Johns-Manville

# Internal Correspondence

To: Robert D. Batson 2-20

Date: November 2, 1981

From: Helen Marsh, 2-20

PLAINTIFF'S EXHIBIT
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JMMC-392

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Subject: Hank Blechar knowledge regarding Flintkote fiber sale

I spoke with Hank Blechar regarding the Flintkote sale of fiber to the Waukegan and Manville plants in 1977. Hank reviewed the documents relating to this order, and explained that he purchased Flintkote's fiber inventory when they closed out one of their asbestos using operations in Ohio. Some of the fiber was shipped directly from the plant, and some of it was shipped from a warehouse where Flintkote had the fiber in storage. Fiber from this purchase went to both Waukegan and Manville.

The purchase order is dated June 9, 1977. The shipments to the Waukegan plant started on June 20 and continued through July 8. The dates indicated on the bills of lading are the dates that the fiber was shipped. All of this fiber would have reached the Waukegan plant prior to July 15, 1977.

Two types of fiber were involved in the purchase, L6 and ML6. By checking his computer printouts, Hank concluded that none of the L6 fiber was used at anytime during July, 1977.

As to the ML6 type of fiber, the plant had a substantial inventory on hand at the time of the Flintkote purchase. Our stock rotation system is first in, first out. If we assume that this system was followed with respect to the Flintkote purchase, Hank estimates that that fiber would not have been used for as much as 1½ years after its arrival at the plant. Hank declined, however, to vouch for the specific operation of the stock rotation plan with respect to this material.

Hank would be able to sign an affidavit to support Flintkote's motion for summary judgment, provided that we make it clear that his knowledge as to the use of the fiber is based on an assumption, rather than actual knowledge, that the stock was rotated in the proper fashion.