

FILE NAME: Goodyear (GY)

DATE: 2001 Oct 3

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AFFIDAVIT OF
ALLEN R. BARBER

STATE OF OHIO)
)
COUNTY OF SUMMIT)

The undersigned, Allen R. Barber, being first duly sworn, states:

1. I am employed as Vice President, Programs & Operations, at Lockheed Martin Naval Electronics & Surveillance Systems-Akron. ("LMNE&SS-A"), a Division of Lockheed Martin Corporation.
2. By virtue of my position I am responsible for guiding LMNE&SS-A's day-to-day internal operations and I am familiar with its corporate history.
3. LMNE&SS-A is a successor in interest to Goodyear Aerospace Corporation and to Loral Corporation.
4. On January 12, 1987, Goodyear Aerospace Corporation ("GAC"), a Delaware corporation, and The Goodyear Tire & Rubber Company ("GT&R"), an Ohio corporation, entered into the AMENDED AND RESTATED AGREEMENT FOR PURCHASE AND SALE OF ASSETS ("the GAC Sale Agreement") with LORAL CORPORATION, a New York Corporation.

The GAC Sale Agreement resulted in the sale of substantially all of the assets of Goodyear Aerospace Corporation, a wholly owned subsidiary of The Goodyear Tire & Rubber Company, to Loral Corporation.

At the time of the GAC Sale Agreement, GAC consisted of a number of divisions, two of which included The Defense Systems division and Aircraft Wheel & Brake division, both located in Akron, Ohio.

The Defense Systems division and the Aircraft Wheel & Brake division of GAC became divisions of LORAL CORPORATION as a result of the GAC Sale Agreement.

The Aircraft Wheel and Brake Division became known as Loral Aircraft Braking Systems Division.

5. On March 26, 1989, LORAL CORPORATION entered into the AGREEMENT FOR THE PURCHASE AND SALE OF ASSETS between LORAL CORPORATION AND OPUS ACQUISITION CORPORATION ("the Opus Agreement").

That Agreement memorializes, among other things, that substantially all of the assets of Loral Aircraft Braking Systems Division were sold by LORAL CORPORATION to OPUS ACQUISITION CORPORATION, a Delaware corporation.

6. On April 29, 1996 the remaining divisions of LORAL CORPORATION merged with LOCKHEED MARTIN CORPORATION, a Maryland corporation. Loral Defense Systems-Akron (formerly GAC Defense Systems) became Lockheed Martin Tactical Defense Systems-Akron, a division of Lockheed Martin Corporation.

7. The business unit once known as Goodyear Aerospace Corporation, Defense Systems Division is now known as Lockheed Martin Naval & Electronics Surveillance Systems-Akron ("LMNE&SS-A").
8. The business unit once known as Goodyear Aerospace Corporation, Aircraft Braking Systems is now known as Aircraft Braking Systems Corporation.
9. Lockheed Martin Corporation does not own and never has owned, or been affiliated with, in any way, the Aircraft Braking Systems Division of Goodyear Aerospace Corporation, Loral Aircraft Braking Systems Division or Aircraft Braking Systems Corporation.
10. On July 8, 1964, Allen Marker became employed by the Aircraft Braking Systems Division of Goodyear Aerospace Corporation ("GAC"). Loral Aircraft Braking Systems Division is a successor in interest of GAC Aircraft Braking Systems Division. Aircraft Braking Systems Corporation is a successor in interest of Loral Aircraft Braking Systems Division.
11. Allen Marker has been employed in the manufacture of aircraft wheels and brakes during his entire career with Aircraft Braking Systems Division of Goodyear Aerospace Corporation, Loral Aircraft Braking Systems Division and Aircraft Braking Systems Corporation; however, Allen Marker has never been employed by Lockheed Martin Corporation.

The foregoing instrument was acknowledged before me this 3rd day of October, 2001 by Allen R. Barber.


NOTARY PUBLIC

My commission expires 10-12-05

(Seal)

Jill P. Newman
Notary Public
My Commission Expires
October 12, 2005


Allen R. Barber
General Manager & V.P. of
Operations & Programs