

VERIFICATION

STATE OF CONNECTICUT)

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ss:

COUNTY OF FAIRFIELD)

JOHN MACDONALD, being duly sworn according to law, deposes and says: that he is the Assistant Corporate Secretary of defendant Union Carbide Corporation, that he has read the answers to Plaintiffs' Interrogatories and is familiar with their contents; that the answers set forth herein were assembled and prepared by counsel for defendant based on information provided to counsel by employees or former employees through their sworn testimony and/or contained in documents located in the repositories of asbestos-related documents maintained by counsel; and that to the best of deponent's knowledge, information and belief, the responses are true.

John Macdonald
Assistant Corporate Secretary

Sworn to before me this _____ day
of _____, 2004.

Notary Public