

FILE NAME: Sperry Rand (SR)

DATE: 2019 April

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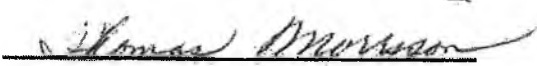
DOCUMENT DESCRIPTION: Legal – Affidavit of Morrison

AFFIDAVIT OF THOMAS MORRISON

I, Thomas Morrison, 264 Tam O'Shanter Road, Mount Laurel, NJ being first duly sworn, state upon oath the following:

1. I worked for the Sperry Corporation later Unisys Corporation in Blue Bell, Pennsylvania, from 1973 to 1986.
2. Michael Lombardo was my co-worker beginning in 1974 and throughout the rest of my career at the Blue Bell office.
3. I worked in close proximity to Mr. Lombardo every day.
4. The building in which we worked had previously been used for manufacturing and had been converted into offices.
5. Much of the office space were cubicles.
6. The workforce at the Blue Bell facility regularly grew through my employment there.
7. To accommodate the new employees the building was frequently renovated. In fact, the area of the building in which we worked was changed several times during our employment. Mr. Lombardo also worked in the computer room.
8. The area being renovated would be draped off with plastic sheets. Employees could still walk though the areas to go down the aisles and go to another area of the plant. An example of this would be to use the bathroom.
9. During the renovations the ceilings were taken down and the floors were drilled into to unsecure and secure cubicles.
10. Dust was present whenever renovation occurred.
11. The renovations were done during business hours, while employees, including Mr. Lombardo and me, were present.
12. We were not warned about the dangers and hazards of asbestos, not warned against or prevented from walking through areas undergoing renovation, and not given any devices to protect us against inhaling the dust.

Sworn to and Subscribed
before me this 11 day
of April, 2019


Thomas Morrison


Notary Public

DONNA J SAUNDERS
Notary Public
State of New Jersey
My Commission Expires Mar 6, 2021