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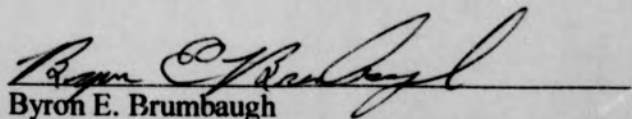
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 51 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, Byron E. Brumbaugh, 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


Byron E. Brumbaugh

DECLARATION OF William T Wirrick

1. My name is William T Wirrick. 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, William T Winick, 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

William T. Winick
William T. Winick

DECLARATION OF

Joseph Lightner

1. My name is Joseph Lightner. 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 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, Joseph Lightner, 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 Lightner
Joseph Lightner

DECLARATION OF CHARLES K. DETWILER

1. My name is Charles K. Detwiler. 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.

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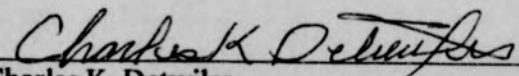
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10. I am currently 59 years old and have worked here at the shops in Altoona since 1975. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by 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, Charles K. Detwiler, 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


Charles K. Detwiler

DECLARATION OF DAVID J McTIGUE

1. My name is DAVID J McTIGUE. 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 55 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, DAVID J McTigue, 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 J McTigue
David J. McTigue

DECLARATION OF WILLIAM L. CORL

1. My name is William L. Corl. 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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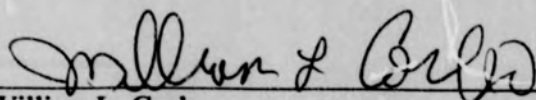
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Verification

I, William L. Corl, 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 L. Corl

DECLARATION OF

CARL PRUGAR

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CARL PRUGAR

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CARL PRUGAR

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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, CARL PRUGAR, 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 10th, 2001

CARL PRUGAR
Carl Prugar

DECLARATION OF

WAYNE L. RICE

1. My name is WAYNE L. RICE. 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 2-74. 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, WAYNE L. RICE, 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

WAYNE L. RICE
Wayne L. Rice

DECLARATION OF DONALD E. CLAAR

1. My name is Donald E. Claar. 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.

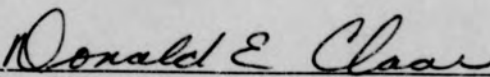
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 54 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, Donald E. Claar, 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. Claar

DECLARATION OF

Richard A Sheehan

1. My name is Richard A. Sheehan. 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.

Richard A Sheehan

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 52 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, Richard A Sheehan, 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

Richard A. Sheehan
Richard A Sheehan

DECLARATION OF MICHAEL A DASCANIO

1. My name is Michael A Dascanio. 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 reservation 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.

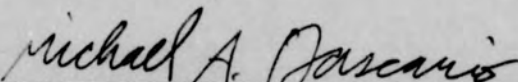
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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, Michael A. Dascanio, 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 A. Dascanio

DECLARATION OF Steve Matthews

1. My name is Steve Matthews. 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, Steve Matthews, 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

Steve Matthews
Steve Matthews

DECLARATION OF Stephen Mardula

1. My name is Stephen Mardula. 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.

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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, Stephen Mardula, 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 Mardula
Steph Mardula

DECLARATION OF E E MCGEARY

1. My name is E E MCGEARY. 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 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, E E M^cGEARY, 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

E E M^cGEARY

E E M^cGEARY

DECLARATION OF Nathan N. Lindsey

1. My name is Nathan Lindsey. 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.

Nathan N. Lindsey

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, Nathan Lindsey, 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

Nathan Lindsey

Nathan Lindsey

DECLARATION OF Robert T Newkirk

1. My name is Robert T Newkirk. 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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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.

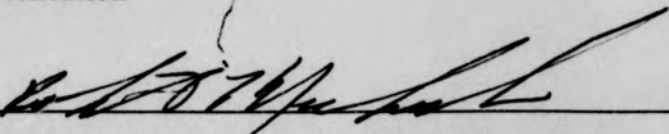
7. With regard to protective benefits, again, I have no reason to believe that Norfolk Southern is going to provide protective benefits. Beyond having no reason to trust Norfolk Southern, as it is obvious they cannot be trusted, with respect to protective benefits, I have become aware of numerous co-workers 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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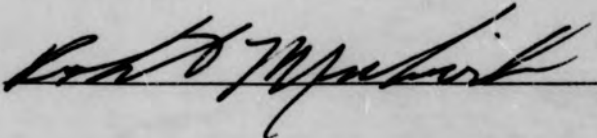
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Verification

I, , 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 T NEWKIRK


DECLARATION OF JOHN T. UMBLEBY

1. My name is JOHN T. UMBLEBY. 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 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 T. UMBLEBY, 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 T. Umblesby

DECLARATION OF Gary M. Snyder

1. My name is Gary M. Snyder. 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 49 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, Gary M. Snyder, 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

Gary M. Snyder
Gary M. Snyder

DECLARATION OF John K. Hicks

1. My name is John K. Hicks. 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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Verification

I, John K. Hicks, 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 K. Hicks
John K. Hicks

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9 of 13

DECLARATION OF WILLIAM R. MARLOWE

1. My name is WILLIAM R. MARLOWE. 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, William R. MARLOWE, 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

William R. MARLOWE
William R. Marlowe

DECLARATION OF STEVE J. AUKER

1. My name is Steve J. Auker. 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.

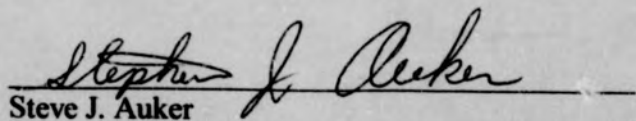
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 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, Steve J. Auker, 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


Steve J. Auker

DECLARATION OF DONALD E. CONNER

1. My name is Donald E. Conner. 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.

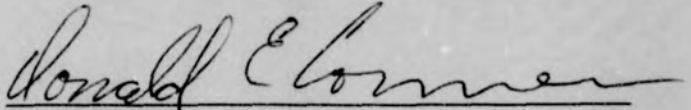
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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, Donald E. Conner, 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 12, 2001


Donald E. Conner

DECLARATION OF Gary Poet

1. My name is Gary Poet. 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.

Bary Poet

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.

Gary Poet

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 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, Gary Poet, 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

Gary Poet

Gary Poet

DECLARATION OF

Kenneth R. Hofer

1. My name is Kenneth R. Hofer. 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.

Kenneth P. Hofer

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.

Kenneth P. Hofer

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 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, Kenneth P. Hofer, 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 P. Hofer
Kenneth P. Hofer

DECLARATION OF David Yingling

1. My name is David Yingling. 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.

David Yingling

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 52 years old and have worked here at the shops in Altoona since 1971. 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 Yingling, 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 Yingling
David Yingling

DECLARATION OF Dale Zeigler

1. My name is Dale Zeigler. 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.

Dale Zeigler

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.

Dale Zeigler

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 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, Dale Zeigler, 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

Dale ZeiglerDale Zeigler

DECLARATION OF KENNETH J. BECKER

1. My name is Kenneth J. Becker. 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.

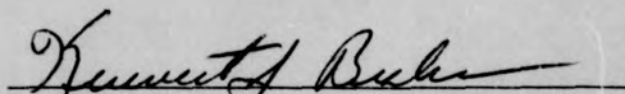
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 55 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, Kenneth J. Becker, 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. Becker

DECLARATION OF William H. Rhodes

1. My name is William H. Rhodes. 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 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, William H. Rhodes, 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 H. Rhodes
William H. Rhodes

DECLARATION OF Robert J Krisko

1. My name is Robert J Krisko. 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 J Krisko

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 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, Robert J. Krisko, 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. Krisko
Robert J. Krisko

DECLARATION OF

Philip D. Luciano SR

1. My name is Philip D. Luciano SR. 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.

PHILIP D. LUCIANO SR

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.

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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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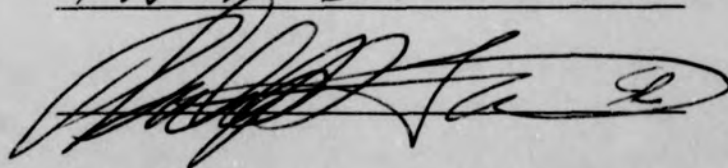
PHILIP D. LUCIANO SR

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, PHILIP D. LUCIANO SR 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, 2001PHILIP D. LUCIANO SR


DECLARATION OF William L Gorsuch

1. My name is William L Gorsuch. 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 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, William L Gorsuch, 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 L Gorsuch

William L Gorsuch

DECLARATION OF JAMES A. KASPICK

1. My name is JAMES A. KASPICK. 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.

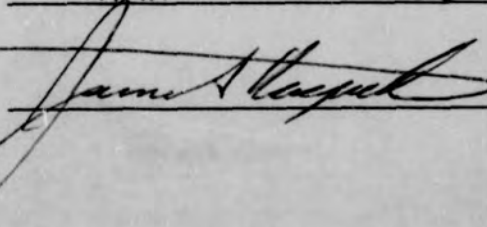
10. I am currently 56 years old and have worked here at the shops in Altoona since 1971. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, JAMES A. KASPICK, 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 A. KASPICK

A handwritten signature in dark ink, appearing to read "James A. Kaspick", written over a horizontal line. The signature is stylized with a large, sweeping initial "J".

DECLARATION OF Theodore Hoover

1. My name is Theodore Hoover. 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 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, Theodore Hoover, 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 Hoover
Theodore Hoover

DECLARATION OF RONALD J. HARELLA

1. My name is RONALD J. HARELLA. 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.

RONALD J. HARELLA

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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, RONALD J. HARELLA, 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 J. HARELLA
Ronald J. Harella

DECLARATION OF

HAROLD E. ROSSMAN JR

1. My name is HAROLD E. ROSSMAN 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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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, HAROLD E. ROSSMAN 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

HAROLD E ROSSMAN JR
Harold E. Rossman Jr

DECLARATION OF

M.J. Hritz

1. My name is M.J. Hritz. 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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M. J. Hritz

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M. J. Hritz

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10. I am currently 55 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, M. J. Hritz, 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

M. J. Hritz
M. J. Hritz

DECLARATION OF Thomas S. GRAY

1. My name is Thomas S. GRAY. 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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Thomas S. GRAY

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.

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Thomas S. Gray

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 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, Thomas S. Gray, 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 S. Gray
Thomas S. Gray

DECLARATION OF Thomas H Snyder

1. My name is Thomas H Snyder. 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 53 years old and have worked here at the shops in Altoona since 72. 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 H Snyder, 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 H Snyder
Thomas H Snyder

DECLARATION OF DENNIS C. BARRONER

1. My name is Dennis C. Barroner. 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.

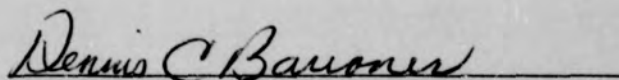
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 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 C. Barroner, 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 C. Barroner

DECLARATION OF JACK L. COX

1. My name is Jack L. Cox. 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 54 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, Jack L. Cox, 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

Jack L. Cox

DECLARATION OF John W. Malone Jr.

1. My name is John W. Malone 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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(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 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, John W. Malone 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

John W. Malone Jr
John W. Malone Jr.

DECLARATION OF John L. Hall

1. My name is John L. Hall. 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 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, John L. Hall, 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 L. Hall
John L. Hall

DECLARATION OF THOMAS J. DETWILER

1. My name is Thomas J. Detwiler. 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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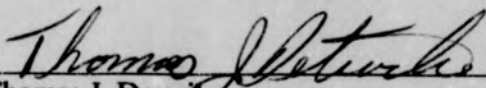
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 48 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, Thomas J. Detwiler, 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 12, 2001


Thomas J. Detwiler

DECLARATION OF

D. K. STATES

1. My name is D. K. STATES. 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.

D.K. STATES

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.

D.K. STATES

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 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, D.K. STATES, 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

D.K. STATES

D.K. States

DECLARATION OF DARRELL E. BENZ

1. My name is Darrell E. Benz. 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 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, Darrell E. Benz., 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 10th, 2001

Darrell E. Benz
Darrell E. Benz

DECLARATION OF D. THOMAS DETWILER

1. My name is D. Thomas Detwiler. 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.

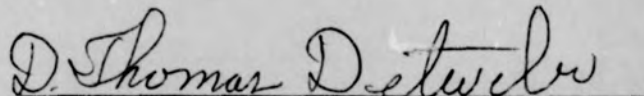
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 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, D. Thomas Detwiler, 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


D. Thomas Detwiler

DECLARATION OF MARK GRIMM

1. My name is MARK GRIMM. 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, MARK GRIMM, 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

MARK GRIMM
Mark M. Grimm

DECLARATION OF JEFFERY L. DIEHL

1. My name is Jeffery L. Diehl. 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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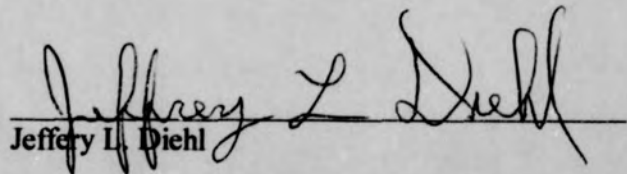
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10. I am currently 45 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by 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, Jeffery L Diehl, 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


Jeffery L. Diehl

DECLARATION OF Ronald E. Shoop

1. My name is Ronald E. Shoop. 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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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 52 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, Ronald E Shoop, 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 E. Shoop
Ronald E Shoop

DECLARATION OF RICHARD T. ORNDOFF

1. My name is RICHARD T. ORNDOFF. 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 53 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, RICHARD T. ORNDOFF, 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

RICHARD T. ORNDOFF
Richard T. Orndoff

DECLARATION OF

Tom Hammett

1. My name is Tom Hammett. 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.

Joan Hamner

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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 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, Tom Hamme!, 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

Tom Hamme!
Tom Hamme!

DECLARATION OF Dennis J. Michina

1. My name is Dennis J. Michina. 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.

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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, Dennis J. Michina, 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. Michina
Dennis J. Michina

DECLARATION OF James R Snyder

1. My name is James R Snyder. 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 50 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, James R Snyder, 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 R Snyder

James R Snyder

DECLARATION OF F.J. NACHTMAN

1. My name is F.J. NACHTMAN. 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 47 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, F. J. NACHTMAN, 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. J. NACHTMAN

F. J. Nachtman

DECLARATION OF THOMAS J. DOUGHTY

1. My name is Thomas J. Doughty. 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.

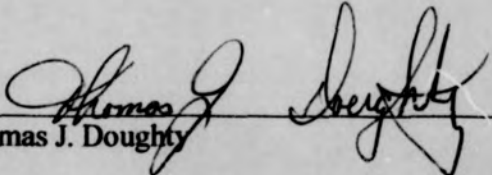
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10. I am currently 44 years old and have worked here at the shops in Altoona since 1976. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by 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, Thomas J. Doughty, 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. Doughty

DECLARATION OF JOHN R. BOLLINGER

1. My name is John R. Bollinger. 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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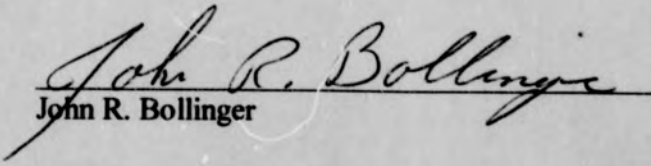
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 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, John R. Bollinger, 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 R. Bollinger

DECLARATION OF DEAN C. CONRAD

1. My name is Dean C. Conrad. 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.

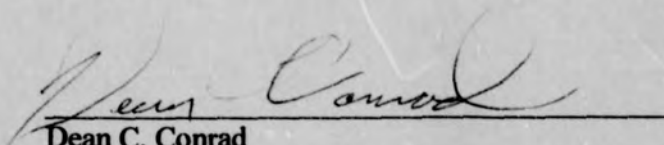
9. In addition, especially when considering that NS has not identified any of the work they are allegedly transferring, along with their increasingly aggressive cost cutting measures which have been announced publicly in various forums where it appears they are cutting as many employees as possible, 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 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, Dean C. Conrad, 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


Dean C. Conrad

DECLARATION OF Ronald B. Greene

1. My name is Ronald B. Greene. 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 official 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, Ronald B. Greene, 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 B. Greene
Ronald B. Greene

DECLARATION OF

Joseph Hainley

1. My name is Joseph Hainley. 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.

Joseph Hanley

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.

Joseph Hainley

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 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, Joseph Hainley, 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 Hainley
[Signature]

DECLARATION OF MW Kauffman

1. My name is MW Kauffman. 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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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 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, Mu Kauffman, 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

Mu Kauffman

Mu Kauffman

DECLARATION OF

Ralph McKendree

1. My name is Ralph McKendree. 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.

Ralph M Kewolree

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.

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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.

Ralph M. Kendrick

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 52 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, Ralph M. Kendrick, 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

Ralph M. Kendrick
Ralph M. Kendrick

DECLARATION OF

James B Hitchens

1. My name is James B Hitchens. 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 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 B Hitchens, 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 B Hitchens

James B Hitchens

DECLARATION OF

Harland A. Imler

1. My name is Harland A. Imler. 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.

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10. I am currently 51 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, Harshaw A. Imber, verity 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

Harshaw A. Imber
Harold C. Imber

DECLARATION OF PAUL E Tuskovich III

1. My name is PAUL E Tuskovich III. 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.

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10. I am currently 48 years old and have worked here at the shops in Altoona since 1971. 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 E Tuskovich III, 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 E Tuskovich III

Paul E Tuskovich III

DECLARATION OF RICKY L. DICK

1. My name is Ricky L. 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.

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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, Ricky L. 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

Ricky L. Dick
Ricky L. Dick

DECLARATION OF Kenneth W. Teeter

1. My name is Kenneth W. Teeter. 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.

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10. I am currently 47 years old and have worked here at the shops in Altoona since 9-11-75 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, Kenneth W. Teeter, 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 W. Teeter

Kenneth W. Teeter

DECLARATION OF JOHN P. LITZINGER

1. My name is John P. Litzinger. I am a Sheet Metal Worker 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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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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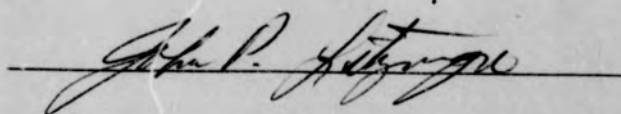
10. I am currently 51 years old and have worked here at the shops in Altoona since 1974. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, John P. Litzinger, verify that under penalty of perjury that I am a Sheet Metal Worker 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. Litzinger



DECLARATION OF RONALD C. KEAGY

1. My name is Ronald C. Keagy. I am a Sheet Metal Worker 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 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, Ronald C. Keagy, verify that under penalty of perjury that I am a Sheet Metal Worker 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 C. Keagy

Ronald C Keagy

DECLARATION OF CHARLES W. GETIC

1. My name is Charles W. Getic. I am a Sheet Metal Worker 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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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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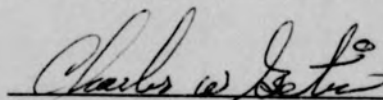
10. I am currently 59 years old and have worked here at the shops in Altoona since 1977. I have deep family and other ties here in the Altoona area and fear uprooting these ties and disrupting my family, only to be told in a short period of time by Norfolk Southern, who obviously cannot be trusted, that again there is no work at a location that I may have the opportunity to transfer to.

Verification

I, Charles W. Getic, verify that under penalty of perjury that I am a Sheet Metal Worker 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

Charles W. Getic



DECLARATION OF LAVERN M. GABELLA

1. My name is LaVern M. Gabella. I am a Sheet Metal Worker 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.

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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 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, LaVern M. Gabella, verify that under penalty of perjury that I am a Sheet Metal Worker 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

LaVern M. Gabella

LaVern M. Gabella

DECLARATION OF RUSSELL C. BRINK

1. My name is Russell C. Brink. I am a Sheet Metal Worker 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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10. I am currently 56 years old and have worked here at the shops in Altoona since 1967. 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, Russell C. Brink, verify that under penalty of perjury that I am a Sheet Metal Worker 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

Russell C. Brink

Russell C. Brink

DECLARATION OF JAMES R. SETTLEMYER

1. My name is James R. Settlemyer. I am a Machinist 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, James R. Settlemyer, verify that under penalty of perjury that I am a Machinist 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 R. Settlemyer

James R Settlemyer

DECLARATION OF ARTHUR J. MCCOY

1. My name is Arthur J. McCoy. I am a Machinist 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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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, Arthur J. McCoy, verify that under penalty of perjury that I am a Machinist 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

Arthur J. McCoy

Arthur J. McCoy

DECLARATION OF HOWARD E. JAMES

1. My name is Howard E. James. I am a Machinist 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 57 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, Howard E. James, verify that under penalty of perjury that I am a Machinist 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 E. James

Howard E. James