

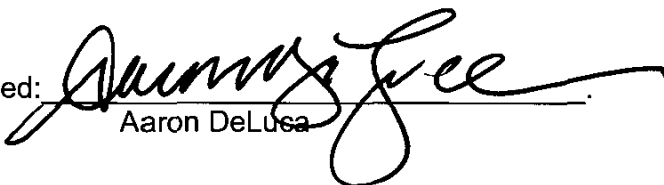
Affidavit of Aaron J. DeLuca

My name is Aaron J. DeLuca. I am an attorney in the law firm of Goldberg Persky Jennings & White, P.C. My office is in Pittsburgh, Pennsylvania. I have for a number of years represented victims of asbestos caused diseases.

One of the defendants in some of the asbestos disease lawsuits I have filed on behalf of asbestos disease victims is Union Carbide (now merged with DOW Chemical).

In 2001 Goldberg Persky had an informal arrangement with an attorney for Union Carbide. Goldberg Persky told Union Carbide's counsel that our firm wanted to do a Union Carbide document production. Union Carbide counsel invited Goldberg Persky to the Union Carbide document repository at the Kelley Drye law firm in New York City. A team of people from my office, including myself, went to Kelley Drye and marked the documents we wanted copied. I then contracted to have someone come in and get the marked documents for copying and imaging. About two weeks later I received CDs in the mail from the copy service.

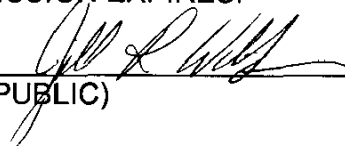
I sent copies of the CDs containing images of all of the produced documents to David Egilman, M.D. Dr. Egilman posted the documents on his internet website. The documents have been widely disseminated to many other attorneys.

Signed: 
Aaron DeLuca

County of Allegheny)
)ss.
State of Pennsylvania)

SUBSCRIBED AND SWORN to before me this 13th day of MAY, 2003

MY COMMISSION EXPIRES: .

SIGNED: 
(NOTARY PUBLIC)

