PLAINTIFF'S
EXHIBIT
KM-431

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BARBARA ANN HOFFMAN and FREDERICK HOFFMAN,	§	
Plaintiffs,	§	
vs.	§	CIVIL ACTION
	§	FILE NO. 98-CV-745-RLV
GEORGIA PACIFIC CORPORATION (successor to BESTWALL GYPSUM COMPANY); et al.	§	

AFFIDAVIT OF DOUG MERRILL

STATE OF CALIFORNIA §
§
COUNTY OF SAN MATEO §

Before me, the undersigned authority, on this day did personally appear Doug Merrill, who, after being duly sworn upon her oath by me stated as follows:

1. "My name is Doug Merrill. I am over the age of eighteen (18) years, have never been convicted of a crime, and have personal knowledge of the matters stated herein.
2. "I have been employed by Kelly-Moore Paint Company for over 30 years.
3. "Paco Textures was a division of Kelly-Moore Paint Company from approximately December 1960 until the Paco Textures division was closed and/or sold in approximately 1983.
4. "One of the products of Paco Textures was 'Paco Quik-Set Joint Compound.' Beginning in 1963, it was manufactured by Kelly-Moore only at the Dallas, Texas (later the Hurst, Texas) plant. In the late 1960s, it was also manufactured in our San Carlos, California plant for a short period of time. Paco Textures had no other products known as "Quick Set" or "Quickset."
5. "According to her deposition testimony, Barbara Ann Hoffman apparently alleges exposure to "Quick Set" product during a remodeling project at her family home in Central Park, Alabama. The project was done over the course of a summer sometime in the late 1950's, or in 1961, 1962 or 1963. She alleges that she acted as a helper to her

great-uncle in that remodeling project. According to Ms. Hoffman, her great uncle purchased the supplies used in the remodeling project at a store in Birmingham, Alabama.

6. "For purposes of this affidavit, I will assume that the "Quick Set" product identified by Ms. Hoffman refers to Paco Quick Set Joint Compound.

7. "Paco Quik-Set Joint Compound was not manufactured or sold at all prior to 1963, and at that time it was manufacured only in the Dallas, Texas area and sold through Kelly-Moore Paint Stores.

8. "There were not, and never have been, Kelly-Moore stores in Alabama. In fact, there have never been any Kelly-Moore stores east of the Mississippi River."

FURTHER AFFIANT SAYETH NOT.

Doug Merrill, Affiant

STATE OF CALIFORNIA §
§
COUNTY OF SAN MATEO §

SUBSCRIBED AND SWORN TO BEFORE ME by Doug Merrill this 22nd day of March, 2000, to certify which witness my hand and seal of office.

Jean M. Boehm
Notary Public in and for
the State of California

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32021.20730

JEAN M. BOEHM
Commission # 1100283
Notary Public — California
San Mateo County
My Comm. Expires Aug 16, 2000