

FILE NAME: Welding (WELD)

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April 7, 1997

Barry Castleman, Sc.D.
2412 Pickwick Road
Baltimore, MD 21207-6631

Re: Welding Rod Defendants

Dear Dr. Castleman:

Pursuant to our telephone conversation of this morning, I am enclosing copies of Dr. Nicholson's and Dr. Dement's affidavits and deposition testimony regarding welding rod exposure, as well as Dr. Dement's study dated March 14, 1995 regarding welding rods.

If you have any questions please feel free to contact me.

Sincerely,



Vincent J. X. Hedrick, II

VJH\pra

Enclosure

Welder studios

AFFIDAVIT OF DR. JOHN DEMENT

STATE OF NORTH CAROLINA :
: SS.
COUNTY OF DURHAM :

APPEARED BEFORE ME, a Notary Public for the state and county aforesaid, John Dement, Ph.D., who being duly sworn on the 18th day of *October*, 1995, did depose and, based on his personal knowledge, state as follows:

1. He has a Doctor of Philosophy degree in Industrial Hygiene and Epidemiology. He is certified in the comprehensive practice of industrial hygiene by the American Board of Industrial Hygiene.

2. He is currently employed by Duke University, Division of Occupational & Environmental Medicine, where he is employed as an Associate Professor of Community & Family Medicine and is involved with epidemiologic and industrial hygiene research.

3. During the course of his academic career and professional training he has conducted, studied and evaluated air sampling studies performed at asbestos manufacturing plants and upon various asbestos products. In particular, he has studied the release of asbestos fibers during normal use and handling, and during application, removal and replacement of asbestos-containing products.

4. The welding process does decompose the asbestos at the point of arc. However, this is not true for the flux coating below the arc area. According to the literature, unless the entire welding rod is consumed during the process, the flux on