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Manville Internal Correspondence

To Barbara Diemer

Date March 12, 1985

From Lois Gaul

Copies H. Marsh

Subject Shipbuilders' Council of America

During the meeting last week with Dr. Selikoff, he mentioned that his researchers had found the library of the Shipbuilders' Council of America in Washington to be very helpful, especially regarding asbestos materials used in ships.

Nikki Dilgarde in CIC tells me that the Council was founded in 1921 and was formerly known as the National Council of American Shipbuilders. Her directory does not show a "library" as such, but states the Council collects information on shipbuilding and compiles statistics. There is a staff of 10. Address and phone number are:

Shipbuilders' Council of America
1110 Vermont Avenue, N.W.
Washington, D.C. 20005
202/775-9060

Ok -
Seawell, Dalton
boxes brought
here for this.
production.

Judy Hatten
they contain
Shipyd Coun-
sel docs

PLAINTIFF'S EXHIBIT
SBCA 5180
exhibitsticker.com

AFFIDAVIT

STATE OF COLORADO)
) ss.
COUNTY OF ADAMS)

I, Margaret J. Baumgardner, being of full age and first duly sworn do hereby state:

1. I am not a party to this action. I have personal knowledge of the facts set forth in this affidavit, and if called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

2. I am the Research Coordinator for the Claims Resolution Management Corporation ("CRMC"), a wholly owned subsidiary of the Manville Personal Injury Settlement Trust ("Trust"). The CRMC was created in December 1998 and is staffed by former Trust employees. On January 1, 1999, CRMC began providing claims resolution facility services to the Trust.

3. In this position, I manage the Asbestos Claims Research Facility ("Facility"), a document and records repository located at 3390 Peoria Street, Suite 304, Aurora, Colorado. The Facility contains the business records including but not limited to correspondence, memoranda, reports, records and data compilations ("record") of Manville Corporation or related entities ("Manville"), generally, as well as Manville records relevant to litigation of asbestos liability. The records found at the Facility were transferred from Manville to the Trust beginning in November 28, 1988, the date on which the Manville bankruptcy plan was consummated. Additional records have been and continue to be transferred directly to the Facility. The Facility's records have been in the custody and control of counsel for the Trust or Trust personnel since the date of consummation.

4. My experience and familiarity with the documents at the Facility began in 1983 while working for Manville. In my work as a paralegal for Manville, I assisted in locating, indexing and packing many of the records which became the foundation documents for the Facility. I continued to work for Manville until September 1987. From March 1988 to September 1988, I was hired to supervise and assist in the indexing of the first 20,000 boxes which were turned over to the Trust in November 1988. From September 1988 to January 1989, I assisted in the privilege review of documents to be given to the Trust. From November 1988 to April 1994, I worked for Freeborn &

Peters and was put in charge of the Facility, managing all productions and "new" acquisitions. In September 1995, I was hired by the Trust to manage the Facility. In December 1998, I was hired by the CRMC to manage the Facility for the Trust. Accordingly, I am personally familiar with many of the records stored at the Facility, as well as how the records have been gathered.

5. To the best of my knowledge, information and belief, I certify that these records were made at or near the time by, or from information transmitted by, a person with knowledge, were kept in the course of the regularly conducted business activity of Manville, and it was the regular practice and the business activity of Manville to make the records.

6. Attached are documents found among the file collcctions at the Facility. These documents, bates labeled CRMC-ShipbuildersCouncil-Files-000001 through CRMC-ShipbuildersCouncil-Files-000884, are true and correct copies of documents found at the Facility.

Margaret J. Baumgardner

Subscribed and sworn to before
me this 23rd day of October, 2014.

AMY W BENHAM
NOTARY PUBLIC
STATE OF COLORADO
MY COMMISSION EXPIRES 05-23-2016

Notary Public