

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

C-E Minerals, Inc.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE
	)	
CARBO Ceramics, Inc.,	)	NO.: 1:11-CV-2574-JOF
	)	
Defendant.	)	

**Second Declaration of Paul Hall**

My name is Paul Hall. I am over the age of 18 and otherwise fit and competent to make this declaration, which is based on my personal knowledge.

1. I have reviewed the two “Record of Visitation of Invitees, Contractors, Licensees, Vendors and Others” forms attached to Mark Edmunds’ October 12, 2011 declaration filed in this case. Apparently I signed these forms in February and March 2005 when visiting CARBO’s facility, although I still do not remember signing them.

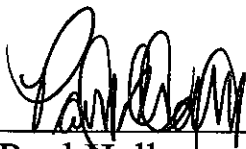
2. In any event, the only purpose for which I recall ever visiting CARBO's facility was to examine how CARBO was storing the clay that C-E had sold CARBO under a large outdoor storage shed on CARBO's property. C-E had encountered problems with CARBO's capacity to accept clay deliveries. We would have preferred to haul all of CARBO's daily needs at one time. But, sometimes by mid-morning, CARBO would report that it could not accommodate any more clay until it used some of what we had already delivered. This required us to make more deliveries with smaller loads, which is less efficient. I wanted to examine the shed that CARBO was using to receive deliveries, to see if there was some way for CARBO to accommodate higher volumes.

3. In visiting CARBO's property, I certainly didn't learn anything about the composition of the clay that C-E was selling to CARBO, something that I and others at C-E obviously knew well before February 2005, which is the date of the first visitation form. Nor did I learn anything about CARBO's proppant production process. I have no

memory of ever going inside any structure that housed CARBO's production line or otherwise witnessing any details of CARBO's production process.

I declare under penalty of perjury and subject to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on October 25, 2011.

  
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Paul Hall