IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THE DOW CHEMICAL COMPANY, Plaintiff, v. NOVA CHEMICALS CORPORATION (CANADA), and NOVA CHEMICALS INC. (DELAWARE), Defendants.	)	C.A. No. 05-737 (JJF) **JURY TRIAL DEMANDED**

NOTICE OF DEPOSITION OF DOW CHEMICAL COMPANY PURSUANT TO FED. R. CIV. P. 30(b)(6)

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendants NOVA CHEMICALS CORPORATION (CANADA), and NOVA CHEMICALS INC. (DELAWARE), will take the deposition of Plaintiff **THE DOW CHEMICAL COMPANY** ("Dow") by oral examination using videotape, audiotape, and/or stenographic means. The deposition will begin at 9 AM on Tuesday April 15, 2008, at the office of POTTER ANDERSON & CORROON LLP., 1313 N. Market Street, Wilmington, Delaware 19801, or such other location as the parties may mutually agree, and will continue from day to day until completed. The deposition will be taken before a Notary Public or other officer authorized by law to administer oaths. You are invited to attend and examine the witness.

Pursuant to Fed. R. Civ. P. 30(b)(6), Dow is directed to designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf regarding each topic in Exhibit A, attached hereto. The persons so designated shall testify as to the matters known or reasonably available to Dow, as defined in Exhibit A.

At least five (5) business days prior to the noticed date, Dow shall designate in writing each person who will testify on its behalf and the subject matters identified in Exhibit A as to which each designee shall testify. Dow shall also produce to Defendant, or identify if already produced, at least five (5) business days prior to the noticed date any documents relied on or reviewed by the designee(s) for the purposes of becoming knowledgeable about the topic(s) on which the designee(s) may testify.

Dated: March 31, 2008

POTTER ANDERSON & CORROON LLP

By: 

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Dated: March 31, 2008
858126 / 29645

EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

1. The term "you," "your," and "Dow" encompasses The Dow Chemical Company and all predecessors and/or successors thereto; all affiliated or related companies thereof; each division or subsidiary thereof; all parents thereof, whether wholly or partially owned; and its partners, directors, owners, officers, members, employees, and any other persons under the control of The Dow Chemical Company.

TOPICS OF EXAMINATION

1. The factual bases for Dow's answers in its March 3, 2008, Reply to Amended Counterclaims of Defendants NOVA Chemicals Corporation and NOVA Chemicals Inc. in paragraph nos.: 16, 36, 38, 39, 43, 55, 56, 57, 58, 64, 65, 66, 78, 79, 80, 81, 88, 89, 92, 101, 104, 106, 110, 116, 118, 121, 122, 124, 132, 134, 136, 147, 170, 235, 236, 237, 238, 239, 240, 241, 267, 271, 309, 310, 311, 312, and 313.

2. The factual bases for Dow's responses to NOVA's Interrogatories to Dow Nos. 2, 7, 8, 14, 19, 23, 24, 25, and 26,

3. The factual bases for Dow's responses to NOVA's Request for Admissions to Dow Nos. 34, 35, 40, 41, 42, 43, 44, 45, 46, 47.

4. The identification of documentation and other evidence, supporting, containing, or reflecting the factual bases in topics 1-3, above.

5. The identification of the persons most knowledgeable about the factual bases in topics 1-3, above.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Notice of Deposition of The Dow Chemical Company Pursuant to Fed. R. Civ. P. 30(b)(6) was served on March 31, 2008, by facsimile and Federal Express, to:

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NOVA CHEMICALS INC.