

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

BUCKEYE DIAMOND LOGISTICS, INC. :
fka BUCKEYE RECYCLERS, INC. :

Plaintiff, :

Case No. C3-01-440

v. :

Judge Walter Herbert Rice

CHEP USA, a general partnership :

Defendant. :

AFFIDAVIT OF RHONDA MUELLER

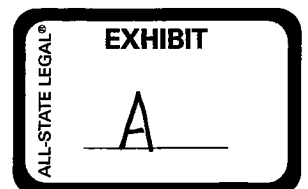
Rhonda Mueller, being first duly sworn upon her oath, hereby affirms:

1. I am over the age of eighteen years old, and I am in all respects competent to make this affidavit. I make this Affidavit based on personal knowledge and information.

2. I was employed by CHEP USA in Orlando, Florida, from 2001 through 2004. In mid-2001, I was hired by CHEP to be executive assistant to Roger Miller, CHEP's Chief Financial Officer. Roger Miller left CHEP in late 2001 and Keith Norder was hired to replace Mr. Miller as CHEP's Chief Financial Officer. I then worked for Mr. Norder as his executive assistant, until Mr. Norder left CHEP.

3. I am familiar with this Buckeye litigation. As part of my duties at CHEP, I assisted in gathering documents responsive to various discovery requests while I was executive assistant to the Chief Financial Officer.

{OR798136;1}



4. When Mr. Miller left CHEP, he left cabinets in his office full of files. Most of these files were created prior to my working for Mr. Miller, and were in a very disorganized state. Many were not labeled, contained a hodge-podge of documents that didn't necessarily relate to each other, contained old documents, and contained duplicate and often triplicate copies of documents. When Mr. Norder saw these files, he instructed me to organize the files, which I did. As part of that process, I re-organized documents into what I considered logical files, threw away duplicate documents, and archived old documents.

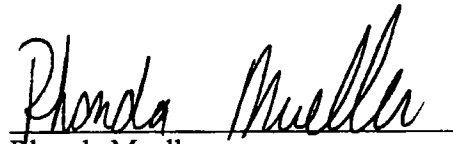
5. During this process, I located the document which has now been identified as CHEP 00795, but which did not contain this bates number when I located it. I recognized this document as being potentially relevant to the Buckeye litigation, and forwarded it to CHEP's legal counsel. The file in which I located this document was not labeled, and was typical of the rest of the old files: containing a hodge-podge of documents that didn't relate to any particular subject, etc.

6. There were other documents that I also located in Mr. Miller's cabinets during this process that I believed may be relevant to the Buckeye litigation, and I also forwarded those documents to CHEP's legal counsel. It is my understanding that all of these documents have been produced to Buckeye's legal counsel.

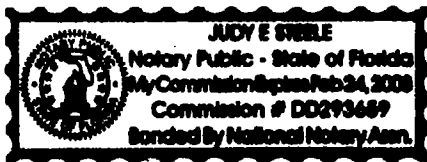
7. I did not maintain any sort of file consisting of the documents in which CHEP 00795 was found nor did I set aside that stack of documents. Rather, I set aside those documents that I believed were relevant to the litigation (forwarding them to legal counsel), and sorted and re-organized the remaining documents into what I considered to be logical files. Thus, it is impossible to re-construct the documents that were located in the file where I located

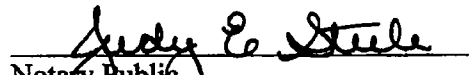
CHEP 00795.

FURTHER AFFIANT SAYETH NOT.


Rhonda Mueller

SUBSCRIBED AND SWORN to before me this 20th day of September, 2004.




Notary Public