

PLAINTIFF'S EXHIBIT

WH-1108

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
DOCKET NO. MID-13639-91

-----X
PETER CERKA and
HELEN CERKA, his wife

Plaintiffs,

v.

A.C.&S. Inc., et al.;

Defendants.
-----X

ASBESTOS LITIGATION

AFFIDAVIT

I, C. Wayne Bickerstaff, after being duly sworn, do depose and say:

1. I am, and have been since 1976, the Manager of Industrial Hygiene and Materials Transportation with the Westinghouse Electric Corporation, and I have personal knowledge of the matters set forth in this affidavit.
2. I received the draft 22-page document attached to plaintiffs' Order to Show Cause with Temporary Restraints and I am familiar with its contents and any actions taken thereon.
3. No asbestos-related documents were discarded in response to the draft 22-page document referred to above.
4. No historical files of the Corporate Industrial Hygiene Department were discarded in response to the draft 22-page document referred to above.

EXHIBIT

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D.W. 7/9/93

5. During my 34 years of employment with Westinghouse Electric Corporation, I am not aware of any asbestos-related documents having been discarded.
6. It is the stated corporate policy of Westinghouse that no asbestos-related documents shall be discarded.
7. In response to a Request for Production of Documents in the asbestos litigation in the states of Mississippi, North Carolina, and Texas, Westinghouse has made available for review to the firms of Ness, Motley, Loadholt, Richardson & Poole and Baron & Budd all of its Corporate Industrial Hygiene files with the exception of certain privileged and proprietary documents; approximately 600,000 pages of documents from the files of the Corporate Industrial Hygiene Department have been produced to these two plaintiffs' firms, and they have copied over 40,000 pages of documents.

Further the affiant sayeth not.

C. Wayne Bickerstaff
C. Wayne Bickerstaff

SWORN TO and subscribed
before me this 10th day
of January, 1993.

Margaret A. Antal
Notary Public

