

A F F I D A V I T

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

1. That I am, and have been continuously employed since December 1, 1952, by Johns-Manville Sales Corporation, Ken Caryl Ranch, Denver, Colorado.
2. Since 1976, as a physical distribution engineer, my duties have included scheduling and control of inventory of asbestos fiber for the various asbestos-cement pipe plants of the pipe division, including the Waukegan Plant. In order to perform said duties and responsibilities regarding the scheduling and shipment of fibers to Johns-Manville Corporation pipe division facilities, I was required to be knowledgeable as to customs and practices regarding plant usage, inventory, purchasing and procedures, at the Transite Pipe Department for the Waukegan Plant in Waukegan, Illinois.
3. In 1977, the Flintkote Company terminated operations at its Ravenna, Ohio plant and had a remaining supply of blue asbestos fiber in storage at the Cotter Merchandise Storage, Akron, Ohio. By agreement between representatives of Johns-Manville Corporation and the Flintkote Company, said remaining supply of blue asbestos fiber was sold by Flintkote Company to Johns-Manville in 1977. As part of that agreement, the Flintkote Company would agree to sell 300 palletloads of bagged fiber stored at the Cotter Merchandise Storage Warehouse in Akron, Ohio and 35 pallets of fiber in storage at the Flintkote Company's Ravenna, Ohio plant for a total of 335 palletloads of fiber.
4. The 335 pallets of blue fiber was composed of 665.3 short tons of blue fiber. 303.6 short tons of the fiber was ML6 blue asbestos fiber (303.6 short tons = 276 metric tons = 153 palletloads = 5520 bags). 361.7 short tons of the fiber was I.6 blue asbestos

