

Page 30	Page 32
1 Q So you think Peterbilt, Kenworth and Freightliner 2 were in the top three? 3 A Top three, hm-hmm. 4 Q During this time between 1983 and 1991, did Eaton 5 manufacture its own brake products? 6 A Yes. 7 Q Did they make their own brake linings? 8 A No. 9 Q Again, during this time frame between 1983 and 1991, 10 from what source or sources did Eaton purchase its brake 11 linings from? 12 A Again, primarily Abex, Carlisle and probably to a 13 lesser extent, smaller amounts still probably some Raybestos. 14 That's probably it. It started to winnow down. 15 Q During 1983 and 1991, do you know what the brake 16 linings were made out of that Eaton obtained from Abex, 17 Carlisle and to a lesser degree Raybestos? 18 A Through the early part of the period, of course they 19 probably would have been asbestos and then evolved into the 20 nonasbestos product. 21 Q Were you familiar with the process Eaton went 22 through to move from asbestos to nonasbestos? 23 A Yes, generally, yes. 24 Q I will come back to that. Now, between 1991 and 25 1995, you then became the division manager for Eaton truck	1 industry. 2 Q Then it looks like you left Eaton in 1997. Can you 3 recall the reason for leaving Eaton? 4 A I retired. 5 Q The next employment looks like as a consultant with 6 Cognis Corporation in Cincinnati, Ohio? 7 A Right. Part-time operation for them representing 8 them as far as business development, sales development and 9 industry feedback. 10 Q What type of business was Cognis in? 11 A Chemical company primarily produces synthetic 12 lubricants for drive train components. 13 Q Over the next couple of years, you served as a 14 consultant for several companies, one, McKay and Company; is 15 that correct? 16 A Yes. 17 Q What did they do? 18 A They do market research work in the trucking 19 industry. 20 Q Then another one, Lubrizol Corporation? 21 A Yes. They are also a chemical company out of 22 Whitcliffe, Ohio and also represent them to the trucking 23 industry, attending industry functions and giving them 24 feedback on the market conditions and also help them in the 25 field testing activities.
Page 31	Page 33
1 components marketing; is that correct? 2 A Yes. 3 Q Where were you located at that time? 4 A In Galesburg, Michigan. 5 Q Can you basically tell us what you did as division 6 manager for the Eaton truck components marketing division? 7 A I had overall responsibility for all of the 8 operations, including sales, including national accounts for 9 all of the field organization. I had about 150 people 10 reporting to me either directly or indirectly. 11 Q From 1995 to 1997, I think it says director of 12 industry and -- 13 A Customer relations. 14 Q For the truck components operation, North America; 15 is that correct? 16 A Yes. 17 Q Again, where were you located at that time? 18 A Still in Galesburg. 19 Q Please describe what your duties were at that time. 20 A Basically represented the truck components operation 21 to the major industry organizations as far as, like, the 22 American Trucking Association, the National Tank Truck 23 Carriers, National Truck Dealers Association and any major 24 fleet accounts. Basically fed or acted as the liaison between 25 Eaton and these organizations that represented the trucking	1 Q You have listed from 2006 to present a consultant 2 for Eaton Corporation? 3 A That's correct. 4 Q Between 1997 and 2006, did you provide any sort of 5 consulting at all for Eaton? 6 A No. 7 Q Can you describe how you were first contacted by 8 Eaton to act as a consultant? 9 A I think through the law firm. 10 Q Mr. Quick's law firm? 11 A Yes. 12 Q Was it in relation to an asbestos case or some other 13 matter? 14 A Through an asbestos case, not a specific case at 15 that time, but it was more general background type of 16 information. 17 Q Do you recall how you were first contacted? 18 A I think it was a phone contact. 19 Q Since being a consultant for Eaton Corporation, 20 aside from this particular case, have you worked on any other 21 asbestos cases? 22 A One, I guess. 23 Q Do you get paid for your time? 24 A Yes. 25 Q What is your pay for appearing here today as a