

1. I am the Director of Materials Management for Kalex Chemical Products, Inc. (Kalex) and as such, I am fully familiar with the facts and circumstances herein.

2. That I submit this Affirmation in Support of the instant motion by the defendants Union Carbide and Monsanto for summary judgment and dismissal of plaintiff's complaint.

3. In 1978 Kalex purchased the Elm Coated Fabrics Division of W.R. Grace. This purchase included the plant at 5727 49th Street, Maspeth, New York where plaintiff's decedent was employed.

4. At its plant, Kalex used polyvinyl chloride resins to produce various vinyl products. These resins were delivered to a silo on the premises. From the silo, the raw materials were pumped into vats, mixed, and then rolled into flat vinyl sheets. These sheets thereafter were used in the manufacturing process of a number of different products. These raw materials were generally consumed within a week of delivery.

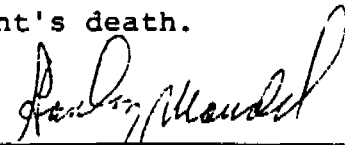
5. As Director of Materials Management, I have been in charge of purchases of polyvinyl chloride resins and products containing PVC's. A review of records maintained by Kalex indicates that they have not purchased polyvinyl chloride resins from Union Carbide since at least 1977. In addition, the records further reveal that Kalex never purchased polyvinyl chloride resins from defendants,

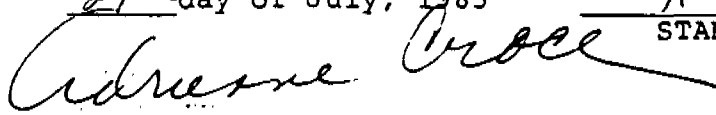
Monsanto, American Cyanamid, or Rohm & Haas. It was also the policy of Kalex to make purchases of polyvinyl chloride resins directly from each manufacturer. The third party distributors were not involved in these transactions.

6. For the above reasons, plaintiff's decedent could not have been exposed to any polyvinyl chloride resins or products containing the same manufactured by the defendants within four years of the decedent's death.

Sworn to before me this

29th day of July, 1985


STANLEY MANDEL



ADRIENNE CROCE
Notary Public, State of New York
No. 52-4893362
Qualified in Suffolk County
Commission expires March 30, 1987

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