

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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NICOLINA SIRECI, as Executrix of the Estate
of JOSEPH E. SIRECI, deceased,

Plaintiff,

AFFIDAVIT

-against-

CHEMO, INC., ROMAN HAAS, INC., MONSANTO,
INC., UNION CARBIDE, INC., AND AMERICAN
CYANAMID, INC., AMERICAN CYANAMID AND MONSANTO,
INC.,

Defendants.
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STATE OF PENNSYLVANIA)
COUNTY OF PHILADELPHIA) SS:.

J. A. Weaver being duly sworn, deposes and says:

I am Business Director, Plastics Business Group -
North American Region, of Rohm and Haas Company, sued in the
above captioned action as "Roman Haas."

I have been employed by Rohm and Haas Company for
15 years and am fully familiar with Rohm and Haas Company
products.

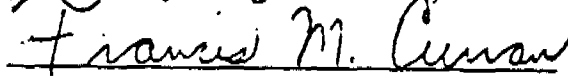
Rohm and Haas Company does not and has not manu-
factured, marketed or distributed any Polyvinyl Chloride resin
or monomers. Indeed, with the one exception of an acrylic-PVC
alloy plastic sheet material with the trademark KYDEX, Rohm and
Haas Company does not and has not manufactured, marketed or
distributed any products containing any polyvinyl chlorid .

UCC 087726

Rohm and Haas Company has never sold or distributed KYDEX to Elm Coated Fabrics, Inc., doing business as Elm Coated Fabrics a Division of Kalex Chemical Products, Inc.


J. A. WEAVER

Sworn to before me this
34TH day of OCTOBER, 1984



FRANCIS M. CURRAN
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires August 1, 1985

UCC 087727