

IN THE CIRCUIT COURT FOR BALTIMORE CITY

IN RE: BALTIMORE CITY) APRIL 5, 1994
ASBESTOS LITIGATION) GROUP II TRIAL CLUSTER
) (Judge Edward J. Angeletti)
)
RALPH GARRETT,)
)
Plaintiff,)
) CA NO.: 94095701
v.)
)
ACANDS, INC., et al.,)
)
Defendants.)

AFFIDAVIT OF DAVID E. BALDWIN

I, David E. Baldwin, of Beaufort, South Carolina, being duly sworn,
make oath as follows:

1. I was the General Manager of the Wire Division of Westinghouse Electric Corporation from January, 1975 until my retirement from Westinghouse in 1987. In that capacity, I was well informed about the various products and manufacturing processes of the Division.

2. The Wire Division manufactured what is commonly known as magnet wire for use in electrical equipment. This wire did not contain any asbestos insulation. To the best of my knowledge, Westinghouse Wire Division did not manufacture or sell insulated wire for general electrical conducting purposes.

3. Based on my personal knowledge since 1975, the Westinghouse Wire Division has not manufactured an asbestos-insulated or asbestos-containing wire or cable.

4. Upon information and belief based upon my knowledge of this division and my contacts and conversations with employees of this division who have been employed since the early 1940s, the Westinghouse Wire Division has not manufactured asbestos insulated or asbestos-containing wire or cable.

5. To the best of my knowledge, information and belief, no division of Westinghouse Electric Corporation has ever manufactured asbestos-insulated or asbestos-containing wire or cable.

7. Upon information and belief based upon my knowledge of this division and my contacts and conversations with employees of this division who have been employed since the early 1940s, wire and cable manufactured by the Westinghouse Wire Division was placed on spools labeled with the Westinghouse name or logo, placed in boxes with the Westinghouse name or logo, or otherwise identified by use of the Westinghouse name or logo.

Given under my hand this 11th day of March, 1994.

STATE OF SOUTH CAROLINA)) TO-WIT:
COUNTY OF BEAUFORT)

My Commission expires: 8-14-2001

[SEAL]