V E R I F I C A T I O N

I, John L. Myers, am Product and Production Manager-Asbestos for a subsidiary of Union Carbide Corporation, one of the defendants in this action and the party responding to the foregoing interrogatories. I have read the foregoing responses by Union Carbide Corporation to first set of interrogatories propounded by plaintiff and know the contents thereof; I am informed and believe that the matters therein are true and on that ground allege them to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this Verification was executed on August 9, 1984. at King City, California.

John L. Myers

A21156

PLAINTIFF'S EXHIBIT
UC-1415

n, Dunn & Crutcher

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October 15, 1980

DRAFT TESTIMONY OF JOHN MYERS

1. Background. B.S. Purdue; 1951-1966 with UCC at Oak Ridge, Tennessee making enriched uranium for government; 1966-1970 asbestos research at Niagara Falls then technical superintendent for asbestos plant at King City, California. 1970 to present; marketing manager for Calidria asbestos.

2. A natural product - use Myers picture of the mining operation as an exhibit.

3. The only sales of Calidria to GAF-Houston were 1970-1971, and 1975-1977; Carbide got into the asbestos operation in 1963 and all records still exist in original, xerox or microfilmed form; there were no other sales to GAF or its predecessors at the Houston Tile Plant; there was no distributor sales of SG103 Calidria asbestos -it was a special purpose floor tile grade.

4. The SG103 is pelletized and as such emits less dust than fibrous material - a two chamber shaker will be constructed by Blair Ingalls.

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