

AFFIDAVIT

STATE OF FLORIDA)
) SS.:
COUNTY OF HILLSBOROUGH)

I, VITO F. EASSONE, on oath depose and state as follows:

1. I, VITO F. EASSONE, am Vice President-Finance, Treasurer and Controller of The Celotex Corporation.

2. That as of August 31, 1988, The Celotex Corporation was a Defendant in approximately 65,000 asbestos-related bodily injury lawsuits.

3. That as of August 31, 1988, The Celotex Corporation had disposed of approximately 27,000 asbestos-related bodily injury lawsuits through settlement, dismissal or judgment.

4. That between September 1, 1988 and February 28, 1989, approximately 140 judgments totaling approximately \$15.5 million in compensatory damages and approximately \$10 million in punitive damages were returned against Celotex in asbestos-related bodily injury cases.

5. That to date approximately \$250,000,000 has been paid on behalf of Celotex for satisfaction of verdicts and/or settlement of asbestos-related bodily injury cases. To date, two punitive damage judgments in the amount of approximately \$175,000 have been paid on behalf of The Celotex Corporation.

6. For the fiscal year ending August 31, 1988, The Celotex Corporation continued to be added as a Defendant in new lawsuits at the rate of approximately 1,600 per month. The majority of these lawsuits contains a claim for punitive damages.

the parties have stipulated that

7. According to the financial statements of Celotex, with which I am familiar as of August 31, 1988, the net worth of Celotex was \$149 million.

8. That if called to testify to the truthfulness of the foregoing, I could competently and truthfully do so.

FURTHER AFFIANT SAYETH NAUGHT.

Vito F. Sassone
VITO F. SASSONE

SUBSCRIBED AND SWORN to before me, this 13 th day of April, 1989.

Barbara L. Harris
Notary Public in and for the County
of Hillsborough, State of Florida

My commission expires: 7/20/89