

**Plaintiffs' Exhibit
BX 5065**

**Plaintiffs' Exhibit
ABEX 5020**

**Plaintiffs' Exhibit
MC 5004**

**Plaintiffs' Exhibit
KEN 5102**

AFFIDAVIT

STATE OF COLORADO)
) ss.
COUNTY OF ADAMS)

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

1. I am not a party to this action. I have personal knowledge of the facts set forth in this affidavit, and if called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. 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.

3. In this position, I manage the Asbestos Claims Research Facility ("Facility"), a document and records repository located at 3390 Peoria Street, Suite 304, Aurora, 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.

4. 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

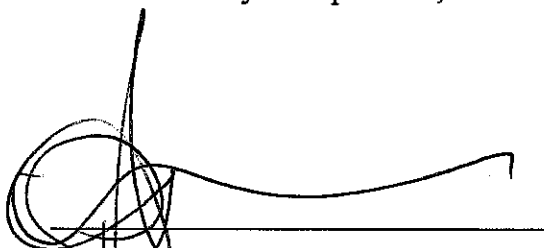
the CRMC to manage the Facility for the Trust. Accordingly, I am personally familiar with many of the records stored at the Facility, as well as how the records have been gathered.

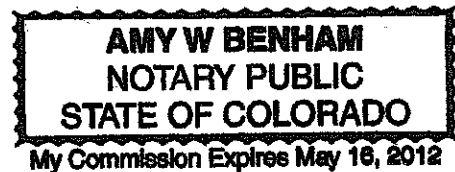
5. To the best of my knowledge, information and belief, I certify that these records were made at or near the time by, or from information transmitted by, a person with knowledge, were kept in the course of the regularly conducted business activity of Manville, and it was the regular practice and the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

6. Documents from this Facility were copied for the firm of Simon, Eddins & Greenstone. The copies have come from files at the Facility and are bates labeled CRMC-SEG-007353 through CRMC-SEG-007402 and these documents are true and correct copies of documents found at the Facility.


Margaret J. Baumgardner

Subscribed and sworn to before
me this 17th day of September, 2009.


Notary Public



BD

the
**ASBESTOS
INFORMATION
ASSOCIATION**

North America

PRODUCED
100 - 83



North America

Serving A Vital Industry

ASBESTOS INFORMATION ASSOCIATION
1660 L Street, N.W., Washington, D.C. 20036



ASBESTOS INFORMATION ASSOCIATION

1660 L Street, N.W.,
Washington, D.C. 20036

In recent years, intensive interest has been focused on man's environment: the air he breathes, the water he drinks, the condition of his workplace, the products available to him which might be harmful.

In the rush to publicize man's environmental problems, asbestos became a prime target of some writers and spokesmen who seized upon the freely admitted fact that excessive exposure to asbestos dust can be injurious. More frequently than not, those who addressed themselves to the asbestos-health issue did so with words to frighten rather than enlighten. cursory reference to scientific data and little or no account of the accomplishments of the industry to protect its workers and control the discharge of asbestos fiber into the environment was usual rather than exceptional.

AIA/NA Is Established

For many years, most asbestos producer and processing companies have had programs for dust control and worker protection. Individually, they responded to the questions of governmental agencies, news media, public interest groups, and the general public with regard to hazards of asbestos in the workplace and in the environment. These individual efforts, costly and often duplicative, lead to the formation, in December of 1970, of the Asbestos Information Association/North America: a group of asbestos companies in the United States and Canada working together for the common interest of a vital industry challenged by relatively new and often confusing information concerning asbestos and health.

At the time AIA/NA was established, government agencies were formulating programs to regulate and control materials deemed hazardous to health. Asbestos was pronounced one of these materials. AIA/NA filled the gap for the asbestos industry for a collective organization to obtain and disseminate authoritative information concerning the asbestos industry with emphasis on the safety, health, and environmental issues. Today, AIA/NA uniquely represents the overall asbestos industry with governmental groups, news media, and others, focusing its attention on the work of the industry in occupational safety, health, and environ-

mental affairs and on the lifesaving and other benefits available through the many uses of asbestos. The government and public relations services of AIA/NA are available to product-oriented trade groups associated with the industry.

Organization of the Association

AIA/NA is an incorporated, non-profit organization. Any company or corporation involved in the mining, milling, processing, or selling of asbestos in the United States or Canada is eligible for membership in the Association. Each member company or corporation is entitled to a seat on the board of directors through its authorized representative, with full and equal voting rights for the conduct of the Association's affairs. Regular meetings of the directors are held quarterly. Committees meet as necessary to provide study and advisory functions for the Association. The annual meeting of AIA/NA is held in September at which time officers of the Association are elected. The work of the Association is funded from dues of its members, based on a percentage of cost of fiber purchased for use in the manufacture of products. Members who do not manufacture asbestos products are assessed a flat fee determined by the directors.

AIA/NA Objectives

These are the objectives of the Association:

To provide industry-wide information on asbestos and health, and on industry efforts to eliminate existing hazards.

To cooperate with governmental agencies in developing and implementing industry-wide standards for worker protection and for the control of asbestos dust emissions into community air and water.

To exchange information on methods and techniques of asbestos dust control.

To correct misleading and uninformed reportage on asbestos-health problems.

To publicize the unique benefits and importance of asbestos products and otherwise represent the asbestos industry.

Government Relations. In 1973, the AIA/NA office was moved from New York City to Washington, D.C. to facilitate liaison with the Federal Government. The Association routinely reports on activities of Congressional committees concerned with activities relating to the asbestos industry and provides a continual working relationship with such government regulatory agencies as the Occupational Safety and Health Administration, Environmental Protection Agency, Food and Drug Administration, and Bureau of Mines. The Association has appeared before these

groups, provided written comment where appropriate, made available specialists from its members to sit on governmental advisory committees, and has presented specific guidance for the preparation of standards affecting the industry. AIA/NA's government relations are also actively involved with state and local regulations concerned with control of asbestos.

Medical Affairs. Besides serving as a central agency for the collection and dissemination of medical information on asbestos-related disease, AIA/NA is represented at major medical meetings of interest to its members and sponsors medical research on asbestos and health.

Environmental Control. Through its Standards and Technical Committee of experts in the fields of industrial hygiene, occupational safety and plant engineering, AIA/NA follows and evaluates new developments in dust control methodology and monitoring techniques. The Association makes available its findings through various publications.

Public Relations. To meet the public interest in the asbestos-health issue, the Association is extensively involved in answering queries of news media; private groups and individuals; preparing letters to editors in whose publications misleading articles appear; assisting feature writers, and, in short, taking all reasonable steps to present to the public a balanced view of the asbestos-health issue. AIA/NA has distributed over 3,000 specially prepared information kits concerning asbestos and related health problems.

Legal Affairs. AIA/NA seeks to provide its members with information on responsibilities and obligations under the various laws and regulations that affect the use of asbestos.

Employee Relations. The Association makes available informational materials to assist its members in presenting a realistic picture of health problems associated with the processing of asbestos and the procedures required to eliminate hazards to health in the workplace.

Customer Relations. Because of the widespread and often misleading publicity which asbestos has received in recent years, special effort has been made by the Association to provide its members with factual information to overcome the apprehensions that have arisen in some customer relationships.

Inter-industry Relations. AIA/NA maintains a close working relationship with various groups associated with the industry, such as the Asbestos Textile Institute, The Asbestos Cement Pipe Producers Association, The Asbestos Cement Products Association, the National Association of Filter Material Manufacturers, the Thermal Insulation Manufacturers Association, Inc., and the Friction Materials

PRODUCED
JM - 83

Standards Institute, Inc. The Association contributes its expertise to the American Society for Testing and Materials, American National Standard Institute, American Industrial Hygiene Association, and other technical associations.

International Relations. The health problems which have been associated with asbestos are not, of course, unique to North America. Indeed, a great deal of the medical literature on asbestos and health and dust control technology come from outside the United States, though America is the largest processor of asbestos-containing products. AIA/NA is privileged to exchange information and is closely associated with the Quebec Asbestos Mining Association and the Institute of Occupational and Environmental Health (Canada), the Asbestosis Research Council and the Asbestos Information Committee (United Kingdom), the Chambre Syndicale de l'Amiante (France), and similarly oriented groups throughout the world.

AIA/NA recognizes the health problems associated with excessive exposure to asbestos dust. The Association dedicates its efforts to the control of this hazard so that it is possible to continue to enjoy the unique benefits of asbestos without risk.

PRODUCED
JM - 83

For further information:

Robert H. Mereness, Executive Director
Asbestos Information Association/North America
1660 L Street, N.W.
Washington, D.C. 20036
(202) 223-4885



North America

ASBESTOS INFORMATION ASSOCIATION

Amatex Corporation
Norristown, Pennsylvania

Atlas Asbestos Company
Montreal, Quebec, Canada

The Bendix Corporation
Southfield, Michigan

Cassiar Asbestos Corporation, Ltd.
Toronto, Ontario, Canada

Cement Asbestos Products Company
Birmingham, Alabama

Certain-teed Products Corporation
Valley Forge, Pennsylvania

Congoleum Industries, Incorporated
Kearny, New Jersey

National Association of Filter Manufacturers, Inc.
Kingston, New York

The Flintkote Co.
East Rutherford, New Jersey

GAF Corporation
New York, N.Y.

Garlock Incorporated
Rochester, New York

Southern Asbestos Company
Charlotte, North Carolina

Jim Walter Research Corporation
St. Petersburg, Florida

Johns-Manville Corporation
Denver, Colorado

Kentile Floors, Incorporated
Brooklyn, New York

National Gypsum Company
Buffalo, New York

Nicolet Industries, Incorporated
Ambler, Pennsylvania

North American Asbestos Corporation
Chicago, Illinois

Raybestos-Manhattan, Inc.
Trumbull, Connecticut

Supradur Manufacturing Corporation
New York, N.Y.

Union Carbide Corporation
New York, N.Y.

Uvalde Rock Asphalt Company
San Antonio, Texas

PRODUCED
JM - 83