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Environmental Control Department
Research & Engineering Center
November 17, 1970

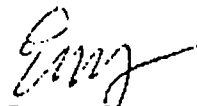
W. P. O'Reilly - Cleveland Dist. Off.

cc: A. C. Smith
N. W. Hendry - Asbestos 1500
H. M. Ball - GHQ
W. P. Raines - GHQ
H. G. Donovan
J. Goldfield
File & C

FORD MOTOR COMPANY
PLYMOUTH, MICHIGAN
YOUR LETTER OF NOVEMBER 13, 1970

I contacted Dr. George Bauer today in accordance with your request. He told me that Ford was greatly concerned with the health hazards related to asbestos fiber usage and that he had been looking for substitute materials. He further stated that his search had convinced him that other materials were equally, if not more, hazardous than asbestos fiber and that instead of using a substitute, they should improve the dust control at their operations. He asked if anyone from Johns-Manville could visit their plant and advise them on dust control procedures.

I informed Dr. Bauer that J. Goldfield and I expected to be in the Detroit-Toledo area sometime within the next two weeks and would visit their plant to review the problem with him and Mr. Leonard Evans, their Plant Engineer.


E. M. Fenner

EMF/gms

SCF-FORD-0679

AFFIDAVIT

STATE OF COLORADO)
) ss.
COUNTY OF JEFFERSON)

I, Margaret J. Baumgardner, being of full age and first duly sworn do hereby state:

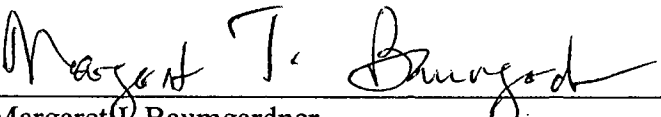
1. I am the Research Coordinator for the Claims Resolution Management Corporation ("CRMC"), a wholly owned subsidiary of the Manville Personal Injury Settlement Trust ("Trust"). The CRMC was created in December 1998 and is staffed by former Trust employees. On January 1, 1999, CRMC began providing claims resolution facility services to the Trust.

2. In this position, I manage the Asbestos Claims Research Facility ("Facility"), a document and records repository located at 4755 East 46th Avenue, Denver, Colorado. The Facility contains the business records including but not limited to correspondence, memoranda, reports, records and data compilations ("record") of Manville Corporation or related entities ("Manville"), generally, as well as Manville records relevant to litigation of asbestos liability. The Trust has managed and operated the Facility from November 28, 1988, the date on which the Manville bankruptcy plan was consummated.

3. My experience and familiarity with the documents at the Facility began in 1983 while working for Manville. In my work as a paralegal for Manville, I assisted in locating, indexing and packing many of the records which became the foundation documents for the Facility. I continued to work for Manville until September 1987. From March 1988 to September 1988, I was hired to supervise and assist in the indexing of the first 20,000 boxes which were turned over to the Trust in November 1988. From September 1988 to January 1989, I assisted in the privilege review of documents to be given to the Trust. From November 1988 to April 1994, I worked for Freeborn & Peters and was put in charge of the Facility, managing all productions and "new" acquisitions. In September 1995, I was hired by the Trust to manage the Facility. In December 1998, I was hired by the CRMC to manage the Facility for the Trust. Accordingly, I am personally familiar with many of the records stored at the Facility, as well as how the records have been gathered.

4. To the best of my knowledge, information and believe, I certify that these records were made at or near the time by, or from information transmitted by, a person with knowledge, were kept in the course of the regularly conducted business activity of Manville, and it was the regular practice and the business activity of Manville to make the records.

5. Documents from this Facility were copied for the law firm of Simmons Cooper. The copy have come from microfilm at the Facility and are bates labeled CRMC-000047 through CRMC-000052 and these document are true and correct copies of documents found at the Facility.


Margaret J. Baumgardner

Subscribed and sworn to before
me this 4th day of February, 2005.


Notary Public

