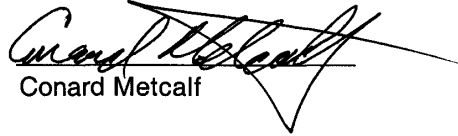


Affidavit of Conard Metcalf

I am an attorney and I represent the plaintiffs in the case of Alber v. Pneumo
Abex et al, No. Case No. 2000 CV 2035, District Court, Boulder County,
Colorado. One of the defendants in the case was General Motors Corp.

In the Supplemental Disclosure Certificate which I filed in the case I listed as
evidence to be offered by the plaintiff against all defendants the deposition of
Ralph A. Froelich, taken on 05/08/00 in the case of Terry v. General Motors,
Montgomery County, Ohio, 98-893. No defendant filed any written objection to
use of this Froelich deposition nor did any defendant file any motion seeking to
preclude use of that deposition. Specifically, General Motors Corp. did NOT file
any motion seeking to enforce any protective order in the Alber case regarding
use of the "Froelich" transcript.


Conard Metcalf

County of Boulder)
)ss.
State of Colorado)

SUBSCRIBED AND SWORN to before me this 12th day of June, 2002

MY COMMISSION EXPIRES: 9/12/02

SIGNED: nancy Dene Adler (NOTARY PUBLIC)

