

FILE NAME: Brown & Root (BR)

DATE: 1994

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AFFIDAVIT

COPY

STATE OF TEXAS

COUNTY OF HARRIS

BEFORE ME, the undersigned authority, on this day, personally appeared Sharon J. Cortez, being known to me personally, who, upon her oath, did state, swear and affirm that she is at least eighteen years of age, is of sound mind, has never been convicted of a felony and has personal knowledge of the facts herein stated:

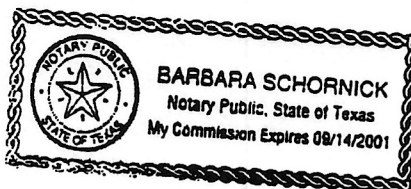
I am the custodian of the records for the Health Services Department of Exxon Company, U.S.A., an unincorporated division of Exxon Corporation. Attached hereto is a true and correct copy of a corporate inquiry report made regarding Exxon's Procedures Concerning Safeguarding Workers from Asbestos Health Hazards Before OSHA, and this corporate inquiry report, consisting of fifty-eight (58) pages, is kept in the regular course of business; and it was in the regular course of business of Exxon for an employee or representative of Exxon, with knowledge of the act, event, condition, opinion recorded, to make the record or to transmit information thereof to be included in such record; and the corporate inquiry report was made at or near the time or reasonably soon thereafter. The corporate inquiry report attached hereto is an exact duplicate of the original.

Sharon J. Cortez
Affiant

SWORN TO AND SUBSCRIBED before me on the 4th day of August, 1998.

Barbara Schornick
Notary Public in and for the
State of TEXAS

My commission expires: 9/14/2001



EXXON COMPANY, U.S.A.
POST OFFICE BOX 2180 • HOUSTON, TEXAS 77252-2180

HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS R. SIEGEL
MANAGER

February 23, 1995

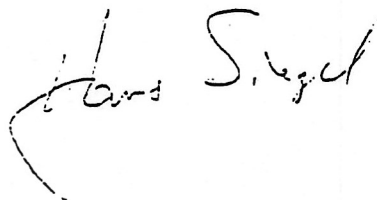
Re: Exxon's Procedures
Concerning Safeguarding
Workers From Asbestos
Health Hazards Before OSHA

R. O. Dockins
C. H. Friedmann
M. C. Hamison
T. R. Huddle
L. W. Raymond

Attached are reports reflecting personal knowledge and recollections of former employees whose duties with the company involved safeguarding workers from the health hazards of asbestos. This corporate inquiry is still ongoing in that there are more reports requested which have not yet been received. I will supplement this report by forwarding them on to you when I receive them.

In the meantime, I thought it appropriate to go ahead and relay on to you the corporate reports we have obtained to date as part of our corporate inquiry into past policies and practices concerning the handling and use of asbestos.

Very truly yours,



Attachment
msdocwinword/hns/asbespro

c: J. M. Nussbaum
B. G. Simpson
CF 28.01

EXXON COMPANY, U.S.A.

POST OFFICE BOX 2180 • HOUSTON, TEXAS 77001

HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS H. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Professor Clyde Berry
15 Curlew Ct.
Hendersonville, North Carolina 28792

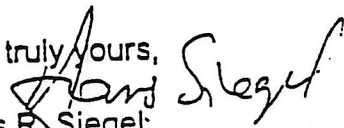
Dear Professor Berry:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. My Company assignment for some years prior to my current position was outside the United States, and I am interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

I am writing to request your input into a Company investigative effort and written report to memorialize the Company's past standard operating procedures and policies with respect to Exxon's and its predecessor companies' efforts to protect workers from potential asbestos health hazards. Our policies and practices regarding asbestos have, from time to time, been a subject of inquiry. However, as you are no doubt aware, the passage of time, the administration of our records retention policy, and the retirements of many long-time employees have all led to some of the Company's records on this subject being discarded or lost. Your input, drawn from your first-hand knowledge and experience of over thirty years will be critical to accurately memorializing the policies and practices of Exxon and its predecessor companies.

You will be contacted shortly concerning the coordination of this effort.

Very truly yours,


Hans R. Siegel
(713) 656-3387

EXXON COMPANY, U.S.A.
POST OFFICE BOX 2180 • HOUSTON, TEXAS 77001

HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS H. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Professor George Cvejjanovich
7607 Eastmark Drive, Suite 260
College Station, Texas 77840

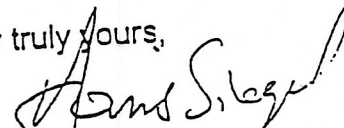
Dear Professor Cvejjanovich:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. Like you, my former duties for the Company took me out of the country for some time, and I am now interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

I understand that you are currently engaged in some consulting work for the Company, and I am writing to request your input into a Company investigative effort and written report to memorialize the Company's past standard operating procedures and policies with respect to Exxon's and its predecessor companies' efforts to protect workers from potential asbestos health hazards. Our policies and practices regarding asbestos have, from time to time, been a subject of inquiry. However, as you are no doubt aware, the passage of time, the administration of our records retention policy, and the retirements of many long-time employees have all led to some of the Company's records on this subject being discarded or lost. Your input, drawn from your first-hand knowledge and experience of over thirty years will be critical to accurately memorializing the policies and practices of Exxon and its predecessor companies.

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POST OFFICE BOX 2180 • HOUSTON, TEXAS 77001
HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS H. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Dr. Robert Eckardt
10409 E. Champagne Drive
Sun Lakes, Arizona 85248

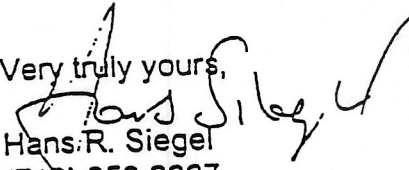
Dear Dr. Eckardt:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. My Company assignment for some years prior to my current position was outside the United States, and I am interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

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(713) 656-3387

EXXON COMPANY, U.S.A.
POST OFFICE BOX 2180 • HOUSTON, TEXAS 77001

HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS M. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Professor James W. Hammond, Sr.
1010 Town Place
Houston, Texas 77057

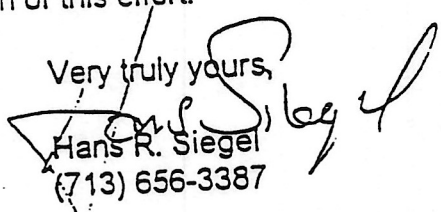
Dear Professor Hammond:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. This is essentially the position you formerly held for over thirty years. My Company assignment for some years prior to my current position was outside the United States, and I am interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

I understand that you are currently engaged in some consulting work for the Company, and I am writing to request your input into a Company investigative effort and written report to memorialize the Company's past standard operating procedures and policies with respect to Exxon's and its predecessor companies' efforts to protect workers from potential asbestos health hazards. Our policies and practices regarding asbestos have, from time to time, been a subject of inquiry. However, as you are no doubt aware, the passage of time, the administration of our records retention policy, and the retirements of many long-time employees have all led to some of the Company's records on this subject being discarded or lost. Your input, drawn from your first-hand knowledge and experience of over thirty years will be critical to accurately memorializing the policies and practices of Exxon and its predecessor companies.

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HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS H. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Dr. John G. Lione, M.D.
American Association of Retired Person
601 E. Street, N.W.
Washington, DC 20049

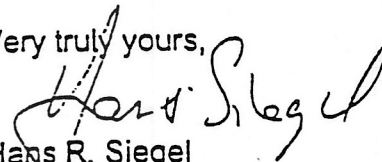
Dear Dr. Lione:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. My Company assignment for some years prior to my current position was outside the United States, and I am interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

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(713) 656-3387

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HEALTH SERVICES DEPARTMENT
INDUSTRIAL HYGIENE

HANS H. SIEGEL
MANAGER

June 9, 1994

RE: Corporate Inquiry
Regarding Past Safety
Programs and Procedures
Concerning Asbestos

Dr. Neill K. Weaver
2327 North Powhatan Street
Arlington, Virginia 22205

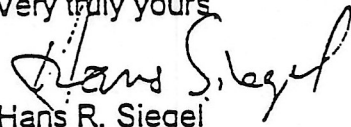
Dear Dr. Weaver:

I have recently assumed the responsibility for the Industrial Hygiene Department of Headquarters Health Services, Exxon Company, U.S.A. My Company assignment for some years prior to my current position was outside the United States, and I am interested in ensuring that I am familiar with the Company's industrial hygiene practices, both currently and in the past.

I understand that you are currently engaged in some consulting work for the Company, and I am writing to request your input into a Company investigative effort and written report to memorialize the Company's past standard operating procedures and policies with respect to Exxon's and its predecessor companies' efforts to protect workers from potential asbestos health hazards. Our policies and practices regarding asbestos have, from time to time, been a subject of inquiry. However, as you are no doubt aware, the passage of time, the administration of our records retention policy, and the retirements of many long-time employees have all led to some of the Company's records on this subject being discarded or lost. Your input, drawn from your first-hand knowledge and experience of over thirty years will be critical to accurately memorializing the policies and practices of Exxon and its predecessor companies.

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