PLAINTIFF'S EXHIBIT 2
1-11-02 AC

PLAINTIFF'S EXHIBIT
MAR-49

MY NAME IS: RALPH C. WYATT

ADDRESS : 772 NORTH WALNUT ST.
PAULDING, OHIO 45879

I WAS EMPLOYED BY AN ASBESTOS BRAKE LINING COMPANY AT PAULDING OHIO FROM MARCH 1946 UNTIL MARCH 1980.

I WAS ACTIVELY EMPLOYED DURING THIS PERIOD EXCEPT FROM AUGUST 1950 UNTIL 1951 WHEN I WAS RECALLED TO ACTIVE DUTY IN THE U.S. AIRFORCE.

DURING THIS TIME THE COMPANY HAD SEVERAL NAME CHANGES:

1941 FROM CALIF GRIZZLY MANUFACTURING COMPANY
PRATT INDUSTRIES
UNIVERSAL FRICTIONS
Dec 1953 MAREMONT CORPORATION
July 1, 1977 NUTURN CORPORATION

DURING MY EMPLOYMENT THE FOLLOWING PERSONS HELD THE POSITION OF OPERATIONS MANAGER.

1. FRANK SHELTON
2. DICK ABLESON
3. SANDY MAREMONT
4. DICK HENRITZE
5. GEORGE MILLER
6. RALPH WYATT
7. GEORGE DOBROWALSKI
8. WAYNE KNIGHT
9. CARL LIGGETT
10. BILL SHUNK

PERSONALLY I FUNCTIONED IN THE FOLLOWING POSITIONS:

1946-1948 INVENTORY CONTROL RECORDS
1948-1953 ACCOUNTS RECEIVABLE & PAYABLE MANAGER
1953-1954 ASSISTANT OFFICE MANAGER
1955-1958 PAYROLL & HOSPITALIZATION ADMINISTRATOR
1959-1964 PRODUCTION PLANNING & CONTROL MANAGER

1.8 yrs WALK THROUGH PLANT ONCE A DAY

TIME STANDARDS EACH PLANT OF LOCATION IN PLANT 8HR/DAY

16 yrs IN PLANT AT LEAST 6HRS/DAY

1964-1965 INDUSTRIAL ENGINEER

1965-1969 OPERATIONS MANAGER

1970 MANUFACTURING MANAGER

1971-1973 OSHA & NIOSH ADMINISTRATION MANAGER

1974-1980 INVENTORY CONTROL & CUSTOMER SERVICE

BAGGED ASBESTOS FURNISHED TO GRIZZLY PLANT AT PAULDING OHIO BY FOLLOWING:

1. ASBESTOS CORP. THETFORD MINES, QUEBEC, CANADA
2. BELL ASBESTOS MINES LTD THETFORD MINES, QUEBEC, CANADA
3. VERMONT ASBESTOS GROUP BOX 548 MORRISVILLE, VT. 05661

ASBESTOS YARN FOR CLUTCH FACINGS:

1. AMERICAN ASBESTOS TEXTILE CORP 1032 STANBRIDGE ST, NORRISTOWN, PA.
2. H.K. PORTER, CHARLOTTE, NORTH CAROLINA.

FINISHED PRODUCT - ~~BRAKE SHOES~~ WITH LINING ATTACHED

1. RAYBESTOS-MANHATTAN CONN.
2. TURNER & NEWELL CORP. ENGLAND.
3. FERODO LTD STOCKPORT ENGLAND

ASBESTOS

RESINS

SULPHER

BARITES (FILLER)

MINERAL SPIRITS

SEA COAL

CARBON BLACK

1970 - 1972

1. FIBER COLLECTION EQUIPMENT WORN BY FACTORY WORKERS.

2 SMALL FILTERS EXAMINED UNDER MICROSCOPE.

3. OUR FIBER COUNT EXCEEDED NIOSH STANDARDS AT ALL GRINDING AND PACKAGING AREAS.

4. BETTER DUST COLLECTING EQUIPMENT WAS PLACED ON FINISHING EQUIPMENT

5. DURING THIS PERIOD CAUTION LABELS WERE PLACED ON ALL CONTAINERS SHIPPED TO CUSTOMERS. A LARGE NOTICE 3" X 5" ON LARGE CONTAINERS AND A SMALL NOTICE 1½" X 2½" ON INDIVIDUAL SET BOXES

LABEL CONTAINED FOLLOWING MESSAGE:

CAUTION

CONTAINS ASBESTOS FIBERS.

AVOID CREATING DUST

BREATHING ASBESTOS DUST MAY

CAUSE SERIOUS BODILY HARM

6. ASBESTOS FIBER COUNT PER SQUARE INCH CONTINUED TO BE LOWERED BY NIOSH.

EVEN AFTER EXTENSIVE IMPROVEMENTS AT ALL GRINDING, SAWING AND PACKING STATION WE COULD NOT QUITE MEET THE LOWERED STANDARDS

7. AT THIS POINT IT WAS DETERMINED WE NEEDED TO REPLACE OUR PRESENT DUST COLLECTION SYSTEM

8. A NEW BAG HOUSE COLLECTION SYSTEM WAS INSTALLED IN 1978

TOTAL COSTS EXPENDED EXCEEDED $750,000.00