

STATE OF ILLINOIS)
) S.S.
COUNTY OF MADISON)

AFFIDAVIT

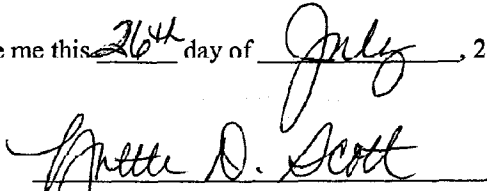
1. My name is William A. Kohlburn.
2. I am an 'of counsel' attorney with the Simmons Firm, LLC in Wood River, Illinois, which handles asbestos personal injury cases on behalf of plaintiffs.
3. In mid-June 2001, I participated in an review of documents at the offices of Kelley, Drye & Warren in New York, NY. These documents were produced by Union Carbide in response to our discovery requests in pending asbestos litigation.
4. During this document review, I was provided with a computer generated log. I was advised by a representative of Kelcey, Drye & Warren that this log reflected a summary of Union Carbide's sales of asbestos, which it had mined at King City, CA. I was advised that the summary log had been prepared by a paralegal working for Union Carbide's attorneys and that it was based upon that person's review of actual invoices contained in Union Carbide's records.
5. While in New York at this document review, I spot checked the log against a few invoices, which were provided to me at the time. I did not note any discrepancies. There were several pages of the log that were illegible, due to repeated copying. I reviewed the invoices covering those sections of the log and hand-wrote information concerning those invoices on to the log. This was done in the presence of Kelley, Drye personnel. Kelley, Drye and Union Carbide retained a copy that reflected those hand-written additions.
6. I have provided Hobin, Shingler & Simon with a true and correct copy of the log, which I received from Union Carbide (altered only as described in paragraph 5 herein).

The foregoing is true and correct to the best of my personal knowledge and information.

DATED: 7/26/02


William A. Kohlburn

SUBSCRIBED AND SWORN before me this 26th day of July, 2002.


Notary Public

