

**DECLARATION OF TERRY PARKS
AAA PAVING & SEALING, INC.**

1. My name is Terry Parks and I am the Vice President of AAA Paving & Sealing, Inc. (“AAA Paving”). AAA Paving operates out of one asphalt-concrete plant (located at 560 Turnpike Industrial Park Road, Princeton, West Virginia) that serves industrial, commercial, and residential customers in the southern area of West Virginia and the southwest area of Virginia.

2. For many of its customers, AAA Paving must purchase aggregate that meets the specifications set by the West Virginia Department of Transportation (“WVDOT aggregate”).

3. The distance from AAA Paving to a quarry is an important factor in my decision where to purchase WVDOT aggregate.

4. Historically, Pounding Mill supplied nearly all of AAA Paving’s WVDOT aggregate from its Mercer Quarry (located at 1111 Blake Hollow Road, Princeton, West Virginia). The Mercer Quarry is approximately 6.5 miles from AAA Paving’s asphalt-concrete plant. Pounding Mill also owned all of the other quarries near AAA Paving, including the Rocky Gap quarry, which is located at 707 Quarry Drive, Rocky Gap, Virginia. The nearest quarry that was not owned by Pounding Mill was located in Lewisburg, West Virginia, about 60 miles away from AAA Paving.

5. I understand that in July 2018, CRH acquired Pounding Mill, including the Mercer Quarry. I also understand that the Department of Justice required that Pounding Mill’s Rocky Gap Quarry be sold to an independent purchaser—Salem Stone—as a condition of allowing that acquisition.

6. The sale of the Rocky Gap Quarry to Salem Stone gave AAA Paving a much closer and more cost-competitive second aggregate supplier than it had before CRH acquired Pounding Mill. Before that acquisition, the Mercer Quarry and the Rocky Gap Quarry were both

owned by Pounding Mill, so they did not compete. Instead, the next best alternative to the Mercer Quarry not owned by Pounding Mill was in Lewisburg, West Virginia, about 60 miles away from AAA Paving's asphalt-concrete plant. As a result of the sale of the Rocky Gap Quarry, the Rocky Gap Quarry now is AAA Paving's next best alternative to the Mercer Quarry. The Rocky Gap Quarry is only 7.5 miles farther away from AAA Paving than the Mercer Quarry. This means that AAA Paving's next best alternative to the Mercer Quarry is now 14 miles away from AAA Paving, while before the acquisition it was about 60 miles away.

7. Since CRH acquired Pounding Mill in July 2018, AAA Paving has been purchasing WVDOT aggregate from the Mercer Quarry, now owned by CRH. AAA Paving's prices for WVDOT aggregate from the Mercer Quarry have not increased since CRH acquired the Mercer Quarry. CRH has never refused to supply AAA Paving with WVDOT aggregate. AAA Paving's costs for WVDOT aggregate have not increased since CRH acquired the Mercer Quarry.

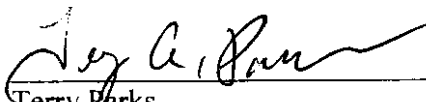
8. The Rocky Gap Quarry is a viable alternative to the Mercer Quarry for AAA Paving's aggregate requirements. To obtain aggregate from the Rocky Gap Quarry, AAA Paving would need to truck the aggregate an additional 7.5 miles beyond the distance from AAA Paving's plant to the Mercer Quarry. I do not anticipate that that additional distance would significantly raise my costs.

9. Salem Stone recently reached out to let me know that it is interested in selling aggregate to AAA Paving once it completes preparing the equipment at the Rocky Gap Quarry to produce WVDOT aggregate. AAA Paving has not yet purchased any aggregate from the Rocky Gap Quarry.

10. In the summer of 2018, CRH provided AAA Paving discounted prices (like account credits) for aggregate. These discounts were provided when a major road construction project on I-77 in West Virginia delayed the movement of AAA Paving's trucks in and out of the Mercer Quarry. Because of these delays, CRH offered to supply AAA Paving with aggregate from its more distant quarry in Bluefield, Virginia. This supply was offered at discounted prices during the construction period, which would make up for the additional cost of trucking.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 26, 2018.



Terry Parks
Vice President
AAA Paving & Sealing, Inc.