

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: HYDROGEN PEROXIDE
ANTITRUST LITIGATION

Civil Action No. 05-666

MDL Docket No. 1682

THIS DOCUMENT RELATES TO:
DIRECT PURCHASER ACTIONS

CLASS ACTION

ADDENDUM TO FMC SETTLEMENT AGREEMENT AND RELEASE

FMC Corporation ("FMC") and plaintiff class representatives (collectively, "plaintiffs") hereby agree to this addendum to the Settlement Agreement and Release between FMC and Plaintiffs dated April 15, 2009, (the "Agreement")

1. Paragraph 32(d) of the Agreement is amended in the following respect:

32 (d) Upon the conclusion of any action filed by any party requesting exclusion from the settlement (whether by settlement or by motion or by a final judgment following trial), FMC shall notify Class Counsel and the Escrow Agent in writing of the identity of the settling plaintiff or plaintiffs ("Settling Plaintiff"). The Escrow Agent shall be entitled to rely upon such written notification from FMC, coupled with a copy, if any, of any publicly filed Court document evidencing the dismissal of any such action. Within ten days of receipt of such notice, the Escrow Agent shall pay to FMC from the Opt Out Escrow Account an amount equal to the initial balance in the Opt Out Escrow Account multiplied by the percentage derived by dividing the Settling Plaintiff's share of Opt Out Purchases by the total Opt Out Purchases, plus any net income attributable to the amount so calculated. Nothing contained in this paragraph shall require disclosure of any of the terms of any such settlement or payment, or the production of any documentation or agreement memorializing any such agreement.

2. All other terms of the Settlement Agreement shall remain in full force and effect.

Dated: May ⁴ / __, 2009



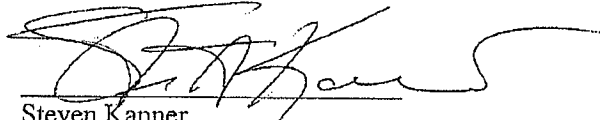
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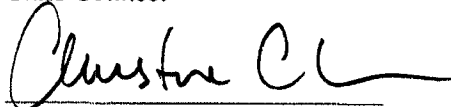
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