PLAINTIFF'S EXHIBIT
WH-996

AFFIDAVIT

PARISH OF ORLEANS

STATE OF LOUISIANA

BEFORE ME, the undersigned authority, personally came and appeared:

JAMES CARROLL

who after being duly sworn did depose and say:

1. I was employed by Avondale from 1945 to 1988.

2. That while employed at Avondale, I was employed as a burner, shipfitter, leader man, and retired as an assistant superintendent.

3. That during the course of my employment, I worked on all commercial ships being built at Avondale.

4. During the course of my work, I worked around Hopeman Brothers.

5. That I recall dust being created in the area where I worked when working around Hopeman Brothers.

6. That if dust was created by Hopeman Brothers, I was exposed due to the proximity in which I worked near Hopeman Brothers.

_____
JAMES CARROLL

SWORN TO AND SUBSCRIBED TO
BEFORE ME THIS _____ DAY OF
_____, 1997.

_____
NOTARY PUBLIC