

AIA NORTH AMERICA
ASBESTOS INFORMATION ASSOCIATION
1660 L Street, N.W. · Washington D.C. 20036 · (202) 223-4885

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9 April 1976

Memorandum For: EXECUTIVE COMMITTEE

Subject: Shoup vs. Johns-Manville et al.

Enclosed please find an affidavit executed this date and forwarded to Mr. Janke, Esq. who is providing local council for Cadwalader, Wickersham and Taft in Michigan. A memorandum from Mr. Adrian May concerning this case will be prepared for distribution to Directors within the next few days.

R. H. Mereness
Executive Director

cc: Adrian May, Esq.

RHM:v
Enclosure

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WILLIAM CARL SHOUP,

Plaintiff,

C.A. No. 76-606-823-NO/CK

vs.

JOHNS-MANVILLE PRODUCTS CORPORATION, et al.,

Defendants.

/

AFFIDAVIT IN SUPPORT OF MOTION FOR ACCELERATED JUDGMENT BY DEFENDANT ASBESTOS INFORMATION ASSOCIATION OF NORTH AMERICA, INC.

DISTRICT OF)
) ss.
COLUMBIA)

ROBERT H. MERENESS, being first duly sworn, deposes and says that:

1. He is the Executive Director of the Asbestos Information Association of North America, Inc. (hereinafter "AIA" or "Association"), and submits this Affidavit in support of AIA's Motion for Accelerated Judgment.

2. He is fully familiar with all of the files, records, policies, and activities of AIA.

3. AIA was incorporated as a Delaware non-profit corporation on April 12, 1971, and has continued to so operate with its sole office located at 1660 L Street, N.W., Washington, D.C. 20036.

production of asbestos insulation materials, to the best of affiant's knowledge, information and belief.

13. The aforementioned Michigan AIA members are the only entities in Michigan which automatically receive health, safety and environmental information from AIA concerning asbestos, and, to the best of affiant's knowledge, information, and belief, no request for such information has ever been received by AIA from any other Michigan source during affiant's tenure as AIA's Executive Director.

14. A membership solicitation by mail within the last six months from AIA included business establishments with offices in Michigan. This was the only communication known to the affiant into the State of Michigan other than to AIA members.

15. Of the business establishments mailed to in Michigan, a responsive inquiry regarding membership possibilities was received from only one. This is the second entity mentioned in Paragraph 12, above, joining AIA on March 22, 1976.

16. To the best of affiant's knowledge, information, and belief, and based upon his experience as AIA's Executive Director operating its sole office consisting of himself, an administrative assistant, and a secretary, affiant knows of no occasion when AIA has participated in any activity which would or could be construed as an effort to withhold or prevent the dissemination of health, safety and environmental information concerning asbestos, from its Michigan members or any other entity in Michigan. On the contrary, AIA prepares and publishes materials for the information of its members with regard to the asbestos-health issue and

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Further, Deponent saith not.

ROBERT H. MERENESS

DISTRICT OF)
) ss.
COLUMBIA)

Subscribed and sworn to before me on this 9th day of April, 1976.

Notary Public, District of Columbia

My Commission expires on: _____

My Commission Expires Oct. 31, 1977

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