Containers, Inc. contained on the two page unaudited financial statement at issue for the Motion for Protective Order is considered extremely confidential by the Company. It is only provided to employees of the Company that must have access to the information to perform their duties. Respondent's unaudited financial information is not made public in any way.
4. Any disclosure of this confidential financial information could be detrimental to the Company in a number of ways, such as providing beneficial information to our competitors about the financial strength and profitability of this Company, to labor unions representing our hourly workforce in union contract

negotiations, or to our customers and suppliers in negotiating supply contracts with our Company.

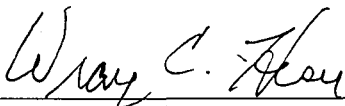
5. Disclosure of this sensitive unaudited financial information to parties outside of this litigation would be detrimental to Respondent's business interests.

6. I have reviewed Saint-Gobain Containers, Inc.'s Reply To Complainant's Response In Opposition to Respondent's Motion for Protective Order.

7. The matters set forth in Saint-Gobain Containers, Inc.'s Reply To Complainant's Response In Opposition to Respondent's Motion for Protective Order are true and correct to the best of my knowledge and belief.

8. The statements made in this affidavit are true and correct to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Wray C. Hiser

Subscribed and sworn to before me  
this 24<sup>th</sup> day of November 2003.

  
\_\_\_\_\_  
Notary Public

