

# Exhibit 32

**SILICA MDL**  
**PLAINTIFF'S SWORN FACT SHEET**

Name: Raymond Eugene Goodwin

SSN: \_\_\_\_\_

Street Address: P.O. Box 371

City: Dora State: Alabama

Date of Birth: 10/27/33 Date of Death (if applicable): \_\_\_\_\_

Work History - See attached Exhibit A - Work History

Product Identification - See attached Exhibit A - Work History.

I am making a claim for the following injuries (diseases):

Silicosis: X

Known Complicating Diseases:

Lung Cancer \_\_\_\_\_ Rheumatoid Arthritis \_\_\_\_\_

Scleroderma \_\_\_\_\_ Pulmonary Massive Fibrosis \_\_\_\_\_

Lupus \_\_\_\_\_ Tuberculosis (TB) \_\_\_\_\_

Kidney Cancer \_\_\_\_\_ Enlarged Heart \_\_\_\_\_

Fear of Cancer X Other: \_\_\_\_\_

My medical providers are on the attached Exhibit B or will be provided in a supplemental disclosure. My medical testing is listed on attached Exhibit C.

**II. Authorizations**

I have signed and attached the following authorizations:

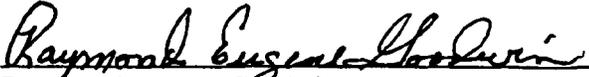
1. Medical Authorization
2. Social Security Earnings History Authorization
3. Employment Authorization
4. IRS Authorization (if I am making a claim for lost wages)

5. Veterans Administration Authorization

III. Claims

At this time, I am making the claims stated in Exhibit D.

I declare under penalty of perjury subject to 28 U.S.C. S 1746 that all of the information provided in this Fact Sheet is true and correct to the best of my present memory, knowledge, information and belief, that I have completed the List of Medical Providers and Work History appended hereto (or in a supplement), which are true and correct to the best of my knowledge, information and belief, and that I have provided the authorizations stated in Section II above. I reserve the right to modify or supplement the foregoing information during the discovery process of my case.

  
Raymond Eugene Goodwin

**Exhibit A**  
**Exposure Work History**  
 (Also list any other activity for which you claim silica exposure)

Employer and Exposure Site	Address	Dates of Exposure	Job Description	Types of Products (List all manufactures or models you remember)
Ingall Iron	Birmingham, AL	1969-1970	In Plant Truck driver	bag sand, (Mfg Unknown) blast equipment, (Mfg Unknown) grinders, grinding wheels, grinding pads, (Mfg Unknown) cutting saws, cutting equipment, (Mfg Unknown) air sweeping equipment, (Mfg Unknown) paint products, fillers, (Glidden) sandblasting equipment, (Mfg Unknown)
United Gunitite	Florence, AL	1994-12/1/95	Mechanic, in-house and in field	bulk sand, (Mfg Unknown) bag sand, (Mfg Unknown) pots, (Mfg Unknown) compressors, hoses, nozzles, (Ingersoll Rand) blast equipment, (Mfg Unknown) bag/baghouses, (Mfg Unknown) grinders, grinding wheels, grinding pads, (Mfg Unknown) cutting saws, cutting equipment, (Mfg Unknown) jack hammers, (Mfg Unknown) sandblasting equipment, (Mfg Unknown)
U S Steel Company	Gary, IN	1958 -1959	Steel grinder	disposable dust mask, (Mfg Unknown) cartridge respirator, (Mfg Unknown) non-air fed hood, (Mfg Unknown) compressors, hoses, nozzles, (Mfg Unknown) grinders, grinding wheels, grinding pads, (Mfg Unknown) cutting saws, cutting equipment, (Mfg Unknown)



**Exhibit C  
Medical Testing**

Please list the medical testing, if any. X-rays, other xerographs and PFT results, in Plaintiffs' custody or control are to be produced. Except documents that are subject to a claim of consulting expert privilege.

Type of testing	Date of Testing	Results
Pulmonary Function Test	3/19/02	FVC: 113%; TLC: 108%; DLCO: 69%; FEV1/FVC: 56%; FVC Score: 4.84; FEV1 Score: 2.72; FEV1: 82%

Exhibit D  
Claims

I am making the following claims, at this time, against the following Defendants.

Defendant	Type of Claim
Air Liquide America Corporation, Successor to Big Three Industries, Inc. d/b/a Sansstrom Delaware Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
American Optical Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ameron International Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ameron, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ash Grove Cement Company, d/b/a Quickcrete of Jackson, d/b/a Quickcrete, d/b/a Quickcrete Material Company, d/b/a Precision Packaging Inc. of Jackson	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Atlas Copco Compressors, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Bacou USA Safety, Inc. f/k/a Survivair, Inc. d/b/a Survivair	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Better Minerals & Aggregate Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Big Three Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Binks Manufacturing Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Blast/Coast Systems, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Blue Ridge Sand & Gravel, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Bob Schmidt, Inc. and Schmidt Manufacturing Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Bowen Tools, Inc. and its division Sansstrom Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Bowto, Inc. f/k/a Bowen Tools, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Briggs-Weaver Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Buckner Rentals Service, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
C&S Transportation, Inc., f/k/a C&S Trucking, Inc. d/b/a Dependable Abrasives	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Cataphote, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Cesco Corp.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Clark Sales and Rentals, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Clark Sand Company, Inc. and Clark Sales and Rentals, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy

Clemco Industries, Corp.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Complete Abrasive Blasting Systems, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Consolidated Materials, Inc. formerly Jahnke Services, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Conway Industrial Supply, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Custom Aggregates & Grinding, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Custom Crete	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Daloz Safety, Inc. f/k/a WGM Safety Corporation d/b/a Willison Safety Products	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Dee-Blast Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Devilbliss Air Power Co. f/k/a Devilbliss Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Dyckerhoff, Inc.	civil conspiracy
E.D. Bullard Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Eastern Safety Equipment Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Empire Abrasive Equipment Company, L.P.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Empire Abrasive Equipment Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
F&S Abrasive Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Figgle International, Inc., individually and f/k/a and/or successor in interest to Safety Supply America Corporation dba Scott Technology, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Flexo Products, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
General Refractories Company	civil conspiracy
Glendale Protective Technologies, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Graco Enterprises, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Grifco, Inc.	civil conspiracy
Gulf Coast Industrial & Supply Co.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Gulf Coast Industrial Supply, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
H.S. Cover Corporation a/k/a Pro-Tech Respirators	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Hanson Aggregates Central, Inc. f/k/a Pioneer Concrete of Texas, Inc. f/k/a Pioneer South Central, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Hanson Building Materials America, Inc.	civil conspiracy
Homes Technical Sand, Inc. a/k/a Technical Sands	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Humble Sand & Gravel, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy

Humble Sand Co., Inc.	civil conspiracy
Ideal Basic Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Inco Safety Products Company, as parent company of WGM Safety Products and as successor in interest to Willison, a division of Inco Safety Products	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Independent Gravel, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ingersoll-Rand Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Inland Manufacturing	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Jabco Abrasives, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Jet Sands, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
John Barten, individually, and db/a John Barten Company and JB Industries Sand	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Kehm Equipment, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Kelco Sales & Engineering Company, a division of Polley, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Key Houston, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Komp Equipment Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Kramer Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Larry Hess & Associates, Inc. db/a Blast-It-All	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Lockheed Martin Corporation, successor in interest to Martin Marietta Corporation, successor to Wedron Silica Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Lone Star Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Louis M. Gerson Co., Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Mine Safety Appliances Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Minnesota Mining & Manufacturing Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Mississippi Valley Silica Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
MMLJ, Inc.	civil conspiracy
Moldex-Metric, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Norton Company (Safety Products Division-USA Norton Company), individually and as successor in interest to Welsh and Welsh, a division of Textron	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Oglebay Norton Industrial Sands, Inc., f/k/a Texas Mining Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ottawa Silica Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
P.K. Lindsay Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy

Pangborn Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Parmelee Industries, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pauli & Griffin Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pauli Systems, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pearl River Sand & Gravel Co., Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pearl Sand of Louisiana, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Phillips Building Supply of Laurel, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pioneer Concrete of Arkansas, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Polley, Inc. d/b/a Kelco Sales & Engineering Company and d/b/a Kelco Sales & Engineering	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Porter Warner Industries, LLC	civil conspiracy
Precision Packaging, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Premium Packaging, Ltd. a/k/a Quikrete Materials	design defect, marketing defect, negligence, gross negligence and civil conspiracy
PTR, Inc. d/b/a H.S. Cover Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Pulmosan Safety Equipment Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Ransburg Corporation (formerly Devilbliss Industrial Products Corporation, successor to The Devilbliss Company)	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Safety Supply American Corporation a/k/a Standard Glove & Safety Equipment formerly Se & SC, formerly Safety Engineering and Supply	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Sandair MS, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Sanstorm Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Sanstorm, Inc., d/b/a Delaware Sanstorm, Inc. (A Division of Bowen Tools, Inc.)	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Schmidt Manufacturing, Inc.	civil conspiracy
Schramm, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Scott Aviation, a div. of Scott Technologies, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Siebe North, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Sily, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Southern Silica of Louisiana, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Specialty Sand Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Standard Equipment	civil conspiracy
Standard Equipment Company, Inc.	civil conspiracy
Standard Sand & Silica Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy

Standard Sand Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Sulair Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Survivar, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Technical Sand Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Technical Sands, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Textron, Inc., individually and as successor in interest to Welsh and Welsh, a division of Textron	design defect, marketing defect, negligence, gross negligence and civil conspiracy
The Carborundum Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
The Morie Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
The Quikrete Companies	design defect, marketing defect, negligence, gross negligence and civil conspiracy
The Tool Center	design defect, marketing defect, negligence, gross negligence and civil conspiracy
The Vallen Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Thorstenberg Materials Company, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Turman's Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Tyco International (US), Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
U.S. Silica Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
U.S. Silica Company, f/k/a Pennsylvania Glass Sand Corporation and Ottawa Silica Company, and as successor in interest to Texas Industrials Minerals Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Unimin Corporation	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Vallen Safety Supply Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Vulcan Materials Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Wedron Silica Company	design defect, marketing defect, negligence, gross negligence and civil conspiracy
WGM Safety Corporation, d/b/a Willison Safety Products, and as successor in interest to Willison, a Division of Inco Safety Products	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Wheelerabrator-Frye, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy
Wheeler Protective Apparel, Inc.	design defect, marketing defect, negligence, gross negligence and civil conspiracy