

STATE OF FLORIDA

COUNTY OF _____

AFFIDAVIT OF PHILIP E. ENTERLINE

PHILIP E. ENTERLINE being duly sworn deposes and says:

1. I reside at 37 St. Clair Drive, Pittsburgh, Pennsylvania 15228.
2. I am a Professor Emeritus of biostatistics at the University of Pittsburgh.
3. My field of specialty is biostatistics.
4. I have reviewed all the medical literature published on asbestos and cancer during the period 1934-1964.
5. In 1978, I prepared a book entitled Asbestos and Cancer which summarized that review.
6. That book was updated in 1980.
7. The review was conducted at the request of the Asbestos Information Association ("A.I.A.").
8. As part of this review, I read an article entitled "Experimental Studies of Asbestosis" published in the Archives of Industrial Hygiene and Occupational Medicine, Volume 3, dated 1951.
9. This article was authored by A. J. Vorwald, T.M. Durkin and P.C. Pratt ("Vorwald Article").
10. As a result of my review of the published literature, I concluded that in the United States there was a twenty-year lag in the acceptance of the causal connection between asbestos exposure and cancer.
11. I have recently reviewed a document entitled "Outline of Proposed Monograph on Asbestosis" written by Dr. Leroy Gardner ("Monograph Outline"). (A copy of which is attached as Exhibit 1.)
12. This Monograph Outline contained information not contained in the Vorwald article.

13. In his Monograph Outline, Dr. Gardner included his findings of an 81.8% tumor incidence in mice exposed to asbestos.

14. Dr. Gardner stated: The incidence rate of 81.8% is excessive. (Emphasis in the original)

15. Dr. Gardner's findings of an 81.8% tumor incidence was not reported in the Vorwald article.

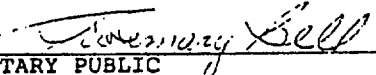
16. I am not qualified as an experimental pathologist, toxicologist or medical doctor, and therefore can offer no opinion about the design, conduct or scientific adequacy or inadequacy of the Gardner mice/cancer findings ("Monograph Outline").

17. It is my opinion that if the Gardner findings of an 81.8% tumor incidence in mice exposed to asbestos had been published in a reputable scientific journal, it would have accelerated in this country the acceptance of a casual relationship between asbestos and cancer.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.


PHILIP E. ENTERLINE

Sworn to and Subscribed before me
this 7th day of March, 1991


NOTARY PUBLIC
STATE OF FLORIDA

My commission expires: Notary Public, State of Florida
My Commission Expires June 17, 1991