

CAUSE NO. 199 596 97

DSC COMMUNICATIONS	§	IN THE DISTRICT COURT OF
CORPORATION n/k/a	§	
ALCATEL USA, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	COLLIN COUNTY, TEXAS
	§	
EVAN BROWN,	§	
	§	
Defendant.	§	219TH JUDICIAL DISTRICT

AFFIDAVIT OF JAMES STARON

Before me, the undersigned authority, personally appeared James Staron, who, being by me duly sworn, deposed as follows:

1. My name is James Staron. I am of sound mind, capable of making this Affidavit, and I have personal knowledge of the facts herein stated:

2. I am the Vice President of Human Resources for DSC Communications Corporation n/k/a Alcatel USA, Inc. ("Alcatel"). For convenience, I will refer to the company by its current name, Alcatel, even when referring to events that occurred when the company was known as DSC. I have been employed by Alcatel since August 1983. I am familiar with the manner in which Alcatel creates and maintains the records in its Human Resources department.

3. Attached hereto are:

Exhibit A, three pages of records, bates-labeled DSC000137 through DSC000139;

Exhibit B, four pages of records, bates-labeled DSC000131 through DSC000134;

Exhibit C, two pages of records, bates-labeled DSC000135 and DSC000136;

Exhibit D, six pages of records, bates-labeled DSC00093, DSC000125 through DSC000128, and DSC000130;

Exhibit E, two pages of records, bates-labeled DSC000124 and DSC000123;

Exhibit F, five pages of records, bates-labeled DSC000114 through DSC000118; and

Exhibit G, four pages of records, bates-labeled DSC00078 through DSC00079, DSC00081, and DSC00096.

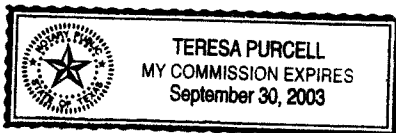
All of these documents are maintained in Alcatel's Human Resources Department. These pages of records are kept by Alcatel in the regular course of its business. It was in the regular course of that business of Alcatel for an employee or representative of Alcatel, with knowledge of the act, event, condition, or opinion, recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time of the event recorded, or reasonably soon thereafter. The records attached hereto are exact duplicates of the originals.

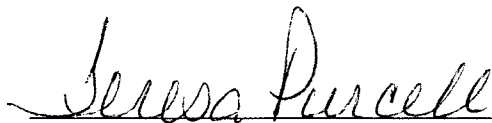
AFFIANT SAYS NOTHING FURTHER.



JAMES STARON

SWORN TO AND SUBSCRIBED BEFORE ME on the 19 day of November, 2001.





Notary Public in and for the State of Texas

SEAL: