

A F F I D A V I T

H. E. BLECHAR, duly sworn upon oath, deposes and says:

1. That I am, employed by Johns-Manville Corporation, Ken Caryl Ranch, Denver, Colorado ~~and am familiar with the facts underlying the transfer of blue asbestos fibre from The Flintkote Company stored at Cotter Merchandise Storage, Akron, Ohio to the warehouse of the Waukegan plant of Johns-Manville Sales Corporation in 1977 and if called to testify in open Court would testify substantially as follows:~~
2. That in 1977, my duties included <sup>(</sup>the Purchasing-of asbestos fibre from sources outside of the related Johns-Manville companies.
3. In 1977, The Flintkote Company terminated operations at its Ravenna, Ohio and had a remaining supply of blue asbestos fibre in storage at the Cotter Merchandise Storage, Akron, Ohio.
4. That in 1977, representatives of The Flintkote Company and Johns-Manville Corporation met resulting in an agreement whereby the remaining supply of blue fibre would be sold by Flintkote to Johns-Manville.
5. Prior to the transfer of the blue fibre, the palletloads of blue fibre were inspected by me at the Cotter Merchandise Storage Warehouse in Akron, Ohio. Any damaged bags were taped and sealed at Cotter Storage Warehouse prior to shipment.
6. After negotiations, it was agreed that The Flintkote Company would sell 300 palletloads of bagged fibre stored at the Cotter Merchandise Storage Warehouse in Akron, Ohio and 35 pallets of fibre in storage at The Flintkote Company's Ravenna, Ohio plant for a total of 335 palletloads of fibre.

7. This fibre consisted of approximately 665.3 short tons of blue fibre. 303.6 short tons of the fibre was ML6 blue asbestos fibre (303.6 short tons = 276 metric tons = 153 palletloads = 5520 bags) 361.7 short tons of the fibre was L6 blue asbestos fibre (361.7 short tons = 328.8 metric tons - 182 palletloads = 6,576 bags.)
8. Pursuant to Purchase Order of 6/9/77 all fibre was shipped by Johns-Manville trucks. 215 pallotloads of blue fibre stored at the Cotter Merchandise Storage Warehouse consisting of 136 pallotloads of ML6 fibre and 79 pallotloads of L6 were shipped to the Waukegan plant and the remaining 120 pallotloads of fibre were shipped by Johns-Manville trucks to its plant in Manville, New Jersey.
9. The fibre used in production at the Waukegan plant of Johns-Manville was rotated on a first in, first out basis.
10. When the Flintkote fibre arrived at the Waukegan plant, it was transferred into the asbestos fibre inventory of the plant and was not put into immediate use in the production process in the Waukegan plant.
11. That because of the stock rotation system in effect in the Waukegan plant, this fibre was not used in the production process before July 15, 1977.

Affiant sayeth nothing further.

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H. E. BLECHAR

SUBSCRIBED and SWORN to before  
me this \_\_\_\_ day of November, 1981.

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NOTARY PUBLIC

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