DECLARATION OF JOHN L. MYERS

I, John L. Myers, declare as follows:

1. I have been employed by Union Carbide Corporation ("Union Carbide") from 1951 to the present date. I have been involved in the various aspects of Union Carbide's asbestos operations since 1966. From 1970 to 1971, I held the position of Marketing Manager-Asbestos of the Metals Division of Union Carbide. As the Marketing Manager for asbestos, I was involved on a daily basis with all phases of marketing asbestos for Union Carbide. My responsibilities included marketing, sales, technical services and the compilation of sales reports for asbestos. As the Marketing Manager, I became familiar with Union Carbide's sales of asbestos and asbestos-containing material and the identity of entities purchasing Union Carbide's asbestos material.

2. In 1981, I began to serve and am presently serving as Product and Production Manager-Asbestos of the Metals Division. I am responsible for and supervise Union Carbide's asbestos ore mining and milling operations. As the manager of the mining and milling operations, I receive and review reports which inform me of the total production and shipments of asbestos at the milling facility.

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PLAINTIFF'S EXHIBIT UC-1418

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3. My eighteen years in Union Carbide's asbestos operation allow me to state that Union Carbide did not sell any asbestos to Pioneer Flintkote in Los Angeles at any time from 1946 to 1952, or to Flintkote in New Orleans, Louisiana, at any time from 1946 to 1960. Not until 1963 was Union Carbide in the business of selling raw asbestos. Since 1963 Union Carbide has mined, milled and sold raw asbestos fibers under the tradename CALIDRIA. Because CALIDRIA was not marketed until 1963, Union Carbide could not have sold any CALIDRIA asbestos to Pioneer Flintkote at any location during the years 1946 to 1960.

I declare under penalty of perjury that the foregoing facts are true and correct and that this declaration was executed on _____, 1984, at King City, California.

_____
John L. Myers

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