

AFFIDAVIT

COMMONWEALTH OF VIRGINIA, AT LARGE, to-wit:

This day James C. Shannon personally appeared before me, the undersigned notary public for the Commonwealth of Virginia, at large, and made oath as follows:

1. He is counsel of record for Garlock Inc, a defendant in numerous asbestos product liability actions pending in the State and Federal Courts in Virginia, including those cases designated as CP 77-1 in the United States District Court in Norfolk, Virginia, and as such is authorized to make this Affidavit on behalf of Garlock Inc;

2. In response to discovery requests by plaintiff's counsel, Garlock Inc has produced from its files a document entitled "Report of Preliminary Dust Investigation for Asbestos Textile Institute, June, 1947", by W. C. L. Hemeon of the Industrial Hygiene Foundation of America.

3. The records of the Asbestos Textile Institute indicate that Garlock Inc was a member of that organization in June, 1947.

4. Garlock Inc has admitted the authenticity of this document in previous litigation in Virginia, and it is the affiant's recollection that the Report was accepted into evidence in the only trial in Virginia in which Garlock Inc has gone to verdict.

James C. Shannon
Counsel for Garlock Inc

Subscribed and sworn to before me this 27th day of September, 1991. My commission expires July 24, 1992.

Notary Public