

1 A. Yes.
 2 Q. Have you reviewed any documents prior to
 3 today's deposition?
 4 A. Yes, some.
 5 Q. What did you look at?
 6 A. I looked at a letter to Ford Motor Company.
 7 Q. Do you have that with you?
 8 A. Yes.
 9 Q. What is the date of that letter?
 10 A. June 30, 1983.
 11 Q. And what is the substance of the
 12 correspondence?
 13 A. It basically confirms that we were -- plan on
 14 using nonasbestos facings in our reman clutches.
 15 MR. SMITH-GEORGE: Okay. Can we have that
 16 marked as the first exhibit?
 17 (EXHIBIT NO. 1 MARKED.)
 18 Q. Have you brought any other documents with
 19 you?
 20 A. Yes. I have four other documents.
 21 Q. Okay. Let's go through them serially.
 22 What's the next one?
 23 A. I have one to Sperry New Holland.
 24 Q. What's the date of it?
 25 A. April 28, 1986.

1 Q. And what is the substance of the document?
 2 A. Basically confirms that we were totally
 3 asbestos free January 1, 1984.
 4 Q. What did y'all do with -- let me ask it this
 5 way: How would you order the component parts to the
 6 manual clutches? In other words, when you -- if you
 7 had to get the asbestos discs for the driven discs
 8 from either HK Porter or Raybestos, would you order
 9 them in bulk or would you do it as the clutches were
 10 being manufactured?
 11 A. I'm assuming you're talking about the clutch
 12 division now.
 13 Q. Correct.
 14 A. The clutch division had standing orders with
 15 Raybestos and H.K. Porter for hundreds of clutch
 16 facings to be shipped a month.
 17 Q. And at the time that you went asbestos free,
 18 did you have any inventory of material that was sent
 19 by H.K. Porter and Raybestos?
 20 A. Yes.
 21 Q. What did you do with that inventory?
 22 A. We used it.
 23 Q. After January 1 of 1984?
 24 MR. RADCLIFFE: Object to the form.
 25 A. No, not to my knowledge. January 1, 1981 --

1 '84 was when we had made the complete change to the
 2 nonasbestos.
 3 Q. When was the decision to make the change?
 4 When did that occur?
 5 A. Well, as I said before -- and I have
 6 another -- what would be an announcement to the field
 7 that we were offering nonasbestos materials in 1981,
 8 August 13 of 1981.
 9 Q. So between August of '81 and January of '84,
 10 during the process of convincing your customers to buy
 11 the fiberglass clutch, you were selling the remainder
 12 of your asbestos clutches?
 13 MR. RADCLIFFE: Object to the form.
 14 Q. Would that be accurate?
 15 A. That's correct. I have -- also have with me
 16 an internal memo to the sales manager that states we
 17 were in the process of superseding all asbestos driven
 18 disc assemblies to the nonasbestos, and that was dated
 19 11/4/83.
 20 MR. SMITH-GEORGE: Why don't we mark the
 21 '86 document as Exhibit 2.
 22 (EXHIBIT NO. 2 MARKED.)
 23 Q. And as Exhibit Number 3 -- what's the next
 24 document you had?
 25 A. I had the press release of August 13, 1981 --

1 MR. SMITH-GEORGE: All right. We'll mark
 2 that as 3.
 3 A. -- stating it was available.
 4 (EXHIBIT NO. 3 MARKED.)
 5 A. And I had the memo to the sales manager.
 6 MR. RADCLIFFE: Hold on. Are you caught
 7 up?
 8 THE REPORTER: Thank you.
 9 MR. RADCLIFFE: Okay. Go ahead.
 10 MR. SMITH-GEORGE: We'll mark the memo to
 11 the sales manager as Exhibit 4.
 12 MS. HALES: What's the date on that?
 13 THE WITNESS: Eighty-three. 11/4/83.
 14 (EXHIBIT NO. 4 MARKED.)
 15 Q. Did you bring any other documents with you?
 16 A. One more.
 17 Q. Okay.
 18 A. It's a memo to -- or it's a letter to one of
 19 our field customers, Consolidated Freightways, stating
 20 that we were switching all our current facing
 21 materials from asbestos to a nonasbestos material.
 22 Q. And what's the date of that?
 23 A. July 6, 1983.
 24 MR. SMITH-GEORGE: Okay. We'll mark that
 25 as Exhibit 5.