

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

BRENT JARRELL, ET AL	CIVIL ACTION
VERSUS	NO. 16-13793
INTERNATIONAL PAPER COMPANY, ET AL	SECTION "L" (1)
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DERRICK JEVONE SANDERS, ET AL	CIVIL ACTION
VERSUS	NO. 16-12567
INTERNATIONAL PAPER COMPANY, ET AL	SECTION "L" (1)
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SHIRLEY SLOCUM, ET AL	CIVIL ACTION
VERSUS	NO. 16-12563
INTERNATIONAL PAPER COMPANY, ET AL	SECTION "L" (1)


**DECLARATION OF KALISA HYMAN**

1. My name is Kalisa Hyman. I am over 18 years old. I understand the nature of an oath, and I am otherwise competent to testify to the matters stated in this Declaration.
2. I am the Mill Communications Manager for the International Paper Company ("IP") mill located in Bogalusa, Louisiana.
3. On June 10, 2015 at 10:44 p.m., I sent an email to: Jackie Rozier ("Rozier"), General Counsel (Containerboard); Brian Heim ("Heim"), General Counsel (Environmental); Rick Ouellette ("Ouellette"), IP's Chief Communications Leader; and Thomas Ryan ("Ryan"), IP's Director of Global Media Relations.
4. The subject line of the email was "PRIVILEGED ATTY CLIENT INFORMATION".
5. The email contained a draft media statement regarding the accidental discharge of black liquor at IP's Bogalusa, Louisiana Paper Mill (the "Mill") on June 10, 2015 (the "Release Event").

**EXHIBIT  
A**

6. IP and its representatives were immediately concerned with potential legal consequences and litigation which might, and did, arise from the Release Event.
7. As such, the email sought advice from IP's in-house counsel on the potential legal implications of the draft media statement.
8. Pursuant to 28 U.S. Code ¶ 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 24, 2021.

  
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KALISA HYMAN