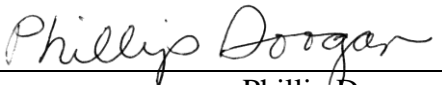


## STATEMENT OF PHILLIP DOOGAN

My name is Phillip Doogan. I am a chemical consultant with Roe. I got my degree in toxicology and agriculture. My job is to go out to farmers and retail stores and sell our products. I am an expert in weed killers, how to use them, and what they can and can't do. I consult and advise our customers on proper uses, what crops need what weed killers, things like that. I've done this for 25 years. I've also farmed for five years in South Roosevelt. I'm not familiar with the Franklin area. I am very familiar with Pre-merge Dinitro. It's probably the best weed killer we have. Without it, lots of farmers in this state would go broke. I am also familiar with the facts of this case. I don't know Mr. Wilson.

First, you have to understand that all weed killers are toxic – that's what makes them work. Without chemicals like 2-sec butyl 4,6-dinitro, there wouldn't be enough food in this country. I received all reports on Dinitro. I have never gotten an adverse report about Dinitro, but I've heard second hand that such claims have been made. There is a problem with every weed killer with spillage – I know because of my own farm work and my meetings with farmers. We discuss the hazards of handling chemicals. The way Mr. Wilson poured Dinitro was very, very careless. Maybe I would expect that from an inexperienced farmer but not one with 30 years' experience. He says the splashing caused his injuries. I'm not a medical doctor, but I know of three instances where farmers have spilled Pre-merge on their arms. They never became ill or anything. I myself, two years ago, spilled some on my shirt – and I was fine. Any farmer knows that gloves *have* to be worn when pouring chemicals. I understand Mr. Wilson did not do so. Again, that action is careless and negligent. If he normally was so careless, over his 30 years, I can see how he would be so sick. Back six decades ago, that's what happened to old farmers who didn't know any better.

December 3, YR-4

  
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Phillip Doogan

[Statement given to defendant's attorneys and made available to plaintiff in discovery proceedings.]