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AFFIDAVIT

COUNTY OF SUMMIT)
) ss
STATE OF OHIO)

NOW COMES the affiant, David M. Wertheimer, first being duly sworn and states as follows:

1) That I am over the age of 18 years, am not under any restraint or legal disability, am competent to testify to the matter stated herein and make this affidavit based upon my own knowledge.

2) I was an employee of the BFGoodrich Company from 1946 to 1982.

3) I was a production worker and a pipefitter helper in BFGoodrich Company's Akron facilities.

4) As a pipefitter helper, I assisted in the installation of asbestos insulation on tanks and pipes. As a pipefitter helper, I worked with asbestos materials on a daily basis.

5) We worked in close proximity to the production workers and our work created significant amounts of asbestos dust.

6) My employer, the BFGoodrich Company, never told me of the dangers of asbestos exposure including the risks of asbestosis, lung cancer, or mesothelioma and I took no safety precautions regarding asbestos or asbestos products.

7) BFGoodrich never told us to warn the production workers of the dangers of asbestos.

8) I helped mix and installed Eagle Picher insulating cement on pipe joints throughout the BFGoodrich Akron plants.

9) I helped mix and install Eagle picher insulation cement on curing presses and tanks.

FURTHER AFFIANT SAYETH NAUGHT.

David M. Wertheimer

SWORN TO before me, a Notary Public, and signed in my presence this 22ND day of SEPT., 1997.

Notary Public

AMY STITAY, Notary Public
Residence—Summit County
State Wide Jurisdiction, Ohio
My Commission Expires Aug. 26, 1998