PLAINTIFF'S EXHIBIT E-156

THE ROCKBESTOS COMPANY
285 NICOLL STREET, P.O. DRAWER 1102, NEW HAVEN, CT 06504

January 23, 1987

Mr. James R. Shaw
Huie, Fernambucq and Stewart
First Alabama Bank, Suite 825
Birmingham, AL 35203

REF: JESSIE P. JACKSON, ETC., VS. OWENS
CORNING FIBERGLASS CORPORATION, et. al.

Dear Mr. Shaw:

Enclosed is the signed Affidavit of Robert J. Gehm. Please note that although you were advised to prepare this Affidavit for signature by Donald R. Bafundo, it was later decided to have our Manager of Electrical and Product Engineering sign instead. We have retyped the Affidavit incorporating the necessary changes.

Very truly yours,

Deborah-Lee Gollnitz
Financial Analyst

DLG/ddm

Enclosure

cc: D. Bafundo
K. Leick

STATE OF ALABAMA)
:
JEFFERSON COUNTY)

AFFIDAVIT OF ROBERT J. GEHM

Before me, the undersigned authority in and for said state and county, personally appeared ROBERT J. GEHM, who, being by me first duly sworn, deposes and says on oath as follows:

1. I am Robert J. Gehm. I am Manager of Electrical and Product Engineering of the Rockbestos Company.

2. I have read the plaintiff's complaint and I am familiar with the claims made therein. Specifically, I am familiar that it is alleged that the plaintiff's decedent was a maintenance engineer and was exposed to asbestos, asbestos insulation, and other asbestos products. I am familiar with the allegations that the plaintiff's decedent inhaled or ingested asbestos resulting in the condition of asbestosis and the decedent's death on July 9, 1983.

3. I am familiar with the products manufactured by the Rockbestos Company and any corresponding use of asbestos material.

4. Rockbestos has used asbestos as electrical wire insulation in the form of an impregnated firm and highly compressed insulating sheath. The impregnating process creates a solid matrix in which the asbestos fibers are encapsulated and completely bound by the impregnant which may be either a wax based or synthetic resin based high temperature material.

5. The form of asbestos used by Rockbestos is chrysotile as opposed to amosite which is typically used for pipe insulation. In its finished form, the raw asbestos is transformed into a rubbery, tacky solid that does not release airborne fibers during handling, splicing or terminating. Rockbestos asbestos

wire insulation is completely different in character from the somewhat powdery forms of asbestos which are used in heat insulating products such as pipe coverings and insulating sheets which can release significant quantities of airborne fibers during handling and insulation.

Robert J. Gehm

SWORN TO AND SUBSCRIBED BEFORE ME

on this the 23rd day of January,

1987.

Donna O. McHugh
Notary Public

My Commission Expires: My Commission Expires Mar. 31, 1991

RBB 00197