

AFFIDAVIT

STATE OF TEXAS)
) ss:.
COUNTY OF CAMERON)

I, Belia Cortez, being duly sworn, state and affirm the following:

1. I am presently employed by Union Carbide Chemicals & Plastics Company, Inc. (Union Carbide) as the Site Manager for Union Carbide's Brownsville Texas facility. I began working for Union Carbide in 1973 and have held the following positions:

1973 - 1982	Controller's Department - various functions which included Payroll, Cashier, Material Accounting, and Budgeting
1982 - 1983	Controller's Department - Accounting Supervisor
1983 - 1985	Administrative Assistant
1985 - Present	Site Manager

2. In the course of my employment with Union Carbide, as part of my business responsibilities, I have become familiar with the work done at Union Carbide's Brownsville Texas facility, including the asbestos removal, disposal and replacement work.

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3. In accordance with Union Carbide's normal records retention policy, the receipts and records of the costs paid to Brown & Root for the said work have been purged from Union Carbide's files and are no longer maintained by Union Carbide.

4. I have reviewed the affidavit of William S. Callaway, of Brown & Root, dated October 28, 1991. I concur with the statements set forth therein, including the best estimates for labor costs and fees paid by Union Carbide to Brown & Root for asbestos removal, disposal and replacement work at Brownsville, Texas from 1962 through 1982.

5. Based on those estimates and my knowledge, from my business capacity, as to the relationship between labor costs and material costs incurred by Union Carbide for the purchase or rental of material and equipment for the asbestos removal, disposal and replacement work, the following are my best estimates of those costs:

Material Costs for Removal and Disposal	\$1,189,028
Material Costs for Replacement	<u>\$4,756,111</u>
Total Estimated Material Costs for Removal, Disposal & Replacement	\$5,945 139

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Belia Cortez
Belia Cortez

Sworn to before me this 29th
day of October, 1991.

Sebastian G. Acosta
Notary Public

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