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5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 47 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, PR Lindsey Jr, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

PR Lindsey Jr
PR Lindsey Jr

DECLARATION OF

Bob Noel

1. My name is Bob Noel. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

Bob Noel

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

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10. I am currently 51 years old and have worked here at the shops in Altoona since 1973. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Robert J. Noel, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Robert J. Noel
Robert J. Noel

DECLARATION OF

George L. Rightenour

1. My name is George L. Rightenour. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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10. I am currently 44 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, George L Rightenour, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

George L Rightenour
George L Rightenour

DECLARATION OF

THOMAS J. LEY

1. My name is Thomas J. Ley. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

THOMAS J. LEYO

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 47 years old and have worked here at the shops in Altoona since 9/23. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, THOMAS J LEYO, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

THOMAS J. LEYO
Thomas J Leyo

DECLARATION OF

Donald E. Kiser

1. My name is Donald E. Kiser. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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10. I am currently 58 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Donald E. Kises, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Donald E Kises
Donald E. Kises

DECLARATION OF R.L. Steach

1. My name is R.L. Steach. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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Verification

I, R. L. Steach, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

R. L. Steach
Robert L. Steach

DECLARATION OF

JOSEPH A. ARCHEY

1. My name is JOSEPH A. ARCHEY. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, JOSEPH A. ARCHEY, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

JOSEPH A. ARCHEY
Joseph A Archey

DECLARATION OF

R. M. Verbonitz

1. My name is R. M. Verbonitz. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, R.M. Verbonitz, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

R. M. Verbonitz
R.M. Verbonitz

DECLARATION OF JAMES D. BENN Jr.

1. My name is James D. Benn Jr.. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

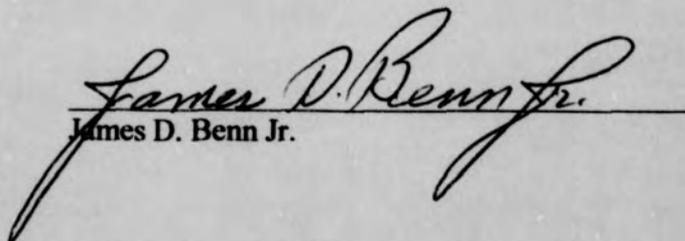
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 61 years old and have worked here at the shops in Altoona since 1972. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, James D. Benn Jr., verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


James D. Benn Jr.

DECLARATION OF VOBIE M HOCKENBERRY

1. My name is VOBIE M HOCKENBERRY. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

LOBIE M HOCKENBERG

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 45 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, JOBIE M HOCKENBERRY, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

JOBIE M HOCKENBERRY
Jobie M Hockenberry

DECLARATION OF Robert A. Lenhart

1. My name is Robert A. Lenhart. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

Robert A Lenhart

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 49 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Robert A. Lenhart, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Robert A Lenhart
Robert a. Lenhart

DECLARATION OF James T. Harkins

1. My name is James T. Harkins. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 44 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, James T. Harkins, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

James T. Harkins

James T. Harkins

DECLARATION OF R.A. DONLEY

1. My name is R.A. Donley. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

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8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

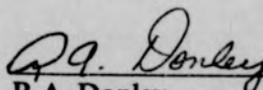
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 47 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, R.A. Donley, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


R.A. Donley

DECLARATION OF BRAD W. BROKAW

1. My name is Brad W. Brokaw. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

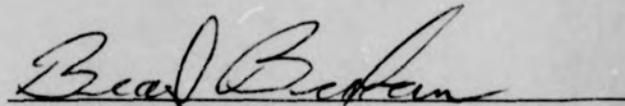
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 44 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Brad W. Brokaw, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Brad W. Brokaw

DECLARATION OF BILL C. BOOKHAMMER

1. My name is Bill C. Bookhammer. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

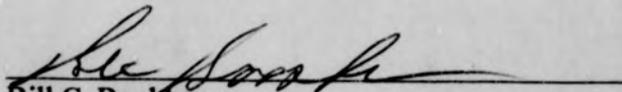
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 58 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Bill C. Bookhammer, verify that under penalty of perjury that I am a Carran employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Bill C. Bookhammer

DECLARATION OF ROBERT F. FORD

1. My name is Robert F. Ford. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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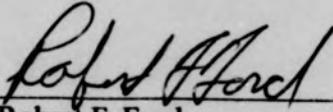
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 54 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Robert F. Ford, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Robert F. Ford

DECLARATION OF BRIAN F. REGALA

1. My name is BRIAN F. REGALA. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 55 years old and have worked here at the shops in Altoona since 12/73. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, BRIAN F. REGALA, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

BRIAN F. REGALA
Brian F. Regala

DECLARATION OF Herbert E. Nolder

1. My name is Herbert E. Nolder. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 60 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Herbert E. Nolder, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Herbert E. Nolder

Herbert E. Nolder

DECLARATION OF DAVID M. MATTERN

1. My name is DAVID M. MATTERN. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

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9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 35 years old and have worked here at the shops in Altoona since 1977. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, DAVID M. MATTERN, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

DAVID M. MATTERN
David M. Mattern

DECLARATION OF Dennis R. Sellers

1. My name is Dennis R. Sellers. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 48 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Dennis R. Sellers, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Dennis R. Sellers

Dennis R. Sellers

DECLARATION OF

Duane A. Mock

1. My name is Duane A. Mock. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999).

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

Duane A. Mock

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 44 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Duane A. Mock, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Duane A. Mock
Duane A. Mock

DECLARATION OF

Paul E Wise

1. My name is Paul E Wise. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

PAUL WISE

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Paul Wise, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Paul Wise
Paul Wise

DECLARATION OF GREGORY L. DAVIS

1. My name is Gregory L. Davis. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

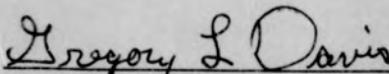
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 45 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Gregory L. Davis, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July____, 2001



Gregory L. Davis

DECLARATION OF

Rudy L. KRISE

1. My name is Rudy L. KRISE. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

Rudy L. KRISE

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers. again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 48 years old and have worked here at the shops in Altoona since 12/1/75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Rudy L. KRISE, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Rudy L. KRISE
Rudy L. KRISE

DECLARATION OF CHESTER W. CLAYCOMB

1. My name is Chester W. Claycomb. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 45 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Chester W. Claycomb, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Chester W. Claycomb
Chester W. Claycomb

DECLARATION OF Thomas B Harris

1 My name is Thomas B Harris. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 43 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Thomas B Harris, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Thomas B Harris

Thomas B Harris

DECLARATION OF William G. Johnson

1. My name is William G. Johnson. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 50 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, William G. Johnson, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

William G. Johnson
William G. Johnson

DECLARATION OF Michael J. McGRAW

1. My name is Michael J. McGRAW. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

Michael J. McGraw

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

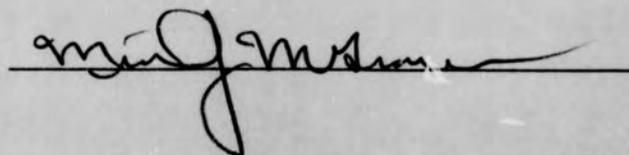
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Michael J. McGraw, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July , 2001

Michael J. McGraw


DECLARATION OF

Theodore L. McKillip Jr.

1. My name is Theodore L. McKillip. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

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10. I am currently 45 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Theodore McKillip, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Theodore McKillip
Theodore McKillip

DECLARATION OF DANIEL R. HAND

1. My name is DANIEL R. HAND. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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10. I am currently 46 years old and have worked here at the shops in Altoona since 09/22/75 have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, DANIEL R. HAND, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

DANIEL R. HAND
Daniel R. Hand

DECLARATION OF DANIELV. ALTIERO Jr.

1. My name is Daniel V. Altiero Jr.. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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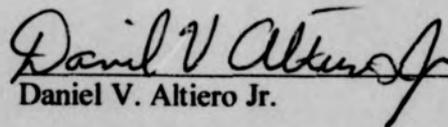
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 47 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Daniel V. Altiero Jr., verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Daniel V. Altiero Jr.

DECLARATION OF Cloyd E mcmastruc

1. My name is Cloyd E mcmastruc. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

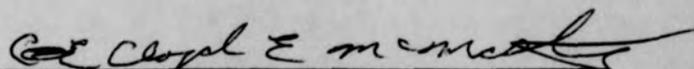
10. I am currently 48 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Cloyd E McMasters, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Cloyd E McMasters



DECLARATION OF Jeffrey A. Seilhamer

1. My name is Jeffrey A. Seilhamer. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 48 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Jeffrey A. Seilhamer, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Jeffrey A. Seilhamer
Jeffrey A. Seilhamer

DECLARATION OF FRANK MODICO

1. My name is FRANK MODICO. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

FRANK MODICO

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Holliday burg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

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10. I am currently 50 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, FRANK MODICO, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

FRANK MODICO
Frank Modico

DECLARATION OF Christopher P. Robinson

1. My name is Christopher P. Robinson. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 45 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Christopher P. Robinson, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 16, 2001

Christopher P. Robinson
Christopher P. Robinson

DECLARATION OF Clair Wyland

1. My name is Clair Wyland. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

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10. I am currently 49 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Clair Wyland, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Clair Wyland
Clair Wyland

DECLARATION OF Walter A Siny

1. My name is Walter A Siny. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow. as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 47 years old and have worked here at the shops in Altoona since 74. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Walter A. Siny, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Walter A Siny
Walter A Siny

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DECLARATION OF

John J Mahoney

1. My name is John J Mahoney. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

John J Mahoney

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 53 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, John J Mahoney, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

John J Mahoney
John J Mahoney

DECLARATION OF

Dennis J. Stiffler

1. My name is Dennis J. Stiffler. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 50 years old and have worked here at the shops in Altoona since 75. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Dennis J. Stiffler, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Dennis J. Stiffler
Dennis J. Stiffler

DECLARATION OF DUANE A PECK

1. My name is Duane a Peck. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

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10. I am currently _____ years old and have worked here at the shops in Altoona since _____. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, DUANE A PECK, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

DUANE A PECK
Duane a Peck

DECLARATION OF HOWARD H. DICK

1. My name is Howard H. Dick. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

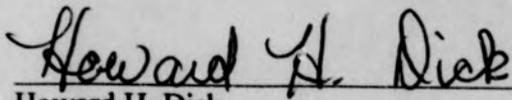
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 51 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Howard H. Dick, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Howard H. Dick

DECLARATION OF STEVEN E. MYERS

1. My name is STEVEN E. MYERS. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

Steven E. Myers

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops. and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 47 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Steven E. Myers, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Steven E. Myer
Stev E Myer

DECLARATION OF

Allen L Black

1. My name is Allen L Black. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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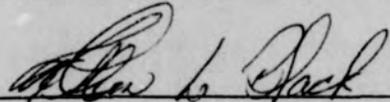
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 54 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Allen L Black, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Allen L Black


DECLARATION OF ROBERT P. GALLAGHER Jr.

1. My name is Robert P. Gallagher Jr.. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

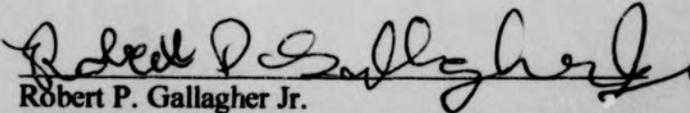
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 53 years old and have worked here at the shops in Altoona since 1972. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Robert P. Gallagher Jr., verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Robert P. Gallagher Jr.

DECLARATION OF

TERRY L. TURNBAUGH

1. My name is TERRY L. TURNBAUGH. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 56 years old and have worked here at the shops in Altoona since 3-74. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, TERRY L. TURNBAUGH, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

TERRY L. TURNBAUGH
Terry L. Turnbaugh

DECLARATION OF JOHN P. FULLER

1. My name is John P. Fuller. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
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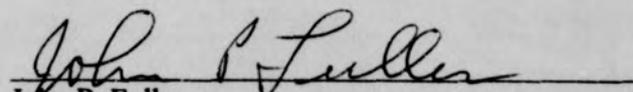
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10. I am currently 54 years old and have worked here at the shops in Altoona since 1972. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, John P. Fuller, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


John P. Fuller

DECLARATION OF JOE V. IERACI JR

1. My name is JOE V. IERACI JR. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 52 years old and have worked here at the shops in Altoona since 11-14-74. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, JOE V. IERACI JR., verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

JOE V. IERACI JR.
Joe V. Ieraci Jr.

DECLARATION OF RONALD P. GEORGE

1. My name is RONALD P. GEORGE. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
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10. I am currently 51 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, RONALD P. GEORGE, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

RONALD P. GEORGE
Ronald P. George

DECLARATION OF PAUL F. KENNEDY

1. My name is PAUL F. KENNEDY. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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10. I am currently _____ years old and have worked here at the shops in Altoona since _____. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, PAUL F KENNEDY, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

PAUL F KENNEDY

Paul F. Kennedy

DECLARATION OF STEPHEN R. GARMAN

1. My name is Stephen R. Garman. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

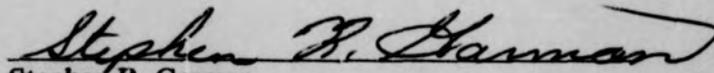
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10. I am currently 49 years old and have worked here at the shops in Altoona since 1972. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Stephen R. Garman, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Stephen R. Garman

DECLARATION OF Timothy P. Noonan

1. My name is Timothy P. Noonan. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Timothy P. Noonan, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Timothy P. Noonan
Timothy P. Noonan

DECLARATION OF LARRY E. NAW

1. My name is LARRY E. NAW. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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10. I am currently _____ years old and have worked here at the shops in Altoona since _____. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, LARRY E. NAW, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July ____, 2001

LARRY E. NAW
Larry E. Naw

DECLARATION OF PAUL F. CAMPBELL

1. My name is Paul F. Campbell. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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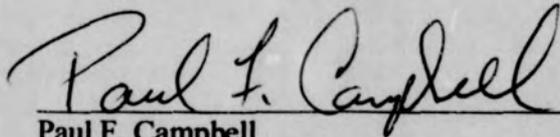
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10. I am currently 55 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Paul F. Campbell, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Paul F. Campbell

DECLARATION OF Frank M O'Dellick Jr

1. My name is Frank M O'Dellick Jr. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

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10. I am currently 48 years old and have worked here at the shops in Altoona since 1973. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Frank M ODellick Jr, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July ____, 2001

Frank M ODellick Jr
Frank M ODellick Jr

DECLARATION OF Theodore C Shade

1. My name is Theodore C. Shade. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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10. I am currently 59 years old and have worked here at the shops in Altoona since 1-14-74 have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Theodore C. Shade, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Theodore C. Shade
Theodore C. Shade

DECLARATION OF F. G. LEGO

1. My name is F. G. LEGO. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 51 years old and have worked here at the shops in Altoona since 1970. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, F. G. LEGO, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

F. G. LEGO
F. G. Lego

DECLARATION OF Theodore J. Martin

1. My name is Theodore J. Martin. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 58 years old and have worked here at the shops in Altoona since 74. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Theodore J. MARTIN, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Theodore J. MARTIN
Theodore J. Martin

DECLARATION OF PAUL H. ADAMS

1. My name is Paul H. Adams. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

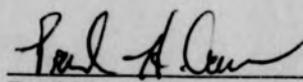
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 48 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Paul H. Adams, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001



Paul H. Adams

DECLARATION OF Leo H. Johnston

1. My name is Leo H. Johnston. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently _____ years old and have worked here at the shops in Altoona since _____. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Leo H. Johnston, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Leo H. Johnston
Leo H. Johnston

DECLARATION OF JOHN W. MALLERY

1. My name is JOHN W. MALLERY. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 50 years old and have worked here at the shops in Altoona since 1973. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, JOHN W. MALLERY, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

JOHN W. MALLERY
John W. Mallery

DECLARATION OF Jeffrey Hoefler

1. My name is Jeffrey Hoefler. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 45 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Jeffrey Hoefler, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Jeffrey Hoefler
Jeffrey E Hoefler

DECLARATION OF CLARENCE T. DALBY

1. My name is Clarence T. Dalby. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 60 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Clarence T. Dalby, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July ____, 2001

Clarence T. Dalby
Clarence T. Dalby

DECLARATION OF DAVID A. CERULLY

1. My name is David A. Cerully. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

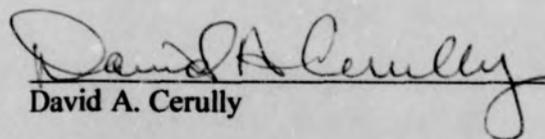
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 46 years old and have worked here at the shops in Altoona since 1973. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, David A. Cerully, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 9, 2001


David A. Cerully

DECLARATION OF

Paul P. Reilly

1. My name is Paul P. Reilly. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

PAUL P. REILLY

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 49 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Paul P. Reilly, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Paul P. Reilly
Paul P. Reilly

DECLARATION OF Darryl E. Miller

1. My name is Darryl E. Miller. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

Darryl E. Miller

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 59 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Darryl E. Miller, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Darryl E. Miller
Darryl E. Miller

DECLARATION OF PAUL C ALLISON

1. My name is PAUL C. ALLISON. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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10. I am currently 48 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, PAUL C ALLISON, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

PAUL C ALLISON
Paul C Allison

DECLARATION OF

David W Lenhart

1. My name is David W Lenhart. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
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David W Lenhart

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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10. I am currently 51 years old and have worked here at the shops in Altoona since 76. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, David W Lenhart, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

David W Lenhart
David W Lenhart

DECLARATION OF

LJ Wiesinger

1. My name is LJ Wiesinger. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shop. was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 59 years old and have worked here at the shops in Altoona since 1969. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, L.J. Wiesinger, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

L.J. Wiesinger
L.J. Wiesinger

DECLARATION OF GLENN E WHEELER

1. My name is GLENN E WHEELER. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 51 years old and have worked here at the shops in Altoona since 1973. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, GLENN E. WHEELER, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

GLENN E WHEELER
Glenn E Wheeler

DECLARATION OF Paul J. Seidel

1. My name is Paul J. Seidel. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.

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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 54 years old and have worked here at the shops in Altoona since 73. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Paul J. Seidel, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Paul J. Seidel
Paul J. Seidel

DECLARATION OF ERNEST N. DOSH Jr.

1. My name is Ernest N. Dosh Jr.. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.

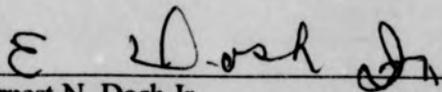
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, I have serious concerns that there will be no work available for me at the locations NS identifies. Further, I am seriously concerned that even if jobs may be available initially, as alleged by NS, they may very well be eliminated in the in the near future, especially when considering NS' actions in reducing employees.

10. I am currently 57 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Ernest N. Dosh Jr., verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001


Ernest N. Dosh Jr.

DECLARATION OF Kenneth J Simanski

1. My name is Kenneth J Simanski. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
3. From October 1996, when the first merger between Conrail and CSX was announced through June 1, 1999, split date of the CSX/NS acquisition and division of Conrail, I personally read or was made aware of continuing commitments being made by Norfolk Southern with respect to the future of the shops in Altoona. I also read or was made aware of news paper advertisements taken out by NS, addressed to myself as a " stakeholder ", committing to the continued operation of both Hollidaysburg and Juniata shops, and the promotion of employment at these shops. In addition to numerous news articles and Norfolk Southern press releases, as time progressed towards the ultimate approval of the " Conrail Transaction " and then the actual takeover in June 1999, based on repeated news and other reports of commitments being made by Norfolk Southern with respect to the shops in Altoona, I had reason to be confident that my employment in Altoona, Pennsylvania, with Norfolk Southern was secure for years to come. In fact, based on Norfolk Southern's repeated commitments, I had reason to be confident that the work at the Altoona shops was going to grow, as well as employment levels. Based on what Norfolk Southern was telling everyone concerned, which was widespread public knowledge, I was quite confident concerning my employment.
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(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

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10. I am currently 45 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Kenneth J Simanski, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July 10, 2001

Kenneth J Simanski
Kenneth J Simanski

DECLARATION OF

Robert C. Miller

1. My name is Robert C. Miller. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg /Juniata) and split date, June 1, 1999.

2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.

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In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

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Verification

I, Robert C Miller, verify that under penalty of perjury that I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania, that I have read the foregoing document and its contents, and that the same is true and correct to the best of my knowledge and belief.

Executed on July , 2001

Robert C Miller

Robert C Miller

DECLARATION OF BYRON E. BRUMBAUGH

1. My name is Byron E. Brumbaugh. I am a Carman employed by Norfolk Southern in Altoona, Pennsylvania. I am a former employee of Consolidated Rail Corporation and was employed in Altoona during the years leading up to Norfolk Southern's acquisition of the Altoona shops (Hollidaysburg / Juniata) and split date, June 1, 1999.
2. As an employee of Conrail, subsequent to the announced merger of CSX and Conrail in 1996, and then the announced agreement between CSX and NS to acquire and divide Conrail's assets I had reason to be seriously concerned about my employment as a result of these proposed mergers. This concern resulted in my paying very close attention to what Norfolk Southern was saying with regard to the future of the shops in Altoona.
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4. Further, Norfolk Southern CEO David Goode, in a speech to us workers at Juniata Locomotive shop on June 01, 1999, acknowledged and reaffirmed the commitments NS made to the shops in Altoona, this time subsequent to the merger being approved, once again providing reassurances concerning employment for years to come.

5. Unfortunately however, this has changed with Norfolk Southern's announced plans to close the shops. Since Norfolk Southern's announced closing of Hollidaysburg, obviously I have had cause to closely follow all that has happened. In doing so, there are at least two things which stand out based on my knowledge of Norfolk Southern's commitments to continue operations at the shops in Altoona.

(a) That Norfolk Southern's planned closing of Hollidaysburg Car Shop completely contradicts repeated, firm commitments to continue operations at Hollidaysburg Car Shop, and (b) That Norfolk Southern is now attempting to assert that they merely stated aspirations, expectations or beliefs concerning the shops, which is completely false. To the contrary, as employees, we were repeatedly assured via the news, advertisements run by NS, NS publications, and the operating plan that NS made an unconditional commitment to continue operation of the shops and promote employment at the shops. In fact, throughout this process NS officials made frequent visits to the shops, holding meetings with the workers, again, during which time they repeatedly told employees of the commitment NS made to the shops, and that we, as workers had no reason to be concerned.

In view of Norfolk Southern's obvious attempts to renege on the clear promises they made to the workers at Hollidaysburg, I have now lost all trust in Norfolk Southern.

6. Also, with respect to what work is allegedly being transferred to other locations, I am not aware of any such work which is being transferred, and to my knowledge Norfolk Southern has not advised anyone of specifically what work is actually being transferred.

7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers who have been adversely affected by the Conrail Transaction who were denied protective benefits. As workers, our experience and understanding since implementation of this transaction is that Norfolk Southern does everything they possibly can to avoid the payment of protective benefits.

8. Finally, my reservations concerning the integrity, or lack thereof, of anything Norfolk Southern officials state is based on the obvious and outright lies stated by Norfolk Southern to gain approval of the Conrail Transaction.