

EXHIBIT A

STATEMENT OF LUCAS JOHN COUVARAS

I Lucas John Couvaras of 216 E 26th Street, Houston, Texas, to the best of my knowledge provide the following clarifications and facts, concerning the relationship between UCC - USA and UCIL-INDIA with respect to the design of the Bhopal plant.

1. Union Carbide India Ltd (UCIL) was a subsidiary Company of Union Carbide Corporation USA (UCC) and I was a UCC employee assigned to UCIL from 1971 to the end of 1981, to manage the engineering and construction of the plant based on proprietary UCC design .. UCIL provided all the other administration and engineering staff to execute the project, using local contractors and material suppliers required by the Government of India.

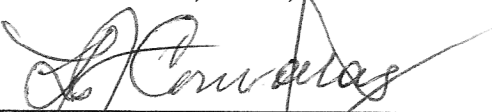
2. The process design reports for the UCIL plant were prepared by UCC-Technical Center in Charleston , West Virginia. These reports were reviewed and approved by the Managers of the various groups who worked on the preparation of these reports before they were sent to India.

3. The engineering and construction group formed in India to implement the project, thoroughly reviewed the design reports and awarded a contract to a UK-engineering company, Humphreys and Glasgow. Detailed engineering entails to all detailed drawings covering, piping, electrical, structural, machinery, foundations etc. I as Project manager overviewed and coordinated all the activities for the timely completion of the project.

4. The engineering and construction group was entirely UCIL employees, most of them were absorbed in the operation of the plant, after its mechanical completion.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of January, 2014 at Houston, Texas, USA.



L. J. Couvaras