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IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	Subcase No. 63-04724
	)	
	)	AFFIDAVIT OF GEORGE PULLMAN DATED
Case No. 39576	)	DECEMBER 17, 2003
	)	
	)	
_____	)	
STATE OF IDAHO	)	
	)ss.	
<u>County of Ada</u>	)	

GEORGE PULLMAN, being first duly sworn upon oath, deposes and says:

1. I make the following statements based on personal knowledge, except as to matters stated on information and belief, and as to those matters I believe them to be true.
2. On December 23, 1952, Mr. Karl Fischer and Cleo Fischer, husband and wife and Boise Brick Company sold to Joe Pullman, Roy Pullman, H. L. Pullman, and myself a

twenty-acre parcel in sections 28, 29, Township 3 North, Range 3 East, B.M. A true and correct copy of this deed is attached as Exhibit 1.

3. Joe Pullman was my father; Roy Pullman was my brother; and H. L. Pullman was my brother. We created a corporation called the Pullman Brick Company, Inc., and the Pullman Brick Company, Inc. manufactured bricks on this parcel from 1952 to 1989.

4. I am informed and believe, and therefore allege the facts to be as follows:

- i. that Mr. Campbell, Mr. Childs, and Mr. Morache began the manufacture of bricks at this twenty acre parcel in 1945 or 1946;
- ii. that the name of this company was the Campbell-Child Brick Company; Inc.;
- iii. that the name of Campbell-Child Brick Company, Inc. was changed later to the Boise Brick Company; Inc.;
- iv. that a Mr. Karl Fischer owned the mortgage for this site;
- v. that a well was constructed on this parcel when the brick manufacturing facility was first constructed;
- vi. that this well supplied all the water needs on the site including the brick manufacturing operation, all the buildings and the outside irrigation; and
- vii. that when the brick-making by Mr. Campbell, Mr. Child, and Mr. Morache was not a success, Mr. Fischer became involved in the brick-making operation.

5. The Pullman Brick Company brick manufacturing plant operated five days a week, eight hours a day during the frost-free period of the year, which is about six months in duration. The plant produced from 60,000 to 70,000 bricks a day. The clay, usually obtained from Marsing, Grandview, or Emmett, was formed into bricks after pulverizing, screening, and mixing with water. A standard 4"x8½"x2¼" brick weighed between 5½ and 6 lbs. when formed

from wet clay. After sun drying in the yard and baking in the kiln, its final size was 3 7/8"x8"x2", and it weighed 4 lbs. Two cubic yards of clay would produce about 1,000 standard size bricks, and two cubic yards weighed about 2,400 lbs. One Saturday each month, the brick-manufacturing crew, working overtime, would take the equipment apart and clean it.

6. The on-site well was 75 feet deep with a 6" casing. The well had a 2-horsepower submersible pump that was set at a depth of 70 feet. The static water level in the well was about 15 feet below the land surface. The water in the well was pumped into a 300 gallon steel tank that was elevated about ten feet off the ground. This tank provided constant pressure to the pug mill. Two pipes, a one-inch diameter and a 3/4 inch diameter, supplied water from the tank to the pug mill. The one-inch pipe provided enough water for normal operation of the pug mill. When the clay was very dry, the 3/4 inch line provided additional water for mixing with the clay.

7. Pullman Brick Company had a separate office building, which had a lawn, trees and other landscaping. The Pullman Brick Company also had two mobile homes on the parcel. The mobile homes were full time residences. A guard employed by the company lived in one mobile home. A Mr. Harlie Wade lived in the other residence. Each of the residences had a lawn, garden, trees, and other irrigated landscaping. The total area of irrigated lawn, garden, trees, and other landscaping was about one acre. There was no runoff from the site. All water pumped from the well was completely consumed on the brick-manufacturing parcel.

8. Pullman Brick Company employed about fifty employees at the Boise brick manufacturing plant.

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9. Further your Affiant sayeth naught.

George Pullman
GEORGE PULLMAN

Subscribed and sworn before me this 17th day of December, 2003.

Stanley D. Crow
Notary Public for the State of Idaho
Residing at Bow
My commission expires: 3-16-06

