PLAINTIFF'S EXHIBIT

UC-5361

AFFIDAVIT OF EDWARD W. DEBOR

State of Vermont)
) ss:
County of Lamoille)

Edward W. DeBor, being duly sworn, deposes and says:

1. I am the Assistant Manager of the Union Carbide Corporation Records Center located in Morrisville, Vermont (the "Records Center"). I have been working at the Records Center for approximately 25 years, and am generally familiar with Union Carbide documents.

2. Over the past years, I participated in collecting Union Carbide's asbestos-related documents for inclusion in the asbestos-related document repository maintained in offices of counsel for Union Carbide, and am generally familiar with the types of documents contained in the repository.

3. I have reviewed most of the documents listed on the "Index of Union Carbide Documents," which index I understand was prepared by or on behalf of the law firm Goldberg, Persky, Jennings & White (the "Goldberg Persky index"). A true and correct copy of the index with which I was provided is annexed hereto as Exhibit A. The Goldberg Persky firm also provided me with a box of documents that purported to be the documents listed on the index, although certain documents listed on the index were not found within the box. Each page of every document that I was provided appears to bear a separate page number, and each page number bears the prefix "UCC."

4. Based on my familiarity with Union Carbide documents and with the Union Carbide documents which were placed in the repository, the following documents, referred to by their individual page numbers, are authenticated as copies of documents from the files at Union Carbide:

UCC 31-32
UCC 49-51
UCC 52-63
UCC 66-70
UCC 112-114
UCC 154-155
UCC 196-211
UCC 216-218
UCC 1202-1204
UCC 2234
UCC 3453-3486
UCC 3505
UCC 3506-3514
UCC 3571-3588
UCC 3718-3728
UCC 3764-3774
UCC 3833-3851
UCC 4129-4137
UCC 4459-4475
UCC 4480-4481
UCC 4531
UCC 4547-4550
UCC 4954-4955
UCC 4956-4960
UCC 4961-4968
UCC 4969-4970
UCC 4970a-4970c
UCC 5046
UCC 5107
UCC 5172-5224
UCC 5454-5456
UCC 5710-5716
UCC 5734-5736
UCC 5744
UCC 5967
UCC 5968-5973
UCC 6004-6013
UCC 6031-6034
UCC 6324-6327
UCC 6860-6871
UCC 7043-7056
UCC 7425-7426
UCC 7456-7458
UCC 7885-7890
UCC 8065
UCC 8287-8298
UCC 8371
UCC 8372

UCC 8443
UCC 8541-8545
UCC 8607-8610
UCC 10088-10089
UCC 10090-10091
UCC 10490-10518
UCC 10607
UCC 10608
UCC 10609
UCC 10641-10642
UCC 10685-10686
UCC 11023
UCC 11838-11842
UCC 11845-11850
UCC 12755
UCC 12762
UCC 12955-13025
UCC 13815-13816
UCC 13817-13820
UCC 13821-13822
UCC 13839-13840
UCC 13846
UCC 13847
UCC 13861
UCC 14133-14134
UCC 14517-14525
UCC 14398-14406
UCC 15631
UCC 15633
UCC 15634
UCC 15635-15636
UCC 15637
UCC 15639
UCC 15640
UCC 15921-15927
UCC 16184-16194
UCC 17917
UCC 18194-18200
UCC 18201-18202
UCC 18203-18205
UCC 18206-18207
UCC 20770-20771
UCC 20782-20785
UCC 20786-20790
UCC 20797
UCC 20800-20804
UCC 20805
UCC 20806

UCC 20807
UCC 22284-22290
UCC 23078-23083
UCC 23540-23542
UCC 23543-23544
UCC 23545
UCC 23915-23933
UCC 24973-24991
UCC 24992-24994
UCC 25514-25516
UCC 25517-25519
UCC 25526-25529
UCC 25533-25537

5. I understand that counsel for Union Carbide is asserting a privilege as to certain documents contained in those provided for authentication. The remainders of the documents in which those pages appear are not privileged and are authenticated as follows:

UCC 76-81
UCC 83-84
UCC 13026-13028
UCC 13030
UCC 13032-13046
UCC 20799
UCC 23085-23086

6. Based on my familiarity with Union Carbide documents and with the Union Carbide documents which were placed in the repository, the following documents, referred to by their individual page numbers, appear to be partial or incomplete copies of documents from the files of Union Carbide, or appear to be compilations of copies of separate documents from the files of Union Carbide. Those documents are:

UCC 152
UCC 153
UCC 170-172
UCC 2590-2591
UCC 3485-3486
UCC 3614
UCC 3815-3817
UCC 3808-3810
UCC 3872-3874

UCC 4085
UCC 4150-4170
UCC 4189
UCC 4497-4500
UCC 4551-4557
UCC 4558-4564
UCC 4807
UCC 5128-5139
UCC 5295-5304
UCC 5942
UCC 5949
UCC 7230
UCC 8114-8150
UCC 8271
UCC 9557-9558
UCC 100487-100490
UCC 11025
UCC 13053-13054
UCC 13055
UCC 13086-13088
UCC 13135-13136
UCC 13823
UCC 20772-20771
UCC 20791-20794
UCC 25546-25558

7. Based on my familiarity with Union Carbide documents and with the Union Carbide documents which were placed in the repository, the following documents, referred to by their individual page numbers, are not copies of documents from the files of Union Carbide, and as such, cannot be authenticated. Those documents are:

UCC 558
UCC 3712-3717
UCC 4203
UCC 5001-5036
UCC 5042-5045
UCC 6286-6288
UCC 9559-9561
UCC 12748
UCC 20796
UCC 20796

8. Document UCC 447, although listed on the Goldberg Persky index, was not provided to me for my review, and as such, cannot be authenticated.

9. I was unable to determine whether the certain documents were copies of documents from the files of Union Carbide. As such, the following documents cannot be authenticated:

UCC 8-10
UCC 2557
UCC 3813-3814
UCC 13336

Edward W. DeBor

Sworn to and subscribed before me this
22nd day of August, 2002

Notary Public (2/10/03)