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November 29, 1995



CHARLES R. HOLLOWAY
OF COUNSEL

*MEMBER OREGON STATE BAR
AND
WASHINGTON STATE BAR

VIA FACSIMILE (214) 520-1181

Karen M. Gammon
Baron & Budd, P.C.
The Centrum
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75219-4281

Re: United States Mineral Products Company
Document Authentication

Dear Ms. Gammon:

Pursuant to our telephone discussions concerning the captioned matter and after having had an opportunity to review the exhibit list and documents which you provided for authentication, United States Mineral Products Company has authorized me to enter into the following Rule 11 agreement:

United States Mineral Products Company is unable to authenticate Exhibit Nos. 41, 71, 97, 126, 127, 228, 276, 303 or 333. (Exhibit No. 41 was missing and we may be able to authenticate it at a later date. Exhibit 276 has an attachment which was generated by United States Mineral Products Company and which could be separately authenticated; however, the document to which the United States Mineral Company document is attached cannot be authenticated.) In general, some of the documents may not have been provided in their entirety, may reference attachments which have not been provided, or may have portions excised by unknown persons. To the extent that attachments need to be provided to fully authenticate the document, or to the extent that the document may be otherwise incomplete or altered from its original state, appropriate objections will be raised at any time such document is offered into evidence. Certain documents provided contain handwritten notes whose origin is unknown and United States Mineral Products Company specifically denies authentication of unidentifiable handwritten notes. (A list of documents containing unidentifiable handwritten notes will be provided to you subsequent to this Rule 11 agreement.)

Ms. Gammon
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With the foregoing exceptions, United States Mineral Products Company agrees that the exhibits referenced in the attached 31 page exhibit list, previously provided by your office, are documents which are kept in the ordinary course of business by United States Mineral Products Company and are documents concerning which United States Mineral Products Company will not raise authentication objections in any subsequent Barron & Budd litigation.

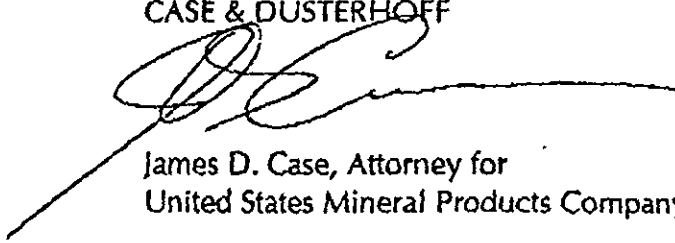
It is specifically understood and agreed that the foregoing Rule 11 agreement is applicable only with respect to Barron & Budd litigation, may not be provided by Barron & Budd to any other plaintiff's attorney in any jurisdiction or to any plaintiff in any jurisdiction represented by a firm other than Barron & Budd. In addition, United States Mineral Products Company specifically reserves all other valid objections to the admissibility of any of the referenced documents in any subsequent litigation.

Barron & Budd further agrees to cancel the scheduled records deposition of James P. Verhaizen and further agrees not to subsequently notice his deposition with respect to inquiry into any of the documents herein authenticated. *auth*

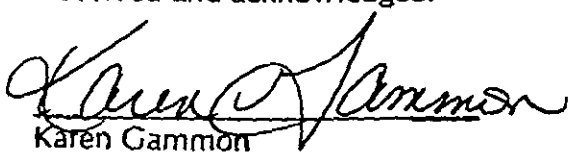
Authentication of

Very truly yours,

CASE & DUSTERHOFF


James D. Case, Attorney for
United States Mineral Products Company

Received and acknowledged:


Karen Gammon

Barron & Budd

Date: 11/29/95

JDC:ifm
Enclosure

cc: Paulette Kaminski (Via facsimile (201) 347-1339)
Laura Ellis-Kugler (Via facsimile (214) 953-5455)

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