

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 an Information Processing 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 that position, I manage Records Repository which is located at 11000 East 51st Avenue, Denver, Colorado.

3. The Repository contains documents obtained from Manville Corporation and related entities which relate to asbestos litigation. The Trust managed and operated the Repository from November 28, 1988, the date on which the Manville bankruptcy plan was consummated.

4. Documents from this Repository were copied for the law firm of Baron & Budd relating to the fiber content of Johns-Manville Corporation's roofing shingles and siding. The copies have been bates labeled as numbers MT-000047 to MT-000566, and these documents are true and correct copies of documents found at the Repository.

Further affiant sayeth not.

Margaret J. Baumgardner
Margaret J. Baumgardner

Subscribed and sworn to before
me this 4th day of December, 2000.

Jami Hanley
Notary Public

My Commission Expires June 18, 2001
4360 Wadsworth Boulevard
Westridge, Colorado 80033

