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AFFIDAVIT

Frank Wathen, being duly sworn, states as follows:

1. I am the duly elected Secretary of Southern Talc Company, a Georgia corporation ("Southern Talc").

2. In my capacity as Secretary of Southern Talc, I am the custodian of the business records of Southern Talc.

3. Attached to this Affidavit are copies of seven pages which were submitted to me for authentication by the law firm of Bevan & Economus.

4. At my direction, the seven pages that are attached to this Affidavit have been compared to the business records of Southern Talc of which I am the custodian.

5. Some of the seven pages are not complete copies of the business records of Southern Talc, because some of the information in the business records was blocked when the copies were made. However, the information on the seven pages that was not blocked is an accurate copy of the information that appears in the business records.

6. Also, the seven pages contain telecopy transmittal markings and court reporter's exhibit notations that do not appear on the business records from which the copies were made.

7. Subject to paragraphs 5 and 6 above, the seven pages attached to this Affidavit are complete and accurate copies of documents which are held among the business records of Southern Talc. To the best of my knowledge and belief, all of such documents are more than 20 years old.

Frank Wathen

Frank Wathen

State of Kentucky

County of Jefferson

The foregoing Affidavit was subscribed and sworn to before me, by Frank Wathen on June 25, 1998.

Billie Joyce McBee

Notary Public

My Commission expires: MY COMMISSION EXPIRES AUGUST 25, 2001

E:\FJM\WATHEN.AFF.WPD

PLAINTIFF'S EXHIBIT 11 7-8-98

SHIPMENTS (TONS)
POWDER AND ROOFING TALCS

		1954	1955	1956	1957	1958
1.	Aetna Paper Company, Dayton, Ohio	400	340	360	231	0
2.	American Crayon Company, Sandusky, Ohio	0	0	35	0	30
3.	American Synthetic Rubber, Louisville	440	385	210	140	215
4.	Anaconda Wire & Cable Company					
	Marion, Indiana	105	140	140	140	70
	Orange, California	0	30	0	0	0
	Hastings, New York	105	175	140	36	0
5.	Arco Company, Cleveland, Ohio	140	140	210	210	175
6.	Armstrong Tire & Rubber Co., Natchez, Miss	60	45	60	45	75
7.	Armstrong Rubber Mfg. Des Moines, Iowa	75	70	70	60	70
8.	Automotive Finishes, Inc., Dearborn, Mich.	0	0	22	66	44
9.	Athens Insecticide Company, Athens, Tenn.	12	12	9	6	12
10.	Armco Drainage & Metals Co., Atlanta	5	3	6	9	5
11.	American Hard Rubber Company	0	0	0	0	5
12.	Atlas Paint & Varnish Company	30	30	0	30	30
13.	Baldwin Rubber Co., Pontiac, Michigan	160	305	160	160	120
14.	Barada & Page, Inc., New Orleans	35	0	0	0	0
15.	Barrett Division, Chicago, Illinois, 842	2640	2360	2480	2560	2560
16.	Barrett Division, Chicago No. 863	0	0	0	0	920
17.	Barrett Division, Ensley, Alabama	1100	1180	1250	1921	1995
18.	Barrett Division, Philadelphia, Pa.	920	680	480	120	0
19.	Morris Bean & Company, Yellow Springs, O.	0	0	400	80	225
20.	Bird & Son, Inc.					
	Shreveport, Louisiana	1850	2150	1700	2374	2250
	Charleston, S. C.	0	150	680	115	1375
	Chicago, Illinois	160	120	90	0	0
21.	Berlen Products Co., Nashville, Ga.	0	0	40	0	40
22.	Cabell Chemical Company, Huntington, W.Va.	140	70	70	35	35
23.	Candian Gypsum Company, Mt. Dennis, Ont.	0	180	40	0	0
24.	Philip Carey Mfg. Company, Lockland, Ohio	1080	1800	880	800	982
25.	Caterpillar Tractor Company, Peoria, Ill.	50	60	0	35	35
26.	Certain-teed Products Corporation					
	Marseilles, Ill.	0	0	40	0	0
	East St. Louis, Ill.	440	1080	640	400	560
	KansasCity, Missouri	360	280	120	40	80
	Port Wentworth, Georgia	600	320	240	40	85
	Richmond, California	0	250	400	400	450
	Tacoma, Washington	0	200	500	150	250
25.	Cincinnati Rubber Company, Cincinnati, O.	0	0	12	11	0
26.	Coahoma Chemical Co., Clarksdale, Miss.	50	0	250	0	0
27.	Collins Feed & Supply, Miami, Florida	185	295	115	160	120
28.	Cone Mills Co., Greensboro, N. C.	0	41	0	0	0
29.	Consolidated Process Co., Indianapolis	0	5	15	0	0
30.	Copolymer Corporation, Baton Rouge, La.	135	270	135	90	270
31.	Corduroy Rubber Co., Grand Rapids, Mich.	160	40	35	35	70
32.	Crown Products Co., Douglas, Ga.	0	35	0	35	0
33.	Cotton Producers Association, Cordele	35	80	70	33	51
34.	Helene Curtis, Inc., Chicago	80	40	40	40	0
35.	Philip Carey Mfg. Company, Cincinnati	1080	1800	880	800	982
36.	Deroe & Reynolds, Newark, N. J.	120	180	60	0	0
37.	Dixie Insecticide Company, Miami	0	0	70	0	0
38.	Dixie Roofing Mills (Ruberoid)	450	450	0	0	215
39.	Esser Wire & Cable Co., Detroit	0	0	80	44	5
40.	E-Z Flow Mfg. Company	0	0	0	0	35
41.	Fabricast Division, GAC, Bedford, Ind.	0	0	22	33	0

COPY

		1954	1955	1956	1957	1958
42.	Lloyd A. Fry Roofing Company					
	Memphis, Tennessee	256	372	310	191	153½
	Detroit, Michigan	280	360	40	0	0
	Brookville, Indiana	180	200	120	160	240
	Summit, Illinois	160	320	80	0	0
	Morehead City, N. C.	165	105	90	0	0
	Jacksonville, Florida	160	200	200	72	30
	E. Kansas City, Missouri	80	240	40	80	0
	Robertson, Missouri	80	120	80	50	0
	Ft. Lauderdale, Fla.	80	240	40	80	145
	Minneapolis, Minnesota	80	200	40	0	0
43.	Farm Bureau Coop., Dayton, Ohio	80	80	0	0	0
44.	Fenton Foundry Supply, Dayton, Ohio	70	35	35	0	
45.	Firestone Tire & Rubber Co., Akron, Ohio	200	245	150	360	0
	Sylos Division	0	0	36	168	828
46.	Firestone Tire & Rubber Co., Des Moines	140	275	300	385	282
47.	Firestone Tire & Rubber Co., Hamilton, Ont.	53	90	30	0	0
48.	Firestone Tire & Rubber Co., Memphis, Tenn.	1130	1296	1044	432	540
49.	Flag Sulphur & Chemical Co., Tampa, Fla.	40	0	0	0	0
50.	Flintkote Company, Chicago Heights, Ill.	0	0	40	320	200
51.	Flintkote Company, New Orleans	0	0	40	200	440
52.	Florida Agricultural Supply, Jax.	440	240	120	0	0
53.	Forbes Finishes Division, Cleveland	70	55	0	0	12
54.	Fuco Industries, Inc., Live Oak, Fla.	79	5	0	36	36
55.	Garlock Packing Co., Palmyra, N.Y.	35	0	0	0	0
56.	Gates Rubber Company, Denver, Colo.	105	70	35	35	35
57.	Geigy Company, Elizabeth, Miss.	680	0	0	0	0
58.	General Tire & Rubber Co., Jeannette, Pa.	210	165	210	245	315
59.	Globe Rubber Co. Corp., Philadelphia	0	0	168	40	0
60.	B. F. Goodrich Co., Akron, Ohio "26"	800	655	520	375	350
	"29"	0	190	260	420	140
61.	B. F. Goodrich Co., Los Angeles	0	75	70	45	30
62.	B. F. Goodrich Co., Miami, Okla.	35	35	105	140	105
63.	B. F. Goodrich Co., Tuscaloosa, Ala.	60	65	115	70	105
64.	Goodyear Tire & Rubber Co., Akron	665	805	690	560	420
65.	Goodyear Tire & Rubber Co., Gadsden, Ala.	820	1020	1000	1200	1380
66.	Goodyear Tire & Rubber Co., Jackson, Mich.	370	245	210	175	33
67.	Goodyear Tire & Rubber Co., Topeka, Kan.	20	162	63	15	45
68.	Grizzly Mfg. Company, Paulding, Ohio	200	160	160	160	160
69.	General Split Corporation, Milwaukee	0	0	0	60	40
70.	Hector Supply Company, Miami	40	160	200	240	120
71.	Hill & Griffith Company, Cincinnati	0	0	126	200	80
72.	Holtite Mfg. Company, Baltimore	110	140	105	175	105
73.	Innis, Speiden Company	140	120	40	60	80
74.	Johns-Manville Products, Manville, N.J.	0	0	720	0	0
75.	Johns-Manville, Marrero, Louisiana	440	520	280	120	130
76.	Johns-Manville, Savannah, Georgia	0	0	225	695	280
77.	Johns-Manville, Waukegan, Illinois	0	0	240	760	920
78.	Johnson Rubber Company, Middlefield, O.	35	35	35	35	70
79.	Kentucky Color & Chemical Co., Louisille	91	46	10	Sold out	
80.	Koppers Company, Houston, Texas	0	0	1350	1260	2500
81.	Koppers Company, Woodard, Alabama	440	1040	920	320	880
82.	Kraft Chemical Co., Chicago, Illinois	160	400	240	280	320
83.	Lancaster Chemical Co., Carlstadt, N.J.	315	298	140	0	0
84.	The Lehon Company, Memphis, Tennessee	760	718	210	200	90
85.	The Lehon Company, Wilmington, Illinois	480	1400	1040	520	560

COPY

		1954	1955	1956	1957	1958
86.	Leidy Chemicals, Baltimore	35	35	0	0	70
87.	Logan-Long Company, Franklin, O.	440	560	480	200	240
88.	Logan-Long, Tuscaloosa, Alabama	0	53	180	0	17
89.	LCL	- Not counted combined -				150
90.	Marshall-Eclipse Div., Troy, N.Y.	0	0	165	140	85
91.	Olin Mathieson Chemical, Aberdeen, N.C.	0	0	180	0	0
92.	Midwest Rubber [illegible] Co. K. St. Louis	80	5	175	235	220
94.	Midwest Rubber, Barberton, Ohio	120	0	0	0	0
95.	Minnesota Mining, Detroit	45	28	120	180	0
96.	National Mfg. Company, Tonawanda	0	40	560	560	0
97.	Niles Chemical Co., Niles, Mich.	30	0	0	0	30
98.	Niagara Chemical Division, Belle Chasse	0	90	0	320	40
99.	Niagara Chemical Division, Jax.	1100	968	2563	1981	1106
100.	Niagara Chemical, Pompano Beach	0	0	105	0	0
101.	Niagara Chemical, Wheming, Illinois	0	0	80	0	0
102.	S. Obermayer, Chicago	75	105	80	40	40
103.	S. Obermayer, Cincinnati	40	40	40	35	35
104.	Pittsburgh Coke & Chemical Co.	5439	5321	4020	4225	2059
105.	Proko Company, Dallas	0	0	0	0	40
106.	John Powell, East Point	384	660	80	0	30
107.	Presstite-Keystone Engr. St. Louis	0	0	0	0	40
108.	W. T. Rawleigh Co., Freeport, Ill.	480	280	280	320	360
109.	W. T. Rawleigh, Memphis, Tennessee	120	120	80	80	120
110.	Reilly Tar & Chemical, Lone Star, Tex.	2200	2850	4050	2600	4250
111.	Reilly Tar, Indianapolis	740	1250	1700	1000	1500
112.	Rinshed-Mason Company	600	828	288	156	120
113.	G. S. Robins & Company	80	40	40	75	70
114.	H. M. Royal, Inc., Trenton, N.J.	320	280	480	400	400
115.	Stauffer Chemical, Bayonne, N.J.	1 0	140	600	525	615
116.	Stauffer Chemical, Harvey, La.	0	105	200	0	0
117.	Stauffer Chemical, Tampa, Fla.	0	908	1820	655	494
118.	Stauffer Chemical, Omaha, Nebr.	0	0	0	0	15
119.	F. E. Schundler, Joliet, Ill.	75	80	40	40	0
120.	Sherwin-Williams, Kensington, Ill.	180	60	30	30	17
121.	Smith Chemical & Color Co. Brooklyn	40	35	0	0	0
122.	Sorg Paper Company, Middletown, O.	0	80	200	140	120
123.	Stoller Chemical Company, Akron, O.	400	520	600	480	360
124.	Swift & Company, Atlanta	5	0	80	427	120
125.	Stylon Company, Florence, Alabama	0	0	0	0	75
126.	Tamms Industries Co., Chicago	0	120	600	612	467
127.	Thompson-Hayward Chemical St. Louis	80	40	40	80	0
128.	Thompson-Hayard Chemical, Kansas City	40	40	40	0	0
129.	Thompson-Hayard Chemical, Houston	0	0	0	40	75
130.	Thompson-Hayward Chemical, Omaha	0	0	0	70	35
131.	Tobacco States Chemical, Lexington	315	155	280	400	435
132.	U. S. Gypsum, St. Paul, Minnesota	520	560	480	440	680
133.	Whittaker, Clark & Daniels, Newark	595	573	533	867	972
134.	Whittaker, Clark & Daniels, Chicago	90	120	60	70	95
135.	Whittaker, Clark & Daniels, Cleveland	105	210	65	95	120
136.	Witco Chemical Company, New York	676	578	40	108	40
137.	Brenn Paper Company, Middletown, O.	280	160	40	40	0
138.	Weil-Elliott Chemical, Louisville	0	0	0	0	120
139.	Web-Cote Roofing Co.	0	0	0	0	16
140.	Yates Bleachery Co., Flintstone, Ga.	20	40	40	40	20.
		39,805	47,181	44,456½	40,257½	42,695

INVOICE

SOUTHERN TALC COMPANY

NO. 004637-B

MINERS AND MANUFACTURERS
INDUSTRIAL TALC FOR ALL PURPOSES
TALC POWDER – METAL WORKER'S CRAYONS – ROOFING TALC
P. O. DRAWER F. CHATSWORTH, GEORGIA 30705

The B. F. Goodrich Company
500 S. Main Street
Akron, Ohio 44318

ATTN: Accounts Payable D/0076, MAB-3

TERMS: 1% 10 DAYS NET 30

DATE March 8, 1976
ORDER NO. 862073 Req. 192151
SHIPPED VIA Johnson Motor Lines
CAR NO.
SHIPPED TO Cabel International
Charleston, S. C.

QUANTITY		AT	AMOUNT
1 ton	(40/50# Paper bags) Code 26DCD Soapstone	$60.00	$60.00

PLAINTIFF'S EXHIBIT
WGlenn-13

EXHIBIT AAA

P.08
330 467 4493
BEVAN & ECONOMUS

PLAINTIFF'S EXHIBIT
UGlen #14

(a) Customer	1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967	1968	1969
Firestone Tire Co. (Rubber) Akron, Ohio									0	0	X 140	135				DIA 275
Goodrich Rubber Co. (Rubber) Akron, Ohio	800	845	780	795	400	195	216	286	144	175	105	455	115	60	80	171

TOTAL 5135

			1954	1955	1956	1957	1958
45.	Firestone Tire & Rubber Co., Akron, Ohio Sylos Division		200 0.	215 0	150 36	360 168	0 828
60.	B. F. Goodrich Co., Akron, Ohio	"26" "29"	800 0.	655 190	520 260	375 420	350 440

PLAINTIFF'S EXHIBIT

Wilson #15

B.F. Goodrich Co.

1.				
2	2/18/70	CE-801234	TL	20 Akron
3.	5/13/70	CE 801433	TL	20 Akron
5				
6.				
7.	9/30/70	CE 8C130	JRSW 63533	50 Cols 2c
8.	10/9/70	CE 801762	TL	20 Cols 2c
9.	10/13/70	CE 801755-	JM 98774	50 Cols 2c

Tusca TV
Akron 160

PLAINTIFFS EXHIBIT
Williams #16