



UNION CARBIDE CORPORATION

Corporate Health, Safety and Environmental Affairs Department

39 OLD RIDGEBURY ROAD, DANBURY, CT 06817-0001

September 3, 1985

LF
Neff
Perkins
Sheppard
Whitmer

Mitchel B. Axler Esq.
Squire, Sanders & Dempsey
Counsellors at Law
1800 Huntington Building
Cleveland, Ohio 44115

Re: Neff, Perkins, Sheppard and Whitmer

Dear Mr. Axler:

I am attaching the affidavit signed and notarized as per your request.

Very truly yours,

R. N. Wheeler, Jr.

RNW,Jr./maw

Attachment

cc: Martha J. Friar Esq.

0521G

RECEIVED

SEP 10 1985

M. J. FRIAR

PRIVILEGED AND
"CONFIDENTIAL MATERIAL
SUBJECT TO PROTECTIVE
ORDER"

UCC 071320

COUNTY OF KANAWHA
STATE OF WEST VIRGINIA

AFFIDAVIT OF
R. NICHOLAS WHEELER, JR.

I, R. NICHOLAS WHEELER, JR., being duly sworn according to law,
depose and say:

1. My business address is P. O. Box 8361, South Charleston, WV 25303.
2. I am employed by the Union Carbide Corporation. My title is Assistant Director of Product Safety.
3. To enable Union Carbide Corporation to determine whether it made any sales of polyvinyl chloride resin to defendant Celanese Corporation, Celanese Plastics, or Celanese Piping System at its Hilliard facility in Franklin County, Ohio or at any location in Columbus, Ohio, a systematic search of Union Carbide Corporation's Sales Accounting Records for the years 1965 through 1982 was undertaken at my direction.
4. I have reviewed these Sales Accounting Records for the years 1965 through 1982. The records contained no indication whatsoever of any sale of polyvinyl chloride resins to Celanese Corporation, to Celanese Plastics, or to Celanese Piping Systems at any location in Columbus, Ohio or in Hilliard, Ohio during the years specified.


R. Nicholas Wheeler, Jr.

UCC 071321

Sworn to before me and subscribed in my presence this 3rd
day of September, 1985.

Patricia S. Keffer
Notary Public