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Attorneys for BNSF Railway Company and John Swing

IN THE ASBESTOS CLAIMS COURT OF THE STATE OF MONTANA

<p>IN RE ASBESTOS LITIGATION,</p> <p><i>Consolidated Cases</i></p>	<p>Cause No. AC 17-0694</p> <p>AFFIDAVIT OF ATHENA PATRICK RE: BNSF AND JOHN SWING'S RESPONSE TO MHSL PLAINTIFF'S NOTICE OF SUPPLEMENTL AUTHORITIES</p> <p>Applicable to All Cases</p>
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I, Athena Patrick, being first duly sworn on oath, hereby depose and state as follows:

1. I am the practice manager at the firm of Knight Nicaastro MacKay, LLC, the firm that serves as counsel for Defendants, BNSF Railway Company and John Swing.
2. I have been in charge of coordinating all records collections for the cases currently pending before this Court.
3. To date, Knight Nicaastro MacKay, LLC has received 1,928 sets of records from the CARD Clinic. BNSF is named as a defendant in 852 of those 1,928 cases.
4. BNSF has received facts sheets for 743 of those 852 Plaintiffs. Of the 743 Plaintiffs that BNSF has received fact sheets for, 705 (94.8%) have designated CARD Clinic as their primary ARD provider. An additional 32 (4.3%) have jointly listed the CARD Clinic and another office as their ARD providers.
5. For the 55 individuals listed on Exhibit 7, our office cross referenced their annual exam dates provided in Plaintiff's Master Claims List with the medical records that

we have received from CARD Clinic to date. Of those 55 individuals, we have no medical records that correspond to the annual exam date provided for 10 of the 55 Plaintiff.

6. The names of those 10 Plaintiffs are:

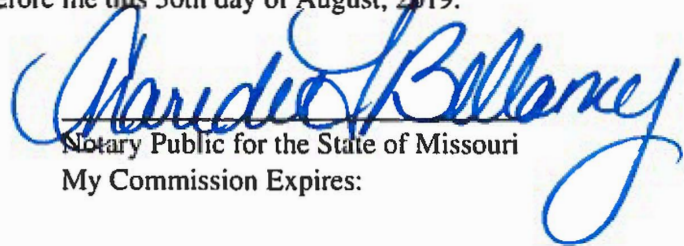
Raymond Abrahamson
Bernard Bosch
Caroline Hamann
Lynn Koskela
Cheri Meyer
Katherine Nielsen
Wilbert Pariseau
Dennis Quinn
Kenneth Rayome
Todd Rebo

RESPECTFULLY SUBMITTED this 30th day of August, 2019.



Athena Patrick

SUBSCRIBED AND SWORN to before me this 30th day of August, 2019.



Notary Public for the State of Missouri
My Commission Expires: