

AFFIDAVIT OF JOSEPH P. SAVEL, SR.

STATE OF SOUTH CAROLINA :

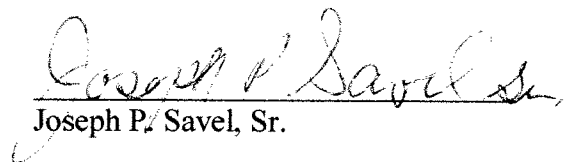
COUNTY OF BEAUFORT :

BEFORE ME, the undersigned authority, appeared the Affiant, Joseph P. Savel, Sr. and having taken an oath, Affiant, based on personal knowledge, deposes and says:

1. I am over 18 years of age and competent to testify as to the matters contained herein.
2. My name is Joseph P. Savel, Sr.
3. My address is 9A Wood Duck Lane, Beaufort, South Carolina 29907.
4. My phone number is 843/524-2564.
5. I worked at True Temper Corp. in Saybrook, Ohio from January 1944 until July 1977 retiring under the 30 year and out program for salaried personnel.
6. I was an employee at the University of Florida from December 1977 until December 1989 when I retired.
7. My first job at the University of Florida was driving a dump truck.
8. After three years, I was promoted to a heavy equipment operator in which I drove a front end loader.
9. My job was at the dump off of 34th Street, mostly, where I would push the trash that was brought out to the dump over the bank and in the evening at quitting time I would put dirt on it.
10. I did this until about 1986 when I was promoted to supervisor of heavy equipment and retired in 1989 because of age.

11. I saw many different things brought to the dump off 34th Street including dead animals in barrels with some kind of powder in the drum. Sometimes the lids would come off after I pushed them over into the pit. I also saw dead cows buried out there.
12. William Rainey from Lake Butler was the backhoe operator that dug the holes for these dead animals.
13. There was also all types of construction material including wood, concrete, paint cans, bottles, wire, pipe, and limbs. But no household garbage was dumped out there.
14. At one time, I passed out at the dump and was transported to Shands hospital in Gainesville, Florida, where I spent the better part of the day in the emergency room and then sent home.
15. I have a rash on my torso and arms for which I have been tested and was given medication which I applied for about 6 to 8 months, but it did not help.
16. Shortly after I retired I developed a breathing problem for which I use a Flowvent inhaler.

Dated this 3rd day of October, 2003.


Joseph P. Savel, Sr.

STATE OF SOUTH CAROLINA :

COUNTY OF BEAUFORT :

The foregoing instrument was acknowledged before me this 3rd day of October, 2003, by Joseph P. Savel, Sr., who is personally known to me [] or has produced South Carolina Driver's License No. 011637778 as identification.

NOTARY PUBLIC

Signature: Civily Co. Graves
State of South Carolina at Large (Notary Seal)

My commission expires: 10/28/06