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DECLARATION OF JOHN L. MYERS

I, John L. Myers, declare as follows:

1. I have been employed by Union Carbide Corporation ("Union Carbide") from 1951 to the present date. I have been involved in the various aspects of Union Carbide's asbestos operations since 1966. From 1970 to 1971, I held the position of Marketing Manager-Asbestos of the Metals Division of Union Carbide. As the Marketing Manager for asbestos, I was involved on a daily basis with all phases of marketing asbestos for Union Carbide. My responsibilities included marketing, sales, technical services and the compilation of sales reports for asbestos. As the Marketing Manager, I became familiar with Union Carbide's sales of asbestos and asbestos-containing material and the identity of entities purchasing Union Carbide's asbestos material.

2. In 1981, I began to serve and am presently serving as Product and Production Manager-Asbestos of the Metals Division. I am responsible for and supervise Union Carbide's asbestos ore mining and milling operations. As the manager of the mining and milling operations, I receive and review reports which inform me of the total production and shipments of asbestos at the milling facility.

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PLAINTIFF'S
EXHIBIT

UC-1418

1 3. My eighteen years in Union Carbide's asbestos
2 operation allow me to state that Union Carbide did not sell
3 any asbestos to Pioneer Flintkote in Los Angeles at any time
4 from 1946 to 1952, or to Flintkote in New Orleans, Louisiana,
5 at any time from 1946 to 1960. Not until 1963 was Union
6 Carbide in the business of selling raw asbestos. Since 1963
7 Union Carbide has mined, milled and sold raw asbestos fibers
8 under the tradename CALIDRIA. Because CALIDRIA was not
9 marketed until 1963, Union Carbide could not have sold any
10 CALIDRIA asbestos to Pioneer Flintkote at any location during
11 the years 1946 to 1960.

12 I declare under penalty of perjury that the
13 foregoing facts are true and correct and that this declaration
14 was executed on _____, 1984, at
15 King City, California.

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19 _____
John L. Myers

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