

FILE NAME: Early Asbestos Damage Suits (EADS)

DATE: 1980

DOC#: EADS003

DOCUMENT DESCRIPTION: Deposition of Franklin Swersky

IN THE CIRCUIT COURT FOR
KNOX COUNTY, TENNESSEE

1	EARL THOMAS	NO. 3-128-77
	HAROLD WAYNE BLALOCK, ET UX,	NO. 1-365-77
2	JAMES M. BOLINGER, ET UX	NO. 1-462-77
	LAGAN JARRETT CHUNN, ET UX	NO. 2-463-77
3	WILLIAM WALTER CHITTUM, ET UX	NO. 3-494-78
	CECIL ALAN CLARK, ET UX	NO. 2-713-79
4	HAROLD LLOYD COLSTON, ET UX	NO. 1-74-79
	RALPH G. CRIGGER, ET UX	NO. 2-346-78
5	JOE A. WALLACE, ET UX	NO. 3-116-78
	ROBERT WARREN MILLER, ET UX	NQ. 1-117-78
6	LAWRENCE EDWARD REDMON, ET UX	NO. 3-117-78
	OSCAR L. WILLIAMS, ET UX	NO. 1-118-78
7	AVERY E. BUCKNER, ET UX	NO. 2-118-78
	FRANK HARRISON, ET UX	NO. 3-118-78
8	ROBERT LEE CLAY, ET UX	NO. 1-119-78
	TOM T. TREADWAY, ET UX	NO. 2-119-78
9	GEORGE DANIEL SMALLWOOD	NO. 3-119-78
	CARL W. REIORDAN, ET UX	NO. 2-120-78
10	ROY G. CAMPBELL, ET UX	NO. 2-151-78
	CONNIE G. BAWGUS, ET UX	NO. 2-152-78
11	DAVID L. BEARD, ET UX	NO. 3-152-78
	CHARLES ALBERT PATRICK, JR., ET UX	NO. 1-153-78
12	EARL H. ERWIN, ET UX	NO. 2-153-78
	WILLIAM D. KETCHUM, ET UX	NO. 3-153-78
13	JOHN A. GUNTER, ET UX	NO. 1-154-78
	LUTHER CLINTON REESE, ET UX	NO. 3-154-78
14	CHARLES DAN CATHEY, ET UX	NO. 2-115-78
	WALTER EDGAR PATTERSON, ET UX	NO. 2-302-78
15	DAVE HICKSON, ET UX	NO. 1-328-78
	GARY LYNN HEADRICK, ET UX	NO. 1-330-78
16	ROBERT JERRELL MYERS, ET UX	NO. 2-330-78
	KENNETH RUDOLPH HARRISON, ET UX	NO. 3-330-78
17	MICHAEL LEE TREADWAY	NO. 1-331-78

18 T R A N S C R I P T of the above-entitled matter
19 taken by and before NANCY TARNOWSKI-MISARTI, a Certified
20 Shorthand Reporter and Notary Public of the State of New
21 Jersey at the offices of Messrs. Brach, Eichler, Rosenberg,
22 Silver, Bernstein & Hammer, 33 Evergreen Place, East Orange,
23 New Jersey, on Monday, December 22, 1980, commencing at
24 10:00 a.m.

22 Reporting Services Arranged Through:
23 ROSENBERG AND ASSOCIATES
24 Certified Shorthand Reporters
25 769 Northfield Avenue
 West Orange, N. J. 07052
 (201) 678-5650

1	GEORGE WILLIAM HEADRICK, ET UX	NO. 2-331-78
	JOHN STEWART, ET UX	NO. 3-331-78
2	JERRY LYNN HARRISON, ET UX	NO. 3-332-78
	BENNY DALE TREADWAY, ET UX	NO. 1-333-78
3	RALPH EUGENE KOONTZ, ET UX	NO. 3-333-78
	TIMMONS JOE HEADRICK, ET UX	NO. 1-334-78
4	EVELYN J. REECE, ET VIR	NO. 2-334-78
	THOMAS L. GANN	NO. 3-334-78
5	HAROLD THOMAS WHALEY	NO. 1-335-78
	GARY LYNN COLE, ET UX	NO. 2-335-78
6	BUSTER EDWARD GREER, ET UX	NO. 3-335-78
	VERNON GILBERT WHALEY, ET UX	NO. 1-336-78
7	JAMES E. MCINTURF, ET UX	NO. 2-336-78
	BOB STEPHENS WINSTEAD, ET UX	NO. 3-336-78
8	HAROLD L. TREADWAY, ET UX	NO. 1-337-78
	IVA LOU BAWGUS, ET VIR	NO. 3-337-78
9	ALLEN STARNES, ET UX	NO. 1-338-78
	JAMES THOMAS REEL, ET UX	NO. 2-338-78
10	ONEDA ANN HOLTON, ET VIR	NO. 3-338-78
	MARVIN A. SAYNE, ET UX	NO. 2-339-78
11	WILLIAM DAVID HEADRICK	NO. 1-345-78
	LONNIE L. COLEMAN, ET UX	NO. 2-345-78
12	WILLARD A. DUGGER	NO. 3-345-78
	GEORGE E. LINDSEY, ET UX	NO. 1-346-78
13	LOIS ANN STARNES COLE, ET VIR	NO. 3-346-78
	EMORY R. MILLER, ET UX	NO. 1-347-78
14	BOBBY RAY DUGGER, ET UX	NO. 2-347-78
	CARROLL STARNES, ET UX	NO. 3-347-78
15	IVA LEE LOUDY, Individually and for the benefit of next-of-kin of Jack Loudy, Deceased	NO. 1-348-78
16	CHARLES DAVID NAVE	NO. 2-348-78
17	BARBARA G. STARNES, ET VIR	NO. 3-348-78
	JAMES A. PROFITT, ET UX	NO. 2-349-78
18	JOHN RODNEY STARNES	NO. 3-349-78
19	KAYE MEECE, Individually and for the use and benefit of the next-of- kin of RUEL MEECE, deceased	NO. 2-61-79
20	BILL JOPLIN, ET UX	NO. 3-432-79
	JOHN W. ALVIS, ET UX	NO. 1-433-79
21	CHARLES D. ARNOLD, ET UX	NO. 1-540-79
	ROBERTA WOODY, ET VIR	NO. 2-449-79
22	DANNY F. MORRISETTE, ET UX	NO. 3-549-79
	BEN BELEW	NO. 1-550-79
23	PAUL W. HALL, ET UX	NO. 2-550-79
	THOMAS J. CALBAUGH, JR., ET UX	NO. 3-550-79
24	ARTHUR CLAY COLLINS, ET UX	NO. 3-619-79
	JAMES E. MASON, ET UX	NO. 1-656-79
25	LAWRENCE D. KENNEDY, ET UX	NO. 2-659-79

1	MILLARD J. ROGERS, ET UX	NO. 3-696-79
	SAMUEL DAVID DISNEY, ET UX	NO. 3-73-79
2	RAYMOND D. WEBB, ET UX	NO. 1-714-79
	ISABELLE W. SLUDER, ET VIR	NO. 2-56-80
3	HERSHEL J. GOFORTH, ET UX	NO. 3-77-80
	C. L. MURPHY, ET UX	NO. 1-77-80
4	JACK W. STILES, JR., Single	NO. 1-78-80
	STEDFORD JAMES ISABELL, ET UX	NO. 3-76-80
5	LUCILLE F. HELMECKI, Executrix of	
	the Estate of NARCISSUS A. HELMECKI,	
6	deceased, and Lucille F. Helmecki,	
	individually and for the use and	
7	benefit of the next-of-kin of	
	Narcissus A. Helmecki, deceased	NO. 2-77-80
8	CURTIS G. DREWRY, ET UX	NO. 2-200-80
	WILLIAM E. BRANDON, ET UX	NO. 1-387-80
9	CHARLES D. BROWDER, ET UX	NO. 2-387-80
	R. L. MCKINNEY, ET UX	NO. 2-74-79
10	LEWIS ROSS SCHLICHER, ET UX	NO. 3-436-80
	LENA W. EARLS, ET VIR, WALLIE EARLS	NO. 2-425-80
11	WALLACE CEATHER VAUGHN, ET UX	NO. 1-595-80
	ISAAC HARRIS, ET UX	NO. 2-609-80
12	WILLIAM EDGAR BLUE, ET UX	NO. 1-632-80
	BYRON LOUIS STANDIFER, ET UX	NO. 3-631-80
13	ROBERT F. SOLOMON, ET UX	NO. 3-640-80
	CHARLES LEE WRIGHT, ET UX	NO. 2-369-80
14	RICHARD GILLIAM, ET UX	NO. 1-683-80
	JAMES W. TIPTON, ET UX	NO. 3-682-80

Plaintiffs,

vs.

JOHNS-MANVILLE SALES CORPORATION,
et al,

Defendants.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION

ARTHUR R. MELTON, ET UX, : NO. 3-80-361
RICHARD HARKLEROAD, ET UX, : NO. 3-80-490
EMANUEL G. LAWSON, ET UX, : NO. 3-80-491
CHARLES E. MURPHY, ET UX, : NO. 3-80-466
:
Plaintiffs, :

vs. :

JOHNS-MANVILLE SALES
CORPORATION, ET AL, :

Defendants. :

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

ELMER B. PUGH, ET UX, : NO. 79-3510
ESMOND H. HARDING, : NO. 80-3050
:

Plaintiffs, :

vs. :

JOHNS-MANVILLE SALES
CORPORATION, ET AL, :

Defendants. :

IN THE CIRCUIT COURT FOR
DAVIDSON COUNTY, TENNESSEE

1	FLOYD ALEXANDER ERWIN, ET UX	NO. C-3533
2	CHARLES D. MACKIE, ET UX	NO. C-3534
3	JOSEPH L. DAVIS, ET UX	NO. C-3535
	MILTON BOYD, ET UX	NO. C-3536
4	ROBERT L. BULLOCK, ET UX	NO. C-3537
	ELMER LEE CATHEY, ET UX	NO. C-3538
5	JAMES V. MACKIE, ET UX	NO. C-3539
	DON EDWARD CHILDRESS, ET UX	NO. C-3540
6	HORACE K. OLIVER, ET UX	NO. C-3541
	ROBERT WESLEY OVERTON, ET UX	NO. C-3542
7	CLAUDE E. MURPHY, ET UX	NO. C-3543
	WILLIAM D. FERRELL, ET UX	NO. C-3563
8	ROGER D. JENNETTE, ET UX	NO. C-3564
	WILLIAM MORTON ADKISSON, ET UX	NO. C-3565
9	GRANVILLE CHILDRESS, ET UX	NO. C-3566
	WILLIAM TRAVIS RING, ET UX	NO. C-3567
10	JAMES W. SMITH, ET UX	NO. C-3568
	SILAS E. CHILDRESS, ET UX	NO. C-3569
11	THOMAS F. HOOVER, ET UX	NO. C-3570
	CLYDE E. HARRIS, ET UX	NO. C-3571
12	ROBERT E. DAVIS	NO. C-3572
	BILLY D. KEMP	NO. C-3573
13	JERRY WAYNE CANTRELL, ET UX	NO. C-3574
	LIVELY E. NEELY, ET UX	NO. C-3575
14	WILLIAM M. CHUNN, ET UX	NO. C-3576
	CLARENCE MILTON TAYLOR, ET UX	NO. C-5991
15	RUBEN C. BILLINGTON, ET UX	NO. C-6234
	ROBERT W. BILLINGTON, ET UX	NO. C-6235
16	WILLIAM ALBERT HARPER, JR., ET UX	NO. C-6236
	HERMAN S. RING, ET UX	NO. C-6237
17	GENE M. TAYLOR, ET UX	NO. C-6238
	THOMAS E. ERWIN	NO. C-6278
18	FRANK J. WARD, ET UX	NO. C-6279
	RICHARD A. STEPHENSON, ET UX	NO. C-6281
19	JAMES W. ADKISSON, ET UX	NO. C-6282
	WILLIAM ROBERT WALL, ET UX	NO. C-6283
20	WILLIAM W. ERWIN, ET UX	NO. C-6284
	DANNY WILBURN BERLIN, ET UX	NO. C-6285
21	DONALD O. CUNDIFF, ET UX	NO. C-6286
	WILLIAM T. GOOCH, ET UX	NO. C-6287
22	MILDRED RIMLINGER, Individually and for the benefit of next-of-kin of	
23	Charles Harlan Rimlinger, Deceased	NO. C-6340
24	JESSIE L. CARROLL, Individually and for the benefit of next-of-kin of J. C. Carroll, Deceased	NO. C-6341
25	LOUIS CHARLES WINKLER FRANK, ET UX	NO. C-6342

1 A P P E A R A N C E S :

2 MESSRS. GILLENWATER, WHELCHER & ROBERTS
3 BY: PAUL T. GILLENWATER, ESQUIRE
4 Attorney for Plaintiffs.

5 MESSRS. DWYER, CONNELL & LISBONA,
6 BY: DENNIS F. CAREY III, ESQUIRE
7 Attorney for Unarco Industries

8 MESSRS. MORGAN, MELHUSH, MONAGHAN, & SPIELVOGEL
9 BY: NAN BERNARDO, ESQUIRE
10 Attorney for Raybestos Manhattan

11 MESSRS. HASKINS, ROBOTOM, HACK, PIRO & O'DAY
12 BY: SUSAN M. CLAPP, ESQUIRE
13 Attorney for Combustion Engineering

14 MESSRS. BUDD, LARNER, KENT, GROSS, PICILLO &
15 ROSENBAUM
16 BY: DAVID J. NOVACK, ESQUIRE
17 Attorney for Johns-Manville

18 MESSRS. HODGES, DOUGHTY & CARSON
19 BY: WILLIAM ALLEY, ESQUIRE
20 Attorney for Owens, Corning Fiberglas, Keene
21 Corp., Eagle-Picher, Forty-eight
22 Insulation Co., Armstrong World Indus-
23 tries, and for all other Defendants
24 other than Johns-Manville, Raybestos
25 Manhattan, Unarco Industries, and
Combustion Engineering.

I N D E X

WITNESS

DIRECT

CROSS

RED.

REC.

Franklin Swersky

By: Paul T. Gillenwater

8

David J. Novack

14

E X H I B I T

EXHIBIT

DESCRIPTION

IDENT.

EVID.

S-1

Complaint and Demand for Jury
Trial

8

S-2

Notice of Demand for Security
for Costs

8

S-3

Answer

8

S-4

Interrogatories

8

1 MR. GILLENWATER: The deposition of Mr.
2 Franklin Swersky is taken pursuant to Notice in the
3 cases that are captioned. It is agreed and stipu-
4 lated by and between Counsel for the respective
5 parties that all objections except objections as to
6 form of the question are reserved.

7 (Complaint and Demand for Jury Trial re:
8 Fred C. Wenham marked S-1 for Identification; Notice
9 of Demand for Security for Costs marked S-2 for
10 Identification; Answer marked S-3 for Identification;
11 Interrogatories marked S-4 for Identification.)

12
13 F R A N K L I N S W E R S K Y, E S Q U I R E, 500 Morris
14 Avenue, Springfield, New Jersey, Duly Sworn.

15 DIRECT EXAMINATION BY

16 MR. GILLENWATER:

17 Q Would you please state your full name, your
18 age and your place of residence to the Court and Jury.

19 A Franklin Swersky. I live at 1177 Foothill Way,
20 Mountainside, New Jersey, age 65.

21 Q What is your profession, Mr. Swersky?

22 A I am an Attorney at Law of the State of New Jersey.

23 Q How long have you practiced law, sir?

24 A Approximately twenty five or more years.

25 Q Are you licensed to practice law in the State

1 of New Jersey?

2 A Yes, I am.

3 Q Are you presently engaged in the act of prac-
4 tice of law?

5 A Yes.

6 Q Where are your offices located now?

7 A 500 Morris Avenue, Springfield, New Jersey.

8 Q Mr. Swersky, back in 1960, 1961, did you have
9 occasion to represent a man named Fred C. Wenham?

10 A Yes, I did.

11 Q Would you please tell us the circumstances
12 surrounding your representation of Mr. Wenham?

13 A He was referred to my office, which was located in
14 Newark, New Jersey at the time. It was probably at the end
15 of 19 -- well, it was prior to 1961.

16 Mr. Wenham had been treated by a doctor for a
17 bronchitis condition, and he came into my office with a
18 medical report. As result of that report I had him examined,
19 and the report indicated that Mr. Wenham suffered from
20 asbestosis.

21 I thereupon filed a Worker's Compensation Claim
22 Petition on behalf of Mr. Wenham in the Department of Labor
23 and Industry of New Jersey. The claim petition was based
24 upon bilateral asbestosis arriving out of in the course of
25 his employment. He worked through a Union and I think he

1 lived in the Bronx at the time, and he worked through a
2 Union. He was working for some company, I don't recall the
3 name of the company who is named as a Respondent in the
4 compensation claim petition.

5 Q Did you at some time after that file what is
6 called a common law cause of action on behalf of Mr. Wenham?

7 A Yes, I filed a third-party action on behalf of Mr.
8 Wenham who, however, had died in the meantime. He had died
9 prior to the disposal of the compensation claim, and we had
10 to change the compensation claim to a dependency claim
11 petition on behalf of his wife.

12 I thereupon filed a third-party action after we had
13 disposed of the compensation claim. I filed a third-party
14 action against Johns-Manville Products, and the action was
15 filed by Bessie Vina who was Mr. Wenham's daughter at the
16 time. She was the administratrix ad prosequendum. She lived
17 in the Bronx. I believed he lived with her, and he had
18 predeceased, so, therefore, I filed the third-party action
19 through Bessie Vina, the administratrix.

20 Q Mr. Swersky, do you have still in your office
21 a part of this old file?

22 A Yes. I have the Complaint and Demand for jury trial.
23 I have a copy of it that I had retained in my form files,
24 and this consists of three counts, and was signed by me.
25 It is a Complaint and Demand for jury trial, and the

1 Plaintiff was Fred C. Wenham by Bessie Vina, administratrix
2 ad prosequendum, and the Defendant was Johns-Manville
3 Products Corporation, which was a corporation of the State
4 of Delaware.

5 Q The document that you have in front of you,
6 is that a copy of it or the one that you have and have re-
7 tained in your file in the ordinary and normal course of
8 your business?

9 A Yes --

10 MR. NOVACK: Objection to the form of the
11 question. The witness has stated to the contrary.

12 A This is a copy of the original Complaint and Demand
13 for Jury Trial which was filed with the United States Dis-
14 trict Court for the District of New Jersey.

15 Q When was that Complaint filed in the Federal
16 Court against Johns-Manville?

17 A It would have been the early part of 1961, probably
18 in February of 1961.

19 Q What was the basis of the complaint, that is,
20 what did the complaint complain of Johns-Manville about?

21 A Well, Mr. Wenham was an asbestos applicator. He
22 would insulate pipes and boilers, and in order to insulate
23 it apparently he would mix asbestos powder or dust, he would
24 mix it with water, for example, to make a paste, and then
25 he would apply it to insulate various, various industrial

1 applications.

2 MR. GILLENWATER: I'd ask that the Complaint
3 that you have just referred to which is marked
4 Exhibit S-1 be offered in evidence.

5 Q Mr. Swersky, I have your file, and I have
6 another document which has been marked S-2, and ask you if
7 that is a document that came from your file and if you can
8 identify that.

9 A Yes. After I had filed the Complaint I received
10 from Defendant's attorney a Notice of Demand for Security
11 for Costs, which was required under the Federal Rules, and
12 this was dated April 14, 1961, and this is a copy that I
13 received from the Defendant's attorney.

14 MR. GILLENWATER: I ask that Exhibit No. S-2
15 be admitted in evidence.

16 Q I have another document which also came from
17 your file which is marked Exhibit No. S-3, and ask if you
18 recognize that?

19 A Yes. This is a copy of the Answer that was filed
20 by the Defendant in answer to the Complaint that I had
21 filed. There is no date on this Answer, but apparently I
22 acknowledged service of this answer sometime in April, 1961.

23 MR. GILLENWATER: I ask that Exhibit No. S-3
24 be admitted in evidence.

25 Q I have another document that also came from

1 your file marked Exhibit S-4, and ask you if you can identi-
2 fy that.

3 A These are Interrogatories that were prepared by
4 Defendant and served upon, and they set forth a voluminous
5 number of questions, and this apparently was served upon me
6 on September 5, 1961, because I acknowledged it on said
7 date.

8 MR. GILLENWATER: I offer that document in
9 evidence.

10 Q Mr. Swersky, you said that there was a settle-
11 ment. Would you explain to us about the settlement entered
12 into between you on behalf of the Wenham estate and Johns-
13 Manville?

14 A Well, we had received a compensation award, Mr,
15 Wenham died during the course of the compensation claim
16 petition, and I then executed a dependancy claim petition
17 on behalf of his widow who lived, who had moved to England,
18 and was living in England at that time, and the dependancy
19 claim petition, the judgement awarded the widow a certain
20 amount of money, I believe it was approximately \$17,000
21 under the compensation statute at the time for total dis-
22 ability as the result -- on behalf of the decedant because
23 of the death arose out of in the course of his employment.
24 He had asbestosis in both lungs, and this had metastasized,
25 it had become cancerous and metastasized throughout the

1 body, although both doctors agree that the primary source
2 of the cancer was the lungs, and therefore, she was given
3 an award for approximately \$17,000. However, I had then
4 filed a third-party complaint, and --

5 Q Against Johns-Manville?

6 A Against Johns-Manville, and of course, the compensa-
7 tion carrier would have been entitled to up to \$17,000 in
8 reimbursement of their expenses.

9 The widow was living in England at the time, and she
10 would not have come back to America, and I thereupon settled
11 the case with Johns-Manville I believe for approximately
12 \$10,000, and worked out something with the comp carrier,
13 wherein they allowed a certain percentage, I believe a third
14 or a quarter to the widow and they took the balance of the
15 proceeds.

16 MR. NOVACK: For the record, I would like to
17 move to strike the witness's response as not being
18 responsive to the question posed by Counsel.

19 MR. GILLENWATER: Thank you, sir. You, ladies
20 and gentlemen, may inquire.

21
22 CROSS-EXAMINATION BY

23 MR. NOVACK:

24 Q Mr. Swersky, my name is David Novack. I
25 represent Johns-Manville in this matter. Counsel for the

1 Plaintiff frequently in his examination of you referred to
2 your file. Do you actually have a file with regard to the
3 matter of Wenham versus Johns-Manville or the Wenham Estate
4 versus Johns-Manville?

5 A I didn't have the complete file anymore, but I had
6 extracted certain of these documents that I kept in my
7 form files throughout the year.

8 Q So when Counsel for Plaintiff said "your
9 file", he was really referring to your form file, isn't
10 that right?

11 A That is correct, as far as these documents are con-
12 cerned, yes.

13 Q And these documents, the documents that were
14 marked here today came from your form file, not from any
15 file which you maintained in the pursuit of this litigation,
16 isn't that right?

17 A No, except they came out of the Wenham file that I
18 had.

19 MR. NOVACK: I have no further questions of
20 this witness.

21 MR. GILLENWATER: At the conclusion of the
22 deposition of Mr. Swersky it is agreed and stipu-
23 lated by and between the parties that I be permitted
24 to take the videotape of the deposition of Mr.
25 Swersky into my possession, and return it to

1 Knoxville for use in the cases as they are called.

2 It is further agreed and stipulated that
3 the videotape operator will break the seal on the
4 videotape, and as I understand by doing that you
5 can't tape over it or change it, is that correct?

6 MR. ATTANUCIO: Not one hundred percent
7 correct, but I will just clarify it for you.
8 Basically, if you put it in you won't accidentally.
9 Purposely you could.

10 (Whereupon proceedings were adjourned at
11 2:00 p.m.)
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1
2
3 C E R T I F I C A T E
4

5 I, NANCY TARNOWSKI-MISARTI, C.S.R., R.P.R.,
6 a Notary Public and Shorthand Reporter of the
7 State of New Jersey, do hereby certify that
8 prior to the commencement of the examination

9 Franklin Swersky
10 was duly sworn by me to testify the truth, the
11 whole truth and nothing but the truth.

12 I DO FURTHER CERTIFY that the foregoing
13 is a true and accurate transcript of the testimony
14 as taken stenographically by and before me at the
15 time, place and on the date hereinbefore set forth,
16 to the best of my ability.

17 I DO FURTHER CERTIFY that I am neither
18 a relative nor employee nor attorney nor counsel
19 of any of the parties to this action, and that I
20 am neither a relative nor employee of such attorney
21 or counsel, and that I am not financially interested
22 in the action.

23 Nancy Tarnowski-Misarti
24 Notary Public of the State of New Jersey
25