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AFFIDAVIT

COUNTY OF SUMMIT)
) ss
STATE OF OHIO)

NOW COMES the affiant, William Phillips, first being duly sworn and states as follows:

1) That I am over the age of 18 years, am not under any restraint or legal disability, am competent to testify to the matter stated herein and make this affidavit based upon my own knowledge.

2) I was employed by the BFGoodrich Company in their Akron plant from 1946 to 1987. I was a production worker, maintenance worker, and also worked in interplant transportation.

3) My job duties required me to work throughout the BFGoodrich plant.

4) Asbestos insulation was on the piping and machinery throughout the BFGoodrich plant. Soapstone/talc was used extensively throughout the plant.

5) While working in interplant transportation, I was required to transport asbestos materials such as raw asbestos fiber and soapstone for use in production, and asbestos materials such as pipe covering, gaskets, and packings for use in maintenance. Periodically, bags of soapstone and asbestos fiber would fall off the jitney or forklift and break open, causing a cloud of dust. Either I or co-workers in plant cleaning would clean up and replace the bags.

6) Some products I recall seeing at BFGoodrich Company are:

a. Akrochem
b. Asbestos Corp. Limited
c. McNeil curing presses
d. M.F. Murdock
e. Unibestos
f. Kaylo

7) Prior to 1980, The BFGoodrich Company never told me or my co-workers of the dangers of asbestos exposure including the risks of asbestosis, lung cancer, or mesothelioma.

FURTHER AFFIANT SAYETH NAUGHT.

William Phillips

SWORN TO before me, a Notary Public, and signed in my presence this 27 day of July, 1997.

Robin E. Phillips
Notary Public

ROBIN E. PHILLIPS, Notary Public
Residence • Summit County
State Wide Jurisdiction, Ohio
My Commission Expires June 5, 2001