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OF COUNSEL
MARSHALL SCHWARZBACH

October 27, 1988

Barry Castleman, Ph.D.
1722 Linden Avenue
Baltimore, MD 21217

Re: Madison County asbestos litigation

Dear Barry:

I enclose a copy of an affidavit given by Robert Bockstahler of Eagle-Picher in April 1988, linking Eagle-Picher's purchases of asbestos fibers to GAF and Carey Canada during the years mentioned.

Sincerely,

James M. DeZelar

JMD/lja
Encl.

AFFIDAVIT OF ROBERT L. BOCKSTAHLER

STATE OF OHIO )
) SS:
COUNTY OF HAMILTON )

I, ROBERT L. BOCKSTAHLER, being first duly sworn upon oath, depose and say:

1. My name is Robert L. Bockstahler, and I was formerly the President and General Manager of the Chemical and Fibers Division, of Eagle-Picher Industries, Inc., a corporation duly organized and existing under the laws of the State of Ohio. The Fibers Department, formerly a part of the Chemicals and Fibers Division (hereinafter "the Company"), which was divested on December 31, 1982, was the only unit of Eagle-Picher Industries, Inc., (hereinafter "Eagle-Picher") which ever manufactured industrial insulation. I am authorized to make this affidavit on behalf of Eagle-Picher.

2. I have testified on behalf of Eagle-Picher on numerous occasions, responded to interrogatories and have served as corporate liaison for the attorneys involved with the litigation.

3. I have reviewed the Company's accounting records concerning the purchase of processed chrysotile asbestos fiber from 1935 to 1971. I can state from my own knowledge based on these records that the following facts are accurate.

a. That for the period 1935 through 1957 the processed chrysotile asbestos fiber purchased by the Company was furnished by Asbestos Corporation, Ltd.

b. That for the period 1958 through 1961 Carey Canadian Mines, Ltd. supplied a major portion of the processed chrysotile asbestos fiber purchased by the Company.

c. That for the period 1962 through 1966 the Company purchased 2,253 short tons of processed chrysotile asbestos fiber of which all but 50 short tons were supplied by Cary Canadian Mines, Ltd.

d. That for the period 1967 through 1969 the Company purchased 724 short tons of processed chrysotile asbestos fiber of which 424 tons were supplied by the GAF Corporation and 300 tons were suppled by Carey Canadian Mines, Ltd.

e. That for the years 1970 and 1971 GAF Corporation was the sole supplier of processed chrysotile asbestos fiber to the Company.

4. During the years stated above if the Company produced an asbestos-containing insulation product it would have contained the processed chrysotile asbestos fiber from the supplier listed in each given year.

5. The Company turned its inventory of processed chrysotile asbestos fiber six (6) times per year.

6. During the time frame of 1958 through 1969 when the Company was purchasing processed chrysotile asbestos fiber from Carey Canadian Mines, Ltd., the invoices would customarily be issued by Philip Carey Corporation, although the purchase orders were sent to Carey Canadian Mines, Ltd., either to an address in Canada or occassionally to a domestic place of business. The basis for the invoicing procedure was the exchange rate and for ease of payment to have the invoice based on U.S. dollars.

7. If I were called to testify in an asbestos case as to the supplier of processed chrysotile asbestos fiber used in one of the Company's insulation products during a given period of time, my testimony would be consistent with this affidavit.

FURTHER, AFFIANT SAYETH NOT.

ROBERT L. BOCKSTAHLER

Sworn to and suscribed before me on this 13th day of April, 1988.

Notary Public in and for the State of Ohio.

My commission expires:

EMMA J ROTHER
Notary Public, State of Ohio
My Commission Expires Oct. 15, 1991