

AFFIDAVIT

Frank Wathen, being duly sworn, states as follows:

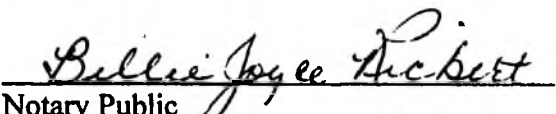
1. I am the duly elected Secretary of Southern Talc Company, a Georgia corporation ("Southern Talc").
2. In my capacity as Secretary of Southern Talc, I am the custodian of the business records of Southern Talc.
3. Attached to this Affidavit are copies of seven pages which were submitted to me for authentication 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

State of Kentucky

County of Jefferson

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


Notary Public

MY COMMISSION EXPIRES
AUGUST 25, 2001

My Commission expires: _____

E:\FJM\WATHEN.AFF.WPD

SHIPMENTS (TONS)
PONDER AND ROOFING TALCS

	1954	1955	1956	1957	1958
1. Astra 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	240	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	14
9. Athens Insecticide Company, Athens, Tenn.	12	12	9	6	12
10. Arco 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	1595
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. Brien Products Co., Nashville, Ga.	0	0	40	0	40
22. Cabell Chemical Company, Huntington, W.Va.	140	70	70	35	35
23. Canadian 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	40	0	35	35
26. Certain-teed Products Corporation					
Marseilles, Ill.	0	0	40	0	0
East St. Louis, Ill.	440	1080	640	400	560
Kansas City, 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, Cordoba	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. Devco & 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. Essex 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

L2. Lloyd A. Fry Roofing Company

Memphis, Tennessee
 Detroit, Michigan
 Brookville, Indiana
 Summit, Illinois
 Waukegan City, N. C.
 Jacksonville, Florida
 Kansas City, Missouri
 Robertson, Missouri
 Ft. Lauderdale, Fla.
 Minneapolis, Minnesota

1954	1955	1956	1957	1958
256	372	310	191	153
280	360	40	0	0
180	200	120	160	240
160	320	80	0	0
165	105	90	0	0
160	200	200	72	30
80	240	40	80	0
80	120	80	50	0
80	240	40	80	145
80	200	40	0	0

L3. Para Bureau Corp., Dayton, Ohio
 L4. Fenton Foundry Supply, Dayton, Ohio
 L5. Plumbstone Tire & Rubber Co., Akron, Ohio
 5700s Division

1954	1955	1956	1957	1958
80	80	0	0	0
70	35	35	0	0
200	245	150	360	0
0	0	36	463	828
0	0	300	365	282
140	275	30	0	0
53	90	104	432	540
1296	0	0	0	0
40	0	40	320	200
0	0	40	200	440
0	0	120	0	0
240	55	0	0	12
70	5	0	36	36
79	0	0	0	0
35	0	0	35	35
105	70	35	0	0
680	0	0	0	0
210	165	210	245	315
0	0	165	40	0
800	655	520	375	350
0	190	260	420	140
0	0	10	45	0
35	15	105	140	105

L6. Flintstone Tire & Rubber Co., Des Moines
 L7. Plumbstone Tire & Rubber Co., Hamilton, Ont.
 L8. Plumbstone Tire & Rubber Co., Memphis, Tenn.
 L9. Flag Supply & Chemical Co., Tampa, Fla.
 L10. Flintstone Company, Chicago Heights, Ill.
 L11. Flintstone Company, New Orleans
 L12. Florida Agricultural Supply, Inc.
 L13. Forbes Plastics Division, Cleveland
 L14. Puro Industries, Inc., Little Oak, Fla.
 L15. Carlisle Packing Co., Palmyra, N.Y.
 L16. Gates Rubber Company, Denver, Colo.
 L17. Celery Company, Elizabeth, Mass.
 L18. General Tire & Rubber Co., Jeannette, Pa.
 L19. Golden Rubber Company, Philadelphia
 L20. B. F. Goodrich Co., Akron, Ohio
 "29"

1954	1955	1956	1957	1958
800	655	520	375	350
0	190	260	420	140
0	0	10	45	0
35	15	105	140	105
60	65	115	70	105
665	805	690	560	420
820	1020	1000	1200	1380
370	245	210	175	33
20	162	63	15	45
200	160	160	160	160
0	0	0	60	40
40	160	200	240	120
0	0	126	200	80
110	140	105	175	105
140	120	40	60	80
0	0	720	0	0
440	520	280	120	130
0	0	225	695	280
0	0	240	760	920
35	35	35	35	70
91	46	10	Sold out	0
0	0	1350	1260	2500
440	1040	920	320	880
160	400	240	280	320
315	298	140	0	0
760	713	210	200	90
480	1400	1040	520	560

L21. R. F. Goodrich Co., Los Angeles
 L22. B. F. Goodrich Co., Miami, Fla.
 L23. B. F. Goodrich Co., Tuscaloosa, Ala.
 L24. Goodyear Tire & Rubber Co., Akron
 L25. Goodyear Tire & Rubber Co., Camden, N.J.
 L26. Goodyear Tire & Rubber Co., Jackson, Miss.
 L27. Goodyear Tire & Rubber Co., Topeka, Kan.
 L28. Oakley Mfg. Company, Paulding, Ohio
 L29. General Supply Corporation, Milwaukee
 L30. Baker Supply Company, Miami
 L31. Hill & Co., Cincinnati
 L32. Koltsie Mfg. Company, Baltimore
 L33. Imels, Spalden Company
 L34. Johns-Manville Products, Knoxville, N.J.
 L35. Johns-Manville, Warren, Louisiana
 L36. Johns-Manville, Savannah, Georgia
 L37. Johns-Manville, Moberg, Illinois
 L38. Johnson Rubber Company, Middlefield, O.
 L39. Kentucky Colic & Chemical Co., Louisville
 L40. Koppers Company, Houston, Texas
 L41. Koppers Company, Woodard, Alabama
 L42. Kraft Chemical Co., Chicago, Illinois
 L43. Lanoster Chemical Co., Carlstadt, N.J.
 L44. The Lehen Company, Memphis, Tennessee
 L45. The Lehen Company, Wilmington, Illinois

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1954	1955	1956	1957	1958
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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. ICI	- Not counted combined -				150
90. Marshall-Eclipses Div., Troy, N.Y.	0	0	165	140	85
91. Olin Mathieson Chemical, Aberdeen, N.C.	0	0	180	0	0
92. Midmont Rubber	83	5	175	235	220
93. Midwest Rubber, Barberton, Ohio	120	0	0	0	0
94. Minnesota Mining, Detroit	15	18	121	181	0
95. National Mfg. Company, Tomsawada	0	40	560	560	0
96. Miles Chemical Co., Miles, Mich.	30	0	0	0	30
97. Niagara Chemical Division, Falls Chasse	0	90	0	320	40
98. Niagara Chemical Division, Jax.	1100	968	2563	1981	1108
99. Niagara Chemical, Pompano Beach	0	0	105	0	0
100. Niagara Chemical, Rocking, Illinois	0	0	80	0	0
101. S. Obermayer, Chicago	75	105	80	40	40
102. S. Obermayer, Cincinnati	40	40	40	35	35
103. Pittsburgh Coke & Chemical Co.	5439	5321	4020	4225	2059
104. Proko Company, Dallas	0	0	0	0	40
105. John Powell, East Point	384	660	80	0	30
106. Prestite-Kaystons Engr. St. Louis	0	0	0	0	40
107. R. T. Rarlsigh Co., Freeport, Ill.	480	280	280	320	360
108. R. T. Rarlsigh, Memphis, Tennessee	120	120	80	80	120
109. Reilly Tar & Chemical, Lone Star, Tex.	2200	2850	4050	2600	4250
110. Reilly Tar, Indianapolis	740	1250	1700	1000	1500
111. Rinsched-Mancum Company	600	828	288	156	120
112. O. S. Robins & Company	80	40	40	75	70
113. R. M. Royal, Inc., Trenton, N.J.	320	280	480	400	400
114. Stauffer Chemical, Bayonne, N.J.	2	140	600	525	615
115. Stauffer Chemical, Harvey, La.	0	105	200	0	0
116. Stauffer Chemical, Tampa, Fla.	0	908	1820	655	194
117. Stauffer Chemical, Omaha, Neb.	0	0	0	0	15
118. P. E. Schindler, Joliet, Ill.	75	80	40	40	0
119. Sherwin-Williams, Kensington, Ill.	180	60	30	30	17
120. Smith Chemical & Color Co. Brooklyn	40	35	0	0	0
121. Sorg Paper Company, Middletown, O.	0	80	200	140	120
122. Stoller Chemical Company, Akron, O.	400	520	600	480	360
123. Swift & Company, Atlanta	5	0	80	427	120
124. Stylon Company, Florence, Alabama	0	0	0	0	75
125. Tamm Industries Co., Chicago	0	120	600	612	467
126. Thompson-Bayard Chemical St. Louis	80	40	40	80	0
127. Thompson-Bayard Chemical, Kansas City	40	40	40	0	0
128. Thompson-Bayard Chemical, Houston	0	0	0	40	75
129. Thompson-Bayard Chemical, Omaha	0	0	0	70	35
130. Tobacco States Chemical, Lexington	315	155	280	400	435
131. U. S. Gypsum, St. Paul, Minnesota	520	560	480	440	680
132. Whitaker, Clark & Daniels, Newark	595	573	533	867	972
133. Whitaker, Clark & Daniels, Chicago	90	120	60	70	95
134. Whitaker, Clark & Daniels, Cleveland	105	210	65	95	120
135. Witco Chemical Company, New York	676	578	40	108	40
136. Zann Paper Company, Middletown, O.	280	160	40	40	0
137. Weil-Elliott Chemical, Louisville	0	0	0	0	120
138. Webb-Cote Roofing Co.	0	0	0	0	16
139. Yates Bleachery Co., Flintstone, Ga.	20	40	40	40	20

39,805 47,181

4,450

4,207

42,615

SOUTHERN TALC COMPANY

NO. 004632 B

MINERS AND MANUFACTURERS

INDUSTRIAL TALC FOR ALL PURPOSES

TALC POWDER - METAL WORKERS CRAYONS - ROOFING TALC

P. O. DRAWER F. CHATTAHOOCHEE, GEORGIA 30705

DATE March 8, 1976

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

ORDER NO. 862073 Rev. 49251

SHIPPED via Johnson Motor Lines

CAL NO.

ATTN: Accounts Payable D/0076, MHB-3

SHIPPED TO Codel International
Charleston, S. C.

TERMS: 1% 10 DAYS NET 30

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

PLAINTIFF'S
EXHIBIT

WG/enn-13

(10)

CUSTOMER

1954	1955	1956	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967	1968	1969
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Bevan Tire Co. (Rubber)

Bevan, Ohio

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Bevan Tire Co. (Rubber)

Bevan, Ohio

800	845	980	795	490	195	216	286	144	175	105	455	115	57	80	174
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10/1/51

PLAINTIFF'S EXHIBIT

WGlenn #14

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	<u>1954</u>	<u>1955</u>	<u>1956</u>	<u>1957</u>	<u>1958</u>
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U 45. Firestone Tire & Rubber Co., Akron, Ohio	200	245	150	360	0
Sykes Division	0	0	36	468	828

60. B. F. Goodrich Co., Akron, Ohio "26"	800	655	520	375	350
"29"	0	190	260	120	140

PLAINTIFF'S
EXHIBIT

WGlenn #15

B.F. Goodrich Co.

1.				
2.	2/18/70	CE-801230	TL	20 Akm
3.	5/12/70	CE-801435	TL	20 Akm
4.				
5.				
6.				
7.	9/30/70	CE-801730	BRW 63533	50 GR 29
8.	10/9/70	CE-801762	TL	20 GR 26
9.	10/13/70	CE-801755	TL 98774	50 GR 29

Tusen 72
AKM 160

PLAINTIFFS
EXHIBIT

Wifenn #16