

PLAINTIFF'S
EXHIBIT
GF-1831

CAUSE NO. 94-C-2110-S

JOHNNY B. AARON, ET AL § IN THE DISTRICT COURT OF
 §
VS. § BRAZORIA COUNTY, TEXAS
 §
ABEX CORPORATION, ET AL § 23RD JUDICIAL DISTRICT

AFFIDAVIT OF SAMUEL J. HEYMAN

STATE OF NEW JERSEY §
 §
COUNTY OF PASSAIC §

BEFORE ME, the undersigned authority, on this day personally appeared SAMUEL J. HEYMAN who, by me having been duly sworn, made the following affidavit:

My name is SAMUEL J. HEYMAN. I am above the age of eighteen (18) years, fully competent to make this affidavit and have personal knowledge of the matters of material fact hereinafter set forth, which are true and correct.

I am the Chairman and Chief Executive Officer of GAF Corporation. GAF Corporation is a Delaware Corporation which was incorporated in 1987 with its principal place of business in New Jersey, County of Passaic. GAF Corporation never manufactured, sold or distributed asbestos or asbestos-containing products.

In 1983, I first became associated with a company then known as GAF Corporation which had ceased manufacturing and selling friable asbestos-containing products in 1971 and, by 1981, had ceased the manufacture and sale of asbestos-containing products. That company was dissolved in 1989. Since I was never associated with that company while it manufactured and sold asbestos-containing products, I have no unique or superior personal knowledge about these matters.

I have no personal knowledge of these plaintiffs, their job duties, their job performance or any facts concerning their alleged exposure to asbestos. I have no expertise in industrial hygiene, toxicology, or the health effects of asbestos

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exposure. I have no unique or superior personal knowledge about the claims or ...
exposures of these plaintiffs.

Further, Affiant sayeth not.



SAMUEL J. HEYMAN

SWORN TO AND SUBSCRIBED before me, the undersigned authority, by SAMUEL J.
HEYMAN, on this the 21 day of August 2000.



NOTARY PUBLIC and for
The State of New Jersey

Catherine Mary Leichter
Notary's Printed Name

My Commission Expires: Nov 2, 2000

CATHERINE MARY LEICHTER
Notary Public of New Jersey
My Commission Expires Nov. 2, 2000