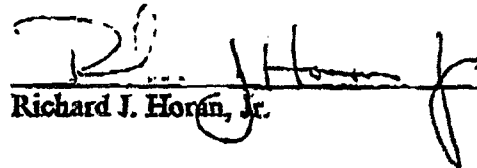


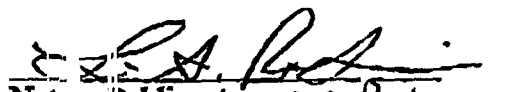
State of Maine)
)
County of Cumberland)

I, Richard J. Horan, Jr., being duly sworn, state under oath:

1. I am a naval architect and a member of the Society of Naval Architects and Marine Engineers. One of my areas of expertise is research on ship design, construction and repair, shipbuilding practices and other issues related to Navy shipbuilding and repair.
2. During the 1940s, manufacturers of high temperature insulating products for thermal pipe covering, insulating block and insulating cement were required to have their respective products undergo testing and approval by the Navy prior to use aboard U.S. Naval combatant vessels, built or overhauled at US Naval Shipyards, including the Brooklyn Navy Yard. The approved manufacturers were listed on the Navy Approved Material Lists.
3. I have personally reviewed Approved Material Lists for thermal pipe covering, thermal insulating block, and high temperature insulating cement dated from the late 1930's through the 1940's.
4. Vundet Cork Corporation was not listed as an approved manufacturer of thermal pipe covering, thermal insulating block, or high temperature insulating cement during this period.


Richard J. Horan, Jr.

Sworn to me, this third day of January, 2000.


Notary Public LORI A. ROBINSON
My Comm. Expires: 11/7/06