

BUMGARDNER, HARDIN & ELLIS

A PROFESSIONAL CORPORATION

673 MORRIS AVENUE

SPRINGFIELD, N. J. 07081

(201) 564-6500

ATTORNEYS FOR Third Party Defendants, Chrysler Motors
Corporation

MARSHALL COATES, et ux.,

Plaintiffs,

vs.

RAYMARK INDUSTRIES, INC., et al :

Defendants.

SUPERIOR COURT OF NEW JERSEY
:LAW DIVISION: MIDDLESEX COUNTY

:

:

Civil Action

Asbestos Litigation

:

DOCKET NO. L-095651-85.

AFFIDAVIT

BRUCE RUSSO, et al.,

Plaintiffs,

vs.

EAGLE-PICHER INDUSTRIES, INC., :
et al.,

Defendants.

:

:

:

:

:

DOCKET NO. L-085514-85

ARTHUR STERNER, JR., et ux., :

Plaintiffs, :

vs. :

DOCKET NO. L-089353-85

RAYMARK INDUSTRIES, INC., et
al., :

Defendants. :

GEORGE SCHRAMM, et al., :

Plaintiffs, :

vs. :

DOCKET NO. L-080949-86

EAGLE-PICHER INDUSTRIES, INC., :
et al., :

Defendants. :

JOSEPH LEJEUNE, et al., :

Plaintiffs, :

vs. :

DOCKET NO. L-024162-86

RAYMARK INDUSTRIES, et al., :

Defendants. :

GEORGE POMEROY, et al., :

Plaintiffs, :

vs. :

THE BENDIX CORPORATION, et al :

Defendants. :

DOCKET NO. L-001414-86

EDITH BECKER, et al., :

Plaintiffs, :

vs. :

BARON BROTHERS, et al., :

Defendants. :

DOCKET NO. L-91267-85

STATE OF MICHIGAN

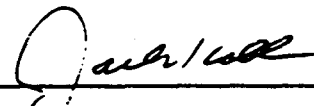
COUNTY OF WAYNE

JACK KOBLIN, of full age being duly sworn upon his oath deposes and says;

1. I am an attorney at law of the State of Michigan and am an attorney with at Chrysler Motors Corporation.

2. At the request of defense counsel I contacted the retired Manager of Workers Compensation to determine whether there were any compensation files regarding asbestos related injury. The manager did not specifically recall any such files.

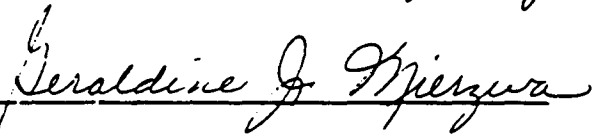
3. The only way to confirm the number of asbestos related workers compensation claims would be to search tens of thousands of files which are not indexed according to disease but rather are indexed according to employee names. This would be an harassing and impossible task since each file would have to be physically examined.



JACK KOBLIN

Sworn to and Subscribed

by me this *11th* day of *January*, 1989



Geraldine J. Mierzwa

GERALDINE J. MIERZWA
Notary Public, Macomb County, Michigan
Acting In Wayne County, Michigan
My Commission Expires April 8, 1989