

AFFIDAVIT

STATE OF COLORADO)

COUNTY OF JEFFERSON)

ss.

I, Margaret J. Baumgardner, being of full age and first duly sworn do hereby state:

1. I am an Information Processing Coordinator for the Claims Resolution Management Corporation ("CRMC"), a wholly owned subsidiary of the Manville Personal Injury Settlement Trust ("Trust"). The CRMC was created in December 1998 and is staffed by former Trust employees. On January 1, 1999, CRMC began providing claims resolution facility services to the Trust.

2. In that position, I manage a Records Repository which is located at 11000 East 51st Avenue, Denver, Colorado.

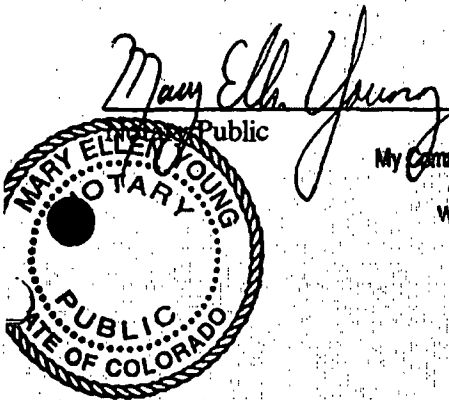
3. The Repository contains documents obtained from Manville Corporation and related entities which relate to asbestos litigation. The Trust has managed and operated the Repository from November 28, 1988, the date on which the Manville bankruptcy plan was consummated. These records are maintained at the Repository in its regular course of business.

4. Documents from this Repository were copied for the Simmons Firm after their review of January 14th and 15th, 2001. The copies have been bates labeled as numbers MTS000001 to MTS-12052, and these documents are true and correct copies of documents found at the Repository.

Further affiant sayeth not.

Margaret J. Baumgardner
Margaret J. Baumgardner

Subscribed and sworn to before
me this 28th day of January, 2002.



My Commission Expires November 15, 2002
4350 Wadsworth Boulevard
Wheat Ridge Colorado 80033