

Exhibit J

STATE OF INDIANA)
) SS:
COUNTY OF ELKHART) CAUSE No. 20D02-1106-PL-00037

LEO VANNORMAN, et al.,)
)
 Plaintiffs,)
)
 v.)
)
 FLEXSTEEL INDUSTRIES, INC.,)
 LDL REALTY COMPANY, LLC,)
 DAVID L. DYGERT, and)
 PHYLLIS B. DYGERT,)
)
 Defendants.)

FLEXSTEEL INDUSTRIES, INC.,)
)
 Third-Party Plaintiff,)

v.)
)
 TRAVELERS PROPERTY CASUALTY)
 COMPANY OF AMERICA, NATIONAL)
 UNION FIRE INSURANCE COMPANY)
 OF PITTSBURGH, PA, ILLINOIS)
 NATIONAL INSURANCE COMPANY,)
 CONTINENTAL CASUALTY)
 COMPANY, SENTRY CASUALTY)
 COMPANY, UNITED STATES FIRE)
 INSURANCE COMPANY, AMERICAN)
 GUARANTEE AND LIABILITY)
 INSURANCE COMPANY, HARTFORD)
 FIRE INSURANCE COMPANY, and)
 INDIANA INSURANCE,)
)
 Third-Party Defendants.)

AFFIDAVIT OF BRIAN LOVE

The undersigned, Brian Love, being first duly sworn, hereby states as follows:

1. I, Brian Love, am over the age of 18, am of sound mind, and have personal knowledge of the matters set forth in this affidavit.

2. I worked for Flexsteel's Dygert Seating Division for approximately four years at its seat manufacturing facility on Marina Drive in Elkhart, Indiana.

3. When I worked for Flexsteel I worked primarily on the installation line.

4. My job included assembling the sixty-forty Geneva line.

5. In connection with that work I would use about a case of C-60 a week to degrease the frames.

6. The C-60 would dry out my hands and dry out my fingernails so I bought my own pair of gloves.

7. Sometimes when I degreased the frames so much C-60 would collect on the table that it would soak through my apron and irritate my stomach.

8. The cans of C-60 were under high pressure and when you depressed the nozzle the liquid would shoot out like a super soaker.

9. When I complained to Greg Lucchese about how dirty the frames were, he would send someone to get C-60 so that I could degrease them.

10. Springs and screws were shipped to Flexsteel in paper barrels.

11. The screws and springs were also degreased using C-60 if needed.

12. The empty paper barrels were used around the factory as trash cans.

13. I remember at least two paper barrels that were kept outside the southwest corner of the building.

14. People would throw empty cans of C-60 and rags soaked with C-60, along with other types of trash, into the paper barrels that were stored outside the building.

15. Sometimes the rain would soak through the bottom of the paper barrels causing them to split, break, or disintegrate.

16. I remember taking breaks outside the southwest corner of the building on Marina Drive and seeing trash, including rags and cans, scattered on the ground.

17. I also remember seeing people standing outside along the south and southwest corner of the building cleaning their glue pots out with C-60 and dumping the glue and solvent on the ground.

FURTHER AFFIANT SAYETH NOT.

I affirm, under the penalties of perjury, that the foregoing statements are true and correct to the best of my knowledge and belief.

3 / 5 / 2012
Date

Brian Love
Brian Love