

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

CHARMAINE G. McLEAN, Executrix and
personal Representative of the Estate
of Maynard F. McLean, Deceased,

Plaintiff,

v.

OWENS-ILLINOIS, INC., et al.,

Defendants.

(**ORIGINAL**

(Law Docket
(31799V-04 (

ZEBULON A. LITTLE, JR.,

Plaintiff,

v.

DANA CORPORATION, et al.,

Defendants

(Law Docket
(37073V-04

WILLIAM R. PYATT,

Plaintiff

v.

GARLOCK, INC., a/k/a/ Garlock
Sealing Technologies, LLC., et al.,

Defendants.

(Law docket
(No. 36688H-02

DEPOSITION UPON ORAL EXAMINATION
OF MARCELLA L. DUNCAN
TAKEN ON BEHALF OF THE PLAINTIFF

Norfolk, Virginia

September 17, 2004

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1 Appearances:

2 GLASSER & GLASSER, P.L.C.
3 By: RICHARD S. GLASSER, ESQUIRE
4 KAREN M. ZELLO, ESQUIRE.
5 Counsel for the Plaintiff

6 LeCLAIR RYAN
7 By: ERIK D. NADOLINK, ESQUIRE
8 and
9 CELBA & DesROCHERS LLP
10 By: STEVEN W. CELBA, ESQUIRE
11 Counsel for Defendant Dana Corporation

12 VANDEVENTER BLACK LLP (Telephonically)
13 By: ROBERT L. O'DONNELL, ESQUIRE
14 Counsel for Defendant Owens-Illinois

15 SIGAL, McCAMBRIDGE, SINGER & MAHONEY
16 By: JOHN A. TURLIK, ESQUIRE (Telephonically)
17 Counsel for Defendant Garlock

18 HUNTON & WILLIAMS
19 By: RAYMOND F. GEOFFROY, ESQUIRE
20 Counsel for Defendant

21 * * *

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I N D E X

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E X H I B I T S

NO.	DESCRIPTION	PAGE
1	Victor Gasket Guide 16th Edition, May 1955, consisting of seven pages	28
2	Victor 1909 - 1959 50th Anniversary Gaskets - Oilseals, VMG-25-0000150 through 157 and VMG-25-0000159	47
3	Quotation and Selling Record, Victor No. 1861	92
4	Quotation and Selling Record, Victor No. 34305	99
5	Quotation and Selling Record, Victor No. 1861	103

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1 Deposition upon oral examination of MARCELLA L.
2 DUNCAN, taken on behalf of the Plaintiff, before Richard W.
3 Zahn, RPR-RMR, a Notary Public for the Commonwealth of
4 Virginia at large, taken by agreement of counsel, commencing
5 at 9:10 a.m., on September 17, 2004, at the offices of
6 Glasser & Glasser, P.L.C., Crown Center, 580 East Main
7 Street, Suite 600, Norfolk, Virginia, 23510-2212, and this
8 in accordance with the Rules of the Supreme Court of
9 Virginia, 1950, as amended.

10

11 MR. GLASSER: Good morning.

12 MR. O'DONNELL: Good morning.

13 MR. GLASSER: Who is on the phone, please. This
14 is Richard Glasser, and we will identify ourselves.

15 MR. GEOFFROY: Ray Geoffroy.

16 MR. GLASSER: Good morning, Ray.

17 MR. TURLIK: John Turlik.

18 MR. GLASSER: Good morning, John.

19 Anyone else? Is anyone on for Garlock?

20 MR. TURLIK: Yes. John Turlik.

21 MR. O'DONNELL: Richard, this is Bob O'Donnell.

22 MR. GLASSER: How are you feeling.

23 MR. O'DONNELL: I have had better days, but I
24 can't miss the show, so I am here.

25 MR. GLASSER: Where are you?

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1 Mr. O'DONNELL: I am in my office. I have my
2 door closed so nobody will feel bad that I am here.

3 MR. GLASSER: Okey-doke. I am, of course,
4 appearing here on behalf of the plaintiffs, and I have Karen
5 Zello, a lawyer in my office, and I am going to ask the
6 other people to introduce themselves.

7 THE DEPONENT: Marcy Duncan.

8 MR. CELBA: Steve Celba for Dana.

9 MR. NADOLINK: Erik Nadolink for Dana.

10 MR. GLASSER: I am going to ask that the witness
11 be sworn in just a moment. But I want to at least on the
12 record clarify one thing.

13 There is ongoing discovery with regard to Dana in
14 these matters. I have been in some conversation with Tom
15 Biggers with regard to privileged documents, and we hope to
16 get going through those documents, and we certainly reserve
17 the right to conduct additional discovery of this witness if
18 we find that some of the documents that come out of our
19 in-camera hearing with regard to privilege require further
20 inquiry.

21 I don't need a response to that. That is simply
22 a statement.

23 And I'm going to ask the court reporter please to
24 swear the witness.

25 MR. NADOLINK: Erik Nadolink. I am not privy to

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1 Mr. Glasser's discussions with Mr. Biggers that relate to a
2 case pending in Portsmouth, and we haven't had any such
3 discussions with respect to this case pending in Newport
4 News.

5
6 MARCELLA L. DUNCAN, was sworn and deposed on
7 behalf of the Defendants, as follows:

8 EXAMINATION

9 BY MR. GLASSER:

10 Q. Would you state your full name, please?

11 A. Marcella Lee Duncan.

12 Q. And can you give us a little bit about your
13 background and your current residence?

14 A. I live at 13710 South Kendall Drive in
15 Plainfield, Illinois. I have worked for Dana Corporation
16 since November 4th, 1968. I am currently the Sales
17 Operations Manager for the Ceiling Products Division of Dana
18 Corporation. I work in the Lisle, Illinois office. It is
19 called the Lisle Technical Center in Lisle.

20 Q. And you have been designated as a witness by Dana
21 in certain trials here in Virginia?

22 A. Yes, sir.

23 Q. Can you tell us what your understanding is of the
24 role that you are to play as a witness?

25 A. That I am to speak to you concerning sales

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1 records that I am the custodian for.

2 Q. And you are talking about the sales records that
3 exist, am I correct?

4 A. Yes, sir.

5 Q. And do these sales records include all products
6 that were made by Victor and Dana?

7 A. No, sir. Just Victor, the old records for Victor
8 Manufacturing and Gasket Company, and then when Dana
9 acquired Victor, the sales records that have been created
10 subsequently through the Victor Products Division. There
11 has been several names for the divisions, Victor Reinz, and
12 now called the Ceiling Products Division, and it is related
13 to gaskets.

14 Q. Do you know how early the records go back that
15 you will be testifying about?

16 A. I don't know the exact dates. But I have seen
17 records back to the 1930s.

18 Q. And when you started with Victor, you started
19 right out of high school?

20 A. Yes, sir.

21 Q. And you had no specialized training or
22 information concerning the sales that had been made by
23 Victor prior to your coming on board?

24 A. No, sir.

25 Q. What was your salary for the year 2003?

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1 A. Let's see. It was \$62,000.

2 Q. And are you a salaried or an hourly employee?

3 A. Salaried employee.

4 Q. And does your responsibilities at Dana include
5 the responsibility to testify?

6 A. My job responsibilities are not -- I am Sales
7 Operations Manager. It has nothing to do with any testimony
8 that I might give on Dana's behalf.

9 Q. Are you paid extra when you testify, or
10 differently?

11 A. No, sir.

12 Q. What about your travel arrangements?

13 A. They do pay all of my business travel expenses.

14 Q. But you receive no extra compensation whatsoever?

15 A. I receive nothing extra. No, sir.

16 Q. Do you have stock in Dana, either in your own
17 name or in your retirement account?

18 A. No stock in Dana.

19 Q. Do you have stock in anything related to Victor
20 or Dana, or the nature of the job that you have?

21 A. No. The only thing that I have is a 401-K
22 through the company. And I believe it is managed by
23 Vanguard.

24 Q. And did I understand you to say that does not
25 include stock in the Dana Corporation?

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1 A. Correct. I have no stock in Dana.

2 Q. The \$62,000 compensation that you received, is
3 that inclusive of all bonuses?

4 A. No. Depending on our -- if we meet our sales
5 forecasts for the division, it will depend on whether we get
6 a bonus every year based on sales, meeting our sales
7 forecast, so once in a while we will get a bonus. That's
8 usually anywhere from 5 to 10 percent of our annual salary
9 if we made a bonus.

10 Q. But your annual salary for 2003 was approximately
11 \$62,000?

12 A. Yes.

13 Q. How many times have you testified at the request
14 of Victor Dana?

15 A. I don't know exactly. I believe it is probably
16 around a half dozen, or a dozen times. Twelve to fifteen
17 times.

18 Q. And does that include your testimony both in
19 depositions, such as we are doing now, and in trials?

20 A. Yes, sir.

21 Q. And when was the first time that you testified?

22 A. Approximately four years ago. I believe it was
23 January. And it was either 2000 or 1999. I can't remember.

24 Q. Do you remember where?

25 A. Yes. In Texas.

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1 Q. And was the purpose of that testimony the same as
2 you have previously described, namely to tell of existing
3 sales records or cards?

4 A. Yes.

5 Q. And are you scheduled to testify in Virginia in
6 the next several weeks?

7 A. Just today that I know of.

8 Q. Have you been told about whether or not you will
9 be coming as a witness to trial in Virginia?

10 A. No, sir.

11 Q. Do you generally get advance warning?

12 A. No, sir.

13 Q. Or notice?

14 A. No, sir.

15 Q. And so they simply tell you to be in Newport
16 News, Virginia, and you will make sure that you are there?

17 A. As a general rule they will tell me like a
18 schedule, ask me what days I have available for deposition
19 testimony, if I am going to be travelling for the company,
20 and my sales responsibilities, to make arrangements, and
21 they will ask me for certain days. Usually, I will know a
22 week or so ahead of time.

23 Q. But has anyone told you about any trial that's
24 upcoming in Newport News, Virginia?

25 A. No.

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1 Q. Now, I saw mention in one of the depositions a
2 witness fee of \$2,700?

3 A. Yes. For expenses.

4 Q. And that was paid to you?

5 A. No, sir.

6 Q. That was paid to the company?

7 A. Yes, sir.

8 Q. And it was based on what expenses?

9 A. My travel expenses and hotel out to California.

10 Q. You showed me a photograph of your husband. I
11 just need to clarify. Am I correct that he had his accident
12 on Sunday?

13 A. Sunday morning.

14 Q. And was it an automobile, or bicycle?

15 A. Bicycle.

16 Q. And what were his injuries?

17 A. Shall I describe the event?

18 Q. Well, in terms of fractures?

19 A. He had a cheek bone fracture and nose fracture.
20 Because he is on heart medicine, Plavix -- it is an
21 anticoagulant -- he had a lot more swelling than he would
22 normally. So he had swelling like from above his eye and
23 all the way down, a lot of blood pooling in his -- the side
24 of his face.

25 Q. And I trust that he is doing better now?

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1 A. I hope so.

2 Q. Did he have surgery?

3 A. No, he did not have to have surgery. On Tuesday
4 we went to multiple doctors. One of them was a plastic
5 surgeon so that they could view the x-rays and the damage to
6 see if surgery was needed to get the bones aligned up, and
7 they said that the bones were in line and would heal
8 naturally. So he does not have to have surgery. And
9 nothing -- he had no tooth or jaw damage, so the oral
10 surgeon didn't have to do anything there. And they will
11 check him out again in about three weeks to make sure
12 everything is doing well.

13 Q. Who at Dana did you notify of your husband's
14 injuries?

15 A. I went to work Monday morning and I notified my
16 boss and the people that I work with, because they were
17 going to have to take some of my responsibilities for
18 Tuesday when I had to take him to the doctor. And human
19 resources.

20 Q. Now, you have previously mentioned in another
21 deposition that you had family in Tidewater?

22 A. Yes.

23 Q. What type of family do you have in Tidewater?

24 A. One of my mother's brothers lives in Chesapeake,
25 and his children. I have six cousins and their families

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1 that live in this area.

2 Q. And you had a grandfather and/or an uncle who
3 worked at a shipyard?

4 A. Yes, sir.

5 Q. And tell me about that?

6 A. It was my grandmother and grandfather that moved
7 their family out here in the '40s. And my mother went to
8 school here, and my grandfather worked at the Naval
9 shipyards. And two of my uncles, for a short period of
10 time, and one uncle who still resides here retired from the
11 shipyards after 40-some years.

12 Q. And when you say that they lived here, where was
13 that, Chesapeake or where?

14 A. It was called Deep Creek. I guess it is now
15 called Chesapeake. It was where they lived.

16 Q. And what was your grandfather's trade?

17 A. I think -- I guess -- I really don't know. I
18 remember him having a farm in Illinois. So I don't know
19 exactly what he did here.

20 Q. But do you know the details of any of the work
21 that your grandfather or your two uncles did at the
22 shipyard?

23 A. I know the one uncle that ultimately retired from
24 the shipyard worked on engines and things like that. He is
25 a mechanic.

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1 Q. Would they be engines aboard ship, or --

2 A. I don't know.

3 Q. Now you indicated that you had made sales calls
4 in this area?

5 A. Yes.

6 Q. When did you make those calls?

7 A. It has probably been about five years ago. It
8 was the last time that I made a direct sales call here four
9 or five years ago.

10 Q. So we are talking 1999?

11 A. Approximately, yes.

12 Q. And I am assuming that these calls did not
13 involve the sale of any asbestos-containing materials made
14 by Victor or Dana?

15 A. No, sir, they did not.

16 Q. And what did they involve?

17 A. Part of my sales responsibilities are house
18 accounts. And I have gasket sales, and sales of gasket
19 sheet material are part of my responsibilities, and those
20 are the items that I would handle here.

21 Q. And who are your customers?

22 A. General Electric Apparatus in Chesapeake is one
23 of them. Southland Industries. Stihl chain saws in
24 Virginia Beach was one of my customers. Still is.

25 Q. And did you have customers in other areas other

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1 than southeast Virginia?

2 A. Yes.

3 Q. And how far was your sales area?

4 A. Because I have house accounts, I had the entire
5 United States. And raw materials, entire United States, and
6 some outside of the U.S.

7 Q. And by house accounts you are describing sales
8 made directly by Victor or Dana to the distributor?

9 A. No, sir. A house account is an account that is
10 small dollars, small volume, and so it doesn't justify a
11 full blown sales account manager. They get company cars and
12 that type of thing, and they have to go on regular visits to
13 the customer. House accounts are mainly maintained
14 in-house. The customers will call in orders, or talk to one
15 of my people, or to me. And that type of thing. They don't
16 require the same kind of customer care.

17 Q. Were all of your customers the actual users of
18 the product? Did any of them, to your knowledge, resell the
19 product? Southland, for example?

20 A. Southland would buy gaskets from us that they
21 would use on like Ford, assemblies for Ford Motor Company or
22 General Motors. Like a water pump assembly, or something
23 like that. I'm not sure exactly what all they do make. And
24 they would place the gasket on the assembly and then sell
25 the end assembly to Ford. So I don't know exactly what you

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1 would call that. It didn't go on the actual vehicle at that
2 time.

3 Q. Southland didn't use it itself. Southland sold
4 it to another purchaser who was the ultimate end user?

5 A. Yes.

6 Q. Do you know who the -- did you have any gasket
7 distributors here in the Virginia area that Victor Dana sold
8 to?

9 A. We didn't sell to distributors. We sold to, as I
10 said, like someone who would put a kit together or something
11 like that, or would actually apply the gasket to the vehicle
12 themselves and sell the vehicle. So we would sell to like
13 General Motors, OE service. I believe they would stock
14 dealers and things like that.

15 Q. Did you sell sheet gasket material to entities
16 who resold it?

17 A. I don't know what the resale conditions were of
18 any of those type of customers. We sold the materials to
19 them. Many of them consumed them in their own gasket
20 manufacturing.

21 Q. So I take it from what you are saying that you
22 did not deal with any distributors here in Virginia?

23 A. Not distributors.

24 Q. And you did not deal with any entities who
25 redistributed your product in the North Carolina area?

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1 A. I don't know what they did with the materials
2 other than manufacturing their own gaskets.

3 Q. Do you have any way to determine what your sales
4 were to Virginia in any given year? Going back to the
5 times that we are dealing with, times of the microfiche
6 records?

7 A. The only way to determine sales is to go through
8 all the microfiche records. Our sales records are -- normal
9 course of business, the old records were not kept by
10 customer, they were kept by part number. Or by the material
11 number, raw material number on our sales cards. And the
12 only way that I can tell by a particular customer, you have
13 to go through all the microfiche cards, all the sales
14 records and physically look for a specific customer.

15 Q. We will talk about that at some length later.
16 But let me continue with some preliminary questions that I
17 have.

18 Have you ever been to the Newport News
19 Shipbuilding Company?

20 A. No. Not to Newport News -- not to Newport News.

21 Q. Have you ever been to Norfolk Naval Shipyard?

22 A. I don't know what the name of the one my uncle
23 worked for. I went with him one time.

24 Q. And was that simply a family visit, or a sales
25 visit?

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1 A. He took me to talk to a couple of his old work
2 people. It wasn't really a sales visit. It was just to
3 show me.

4 Q. When was this?

5 A. Oh, brother. Four years ago.

6 Q. And what were you supposed to talk to these
7 people about?

8 A. Basically just he introduced me to some of the
9 people that he worked with. He showed me -- he was still
10 working as a consultant at that time, so I got to go in with
11 him to see what they did.

12 Q. It was a social visit, not a visit for Victor
13 Dana?

14 A. Yes. More or less.

15 Q. Have you ever been to Norfolk Shipbuilding and
16 Dry Dock Company?

17 A. I don't know the name of the one that I went to.
18 It -- I know where it is at. Norfolkco?

19 Q. Norshipco?

20 A. Norshipco. Yes, that's the one.

21 Q. Have you ever been present when gasket material
22 was being manufactured?

23 A. At our plants, yes.

24 Q. And that would include the manufacturer of
25 asbestos-containing gasket materials?

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1 A. I do believe, yes.

2 Q. Have you ever been present when gasket materials
3 were being installed?

4 A. Yes.

5 Q. And when was that? Or how frequently has that
6 occurred?

7 A. Not that frequently. We had -- I worked in
8 Churubusco at the oil seal manufacturing plant for many
9 years. One of the buildings on the property was a training
10 center for the product planning technicians. They would
11 tear engines down and put them back together, and I was
12 present at several of the demonstrations there for showing
13 where the gaskets would go on the engines and that type of
14 thing.

15 Q. Have you been present when gasket material was
16 being ripped out or removed?

17 A. Yes.

18 Q. Have you been present when gasket material was
19 being sanded or filed?

20 A. No.

21 Q. Do you know whether the gasket operations that
22 you have described were asbestos-containing gaskets?

23 A. No, I don't know.

24 Q. Have you been present when Dana Victor
25 asbestos-containing gaskets or gasket materials were being

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1 tested for the release of airborne asbestos fibers?

2 A. No.

3 Q. If I understood your prior testimony, your first
4 testimony was for ^{four} or five years ago?

5 A. Yes, sir.

6 Q. When were you first contacted about that
7 testimony? How did the fact of your providing testimony
8 come about?

9 A. As I recall, I was asked to read an affidavit and
10 fill out an affidavit for this particular litigation. And I
11 signed that, and as a result of that I was called to testify
12 in Texas concerning what I had written on the affidavit.

13 Q. Who asked you to sign the affidavit?

14 A. It would have been our Dana legal group.

15 Q. In-house, or outside counsel?

16 A. I think it was a combination. I have worked with
17 many people over the last few years and I really don't
18 recall who specifically asked me that first time.

19 Q. And who drafted that affidavit? Was it drafted
20 by the lawyers?

21 A. They drafted part of it. And I filled, I put in
22 my verbiage to the questions that they asked me.

23 Q. And what was the nature? Do you remember the
24 contents of that affidavit?

25 A. No, sir, I don't.

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1 Q. Do you have a copy of it available with your
2 records?

3 A. I probably might have, yes.

4 Q. Would you make an inquiry and let Mr. Celba know?

5 A. Yes.

6 MR. GLASSER: And we, of course, in our notice,
7 issued a request that she bring with her materials. We
8 would like a copy. Is that a problem with you all?

9 MR. NADOLINK: We can look into it. I think the
10 notice you had says documents she has to rely on in this
11 case.

12 MR. GLASSER: I would like to see the affidavit.
13 Is that a problem?

14 MR. CELBA: We have to take a review of it,
15 Richard, and get that to you immediately.

16 MR. GLASSER: Thank you.

17 BY MR. GLASSER:

18 Q. Did you in fact testify in Texas?

19 A. I had a deposition. Is that the same as
20 testifying?

21 Q. Yes, ma'am.

22 A. Yes, sir.

23 Q. And since that time when your testimony has been
24 presented again roughly twelve to fifteen times, you meet
25 each time with counsel for Dana?

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1 A. Not always, no, sir.

2 Q. Are you provided information about what you are
3 to testify about?

4 A. It says records, yes. They tell me that I am
5 being asked about the sales records that I am the custodian
6 of.

7 Q. And by the sales record you are referring to the
8 microfiche?

9 A. Microfiche. The, like the customer master
10 listing. Things like that.

11 Q. Have you ever testified for Victor Dana in a case
12 other than on the issue of the microfiche or the records
13 that still exist?

14 A. No. It has always been sales records relating to
15 our gaskets.

16 Q. If I understood correctly, you are not even aware
17 that there is a trial scheduled in Newport News, to start
18 Monday, September 20th?

19 A. I didn't know.

20 Q. And no one has talked to you about providing any
21 testimony there?

22 A. They haven't.

23 Q. Are you aware as to whether there is a trial set
24 where you have been named as a witness in Newport News in
25 November of 2004?

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1 A. No.

2 Q. Have you done anything to prepare for a trial in
3 Virginia, be it in September, or November, 2004?

4 A. No.

5 Q. Have you been asked to do anything to prepare?

6 A. No.

7 Q. Do you know what the case involves?

8 A. Asbestos.

9 Q. But you are simply assuming that that's what is
10 involved, or you don't have any details on the case?

11 A. No.

12 Q. And I know the answer, but so the record is clear
13 you don't have any indication of the work history of the
14 people who are involved in these asbestos cases?

15 A. No, sir.

16 Q. No one has shared with you any of the testimony
17 that has come forward in discovery depositions about the use
18 of the Victor products?

19 A. No, sir. I have to go back a little bit. All I
20 know is this relates to shipyards. That's all I know.

21 Q. Well, tell me what you know about which
22 shipyards, or what it relates to?

23 A. U.S. Norfolk Naval Shipyard is involved in what I
24 am testifying on today, I understand.

25 Q. And do you know anything about the Newport News

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1 Shipbuilding and Dry Dock Company?

2 A. No.

3 Q. And I am probably repeating myself, but to be
4 sure, you haven't done any review of any records as they
5 relate to Newport News Shipbuilding and Dry Dock Company?

6 A. The only review of Virginia records that I have
7 ever done was for a case last year that I was involved in
8 here with you where I did go through our customer listing
9 for customers in Virginia.

10 Q. And you have not done anything for the cases that
11 I am describing in September and November of 2004?

12 A. No, sir.

13 Q. When you were hired in 1968, to your knowledge
14 who was the most knowledgeable person concerning sales of
15 asbestos-containing gaskets and gasket materials by Victor
16 Dana?

17 A. I had no idea when I was hired at that time.

18 Q. And you don't know who oversaw the sales?

19 A. No, sir.

20 Q. Okay.

21 A. Not at that time.

22 Q. Am I correct that you have never been in charge
23 of recording sales or shipments of asbestos-containing
24 Victopac, gaskets and raw material during your years at
25 Victor Dana?

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1 A. I have recorded sales of asbestos-containing
2 gaskets while working for Dana Corporation in my years of
3 service, yes.

4 Q. To what extent has that been your responsibility?

5 A. Part of my job responsibilities and inventory
6 record keeping and sales.

7 Q. And when did those responsibilities start?

8 A. In 1968.

9 Q. But you have never been in charge of that
10 operation?

11 A. No, I wasn't in charge of the operation. No.

12 Q. Do you know when you made your first sales of
13 asbestos-containing gaskets or gasket material, raw material
14 for Victor Dana?

15 A. It would have been the early 1980s.

16 Q. Is the first time you made a sale?

17 A. That I recall.

18 Q. And any information that you have today about
19 sales prior to 1980 would not be based upon your personal
20 experience?

21 A. Only on my personal knowledge.

22 Q. On knowledge that you have acquired starting
23 when?

24 A. I would say since I worked with Victor.

25 Q. But as I understand your testimony you were never

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1 directly involved with any sale of asbestos-containing
2 gasket or gasket material manufactured by Victor Dana until
3 the early 1980s, am I correct?

4 A. Me personally selling it?

5 Q. You personally.

6 A. Correct.

7 Q. Can you tell me the total volume of
8 asbestos-containing gaskets and gasket materials sold by
9 Victor, whether it is measured in weight, sheet, gaskets, or
10 dollars for any time during the 1930s?

11 A. No, sir.

12 Q. The 1940s?

13 A. No, sir.

14 Q. The 1950s?

15 A. No.

16 Q. The 1960s?

17 A. No.

18 Q. The 1970s?

19 A. No.

20 Q. And into the 1980s?

21 A. No.

22 Q. Can you tell me how many asbestos-containing
23 materials, how many different kinds of asbestos-containing
24 materials were manufactured by Victor in the 1930s?

25 A. No.

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1 Q. The 1940s?

2 A. No.

3 Q. The 1950s?

4 A. No.

5 Q. The 1960s, prior to 1968?

6 A. Not off the top of my head without researching I
7 cannot, no.

8 Q. We will talk about researching.

9 What about the 1970s.

10 A. No.

11 Q. What about the 1980s up until 1988?

12 A. No.

13 Q. You are aware, are you not, that Victor
14 Manufacturing and Gasket Company promoted itself as being
15 the world's largest gasket manufacturer. Are you aware of
16 that?

17 A. The Victor Manufacturing and Gasket Company?

18 Q. Yes.

19 A. I am not aware of that.

20 Q. Are you able to identify this 1955 brochure that
21 I have placed in front of you?

22 A. It appears to be a copy of one of the catalogs
23 issued by the Victor Manufacturing Gasket Company, yes.

24 Q. And you see where it says the world's largest
25 gasket manufacturer?

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1 A. Yes, sir.

2 Q. Do you have any information to dispute that claim
3 that they made?

4 A. No, sir.

5 Q. Do you have any reason to suspect the, or
6 question the authenticity of this document?

7 A. I would have no way of knowing if it was correct
8 or not.

9 MR. GLASSER: Mr. Court reporter, if you will
10 work with us we will get you a clean copy of this, and I
11 would ask that it be marked as Duncan exhibit number 1.

12 (Victor Gasket Guide 16th Edition,
13 May 1955, consisting of seven pages, was
14 marked Exhibit No. 1.)

15 BY MR. GLASSER:

16 Q. Based on your answers to this line of questions,
17 Mrs. Duncan, am I correct that you can't tell me how long
18 Victor Manufacturing and Gasket Company was the largest
19 gasket manufacturer in the world? How long before 1955, or
20 how long after 1955?

21 A. I don't know who or what company was the largest.
22 We use a lot of methods of advertising to promote our
23 business.

24 MR. GLASSER: Let's go off the record just for a
25 second.

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1 (Discussion off the record)

2 (Recess)

3 BY MR. GLASSER:

4 Q. Mrs. Duncan, I am showing you what has been
5 marked as Duncan number 1. Have you seen this before?

6 A. I believe that I have the actual catalog, yes.

7 Q. And I trust then that you are aware that Dana
8 indicated that it made gaskets for a number of industries,
9 including marine engines, industrial engines?

10 A. Yes, sir.

11 Q. And they also boasted of the fact that their
12 products met military requirements.

13 MR. CELBA: I object to the form there.

14 MR. GLASSER: What is the objection.

15 MR. CELBA: Argumentative, boasted. I don't
16 think it is necessary to include that term.

17 BY MR. GLASSER:

18 Q. That they stated that they represented --

19 A. I see the writings in the book, yes.

20 Q. And you agree that they indicated that they met
21 the military requirements for the sale of the gasket
22 material? Just a yes or a no?

23 A. It doesn't say we need to meet military
24 requirements specifically in this statement.

25 Q. Do you know whether the products met military

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1 requirements or not in 1955?

2 A. Some of our materials met military specs, yes.

3 Q. And that's because of the QPLs, isn't it?

4 A. I forget what QPL exactly means.

5 Q. Have you heard that term before?

6 A. Yes, yes.

7 Q. In the past you have said that you weren't
8 familiar with that term.

9 A. May I explain?

10 Q. Surely.

11 A. The concept I am very familiar with. I simply
12 didn't know that the term was used to describe the concept.

13 Q. Do you know what you need do to be approved for
14 the qualified products list known as QPL?

15 A. Yes.

16 Q. What do you need to do to be approved on that
17 list?

18 A. The military will provide material specifications
19 required for a particular vehicle application. And our
20 materials, we will list what our materials are capable of,
21 temperatures, compressibility, recovery, the actual
22 characteristics of the gasket or the material. If the two
23 are the same, then the government would put our material as
24 listed as one of the approved materials on the list.

25 Q. But it is not restricted to any vehicle? It can

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1 be for gasket sheet material, can't it?

2 A. It depends on the military spec.

3 Q. But on the QPLs that Victor had its Victopac
4 approved for, it was for an asbestos-containing compressed
5 asbestos material, wasn't it?

6 A. I am not familiar with the actual specifics of
7 the mil specs.

8 Q. Do you know when Victor first sought and received
9 approval to make sales to the military?

10 A. No.

11 Q. You have no information on that?

12 A. No.

13 Q. It talks in this brochure, exhibit 1, about
14 asbestos millboard. Are you familiar with the asbestos
15 millboard product?

16 A. I have seen it. I know what it is. Yes.

17 Q. And was it a product from which gaskets could be
18 cut?

19 A. It was a product used in combination with other
20 materials to make a gasket.

21 Q. And do you know whether it contained
22 approximately 80 percent asbestos content by weight?

23 A. I don't know how much asbestos was in it, no.

24 Q. But you are aware that it did contain asbestos?

25 A. Yes, sir.

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1 Q. As reflected by its name?

2 A. Yes, sir.

3 Q. And in terms of the last page of exhibit number
4 1, in terms of the industries served, does it show a large
5 vessel or ship?

6 A. It shows a picture of a large ship in the
7 industries served area, yes.

8 Q. And does it also talk in terms of Victor being a
9 supplier of OER equipment.

10 A. It lists suppliers of OER equipment on this page.

11 Q. Does it specifically list ships and submarines?

12 A. It lists submarines and ships, but we didn't make
13 submarines and ships.

14 Q. I am not suggesting that you made submarines and
15 ships, but you made equipment for submarines and ships,
16 gasket equipment; is that correct?

17 A. Well, I wouldn't call it gasket equipment, but we
18 made gaskets that would go on --

19 Q. Submarines and ships?

20 A. Vehicular type stuff for submarines and ships.

21 Q. When you say vehicular, I think automobile?

22 A. Oh, there's trucks. There's tanks. There's
23 internal combustion engines is what our primary gasket
24 production -- that's our market. And predominantly
25 vehicular.

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1 Q. Predominantly vehicular. And there are a bunch
2 of things that are included here, including cars and trucks.
3 But I am asking, doesn't this brochure confirm that they
4 sold material for use aboard submarines and ships.

5 MR. CELBA: I object. It has been asked and
6 answered. But go ahead and answer.

7 A. We sold to those markets, yes, for specific
8 engine applications. I am not familiar with any engine on a
9 ship that we supplied a gasket for that ran the ship. No.
10 BY MR. GLASSER:

11 Q. Firstly this is 1955, and you finished high
12 school in 1968, and you have already testified that you knew
13 nothing about the Victor operation prior to your coming on
14 board.

15 MR. CELBA: I object to the form. I don't think
16 that was the correct testimony.

17 BY MR. GLASSER:

18 Q. Was that not your testimony?

19 A. When I started with Victor in 1968 -- I am sorry.
20 When I started with Dana in 1968, that day that I walked in
21 I had no prior knowledge of any of their materials,
22 customers, sales, products, et cetera.

23 Q. And in 1955 you had no information as to where
24 Dana or Victor sold asbestos-containing gaskets and gasket
25 materials, correct?

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1 A. When I was five years old in 1955, I had no
2 knowledge at that time.

3 Q. And anything that you have now is based upon what
4 you have been told or shown?

5 A. Or researched myself.

6 Q. And we can talk about the completeness of the
7 ability to research, but you have no personal knowledge to
8 in any way contradict the limit, or limit what this brochure
9 says in 1955?

10 A. I am familiar with all the records that I have
11 looked at that go back to the 1930s. I have never, ever,
12 seen any reference to a gasket made for an engine that ran a
13 ship or a submarine, period.

14 Q. What about a gasket that went on a pipe? Have
15 you seen that? You understand that gaskets made by Victor
16 went on pipes, don't you? Just yes or no?

17 A. We made flange gaskets.

18 Q. And you knew your gaskets could go on a flange,
19 correct, and you knew your gaskets could go on a valve,
20 correct?

21 A. I am not familiar with valve gaskets.

22 Q. Are you familiar with gaskets that go on pumps?

23 A. Water pumps, yes, sir. Yes.

24 Q. I think the problem in our communication is you
25 are talking about vehicles, and I am not talking about

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1 something that had to be used aboard a ship.

2 I am talking about something that was usable
3 equipment on a ship, such as pipes, valves, flanges, and
4 pumps. And you have no information to suggest that Victor
5 gaskets couldn't be used in that mode, do you?

6 A. I don't show any -- I have not found any sales of
7 specific gaskets to a specific application on a ship or a
8 submarine.

9 Q. But you found sales to the United States Navy?

10 A. There are sales of gaskets. Some gaskets to the
11 U.S. Navy. They are vehicular gaskets.

12 Q. You have found sales to the U.S. Navy. True or
13 false?

14 A. I found --

15 MR. CELBA: I object. Asked and answered.

16 MR. GLASSER: Steve, you can object if you want,
17 but I am going to repeat the question.

18 MR. CELBA: Go ahead.

19 A. I have seen gasket, vehicular gasket sales to the
20 U.S. Navy, yes.

21 BY MR. GLASSER:

22 Q. Is Victopac a vehicular gasket, or a gasket
23 material in your mind?

24 A. Victopac is a gasket material that can be used in
25 multiple applications.

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1 Q. You don't know from the records that you have
2 reviewed who the end user is of products that were sold by
3 Victor, isn't that correct?

4 A. In some cases we are selling to the end user,
5 such as the original equipment manufacturer. So, yes, we do
6 know what the end use of that gasket is, and we are selling
7 to that original equipment manufacturer. Yes, we do have
8 some of that knowledge.

9 Q. I thank you for that answer, but my question was
10 not that. My question was in all instances, not in some
11 instances, you don't know who the end user of your product
12 is going to be, do you? Your records do not reflect who
13 installed the gaskets that were sold, do they?

14 A. We know where the gaskets went, but not the
15 specific person who may have installed the gaskets.

16 Q. And you don't know where they were installed, do
17 you?

18 A. Gaskets are manufactured for a specific
19 application.

20 Q. Is Victopac manufactured for a specific and only
21 one specific application. That's not correct, is it?

22 A. I am sorry. My statement was for gaskets.
23 Victopac is a gasket material that when sold to someone you
24 do not know, I do not know what they are going to do with
25 it. Where they are going to cut it. We sell it as a sheet

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1 of material with specific characteristics. And then what
2 you cut from it, I do not know.

3 Q. Thank you for that clarification. And what you
4 are saying is that you don't know when it is going to be
5 used, correct, when you sell Victopac sheet gasket. You
6 don't know when it is going to be used?

7 A. Not exactly when. We give them shelf life
8 information if they need it, yes.

9 Q. And you don't know where it is going to be used?

10 A. Only the general temperature application
11 characteristics.

12 Q. And you don't know how it is going to be used?

13 A. To seal some engine, or a joint, or something,
14 you know, what it does.

15 Q. It has multiple uses, and you don't know the
16 specific use it is intended?

17 A. I know the use it is intended for, what we sell
18 it for, yes. We give -- we will give specific
19 characteristics. If someone uses it for something outside
20 of that, we don't know, or can't control.

21 Q. But when you sell it you don't know whether the
22 Victopac compressed asbestos-containing sheet is going to be
23 used on a car or on a ship, or on a pipe or a flange, or a
24 valve or a pump. Am I correct?

25 A. If I am selling you a Victopac material it has

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1 limited uses. It could not be used on say a head gasket.
2 You couldn't use that material on a head gasket. So there
3 are some -- you wouldn't want to -- I couldn't say that you
4 would not do that, but you wouldn't want to.

5 Q. The limitations that you are describing don't
6 limit the fact that Victopac was able to have multiple uses?

7 A. Victopac has multiple uses, but there is limits.

8 Q. The limit in terms of maybe temperature needs, or
9 compression needs?

10 A. Suitability. Robustness. Things like that would
11 make a difference as to whether you would use it in a
12 particular application.

13 Q. Where was Victopac manufactured within the
14 corporate locations of Victor Dana?

15 A. During what years?

16 Q. During the 1950s.

17 A. It was made at the Chicago Churubusco based
18 facilities.

19 Q. And in Chicago did the plant burn? Was there a
20 fire in Chicago?

21 A. That wasn't until the 1990s. There may have been
22 something earlier that I am not aware of.

23 Q. When -- excuse me. Were you through?

24 A. Part of -- we had a fire in the building in the
25 1990s.

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1 Q. For what period of time were the Victopac
2 materials manufactured at the Robinson plant?

3 A. The Robinson plant was built in 1965. So they
4 would have started manufacturing some of the Victopac
5 material after the completion of the plant.

6 Q. And did they continue to manufacture the Victopac
7 asbestos-containing materials at Robinson until 1988?

8 A. Yes.

9 Q. And you were never employed at Robinson?

10 A. That is correct.

11 Q. And I might have misspoken, but am I correct that
12 the Chicago plant as it was initially was, was torn down?

13 A. The Chicago plant was torn down, yes.

14 Q. And that was before you were employed?

15 A. No.

16 Q. After you were employed?

17 A. Yes, sir.

18 Q. And some of their records were burned in the
19 early 1990s?

20 A. There were records in the tower that were burned
21 in the fire in the 1990s.

22 Q. Prior to 1967, to your knowledge did Dana ever
23 manufacture, sell or distribute any asbestos-containing
24 material?

25 MR. CELBA: Object. Lack of foundation.

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1 BY MR. GLASSER:

2 Q. If you know.

3 A. Dana Corporation was a customer of the Victor
4 Gasket and Manufacturing Company. And there were -- they
5 did purchase some of the gaskets from them that contained
6 asbestos, yes.

7 Q. And they had been doing that over what period of
8 time?

9 A. I don't know.

10 Q. But they had been a long-term customer?

11 A. I don't know.

12 Q. They had been long-term enough so they were
13 interested in buying the company in 1967?

14 A. I know they purchased the company in 1967. I
15 don't know their legal terms of the acquisition.

16 Q. And there were a number of the Victopac
17 asbestos-containing asbestos gasket materials in terms of
18 size and thickness, were there not?

19 A. Physical? You are asking about physical size?

20 Q. Yes, ma'am.

21 A. We would make a specific Victopac material and
22 shear it in different sizes and would manufacture it in
23 different gauges, thicknesses.

24 Q. And much of it had asbestos-containing contents?

25 A. Several of the gasket materials did contain

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1 asbestos as one of the components, yes.

2 Q. And many of them contained, you have told me
3 before when we met in the court in Portsmouth, roughly 80
4 percent asbestos to -- asbestos content by weight?

5 A. I don't know by weight. The composition of
6 Victopac was approximately 80 percent fibers and 20 percent
7 binders and what we call rare-earth like micas and clays and
8 those types of things.

9 Q. But by 80 percent fibers you are saying 80
10 percent asbestos fibers?

11 A. Yes, sir.

12 Q. And do I understand that of the numbers assigned
13 to the various forms and gauges of Victopac, anything that
14 did not end with a 9 was asbestos-containing? Victopac 1,
15 Victopac 1B. Victopac 14 would be --

16 A. That was the general -- how do you say it? How
17 you told -- when we converted the materials to nonasbestos,
18 we changed the number to have a 9 at the end for the
19 Victopacs.

20 Q. Do you know how many plants worldwide in the
21 Victor Dana corporate family made asbestos-containing sheet
22 gasket material in the 1950s?

23 A. No.

24 Q. Or '60s, and the same is true for the '70s and
25 the '80s?

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1 A. No.

2 Q. The same is not true, or you don't know?

3 A. Not without just off the top of my head guessing,
4 no.

5 Q. So you don't know where, other than Robinson,
6 Victopac asbestos-containing material was made around the
7 world in the Victor Dana organization?

8 A. I know we made it in Mexico. That's the only one
9 that I am sure of.

10 Q. Were any of the Mexican manufactured products
11 brought to this country?

12 MR. CELBA: I am going to object to that. Lack
13 of foundation.

14 BY MR. GLASSER:

15 Q. Do you know?

16 A. I don't know.

17 Q. Now, am I correct that there was the ability to
18 make markings, or stamps, or logos on the
19 asbestos-containing gasket material manufactured by Victor
20 Dana?

21 A. You could mark the material, yes.

22 Q. And some of it was marked?

23 A. Yes, sir.

24 Q. And some of it was marked with the Victor logo?

25 A. Yes.

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1 Q. And some was marked with the logo of a customer
2 who wanted it marked with their name on it?

3 A. Yes. We would put Caterpillar's name on the
4 material, or if you were talking about gaskets, you stamped
5 the part number sometimes.

6 Q. Did you ever see a Victor or Dana gasket or
7 gasket material that had the word "caution" on it?

8 A. No.

9 Q. Hazard?

10 A. No.

11 Q. Warning?

12 A. On the gaskets?

13 Q. Yes, ma'am.

14 A. No.

15 Q. Did you ever see any document where Victor Dana
16 stated any caution or hazard concerning exposure to
17 asbestos-containing gaskets or gasket material that it was
18 manufacturing or distributing?

19 A. I have seen what is called MSDS sheets.
20 Material Safety Data Sheets that will have specific
21 information related on them about components used in gasket
22 materials.

23 Q. Over what period of time, Mrs. Duncan, have you
24 seen MSDS sheets?

25 A. For sure, absolutely since I have been back with

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1 the Victor Division since 1988 I have seen lots of MSDS
2 sheets.

3 Q. Now the MSDS sheets that you saw when you came
4 back in 1988, did you return in May of 1988?

5 A. Yes, sir.

6 Q. And in June of 1988 you have testified that they
7 stopped making the asbestos-containing gasket material,
8 gasket raw material?

9 A. That is correct.

10 Q. And the MSDS sheets that you saw, were they
11 before or after the asbestos had been taken out of the
12 Victor Dana product in June of 1988?

13 A. There are both. I have seen both.

14 Q. And when you saw the earlier ones before they had
15 taken asbestos out, did they talk in terms of diseases?
16 Have you seen the term mesothelioma on the MSDS sheets?

17 A. I don't know that I have seen that word on the
18 sheets.

19 Q. Have you seen diseases mentioned or described?

20 A. The only thing that I recall seeing is, as far as
21 an MSDS, I don't know if you are familiar with them. It
22 lists all of the materials that are in them. And any
23 precautionary characteristics or things that you would want
24 to do around the materials, if it is like a chemical that
25 smells, or anything like that, we ship these to our

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1 customers. I don't really read them specifically.

2 Q. But to focus on asbestos, do you remember what
3 the precautions, MSDS sheets said about using, installing,
4 modifying or removing asbestos-containing gasket materials?

5 A. I know it has got spaces on there for health, but
6 I have not really read them. I know it is there.

7 Q. You know it is there, but you haven't read them.

8 A. Not really read them, no.

9 Q. Do you remember any mention of protective
10 equipment that should be worn when working with Victor Dana
11 asbestos-containing gasket material?

12 A. (Deponent shook head)

13 Q. You are shaking your head no?

14 A. I am sorry. No. I know we have masks in the
15 chemical area for some of the chemicals and coatings. I
16 would not be the one to ask about all those. I would ask
17 engineering.

18 Q. Let me show you a copy of a document which on its
19 face states that it is a Victor gasket guide for the 50th
20 anniversary from 1909 to 1959. Have you seen this before?

21 A. Yes, sir. It is a copy of the catalog front
22 cover.

23 Q. And this is at least a 1959 publication?

24 A. Yes, sir.

25 Q. And did Victor start making its gaskets as early

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1 as 1909?

2 A. Yes, sir.

3 Q. And Victor was a rather heavy user of asbestos
4 material, was it not?

5 MR. CELBA: I am going to object to the form.

6 BY MR. GLASSER:

7 Q. Was it?

8 A. I don't know. I couldn't classify heavy or light
9 as far as their use.

10 Q. I am turning in this document to page 2. And it
11 talks about Victor, the world's largest manufacturer of
12 gaskets, oil seals and packing. Do you see where I am
13 referring to?

14 A. I see where you are referring to, yes.

15 Q. And it talks about raw materials.

16 A. Yes.

17 Q. And it talks about raw materials that are used
18 annually? Am I correct?

19 A. Yes.

20 Q. And would you read for me the raw material that I
21 have highlighted here on my copy of this document?

22 A. Right here?

23 Q. Yes, ma'am.

24 A. It says 7 million pounds of asbestos millboard.

25 Q. Is that, in your opinion, a substantial amount of

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1 annually used asbestos by Victor Corporation?

2 A. That's asbestos millboard. That's a combination
3 of components, including asbestos.

4 Q. And asbestos ran approximately 80 percent of the
5 millboard too, didn't it?

6 A. I don't know, sir. On the millboard I don't
7 know.

8 MR. GLASSER: I am going to offer this, please,
9 as Duncan exhibit number 2.

10 And off the record.

11 (Discussion off the record)

12 (Victor 1909 - 1959 50th Anniversary
13 Gaskets - Oilseals, VMG-25-0000150
14 through 157 and VMG-25-0000159 was marked
15 Exhibit No. 2.)

16 BY MR. GLASSER:

17 Q. Mrs. Duncan, how were the Victopac
18 asbestos-containing compressed gasket sheets wrapped when
19 they were being sold in volume?

20 A. If we sell gasket, the Victopac, it can be sold
21 in rolls. Of the paper goods. It can be sold in rolls. It
22 is rolled up and has like a, looks like grocery bag paper,
23 brown paper, with wrapping paper like rolled up around it.

24 Sheets were sold laying flat on a metal, or, I am
25 sorry, a wooden skid. And wrapped like with shrink wrap.

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1 You band it to keep them. You don't want them to get
2 damaged, because they can't use the whole sheet if anything
3 is damaged.

4 Q. To your knowledge did any of the wrappings or the
5 rolls that you have described ever contained any type of a
6 health warning about the use of those asbestos-containing
7 products?

8 MR. CELBA: I object. Lack of foundation.

9 Go ahead.

10 A. I am not familiar with warnings on the gasket
11 materials.

12 BY MR. GLASSER:

13 Q. But you never saw one. You never saw a warning
14 on any of the wrappings of any of the Victopac?

15 A. I didn't see any warnings on the wrapping of the
16 Victopac.

17 Q. Or on the product itself?

18 A. I have not seen any warnings on the product.

19 Q. And you have never seen any indication as to how
20 or what precautions should be taken when using the product?

21 A. Please repeat that.

22 Q. You have never seen anything on the wrapping or
23 on the product itself to tell you how, what precautions
24 should be taken when using the product?

25 A. We give instructions on application with gaskets

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1 that are sold to other -- in kits, and things like that.

2 You have instructions on how to install the gaskets.

3 Q. Do you give special instructions for
4 asbestos-containing gasket material as distinguished from
5 non asbestos-containing gasket material?

6 A. I don't know about those.

7 Q. When did you first hear the term mesothelioma?

8 A. Probably five years ago. Four or five years ago.

9 Q. Were you aware of the term asbestosis?

10 A. I heard that term, yes, sir.

11 Q. You mentioned your grandfather and uncles. To
12 your knowledge did any of them -- were any of them ever
13 diagnosed with any asbestos-related disease?

14 A. No, sir.

15 Q. Do you of your own knowledge know from whom
16 Victor Dana purchased the asbestos that ~~he~~^{it} used?

17 A. No, sir.

18 Q. Do you know what type of asbestos was used?

19 A. (Deponent shook head.)

20 Q. You are shaking your head no?

21 A. I heard a term called --

22 Q. Of your own knowledge, do you know what type of
23 asbestos was used in the asbestos-containing products
24 manufactured by Victor Dana?

25 A. No.

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1 Q. Do you know how the asbestos was inventoried?

2 A. No.

3 Q. Did you know how much was used?

4 A. No.

5 Q. Who were the buyers of the asbestos that was
6 purchased by the Victor Dana Corporation?

7 A. I don't know.

8 Q. Was Mark Birch a purchaser at the Robinson plant?

9 A. He was up until just recently. I don't know for
10 how long.

11 Q. Do you know whether he would have been the one to
12 have purchased the asbestos that was used by Victor Dana
13 when it was making asbestos-containing gasket material?

14 A. No. I wouldn't know. I don't know.

15 Q. Is he related to Susan Birch?

16 A. I believe she is his sister-in-law. I know she
17 is his sister-in-law.

18 Q. Was Tom Mills involved with purchasing?

19 A. Tom Mills was a purchaser of Caterpillar kit
20 components. I know that.

21 Q. Would he have purchased asbestos-containing
22 materials for use in the Dana Victor asbestos-containing
23 materials?

24 A. I don't know.

25 Q. What about Larry Irvin?

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1 A. He is also -- he is a purchaser now. I don't
2 know for how long he has been purchasing.

3 Q. Who would have been purchasing for Robinson in
4 the '70s?

5 A. Jack Cunningham was one of the purchasing people,
6 though I do not know what components he was responsible for
7 purchasing.

8 Q. What about the '60s?

9 A. I don't know how long he was there. I know names
10 of some of the people who were in purchasing when I came to
11 work for Dana in the Robinson plant, but I do not know what
12 they purchased specifically.

13 Q. And when was Robinson built?

14 A. 1965.

15 Q. And where was Victopac manufactured, the
16 asbestos-containing Victopac asbestos sheet gasket material
17 prior to 1965?

18 A. In the Chicago plant.

19 Q. Any other plants in the United States?

20 A. Not that I know of.

21 Q. Who in the Victor Dana organization was
22 responsible for health and safety of employees as it relates
23 to asbestos exposure in the 1940s?

24 A. I don't know.

25 Q. In the 1950s?

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1 A. I don't know.

2 Q. In the 1960s?

3 A. I don't know.

4 Q. In the 1970s?

5 A. I don't know.

6 Q. In the 1980s, up until 1988?

7 A. When I came to Victor in 1988, came back to
8 Victor, Tom Staub was the environmental manager person for
9 the division at that time. I don't know how long he had
10 been.

11 Q. Did Victor Dana have an industrial hygiene
12 department, or employ any industrial hygiene firm, to your
13 knowledge?

14 A. I don't know.

15 Q. And that would be true from the '40s, '50s, '60s,
16 '70s?

17 A. I don't know.

18 Q. And into the '80s?

19 A. I don't know.

20 Q. Did Victor Dana have a medical department to
21 address any issues relating to asbestos disease that you are
22 aware of?

23 A. I don't know of anything like that.

24 Q. Have you seen any documents while at Victor Dana
25 to confirm that it did testing to determine the release of

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1 asbestos from the cutting or installation or removal of
2 asbestos-containing gaskets?

3 A. I am not familiar with anything like that.

4 Q. And you have never seen any such documentation?

5 A. No, sir.

6 Q. Do you know whether any of the Victor Dana
7 asbestos-containing materials have ever been tested to
8 determine how much fiber is released?

9 A. I don't know.

10 Q. Do you know whether dust counts have ever been
11 done at Robinson, 1965 or later, or at Chicago, where the
12 asbestos-containing sheet gasket material was being
13 manufactured?

14 A. I don't know. Those are not my areas of work.

15 Q. Whose area of knowledge and responsibility would
16 that be?

17 A. I would probably talk to Rich Kucharski. He is
18 engineering. That's probably where I would go.

19 Q. Mrs. Duncan, are you aware of any OSHA visits to
20 any of the Dana Victor clients where asbestos-containing
21 materials were being manufactured or used?

22 A. I don't know about any of those things.

23 Q. Are you aware of any OSHA violations --

24 A. No, sir.

25 Q. -- that have been -- that have resulted from the

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1 use of asbestos in any of the Victor Dana plants?

2 A. I am not familiar with any OSHA violations at
3 all, because that's not an area that I am familiar with.

4 Q. I have previously asked you when you first became
5 aware of mesothelioma, and I think you answered in the last,
6 maybe in the last five years. When did you first become
7 aware of the term asbestosis?

8 A. Probably about in the last four or five years.
9 It is on TV all the time.

10 Q. Are you aware of any worker's compensation claims
11 having been filed against Victor or Dana, or arising out of
12 claimed asbestos-related disease or injury?

13 A. I am not aware of any, no, sir.

14 Q. Do you know when the first lawsuit was filed
15 against Victor and/or Dana alleging exposure to asbestos?

16 A. No, sir.

17 Q. Are you aware that there are several hundred
18 thousand suits that have been filed?

19 A. I have heard such.

20 Q. Have you ever heard of the Wellington Group?

21 A. No.

22 Q. Have you ever heard of the Center for Claims
23 Resolution?

24 A. No.

25 Q. Do you know whether Dana was a member of either

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1 of those groups?

2 A. No, sir.

3 Q. Did Victor Manufacturing and Gasket Company ever
4 have any contract units to actually install, modify or
5 remove the asbestos-containing gasket materials that it
6 manufactured and sold?

7 A. I don't know.

8 Q. Who was in charge of sales to the United States
9 Government?

10 A. Sales of --

11 Q. Of asbestos-containing materials to the United
12 States Government?

13 A. Gaskets?

14 Q. Gaskets?

15 A. When? What time period.

16 Q. If you know, in the 1970s?

17 A. It would have been Henry Kerner.

18 Q. And what about the 1960s?

19 A. Henry Kerner was the sales operations manager for
20 I believe almost 30 years.

21 Q. And he is deceased?

22 A. Yes, he is.

23 Q. And remind me, when did he pass away?

24 A. Approximately, it was the late 1970s. It had to
25 be.

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1 Q. And he was replaced by Mr. Abernathy?

2 A. Yes, sir.

3 Q. Was Mr. Kerner also in charge of sales to the
4 U.S. Navy?

5 A. He was in charge of the same type of house
6 accounts that I currently am, and those would be considered
7 miscellaneous accounts, so he would have been responsible
8 for those particular sales of gaskets to any of the Navy
9 accounts.

10 Q. From your own personal knowledge, do you know how
11 long Victor Dana has been selling asbestos-containing gasket
12 material to the United States Government?

13 A. I don't know exactly what gaskets were sold to
14 the Navy, asbestos or otherwise, or when they started
15 selling gaskets to the Navy.

16 Q. When was the document repository set up at
17 Cooper & Walinski?

18 A. I believe it was started to be set up probably
19 three or four years ago. I am not sure exactly. I
20 shouldn't say that. I don't know exactly when.

21 Q. Prior to three or four years ago, if you know,
22 was there any central source for documents at Dana Victor?

23 A. At Victor Division the sales records are all
24 generally kept in the Lisle, what was then the division
25 offices, now called the Lisle Technical Center, is where we

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1 keep all of our sales records.

2 Q. And did the company have a document destruction
3 policy?

4 A. We have one, and have had a document retention
5 and destruction policy for several years.

6 Q. And was that roughly six or seven years, once a
7 document had been retained for that long it was okay to
8 destroy it?

9 A. It depended on the document. They are
10 categorized by sales type documents, purchase orders, or
11 outside supplier purchase orders, invoices. There are
12 personnel records. There are any type of document, company
13 document is listed in those different years. Some are
14 forever, or fifty years past the, fifty years after the
15 death of the last employee is one of them. I don't know
16 what document, but there is some that are ten years and some
17 that are six years.

18 Q. Do you know how long if -- the retention policy
19 that you are talking about, was that put into writing in
20 1996?

21 A. Oh, no. There was one before that. There has
22 been one before that.

23 Q. And was there a document retention policy with
24 regard to sales invoices?

25 A. Yes. Yes.

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1 Q. And what is it?

2 A. I don't know exactly the years on all of them.
3 I'd have to look at the book to do that.

4 Q. And where are those sales invoices that have been
5 retained?

6 A. Some of the invoices -- the invoices are at the
7 plants. It is the plants that actually make the sale of the
8 gasket, and so invoices would have been a plant record,
9 along with shippers, copies of shippers, those types of
10 things. Those are kept at the plants.

11 Q. And are any records retained at Robinson
12 concerning the Victopac asbestos-containing compressed
13 gasket materials that were made there from 1965 forward?

14 A. I don't know what the year span is, but they have
15 the sales invoice records. They have some there for
16 Robinson plant, yes.

17 Q. And were the prior records maintained at the
18 Chicago plant when the Victor product was being manufactured
19 there?

20 A. They would keep, each plant would keep their own
21 plant specific records in the plant, so they would keep
22 invoices at the plants.

23 Q. Have you attempted to look at those records with
24 regard to Victopac asbestos-containing manufacturing records
25 or invoices?

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1 A. I don't -- I didn't look at them, no.

2 Q. In your process of offering testimony, you never
3 had occasion to go look at the invoices?

4 A. I have not gone to look at the invoices, no.

5 Q. Am I correct that some of the invoices at Chicago
6 were in fact burned in a fire in the 1990s?

7 A. There were records burned.

8 Q. Do you know how many of them were invoices?

9 A. No, sir.

10 Q. Do you know who would know?

11 A. If anyone would know it would probably be Gary
12 Austin. He was the plant manager of the Chicago plant at
13 that time.

14 Q. Mrs. Duncan, we know now that QPL -- you
15 understand that means qualified products list?

16 A. Yes, sir.

17 Q. Do you know when Victor Dana first sought to have
18 its asbestos-containing compressed gasket material approved
19 on the qualified products list?

20 A. I don't know anything about the approval process.
21 When, dates, no.

22 Q. Do you know who was responsible for obtaining it?

23 A. No.

24 Q. Do you know how many times Victor Dana has
25 renewed its status as an approved listee on the qualified

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1 products list for asbestos-containing compressed sheet
2 gasket material?

3 A. I don't -- no. No. What you are saying, as far
4 as getting approval on the list, I don't know that you -- I
5 am not aware of anyone with within Dana Victor soliciting
6 government to get on the list. I don't know how that is
7 done.

8 Q. You are aware that Victor Dana has requested that
9 its Victopac be approved for government purchases?

10 A. No.

11 Q. You are not aware of that?

12 A. No.

13 Q. All right.

14 A. I don't know how the process is done.

15 Q. Are you aware that it has been done by Dana
16 Victor?

17 A. I don't know what -- I don't know what that
18 process is.

19 Q. But my question is, are you aware that Victor
20 Dana has sought to have its asbestos-containing compressed
21 gasket material approved and placed on the qualified
22 products list?

23 A. No.

24 Q. You are not even aware that it has been done?

25 A. No. I don't know how to explain this. I know

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1 that if my, say, for example, Victolex material, Victorite
2 material is on a government print for a gasket. I don't
3 know the process to have gotten it there. I don't know how
4 that is done.

5 Q. Do you know why it is done?

6 A. It is done -- it is a qualified supplier list.
7 It is like, unless they have approved certain suppliers for
8 materials, it is a validation of a material that works for a
9 particular application that they want, I guess.

10 Q. Is it fair to state that your understanding is
11 unless you have sought and received approval on the
12 qualified products list you can't sell the product to the
13 government?

14 A. I know if you are not on the list you can't sell
15 the product to the government.

16 Q. And if you want to sell it to the government
17 you've got to take the initiative to get on the list?

18 A. Somehow you have to get on the list. I don't
19 know how that process is done. I don't know.

20 Q. Are you aware of the various purchasing agencies
21 of the United States Navy?

22 A. No.

23 Q. Do you know what agencies purchase materials for
24 the United States Navy?

25 A. No.

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1 Q. Are you familiar with the General Services
2 Administration?

3 A. I've never heard of that one.

4 Q. Are you familiar with the Defense Industrial
5 Supply Center?

6 A. I've heard of Defense Industrial Supply Center,
7 yes.

8 Q. Are you familiar with the Navy Supply Center?

9 A. I haven't heard that one.

10 Q. Are you familiar with the Fleet Industrial Supply
11 Center?

12 A. I don't recall that one.

13 Q. Are you familiar with the Defense Construction
14 Supply Center?

15 A. I've never heard of that.

16 Q. Have you heard of other agencies that do purchase
17 for the Navy?

18 A. I have seen like supply officer, but I don't know
19 the name of the group that they are with.

20 Q. Victor Dana sold to Sears Roebuck, didn't it? Or
21 do you know?

22 A. I don't know.

23 Q. You are not able to state today that all purchase
24 contracts for asbestos-containing compressed asbestos
25 material made by Victor Dana exists today, am I correct?

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1 A. Can you ask me that again.

2 Q. You are not -- can you not state that all
3 purchase contracts exist today that reflect sales by Dana
4 Victor of asbestos-containing compressed gasket material?

5 A. What do you mean purchase contracts? I have
6 got --

7 Q. Purchase orders. Evidence of sale. You can't
8 say that all that exists today?

9 A. Our manufacturing plants are the keepers of any
10 purchase orders when we process them through my department,
11 and this has been historical. The plants keep the copies of
12 the purchase orders because they are the ones who make the
13 gaskets. They are the ones who sell the gaskets. So they
14 also would keep the copies of the sales invoices.

15 Q. But my question to you, can Marcy Duncan state
16 that every contract for the sale of asbestos-containing
17 gasket material that we have sold at Victor Dana is still
18 available?

19 A. I don't know.

20 Q. You can't state that?

21 A. I can't tell you that, no.

22 Q. When did you first learn of the microfiche
23 records? Was that when the attorneys approached you?

24 A. No.

25 Q. About your testimony?

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1 A. No, sir. I am the Sales Operations Manager and
2 part of my responsibilities are the maintenance and
3 retention of sales records, and those were sales records in
4 my department when I got the job in 1988.

5 Q. And my question is when did you first learn of
6 those microfiche records? I assume from what you are saying
7 it is sometime after 1988, and I am asking approximately
8 when?

9 A. I am sorry. May of 1988 when I became the sales
10 operations manager I was given all the records that I would
11 be responsible for, and those were part of them, the
12 microfiche records.

13 Q. And that was the first time that you were aware
14 of --

15 A. Yes, sir.

16 Q. Can you tell me today from your own knowledge as
17 to what dates the microfiche records cover?

18 A. I can't tell you the dates that they cover
19 beginning -- I have to go through every single microfiche
20 record. But the records that I have looked at, I have seen
21 some that date back into the 1930s. And the microfiche was,
22 were created in 1988. I have the date written somewhere.
23 But, it was in the, I believe it was, 1988. It is when they
24 were created off the original sales records.

25 Q. When the microfiche was done, when the film was

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1 done --

2 A. Yes, sir.

3 Q. -- was it done under your direction?

4 A. No, sir.

5 Q. I take it, but I want the record to be clear, of
6 all the writing that appears on the roughly 69,000 cards,
7 none of that writing is you?

8 A. That is correct.

9 Q. And you played no role whatsoever in creating the
10 cards that ultimately were microfiched?

11 A. That is correct.

12 Q. And you have no means of determining how complete
13 or incomplete those records were in 1998 when they were
14 microfiched?

15 A. Those records were the manual record keeping
16 system used in the course of business for the Victor
17 Manufacturing Gasket Company, and subsequently Victor Dana,
18 and when it became Victor Dana, that was their method of
19 recording quotations and sales, so they would be as complete
20 as anything that I would ever know about.

21 Q. But my question is, you can't state how complete
22 or how incomplete they are?

23 MR. CELBA: I object to the form of the
24 question. It has been asked and answered.

25 MR. GLASSER: Your objection is noted. I would

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1 like an answer to my question.

2 BY MR. GLASSER:

3 Q. They were just presented, and you are saying
4 that's what I got, and I can't tell you how complete or
5 incomplete they are?

6 A. It is a complete record of all the sales records
7 that were generated.

8 Q. That existed. Not generated. Not generated.
9 That were existing. Am I correct?

10 MR. CELBA: I am going to object. It has been
11 asked and answered and you are being argumentative with the
12 witness now.

13 MR. GLASSER: You can note the objection. I want
14 an answer to my question.

15 BY MR. GLASSER:

16 Q. The microfiche was done of the records that
17 existed in 1998, correct?

18 A. Yes, it was a compilation of sales records used
19 in the normal course of business for many, many, many years.
20 I can't tell you the exact beginning. I can only tell you
21 some of the dates.

22 Q. You can't tell the beginning, when it started,
23 and you can't tell whether it is complete or not with regard
24 to sales that were actually made, from your own personal
25 knowledge?

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1 A. If you are asking me if there is a card missing,
2 I could not tell you if there was, or was not.

3 Q. And you can't say whether there is a card
4 missing, or a thousand cards missing?

5 A. I would certainly hope there are not a thousand
6 cards missing in our business records, sir.

7 Q. But you can't testify that there are not. You
8 can only hope that there are not.

9 MR. CELBA: Again, argumentative. Asked and
10 answered. I object.

11 A. These are records that we have and it is as
12 complete as anything that I know of. If you are asking me,
13 do I know that every single one of them exists, I cannot
14 tell you that.

15 BY MR. GLASSER:

16 Q. Do you know how many different people made
17 entries on the cards that are a part of the microfiche?

18 A. No.

19 Q. Do you know the names of any of the people who
20 did?

21 A. Oh, yes.

22 Q. What portion of the cards have you looked at, all
23 69,000?

24 A. No.

25 Q. What portion of the ones that you have looked at

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1 are illegible?

2 A. I am sorry. We have to go back over that number
3 of 69,000. That is a number of records that I believe you
4 got from the last, the case last year. Those are records --
5 that's a number of records that, specific sales line records
6 that I reviewed for a previous case. There are not 69,600
7 records. There are 900,000 records of sales history. There
8 are 103 microfiche cards. Each of the cards contain 624
9 sales cards, of which each of those contain 15 lines of
10 sales history.

11 Q. And --

12 A. I have personally looked at, at least for that
13 case last year, 69,600 lines of records. That's where that
14 number is coming from.

15 Q. You looked at 69,000 lines of roughly 900,000
16 lines?

17 A. Over 900,000 lines. I looked at lots more, but
18 that was the figure specific to a specific case.

19 Q. In that instance you looked at substantially less
20 than 10 percent of all there was on microfiche?

21 A. I reviewed all raw material records and they
22 consisted of 69,600 lines of sales records. That was a
23 specific area that I was asked to look at. And those were
24 the only records for those.

25 Q. The only records that you know of that exist for

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1 those, would that be a correct restatement?

2 A. Those are the historical sales records for the
3 raw materials that we have.

4 Q. That exist?

5 A. For sales and quotation history.

6 Q. That exist, and existed in 1988?

7 A. Yes.

8 Q. Am I correct that in order for Victor Dana to
9 make a sale there was no requirement in order to complete
10 the sale that a notation be made on the line of the index
11 card; is that correct?

12 A. If you made a sale, you didn't.

13 Q. If a sale was made by one of the people who had
14 entered on the cards, and they forgot to put it on the
15 cards, that didn't mean the sale didn't go through, it was
16 intended to be a handwritten record of sales, am I correct?

17 MR. CELBA: I object. That's a compound
18 question now.

19 But answer it the best that you can.

20 A. The sales card records that are microfiched are a
21 compilation of quotations, handwritten lines, whenever
22 quotation was issued to a customer, and they are also
23 records of purchase orders received from customers for a
24 subsequent sale. These are orders recorded from a customer
25 that they expected us to deliver the product to them from.

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1 It is not the shipping record.

2 BY MR. GLASSER:

3 Q. And in fact it doesn't show where the product was
4 shipped?

5 A. Some of the records list the name of the company
6 and the city and state address of the customer. Some of
7 them only list the name of the company or the entity.

8 Q. And my question again, it doesn't show where the
9 products were shipped?

10 A. I understand your question. It shows who ordered
11 the product.

12 Q. But that's not my question. My question is, does
13 it show where the products were shipped. Yes or no?

14 A. The assumption is that the entity who ordered it
15 is who we shipped it to. But that is an understood in the
16 course of business it does not specifically state where the
17 product was shipped to.

18 Q. And so if it shows U.S. Navy, you don't know, and
19 the records can't tell where it was shipped to?

20 A. The sales cards list U.S. Navy. It does not list
21 anything other than the name U.S. Navy. Where it was
22 shipped would not be on that record anywhere.

23 Q. And you wouldn't know?

24 A. From looking at that record I would not know.

25 Q. Nor would you know when that product was used?

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1 Correct?

2 A. You do not know exactly when a product is used.
3 You are assuming that it will be used within an expected
4 shelf life period of the purchase.

5 Q. What is the shelf life for asbestos-containing
6 compressed gasket sheeting?

7 A. It would depend on the manner in which it is
8 stored and kept. Atmospheric conditions. If it is near
9 salt water, if it is in air conditioning, climate
10 controlled.

11 Q. It can last a long time though?

12 A. As a general rule we say around five years in
13 optimum conditions.

14 Q. And to repeat my question, you don't know when
15 the products that you shipped were used?

16 A. A specific date, no.

17 Q. And you don't know where they were used?

18 A. The normal business assumption is that they are
19 used at the entity where you ship the product.

20 Q. My question is, Mrs. Duncan, is you from your own
21 knowledge don't know where the products that were shipped
22 were used? Correct?

23 Correct or incorrect?

24 A. Well, sometimes.

25 Q. What was my question?

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1 A. I am sorry?

2 Q. What was my question?

3 MR. CELBA: Now you are getting argumentative.

4 Repeat the question back, or read it back.

5 MR. GLASSER: I ask the court reporter to read it
6 back. All I ask that I get an answer to my question.

7 (The pending question was read by the court
8 reporter.)

9 A. I did not see where the product was used, no
10 BY MR. GLASSER:

11 Q. And you didn't see who used it?

12 A. No.

13 Q. And you don't know around whom it was used? Yes
14 or no?

15 A. You assume that the people ordering the product
16 are using the product, but, no, I did not physically see who
17 was using the product.

18 Q. And you don't know how long it was used?

19 A. Correct. I do not know how long what was used?

20 Q. You don't know how long the product sold by
21 Victor Dana, the asbestos-containing compressed gasket
22 material, was used?

23 A. I am getting lost.

24 Q. I don't mean to get you lost. When you come in
25 here, someone brought you records in 1988 and microfiche

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1 them, and you don't know where those products were shipped?
2 When they were shipped. Where they were used. How they
3 were used. How long they were left where they were used.
4 When they were removed. Whether they were ever altered, you
5 don't know any of that information. Am I correct?

6 MR. CELBA: I object. Asked and answered.
7 Compound question.

8 Go ahead.

9 BY MR. GLASSER:

10 Q. Do you understand my question? I am asking it in
11 this fashion to orient you. I would prefer it to have the
12 individual questions that I have asked, but you are saying
13 that you are confused. I don't want you to be confused.
14 You are under oath and I want to know exactly what you can
15 personally and truthfully testify to, and what you have to
16 say, I don't know. That's a fair answer if in fact you
17 don't know.

18 And you don't know when it was used, or how long
19 it was used; do you?

20 MR. CELBA: Same objection.

21 A. I do not know.

22 BY MR. GLASSER:

23 Q. To make sure that I'm clear, Mrs. Duncan, if some
24 of the records that are referred to on the lines of the
25 cards that were microfiched go back to the 1930s, and this

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1 microfiche process was not done until 1988, some of those
2 entries would have been more than 50 years old when the
3 microfiche was done; is that correct?

4 A. Yes, sir.

5 Q. And a number of them would have been done before
6 you were born?

7 A. Yes, sir.

8 Q. And the cards that were microfiched are not
9 sequentially numbered, are they?

10 A. They are numbered by part number, gasket part
11 number. We have part numbers for all the gaskets, and they
12 are in sequence of the gasket number, in consecutive
13 sequence number.

14 Q. All of the cards did not come out of one pile,
15 the first one being numbered 1, the second being numbered 2,
16 the third one being number 3, and so on?

17 A. No, sir. The cards themselves do not have a
18 specific record number for the blank card.

19 Q. Now, did I understand you to say that the
20 purchase orders, the invoices, would have been created and
21 issued at the plant of manufacture?

22 Can I help?

23 A. Which purchase orders?

24 Q. When Robinson, when the Robinson plant was making
25 Victopac in 1965 and forward, the invoices reflecting sales

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1 of asbestos-containing Victopac would have been generated at
2 Robinson and kept at Robinson. Is that correct?

3 A. I am confused. In this question here, you first
4 were asking me, started asking me about purchase orders. I
5 thought that you might be talking about the plants buying
6 supplies. And then you asked me about invoices.

7 Q. Let me try to clarify.

8 When asbestos-containing compressed gasket
9 material was made at Chicago, or Robinson, and there was a
10 purchase of that material, the plant that made it would be
11 the plant that created the paperwork concerning that sale?

12 A. The shipper and the invoices, yes. The plant
13 that manufactured the goods and shipped the goods would
14 create the invoice to the customer and the shipper that
15 would accompany the product.

16 Q. Am I correct that sales and quotation records
17 were done at division headquarters and not at the individual
18 plants?

19 A. That is correct. The division headquarters was
20 in the Chicago plant up until 1978.

21 Q. So from '65 to '78 if someone ordered Victopac
22 from Robinson, the sales and quotation records would be kept
23 at Chicago?

24 A. Up until 1978 they were at the Chicago plant.

25 Q. And the purchase and the information and the

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1 shipping information would have been maintained at the
2 Robinson plant?

3 A. The shipper and the invoice for the product
4 shipped would be retained at the Robinson plant.

5 Q. And the people who would be involved in the sales
6 and quotations?

7 A. Can you go back for a minute?

8 Q. Yes.

9 A. I might have misstated. Did you ask me if the
10 purchase order -- the quotation and purchase order were
11 maintained at division? The customers' purchase order.

12 Q. The sales information and the quotation were
13 maintained at the headquarters, but the specific
14 documentation relating to a sale would stay with the plant
15 of manufacture, is that correct?

16 A. The quotation and the recorded written record of
17 the receipt of the customer's purchase order was maintained
18 at the division level. The actual hard copy of the
19 customer's purchase order, along with the shipper for the
20 product, and the invoice for the goods shipped, were all
21 maintained at the manufacturing plant.

22 Q. Have you attempted to review the records at
23 Chicago and Robinson concerning the sale of
24 asbestos-containing gasket materials? Yes or no?

25 A. Any record --

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1 Q. All the records?

2 A. -- at the plant, I don't look at records at the
3 plants.

4 Q. Help me to understand the corporate history of
5 the use of computers at Victor Dana. Am I correct that
6 prior to 1971 or 1972 there were no computers?

7 A. No, that's not correct. The Robinson facility
8 had a computer service that was local prior to that time.

9 Q. And what did that computer service do? What type
10 of documents, data base records were involved? If you know?

11 A. I don't know.

12 Q. Am I correct that in 1971 or 1972 that Dana
13 Victor converted from more or less manual record keeping to
14 a computer?

15 A. At the oil seal plant in Churubusco, and at the
16 Chicago plant, the transition from manual record keeping in
17 production inventory sales started in 1971 and 1972.

18 Q. And the sales records for 1972 to 1980 are in a
19 raw data form. Is that correct?

20 A. Say that again.

21 Q. The sales records from 1972 to 1980 are in a raw
22 data form?

23 A. The gasket sales records for that period, I
24 believe up to 1980 -- maybe a little later than that even,
25 are on what is called our base. It is raw computer data.

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1 Q. All right. And they are not readable by lay
2 people?

3 A. Correct.

4 Q. And if you wanted to review that information you
5 would have to program a format to get back into that
6 information?

7 A. Our base is a software package that I don't even
8 know if it exists any more as a usable tool, current tool.
9 It is, in 1989, when we went to the current computer system
10 that we have right now, all of those previous records that
11 were on computer from the '71, '72 period up to then were
12 put on this, our base, data base for historical purposes and
13 interchange purposes. And as time passed we did not need to
14 use those records as much and so they were never converted
15 to anything that's current.

16 Q. And now the data base on which that information
17 is obsolete and is not, you are not able to access it by the
18 computers, by the subsequent computer program?

19 A. That is correct.

20 Q. And so the information from '72 to '80 is no
21 longer the subject of any current computer program that
22 works?

23 You are shaking your head yes.

24 A. I am kind of half thinking. We cannot currently
25 access that information on anything we have right now.

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1 Q. You are unable to look at the records from 1972
2 to roughly 1980?

3 A. You can look at them, but you can't read them.
4 They are like -- I don't know what it is called in computer
5 language, but it is the symbols, binary stuff.

6 Q. You can't read them in a meaningful fashion?

7 A. Correct.

8 Q. Now am I correct that you don't know if Victor
9 Dana maintained invoices from the 1947 to 1967 period?

10 A. I don't know -- you mean right now do we have
11 this?

12 Q. Do you have them now, invoices from the 1947 to
13 '67 time frame. Do you know?

14 A. I don't know what is available with invoices.

15 Q. Am I correct that you may not be able to research
16 the sale of gaskets even by part number prior to 1988, due
17 to the computer problems, the computers speaking to one
18 another and the problems that you have with the incompatible
19 databases?

20 A. The information from the 1971, 1972 time period
21 up to 1988, basically, the sales records and quotation
22 records that are the R base files, they are there, they
23 would have to be, and I don't even know what would be
24 required to program and format that so it would be legible.
25 But the records exist. But I can't go to them today and

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1 look at it and give you information from it. It would have
2 to, computer programming people would have to take the
3 information, and my computer today cannot read it.

4 Q. No one has requested you to look at it, am I
5 correct. No one connected to Dana?

6 A. They can't ask me to look at it. I can't look at
7 it. I am not a programmer to be able to put it in a
8 layman's legible format.

9 Q. Going back to Cooper & Walinski, I understand
10 from what you said that that repository was set up four or
11 five years ago?

12 A. I am not sure when it was started. I was made
13 aware of it then might be better.

14 Q. Thank you. Do you know when it was set up?

15 A. No.

16 Q. Do you know who set it up?

17 A. I don't know who set it up. I know I have
18 contributed a lot of data to it.

19 Q. Do you know who initially requested it?

20 A. No.

21 Q. Do you know what it was for?

22 A. It is records that might be used for, might be
23 called upon for use in asbestos litigation.

24 Q. Is this the first time, to your knowledge, that
25 there has been a document repository for purposes of

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1 asbestos litigation at Victor Dana?

2 A. At Dana. On Dana's behalf. Yes.

3 Q. And I have asked the question before, but let me
4 make sure that I am clear on your answer.

5 It is possible to have a sale of gasket material
6 without their being a card line entry completed that would
7 now appear on the microfiche. Let me state that better.

8 Even when the cards were being used, you could
9 complete a sale, Victor Dana could complete a sale whether
10 or not it put the notation on the cards that were eventually
11 microfiched; isn't that true?

12 A. All I can tell you is that the record keeping was
13 the way of the normal business. That's our job now, and
14 people in the past, to record the daily business records.
15 And that's what we were supposed to do. That's what people
16 were to do before. So that it is part of our job to do
17 that. I can't tell you if there is information, all the
18 information was to be put on cards.

19 Q. Should have been. You can't say that it was?

20 MR. CELBA: I object to the calls for
21 speculation.

22 MR. GLASSER: That's exactly my point. You can't
23 speculate and say it was always done. All you can say is
24 that it should have been done.

25 MR. CELBA: I am going to object.

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1 Argumentative.

2 BY MR. GLASSER:

3 Q. Am I correct?

4 Yes or no.

5 A. It is our job to do that.

6 Q. Do you recall my question?

7 A. I cannot tell you if somebody never did it. I am
8 screwing my answer up.

9 All I can tell you is that that's what we were
10 expected to do for our job. I can't tell you if a person
11 did or did not do their job.

12 Q. The cards that ended up on the microfiche were
13 not the actual order form and they were not the invoice,
14 were they?

15 Yes or no.

16 A. They are a record of quotations delivered and
17 orders received from customers, not the invoices. Invoices
18 were not on the sales cards. I mean a record of an invoice
19 is not on the sales card.

20 Q. The records that were shown on the cards that
21 were microfiched in 1988 identify certain products by code;
22 am I correct?

23 A. They are part numbers. Or it specifically says
24 what the product is. Like on the raw materials, at that
25 time they didn't have a part number. It said, Victopac 1.

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1 It actually gave the name of the product. Everything else
2 is by Victor internal part number. Gasket number.

3 Q. Are there any existing records today to fully
4 explain the codes that were used? Yes or no?

5 A. The part number system that's used to record the
6 gaskets, there is a written, I guess template. I use
7 template for lack of a better word. There is a scheme to
8 tell you what the numbers mean and how to assign part
9 numbers.

10 Q. Do you have a copy of that?

11 A. In my office. I don't have one with me. But,
12 yes, I do have a copy of that.

13 Q. Can you make that available to Mr. Celba?

14 A. Yes, I can.

15 Q. And would you make it available to us, please?

16 MR. CELBA: We will review the request and get
17 back to you immediately on it.

18 BY MR. GLASSER:

19 Q. Mrs. Duncan, you don't know whether the codes
20 that identify parts changed, or how much they changed
21 between the 1930s and the 1980s, do you?

22 A. Of course I do. They are part numbers. They are
23 each, when a gasket is made for a specific application, it
24 has a print, it is identified. It has an identification.
25 Like a tag. That is a part number. That's an internal part

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1 number that is assigned based on a specific criteria set up
2 by Victor when they started making gaskets.

3 It exists today. It is the same system I use
4 today for a brand new vehicle, for a brand new gasket we
5 will go to this numbering system and choose a number based
6 on the type of gasket that is.

7 Q. Please listen closely to my question.

8 A. I am sorry.

9 Q. I appreciate your words, but my question was, has
10 the code changed from the 1930s to the 1980s for a given
11 part?

12 You don't know, do you?

13 MR. CELBA: I am going to object.

14 But go ahead.

15 A. You are using the ^{WORD} cord code. It is not a code.

16 BY MR. GLASSER:

17 Q. Has the part number changed? If a product has
18 been made from the 1930s to the 1980s you don't know whether
19 that part number was ever changed during those intervening
20 50 years, do you?

21 A. For this, for a particular gasket, for one
22 particular gasket, and I am talking indicative of all the
23 gaskets that I want to pick one. It has a part number. It
24 was created for a 1930 engine. And we started making the
25 gasket and gave it a number. If I am still making that

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1 gasket today, the materials may have changed, but the part
2 number has not.

3 Q. When did Victor Dana start making the compressed
4 asbestos-containing sheet, raw material for gaskets?

5 A. I don't know.

6 Q. Was it making it in the '30s?

7 MR. CELBA: Object to that. That has been asked
8 and answered.

9 BY MR. GLASSER:

10 Q. You don't know?

11 A. I don't know when they started making it.

12 Q. You don't know of anyone who can truthfully
13 testify that the microfiche records going back to the 1930s
14 is a complete set of every sale and quotation record?

15 MR. CELBA: I am going to object. It has been
16 asked and answered. It is argumentative and calls for
17 speculation. Vague and ambiguous.

18 But go ahead.

19 BY MR. GLASSER:

20 Q. Do you know of anyone who can say that the
21 microfiche records are complete for every sale and quotation
22 given since the 1930s?

23 A. I can't name anyone that can tell you that we
24 don't have everything that we kept over the years in the
25 microfiche. I don't know if all the records are not there.

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1 Q. My question is, do you know of anyone at Victor
2 Dana who can testify that they are all there? Yes or no.

3 MR. CEL A: B Same objection.

4 A. I am no different than anyone else. I can tell
5 you I don't know if anything is not there. I can't tell you
6 if everything is there, or is not there.

7 Y MR. GLASSER:

8 Q. And you don't know of anyone who can tell
9 definitively yes, it is all there. No, this portion is
10 missing.

11 MR. CEL A: B Same objection.

12 A. I can't give you the name of anyone that could
13 give you any other different answer than I have just given
14 you. I know of no person.

15 Y MR. GLASSER:

16 Q. Is there a complete customer list that exists
17 today for the purchasers since the 1940s of the Dana Victor
18 asbestos-containing gasket materials?

19 A. We have a complete compiled customer list right
20 here. I brought one of them.

21 Q. And how large is that list?

22 A. It is 177 pages of customer record, addresses, on
23 computer paper.

24 Q. And when was that generated?

25 A. This list was compiled in 1988.

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1 Q. Was it compiled under your supervision?

2 A. This record was compiled under my supervision,
3 yes.

4 Q. And was the record accurate as of 1988?

5 A. It was a complete compilation of all of the
6 records up to 1988.

7 Q. And compilation starting when? How far back does
8 it relate. If you know?

9 A. I don't know exactly.

10 Q. And how was it compiled?

11 A. This particular record was printed off of our
12 existing computer system at that time. 1988.

13 Q. And do you of your own personal knowledge know
14 how the information that was on the existing computer system
15 in 1988 got there? What it represented?

16 A. Yes.

17 Q. And what was that information?

18 A. It represented the history, historical customers
19 and current customers of the Victor Manufacturing and Gasket
20 Company and subsequently the Victor Products Division of
21 Dana.

22 Q. And did it name, for example, the U.S. Navy?

23 A. There are listings for the U.S. Navy, yes.

24 Q. You say listing. Is there more than one?

25 A. Yes.

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1 Q. And is it your testimony that if any agency or
2 any entity of the United States Navy purchased it would be
3 on that list?

4 A. If any -- what do you call group?

5 Q. Agency?

6 A. Group, agency of the U.S. Navy requested a
7 quotation and purchased product, it would be on this list.

8 Q. They would all be listed?

9 A. They would all be listed.

10 Q. I asked you earlier whether Sears Roebuck was a
11 customer.

12 A. Yes.

13 Q. Can you determine if they were?

14 A. If they were a direct customer of Victor they
15 should be listed in this book.

16 I don't show them as a direct customer of the
17 Victor Gasket Division in this book.

18 MR. GLASSER: We would like to get a copy of this
19 book.

20 MR. CELBA: Richard, I don't know the
21 proprietary thing about this. We are talking customer list,
22 but we can work that out, I am sure.

23 MR. GLASSER: Well, time is of the essence. And
24 if the proprietary thing is a concern to you, I am happy to
25 clear it with the court.

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1 MR. CELBA: I haven't discussed it with someone
2 who has this. We haven't discussed that with Marcy. Like
3 everything else, we will immediately get back to you on
4 this. Okay.

5 MR. GLASSER: Just because of the time. This is,
6 Friday.

7 MR. CELBA: Right .

8 MR. GLASSER: Close to noon. And we have a
9 trial that starts Monday. What does immediate mean?

10 MR. CELBA: It means that I can make a call at a
11 break. Okay?

12 MR. GLASSER: Okay.

13 A. May I clarify something about this list.

14 BY MR. GLASSER:

15 playQ. You may always clarify things. I want you to
16 clarify everything so that when we read this record we know
17 what your fullest, most truthful understanding is to every
18 question I asked. So I thank you. What do you want to
19 clarify?

20 A. This is a customer master list. And this would
21 reflect people that we quoted to and had subsequent sales
22 to. If I quoted someone and didn't have a sale to them,
23 they wouldn't be in here, necessarily, at all. Okay?

24 Q. Thank you.

25 Mrs. Duncan, we talked about 1955 and whether you

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1 could tell me what the gross sales for that year were.
2 Either measured in terms of gasket sheets, or dollars, for
3 sale. And my understanding is that it can't be done. Is
4 that correct?

5 MR. CELBA: I don't think -- she did not have
6 knowledge.

7 BY MR. GLASSER:

8 Q. You don't know how that can be done?

9 MR. CELBA: I don't think that was the question.
10 I object.

11 BY MR. GLASSER:

12 Q. Do you know whether it can be done?

13 A. I don't know if it can be done. I don't know
14 what the sales were at that year.

15 Q. Do you know whether or not Victor Dana has
16 attempted to reconstruct what its sales were for any year in
17 the 1950s?

18 A. I don't know that, no.

19 Q. And is the same true for the 1960s and the 1970s?

20 A. I don't know of any reconstruction of sales
21 records that do not exist.

22 Q. Back in those --

23 A. Back for those dates.

24 Q. Tell me what you are saying here. Have they
25 attempted to reconstruct their sales for any given year of

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1 asbestos-containing compressed gasket material?

2 A. I don't know.

3 Q. Who should I address that question to?

4 MR. CELBA: If you don't know --

5 A. I don't know. I don't know.

6 BY MR. GLASSER:

7 Q. Are you aware of anything that Victor Dana has
8 done to request or hire anyone to independently validate the
9 completeness of the microfiche records?

10 A. I don't -- that's not ever been done to my
11 knowledge. I don't know how in the world it ever could be
12 done.

13 Q. When you initially briefly testified here in
14 February 2003 in Virginia, did I understand that you had
15 personally reviewed 69,000 of the line entries on the
16 microfiche cards?

17 A. Yes, sir, I did.

18 Q. And you did that yourself?

19 A. Yes, I did.

20 Q. Can you tell me approximately what percentage of
21 them were illegible, unreadable?

22 A. With the naked eye, on the microfiche reader,
23 very little is illegible with -- let me explain.

24 The microfiche reader you can hold a little
25 magnifying thing up to and it obviously magnifies what is on

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1 there. If you are familiar with, and I have the knowledge
2 of a lot of the information that's on there, and if you can
3 read part of a customer name, you know who the customer is.
4 So sometimes though only a portion of it may be legible you
5 can figure it out. So I would have to say that there is
6 very little of the records on the microfiche that are
7 impossible to make out or read.

8 Q. Did I understand when you testified here before
9 that you found no records of sales to the Norfolk Naval
10 Shipyard?

11 A. I found no raw material sales to the Norfolk
12 Naval Shipyard during my research of the raw material
13 records for that specific instance, that is correct.

14 Q. I am going to show you an exhibit and ask you,
15 can you identify what this is?

16 A. This is a copy of a sales card that was
17 microfiched.

18 MR. CELBA: Excuse me. Should we mark this
19 Richard, right now.

20 MR. GLASSER: We can.

21 MR. CELBA: Let's mark it now.

22 (Quotation and Selling Record, Victor

23 No. 1861, was marked Exhibit No. 3.)

24 MR. GLASSER: We were off the record just for an
25 instant and we marked this as exhibit number 3.

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1 BY MR. GLASSER:

2 Q. And you have identified this as a quotation and
3 sales record?

4 A. This looks like a copy of one of the sales cards
5 that was put on microfiche, and it is for a cylinder head
6 gasket. 1861 is the part number. And it lists 15 lines of
7 quote and purchase order, customer, purchase order records,
8 listing about, looks like three different, three or four
9 different customers. It lists actually eight actual
10 purchase orders.

11 Q. And the first one is identified as what customer?

12 A. It says, U.S. Navy, Norfolk Navy Yard,
13 Portsmouth, Virginia.

14 Q. And what is second one?

15 A. U.S. Naval Supply Depot.

16 Q. And where is that U.S. Naval Supply Depot?

17 A. It does not list the location.

18 Q. Where is the location of customer in lines 3, 4
19 and 5. Do you know? They are also U.S. Navy Supply Depot?

20 A. No.

21 Q. Do you know whether they are the same depot, or
22 different depots?

23 MR. CELBA: Wait a second. Could you read that.
24 I think we have the question here, but I am confused.

25 Richard, I am sorry to interrupt. Can you just

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1 ask that question again.

2 BY MR. GLASSER:

3 Q. I understood your testimony to be that the
4 listing of the U.S. Naval Supply Depot in line 2, you don't
5 know where that depot is located?

6 A. I do not.

7 Q. And the same would be true, would it not, for the
8 next three entries?

9 A. That is correct. It appears to be the same.
10 They were quotations issued, and with the use of ditto marks
11 it is apparently the same facility. Where, it does not
12 list.

13 Q. They may not have been the same U.S. Naval Supply
14 Depot?

15 A. They may not have been the same.

16 Q. And then the next entry is the U.S. Navy?

17 A. It is U.S. Navy.

18 Q. And you don't know where that was shipped?

19 A. No, sir, I don't.

20 Q. And no way of telling?

21 A. Not without the original purchase order that's
22 listed on the far right corner.

23 Q. And would you have that purchase order?

24 A. I would not have that, no. That would not be at
25 the Lisle office.

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1 Q. So there is no way the determine where that was
2 shipped?

3 A. I cannot tell by looking at this record the
4 location, no.

5 Q. And if you skip down one, it says, U.S. Naval
6 Supply. Do you see that?

7 A. Yes, I do.

8 Q. Do you know the location of that?

9 A. No, I don't. Not for that line. A few down it
10 says Norfolk, with ditto marks.

11 Q. And that says U.S. Naval Supply, Norfolk, and
12 that's on the third line from the bottom?

13 A. Yes, correct.

14 Q. And the fourth line from the bottom says U.S.
15 Naval Supply Shipyard. You don't know where that was
16 shipped either, do you?

17 A. No.

18 Q. And the last line on this, U.S. Naval Supply
19 Depot. You don't know where that was shipped either?

20 A. No. I could look this up in my customer master
21 book to see what possible locations it could have been
22 shipped to.

23 Q. Why don't you look up U.S. Naval Supply Depot and
24 see how many customers appear on your list of that.

25 A. You have to bear with me because I have to go

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1 through all the Us because they are not necessarily listed
2 in real alphabetical.

3 Q. We are happy to bear with you, and my record
4 reflects that it is between 12:05 and 12:06. You take your
5 time.

6 A. You have to be creative sometimes.

7 Q. Why do you say that?

8 A. Because many people created these records, and it
9 may start out with Norfolk Naval Shipyards. Or just Navy.
10 I have Navy Public Works Center, San Diego, California.
11 National City, California.

12 Q. Now you are turning to another document, and it
13 is about 11 minutes after 12?

14 A. I apologize.

15 Q. Tell me what you are looking at now?

16 A. These are copies of pages of this. And these, we
17 printed them out in multiple sequences when we printed them
18 out. And I have several of them. Some of them are in
19 customer code number identified here. Some of them are done
20 in alphabetical sequence. And the one that I brought about
21 may not have been the one I wanted to bring. But these are
22 the -- these are information off the same stuff.

23 Q. The one that you brought may not have?

24 A. Customer master.

25 Q. Is there more than one customer? Is there more

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1 than one master customer list?

2 A. This is the identical information arranged in
3 multiple listings. Some of them are pure alphabetical. But
4 it is the exact same information. Just arranged
5 differently.

6 Q. Who asked you to bring this exhibit?

7 A. Tom Radcliffe asked me to bring one of the
8 customer lists, and I just grabbed one of them.

9 MR. GLASSER: Don't you think -- Steve, don't
10 you think if he wanted her to bring it, he wanted her to
11 bring it for me?

12 MR. CELBA: I don't know, Richard. I don't
13 know. He may have just wanted an example of the customer
14 list. I don't know.

15 What is this document? Maybe you ought to
16 identify that too.

17 A. This is copies from customers from this same
18 master batch listing that I used last year. That has got --
19 let me find them for you. And I don't mean to waste your
20 time. I am very, very sorry.

21 MR. CELBA: He is trying to understand, Marcy,
22 and we are all trying to understand what that list is. If
23 you have another one, or it is the wrong one, tell us so you
24 don't waste our time.

25 A. That's what I was looking for. I didn't look at

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1 it very good before I brought it. I apologize for that. He
2 just asked me to bring one of the customer listings. There
3 is one in different sequence by their code number, and
4 that's why I am not able to find them in the alphabetical
5 sequence that I am trying to find them in.

6 BY MR. GLASSER:

7 Q. How many customer lists are there?

8 A. The exact same information is on five different
9 arrangements. But it is the exact same customers arranged
10 just in five different manners. It is the same information,
11 but it is not all like this one. I should have brought the
12 one that was in purely alphabetical sequence, and I would
13 have been able to find the ones we are talking about very
14 easily.

15 Q. Do you know what you are looking for?

16 A. Yes.

17 Q. If you will continue to please look. It is now
18 12:13.

19 A. I am very sorry. This is my fault. I should
20 have brought the pure alphabetical one.

21 I am very sorry. I am having to go through every
22 one of these, and I don't want to waste your time. I can
23 provide you with a list in alphabetical sequence. I don't
24 have that one with me. I apologize. I don't want to waste
25 your time. I'm sorry.

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1 Q. I thank you for your efforts. It is 12:16
2 according to my watch and I am --

3 A. I will have to go through every record to find
4 the information. It is not in alphabetical sequence I
5 thought I brought. I am very sorry.

6 MR. GLASSER: Give us just a moment.

7 MR. CELBA: Sure.

8 (Recess)

9 MR. GLASSER: Okay. We are back in and it is
10 12:18, and we are back on the record.

11 BY MR. GLASSER:

12 Q. Mrs. Duncan, if an entry is made on the quotation
13 and selling record -- and I am now going to pass you and
14 counsel another sheet.

15 MR. GLASSER: I ask the court reporter please to
16 mark this as Duncan exhibit number 4.

17 (Quotation and Selling Record, Victor
18 No. 34305, was marked Exhibit No. 4.)

19 BY MR. GLASSER:

20 Q. Do I understand you to say that if there is an
21 entry U.S. Navy Portsmouth, which is seen prominently on
22 five lines of Duncan exhibit number 4, that some place in
23 the master customer list there should be a U.S. Navy
24 Portsmouth?

25 A. Yes.

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1 Q. And, in fact, every other reference that we are
2 attempting to read off of these sheets, whether it be U.S.
3 Naval Supply Depot, or U.S. Naval Supply, or U.S. Naval
4 Supply Shipyard, or U.S. Naval Supply Norfolk, each of those
5 should appear on the master customer list?

6 A. They should appear on the master customer list.

7 Q. What is product number 34305 as shown in the top
8 right-hand corner of Duncan exhibit 4?

9 A. That particular part would be a valve cover
10 gasket.

11 Q. And the first entry there a shows a sale to --
12 how do you read that?

13 A. Buda Company.

14 Q. And what are the spec and remarks? What is the
15 language. Can you read that to me?

16 A. Quantity quoted was 7,000. Price, 48 cents --
17 that can't be one hundred. .486 each. I am sorry. Date
18 quoted is 3/5/1943. Did not buy.

19 Then it lists a die. Then it lists 1/32nd number
20 3 Victopac is what it appears to say. That record would be
21 the record of a quotation.

22 Q. And what is the next entry?

23 A. The next entry is for U.S. Navy Portsmouth.
24 Quoted a quantity of 78,000. I am sorry. 7,850. That's
25 difficult to read that. That first line, the price. Date

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1 quoted was 5/4/43.

2 Then it says quantity ordered, 7,850. And the
3 price looks like 32. Date ordered would be 6/8/43. And
4 then over to the right it lists their order number, which on
5 the copy it is very difficult to read.

6 Q. And can you read the next one?

7 A. It is ditto marks for the same U.S. Navy
8 Portsmouth. Same quantity quoted, 7,850. Looks like 48
9 cents. Quoted on 5/4/43 and says, lost.

10 Q. What does that mean?

11 A. That means they didn't get the order. They lost
12 the order. Quote, they didn't get it. Sometimes when you
13 quote you don't always get the business.

14 Q. And is this also for Victopac number 3?

15 A. No. That's what they are talking about, a die
16 down here on the first one. This is actually a record for a
17 gasket sale. These sales in quotes are for this gasket up
18 here. That's what this card is for.

19 Q. But this is a Victopac gasket?

20 A. The valve cover gaskets are cork rubber. I am
21 not sure why they got Victopac on there except they are
22 referencing a buy and I did not buy on that first line. So
23 I'm not sure what they got Victopac listed there for.
24 1/32nd it says die. But this gasket here is a valve cover,
25 gasket number, and those are cork rubber, or cork.

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1 Q. But the Victopac we have described, unless it
2 ended with a 9, is asbestos-containing gasket sheet
3 material?

4 A. I can't -- I do not know why the reference to
5 Victopac is listed on the line with this quote for these
6 gaskets. I don't know what the notation here is for. I can
7 tell you that the Buda Company, 7,000, was a quote that was
8 not subsequently provided an order. I do not know what the
9 reference to a die here was in the 1/32nd number 3,
10 Victopac.

11 And to the best of my knowledge, we didn't make
12 Victopac. There was not a Victopac 3 anyway. So I am not
13 sure what this notation here is for.

14 Q. But the best of your knowledge, this record
15 happens to deal with something long before you were born?

16 A. Yes.

17 Q. And there are references on the top half of this
18 page, are there not, to two more U.S. Navy Portsmouth sales,
19 or quotes, excuse me, quotations or selling records that
20 again refer to Victopac. Do you see that in line 5 and in
21 line 7?

22 A. Yes, I do.

23 Q. And can you read the entry that is on line 6
24 under order number?

25 A. It looks like it says N 181 S 584/27.

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1 Q. Does that mean it was ordered?

2 A. It -- that number is in the order number field,
3 so I -- and it has a date in the area where it would list a
4 date for the date ordered. So I would say that was an
5 order, yes, for quantity of 3100 at 32 cents. Ordered,
6 looks like 8/2/43.

7 (Quotation and Selling Record, Victor
8 No. 1861, was marked Exhibit No. 5.)

9 BY MR. GLASSER:

10 Q. I showed you what has now been marked Duncan
11 exhibit 5, and on the last five entries on this particular
12 exhibit it identifies ships parts control. And all of those
13 appear to be completed orders; correct?

14 A. They are orders received. They list orders
15 received.

16 Q. Do you know where any of these orders were
17 shipped?

18 A. Not from looking at this record, no.

19 Q. Thank you. You can't tell by the writing on
20 Duncan exhibits 3, 4, or 5 who made any of those entries?

21 A. No, I can't. No. Not at these dates.

22 Q. Would it be different if the dates were in the
23 1950s?

24 A. No.

25 Q. And would it be different if these dates were in

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1 the 1960s?

2 A. Some of them, yes, I could tell.

3 Q. By handwriting?

4 A. Yes.

5 Q. You would make what would be, I am sure, your
6 best guess as to who may have made an entry, is that
7 correct?

8 A. Without having seen the person actually sit and
9 write, it would be from my recognition of the handwriting of
10 specific people, and the uniqueness of it would be a guess.

11 Q. And you never made any entry on any of the
12 microfiche records, whether there are 69,000 or 900,000.
13 None of them are Marcy Duncan's entry?

14 A. That is correct.

15 Q. You indicated that Tom Radcliff suggested that
16 you should bring the master sales list with you. Did you
17 review anything else in preparation for coming down here to
18 offer your deposition?

19 A. I reviewed the items that I looked at last year
20 to prepare for that case that I was here in February of last
21 year. And I brought with me the items that I had researched
22 and used at that time.

23 Q. You did not look at anything relating to Newport
24 News Shipbuilding and Dry Dock Company, correct?

25 A. Correct.

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1 Q. You did not look for anything under Newport News
2 Ship?

3 A. Correct.

4 Q. You did not look at Newport News Shipyard?

5 A. I didn't look for anything Newport News.

6 Q. You did not look for Navy -- U.S., excuse me --
7 Navy, Newport News Ship?

8 A. No.

9 Q. And you have not been instructed or requested by
10 anyone to make such an inquiry in the event that you are
11 called down here to testify in the trial in Newport News
12 either in September 2004, or November 2004, or any time
13 thereafter.

14 MR. CELBA: I am going to object to the form.

15 MR. GLASSER: What is the objection?

16 MR. CELBA: Foundation for that, The way you
17 phrased it. That's my only objection.

18 BY MR. GLASSER:

19 Q. Has anyone instructed you to do it to prepare for
20 your testimony in a trial in Virginia, to look and check the
21 existing records for sales to Newport News Shipbuilding and
22 Dry Dock Company, or any combination involving Newport News
23 or shipyard to prepare you for your testimony?

24 A. I have not been asked to do any research for any
25 company or entity that had Newport News or Newport News in

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1 its name, location, at all.

2 Q. You indicated earlier that you were responsible
3 for some accounts and they were more or less smaller
4 accounts that did not justify a salesman in a car and a
5 specific responsibility. Who does handle the large accounts
6 like the Navy, or Norfolk Naval Shipyard?

7 MR. CELBA: I am going to object to form. Lack
8 of foundation. But go ahead.

9 A. Those are not large accounts for us. Those are
10 not current accounts today. And when they were accounts, to
11 the best of what I have seen in the historical record, they
12 have always been handled by the sales operations manager as
13 a house account, which are the smaller, not high dollar
14 accounts.

15 Q. How do you define high dollar?

16 A. Probably multi million dollars a year accounts.

17 Q. And you did not reach the position that you are
18 in until 1988?

19 A. My current position, Sales Operations Manager, I
20 have been since May of 1988.

21 Q. Mrs. Duncan, you are not saying that if a worker
22 at Newport News Shipbuilding and Dry Dock Company, or
23 Norfolk Naval Shipyard, testifies that she saw
24 asbestos-containing Victopac gasket material being used in
25 the 1950s, '60s, '70s or even in the 1980s, that they are

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1 lying or mistaken, are you?

2 MR. CELBA: I am going to object to the form as
3 being argumentative. And it is -- it asks her to improperly
4 comment upon any other evidence that might be presented
5 opinionwise in this case.

6 MR. GLASSER: Your objection is noted.

7 MR. CELBA: And lack of foundation with respect
8 to the question.

9 BY MR. GLASSER:

10 Q. Can you answer my question?

11 A. I have no way of knowing what anyone else has
12 said or not said about any use, I guess use of gaskets, at
13 any location here.

14 Q. If someone says I was there, I saw it, it was
15 being used, you can't say that they are wrong?

16 MR. CELBA: Again, same objection.

17 BY MR. GLASSER:

18 Q. Yes or no?

19 A. I can only tell you the things that I know. I
20 have not heard anybody else say anything. I don't know -- I
21 can't call somebody, tell whether somebody is being truthful
22 or not on something that I have not heard. I don't know how
23 to answer that. I am sorry.

24 Q. What I am saying is that from the records, the
25 records that you have seen, you can't dispute whether Victor

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1 asbestos-containing products were or were not at the Newport
2 News Shipyard, isn't that true? In the 1950s, is it true
3 for the 1950s? You can't say one way or another?

4 MR. CELBA: I am going to object. This has all
5 been asked and answered before with reference to records in
6 this case, the sales records. I object to this type of
7 questioning.

8 But go ahead.

9 A. I am having trouble with understanding the
10 question you are asking me. I don't know anybody that's --
11 other than my uncle who has worked at shipyards. I don't
12 know how to answer that. I am sorry.

13 MR. GLASSER: We are going to take a short
14 break. It is now 20 minutes to 1. And I am going to review
15 my notes and see whether I have any additional questions. I
16 may be through.

17 It may be, if you want, and your schedule
18 permits, you may want to grab lunch downstairs, or if you
19 prefer I will go out and look at my notes and come back.

20 MR. CELBA: I prefer the latter, Richard.

21 MR. GLASSER: Let me do that.

22 (Recess)

23 BY MR. GLASSER:

24 Q. You mentioned the R base, the records between
25 1972 and '80 that are unreadable. Does your master customer

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1 list include customers that were during that time frame,
2 namely 1972 to 1980?

3 A. Yes.

4 MR. GLASSER: I have no further questions.

5 MR. CELBA: Richard she has some clarification
6 for you.

7 A. I have some clarification for you on the customer
8 master list. I have given you a misrepresentation of this.
9 Let me explain.

10 The reason that I could not find the customers
11 listed on those cards from the 1940s on here, they are not
12 on here, necessarily. And I will explain that.

13 When we changed from a manual record keeping
14 system in 1971-72 and started to go on computer for the
15 first time at the Victor Chicago plant in the oil seal
16 plant, we took all records that were available, historical
17 or current, anywhere at that time, throughout any of the
18 facilities, and we loaded those records for part records and
19 customer records on the computer.

20 Those records you showed me were from 1943. If
21 there had not been any recent -- and I am just going to say
22 probably throughout the '60s at least -- sale to that
23 entity, it may very well not be -- and nothing since -- it
24 may very well not be listed as a customer in this book.

25 BY MR. GLASSER:

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1 Q. What I understood is that you couldn't find it
2 anyway because they weren't in order?

3 A. That is correct. But I should have been able to
4 find something, and that's what was bothering me so much. I
5 should have been able to find whether it was under U.S.
6 Navy, or Norfolk or Portsmouth. I should have been able to
7 find it one way or another in here, and I couldn't. I
8 couldn't.

9 So then it came back to me what exactly, where,
10 what is really in this customer master. And I wanted to
11 clarify that with you.

12 Q. And I take it in a different vein, unless there
13 is some record there that because you have no personal
14 knowledge of your own, you are totally dependent upon the
15 completeness of the record that you looked at in attempting
16 to answer a question?

17 MR. CELBA: I am going to object.

18 BY MR. GLASSER:

19 Q. Yes or no?

20 A. No, I am not completely at a loss. Okay. And I
21 will explain why. The whole basis of the Victor system is
22 applications, part numbers that fit specific applications.
23 So our business is, if you have an engine that you need
24 sealed, we will either -- either already making a gasket for
25 you for that, or you are coming to me to design one, and

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1 this has been the history since day one.

2 So it is based on the part number and specific
3 application. And then the customers who buy, or have had
4 you create that gasket for them, for whatever application.
5 It is not a simple record system as saying, this is a list
6 of my customers, and this is what they have purchased.

7 I can do research on microfiche cards, and if I
8 had somebody sitting there going through every record and
9 making a complete list of every name that's on there, on all
10 900,000 records, there are things that can be done to create
11 different lists for different purposes. In our normal
12 business, we have developed record keeping to meet the
13 business needs that we have.

14 Q. I understand. But as I further understand, you
15 have not been asked to do that for Newport News Shipbuilding
16 and Dry Dock Company, or any combination of the names of
17 Newport News and Ship; is that correct?

18 A. That is correct.

19 Q. And you don't intend to do it?

20 MR. CELBA: I am going to object to the form
21 again. We are going back to the form again. She hasn't
22 been asked. She hasn't been asked to do it yet. I don't
23 know if they intend to do it or not.

24 MR. GLASSER: Just so we are communicating with
25 one another, clearly if she does anything now in preparation

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1 of trial, at the very least, it is not that I am trying to
2 open this matter up for more discovery, but the purpose of
3 today was to find out what she knew, what she had been
4 expected to testify as to. I mean the record will speak for
5 itself on that issue.

6 But I think that it would be totally improper to
7 show her anything at this stage forward, between now and the
8 trial in which -- the trial in which this discovery is being
9 taken.

10 But I have no further questions. And the
11 deposition is completed.

12 And, Mr. Celba can tell you, but do you want her
13 to sign, or waive the signing?

14 MR. CELBA: She should review and sign it.

15 MR. GLASSER: I am going to ask the court
16 reporter, once this record is ready, to get it to her with
17 all deliberate speed.

18 We do have a trial that starts Monday. And
19 though there has been no indication she is aware of any
20 attempt to use her, if she intends to testify, certainly I
21 want a transcript in a form that it is usable before she
22 comes into court.

23 (Discussion off the record

24 MR. GLASSER: Back on the record. There being
25 nothing further, this deposition is concluded.

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1 Thank you.

2

3 (Whereupon, the deposition was concluded at 1:05
4 p.m.)

5

6 I, MARCELLA DUNCAN, do hereby certify that I have
7 read the foregoing transcript of my testimony and further
8 certify that said transcript, with the corrections noted
9 below, is a true and accurate transcript of said testimony.

10 Dated at _____ this _____ day of _____ 2004.

11

12

13 ERRATA SHEET

14

15

REASON FOR

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PAGE LINE

CORRECTION

CHANGE

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MARCELLA DUNCAN

COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

Subscribed and sworn to before me
this _____ day of _____, 2004

Notary Public

MY COMMISSION EXPIRES:

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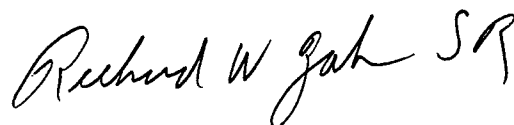
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1 COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

2 I, Richard W. Zahn, RPR, a Notary Public for the
3 Commonwealth of Virginia at large, of qualification in the
4 Circuit Court of the City of Norfolk, Virginia, and whose
5 commission expires January 31, 2005, do hereby certify that
6 the within named deponent, MARCELLA L. DUNCAN, appeared
7 before me at Norfolk, Virginia, as hereinbefore set forth,
8 and after being first duly sworn by me, was thereupon
9 examined upon her oath by counsel for the respective
10 parties; that her examination was recorded in Stenotype by
11 me and reduced to computer printout under my direction; and
12 that the foregoing constitutes a true, accurate and complete
13 transcript of such examination.

14 I further certify that I am not related to nor
15 otherwise associated with any counsel or party to this
16 proceeding, nor otherwise interested in the event thereof.

17 Given under my hand and notarial seal this
18 18th day of September, 2004, at Virginia Beach, Virginia.

19 
20

21 Notary Public
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VICTOR

EXHIBIT
Duncan 1
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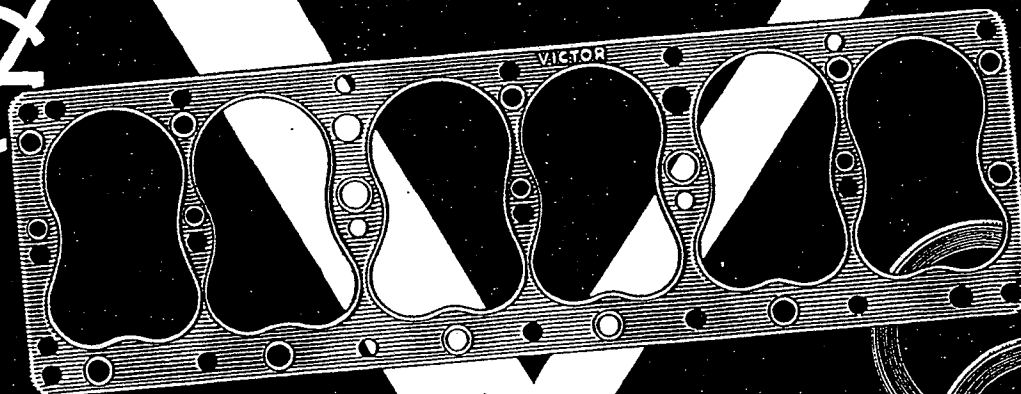
GASKET GUIDE

16TH

EDITION

MAY

1955



VICTOPRENE

OIL SEALS

VICTOR MFG. & GASKET CO., CHICAGO, U. S. A.

GASKETS

Print

DV - 104

VICTOR

GASKETS OIL SEALS

and other Sealing Products

Sealing Products Exclusively. The research, production, and distributing facilities of the Victor Company are devoted entirely to the manufacture of gaskets, oil seals, gasket materials, sheet packings, and kindred sealing products. Practically all of these products, with the exception of cork gaskets and sheets, are produced from basic raw materials within Victor Plants.

ORIGINAL EQUIPMENT

The Victor Company is the largest supplier of gaskets and oil seals for original equipment installation to manufacturers and producers of automotive vehicles, passenger cars, light and heavy trucks, tractors, busses, and farm equipment. The same wide variety and quality of product is supplied for REPLACEMENT applications. Also available are our alternate preferred constructions or materials.

INDUSTRIAL

The Victor line embraces a variety of gaskets, oil seals, and packings used in production and maintenance outside of the automotive field. Special catalogs are available for oil seals and gaskets.

RAILROADS

Victor products are widely used in diesel locomotives, steam locomotives, and various railroad devices and equipment.

MILITARY REQUIREMENTS

The builders of heavy duty engines and equipment depend upon Victor to supply most of their cylinder head and other gaskets. Likewise, U. S. Military and the prime contractors have depended upon the wide experience of Victor engineers in the development of oil seals for critical applications.

GASKETS

Full coverage for all automotive installations including cylinder head, manifold, oil pan, and miscellaneous applications of various types and constructions designed to function effectively under all operating conditions.

VICTOPRENE OIL SEALS

Victor pioneered the development and manufacture of oil seals employing a synthetic rubber sealing element which is now the preferred type for the most severe as well as standard applications and is rapidly replacing other types for general use. Only engine applications of oil seals are listed in this catalog. For a complete listing, including wheel applications, see the latest Victor Oil Seal Guide.

SPECIAL PACKING MATERIALS

Among Victor sealing products are especially compounded packing materials used in fabricating gaskets and oil seals. These, for the most part, are developed and manufactured from basic materials and for specific requirements.

Asbestocork	Teflon
Asbestopac	Victolene
Asbestoprene	Victolex
Asbestos Millboard	Victopac
Corbestos	Vicoplate
Silicone	Victorite

ARMSTRONG-VICTOR CORK GASKETS

The Armstrong Company, the world's leading producer of cork products, and the Victor Company are associated in supplying the trade the finest quality and best merchandised line of cork gaskets, cork sheets, and other cork products. The dimensional accuracy and uniform density of Armstrong-Victor sheet cork, from which gaskets are blanked, is assured by the new dielectric curing process developed by the Armstrong Cork Company.

GASKET SETS

Head gasket sets, general overhaul, and other gasket sets are in wide demand. While Victor Gasket set coverage is by far the most comprehensive, facilities for making sets are constantly being expanded.

NUMBERING AND LABELING

The Victor numbering system is simple and convenient. Packages and sets bear legible printed labels listing the manufacturer's part number and also the corresponding Victor Replacing number in bold figures. Gasket and oil seal numbers are also imprinted upon the product.

CATALOGING

Clear, concise, and comprehensive cataloging is essential to the marketing of any quality product. The Victor Company is justly proud of the wide acceptance and use of their printed matter of which this Guide is an example. Equally well prepared are catalogs covering industrial oil seals and industrial gaskets.

VICTOR

Victor Sealing Products have world wide distribution

VICTORITE

A Quality Treated Paper Packing

Use—Cutting gaskets for applications where high temperatures are not encountered—examples—oil pan, valve cover or gear cover gaskets.

Characteristics

Leatherlike in toughness

High tensile strength

Pliable

Compressibility less than cork but adequate for most applications.

Absorption. Highly resistant to absorption of oil, gasoline, water and most acids.

Shrinkage. Very slight except at higher temperatures.

Effect of storage. Pliability and other characteristics retained for a long time unless exposed to abnormal conditions of heat and dryness.

Thickness

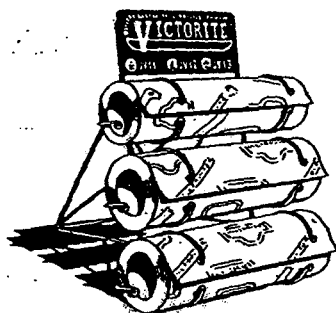
Standard roll thicknesses are $\frac{1}{4}$ ", $\frac{1}{8}$ " and $\frac{1}{16}$ ".

Other thicknesses produced to order are .006", .010", .020", .045" and .125".

The $\frac{1}{4}$ " or .125" thickness is made by laminating two $\frac{1}{8}$ " sheets and can be supplied in sheets or rolls.

Rolls

Victorite is supplied in rolls 36" wide or 18" wide.



JV10—A convenient counter or floor display of sturdy wire construction. There is no charge for this display rack in this assortment and it includes 1 roll each of JV11, JV12, JV13.



JV-93C—A sturdy wire display rack pictured here will be loaned to dealers who carry 36" rolls of Victorite packing. Furnished with first order for 3 rolls. This rack is shipped in a sturdy corrugated carton. Shipping weight 40 lbs.

VICTORITE BY THE ROLL

Thickness	Length	Width	Shipping Weight	
			Lbs.	Kilos
JV-11— $\frac{1}{4}$ " (0.4 m.m.)	10 yds.	18"	4	2
JV-12— $\frac{1}{8}$ " (0.8 m.m.)	10 yds.	18"	8	4
JV-13— $\frac{1}{16}$ " (1.6 m.m.)	5 yds.	18"	8	4

The above rolls may be purchased separately for refills:

JV-90— $\frac{1}{4}$ " (0.4 m.m.)	50 yds.	36"	50	23
JV-94— $\frac{1}{4}$ " (0.4 m.m.)	25 yds.	36"	25	12
JV-97— $\frac{1}{4}$ " (0.4 m.m.)	25 yds.	18"	13	6
JV-91— $\frac{1}{8}$ " (0.8 m.m.)	50 yds.	36"	95	43
JV-95— $\frac{1}{8}$ " (0.8 m.m.)	25 yds.	36"	48	22
JV-98— $\frac{1}{16}$ " (1.6 m.m.)	25 yds.	18"	24	11

Thickness	Length	Width	Shipping Weight	
			Lbs.	Kilos
JV-92— $\frac{1}{4}$ " (1.6 m.m.)	25 yds.	36"	90	41
JV-96— $\frac{1}{4}$ " (1.6 m.m.)	15 yds.	36"	55	25
JV-99— $\frac{1}{4}$ " (1.6 m.m.)	15 yds.	18"	28	13

HANDY ROLL IN CARTON

JV-104—.010" (.25 m.m.)	36"	18"	8 oz.	.23
JV-103—.010" (.25 m.m.)	36"	36"	12 oz.	.34
JV-100— $\frac{1}{4}$ " (0.4 m.m.)	36"	18"	10 oz.	.23
JV-101— $\frac{1}{8}$ " (0.8 m.m.)	36"	18"	1	.45
JV-102— $\frac{1}{4}$ " (1.6 m.m.)	36"	18"	1 1/2	.68
JV-105— $\frac{1}{8}$ " (2.4 m.m.)	36"	36"	3 lbs.	1.36
JV-106— $\frac{1}{4}$ " (3.2 m.m.)	36"	36"	4 lbs.	1.81



JV-40—Handy Tube Assortment, containing:

one piece of Victorite 10x36x $\frac{1}{32}$ "
one piece of Victopac 10x40x $\frac{1}{32}$ "
Every repair shop should have one

VICTOPAC

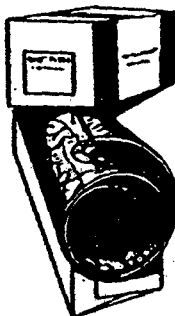
Compressed asbestos or high pressure sheet packing. Long fibre asbestos and small rubber content—a superior grade packing of this type. It is resistant to oil, water and gasoline, and will withstand considerable heat and pressure. Ordinarily supplied not graphited. Can be supplied graphited on one or both sides.

SHEETS

Victor No.	*Sheet	Weight per sheet
JV-87	12 1/2" x 25" x 1/32"	3/4 lb.
JV-88	12 1/2" x 25" x 1/16"	1 1/4 lbs.
JV-85	25" x 25" x 1/32"	1 1/4 lbs.
JV-86	25" x 25" x 1/16"	2 1/4 lbs.

*25x50" or 50"x50" sheet supplied if desired.

If packing is desired to provide minimum oil swell and increased resistance, specify Victopac #50V or #60V.



HANDY CARTONS

Rolls 50" long and 10" wide in square carton convenient for keeping in stock.

JV-210— $\frac{1}{32}$ "	both sides plain.
JV-213— $\frac{1}{16}$ "	both sides plain.
JV-211— $\frac{1}{32}$ "	one side graphited.
JV-214— $\frac{1}{16}$ "	one side graphited.
JV-212— $\frac{1}{32}$ "	both sides graphited.
JV-215— $\frac{1}{16}$ "	both sides graphited.

CORBESTOS

Sheet gasket material consisting of steel core with treated and graphited asbestos on both sides, the asbestos being held by small lugs punched from the steel.

This material is used for cylinder head gaskets and other applications where heat and pressure is encountered.

Warning. This material is difficult to cut by hand. Best procedure is to lay out gasket on a board. Then place corbestos

between two boards and cut design on a band saw. Use punches for small holes. Material can be cut with straight and curved chisels or cutting blades.

JV-222. Corbestos sheet 10 $\frac{1}{2}$ "x36"x $\frac{3}{16}$ ".

Corbestos can be supplied in sheets up to 24" wide and 36" long. (not carried in stock)

ARMSTRONG-VICTOR CORK SHEET

New Electronic Baking Process makes Better Cork Gaskets

The greatest advance in cork gasket making since modern Armstrong cork composition was first introduced. Fast efficient electronic cork baking takes the place of slow uncertain steam curing. The result—stronger, livelier, better-sealing gaskets than ever before.

The Manufacturer. Armstrong-Victor cork sheets are made by the Armstrong Cork Company for many years the world's leading manufacturer of cork products. The Armstrong Company operates in Spain and Portugal where cork is grown and is in position to obtain the best bark available.

Quality. The Armstrong cork sheet is made from selected clean cork granules free from hard-back. The binder has been developed by Armstrong through years of research and test. In the Armstrong sheet the qualities of natural cork are retained to a greater degree than most other sheets on the market.

Shrinkage-Stability. Armstrong cork sheet has the highest degree of stability and does not shrink perceptibly unless subject to extreme conditions of heat and dryness. This is a most important point of superiority in the Armstrong-Victor sheet and cut gaskets.

Sizes. Three standard sheet sizes and four standard thicknesses as shown below. Thicknesses up to $\frac{1}{2}$ " and sheets as long as 50" can be supplied to order.

Packaging. Ten sheets in a flat box, except $\frac{1}{4}$ " which is packed 5 to a box, clearly labelled on the end.

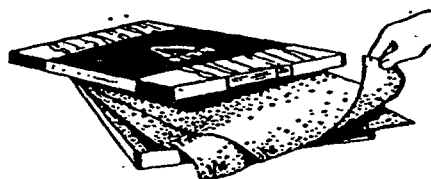
Fine Granule. For some uses fine granule cork sheet is desirable, although for ordinary uses, the standard coarse granule sheet (No. 9530) is the best. There are several grades of density in fine granule sheet, the most commonly used being No. 114. Such sheets are supplied to order—prices on request.

Resin-Bonded Cork. In some tropical climates standard cork composition is subject to mold which causes disintegration.

Resin-bonded cork composition is effective in meeting this condition. Coarse granule resin-bonded cork is No. 414. Fine granule No. 514.

Sheets and cut gaskets of resin-bonded cork can be supplied to order if the quantity is large enough to warrant a special run. Quotations on request.

Cork Sheet (Coarse Granule Standard Binder)



Victor No.	Sheet Size	Thickness
32500	36" x 12"	$\frac{1}{16}$ "
32501	36" x 12"	$\frac{3}{32}$ "
32502	36" x 12"	$\frac{1}{8}$ "
32503	36" x 12"	$\frac{1}{4}$ "
32600	36" x 16"	$\frac{1}{16}$ "
32601	36" x 16"	$\frac{3}{32}$ "
32602	36" x 16"	$\frac{1}{8}$ "
32603	36" x 16"	$\frac{1}{4}$ "
39960	36" x 18"	$\frac{1}{16}$ "
39961	36" x 18"	$\frac{3}{32}$ "
39962	36" x 18"	$\frac{1}{8}$ "
39963	36" x 18"	$\frac{1}{4}$ "

ASBESTOS MILLBOARD

Manufactured by Victor

The Victor Company manufactures asbestos millboard under exacting specifications for making gaskets. It is even in thickness and uniform in density. No organic binders are used.

In normal times this high quality sheet is offered to trade and industry in large or small quantities.

Sheet size. Full size sheet 42"x48". Smaller sizes to order.

Stock sizes as follows:

JV-310	10"x36"x $\frac{1}{16}$ "
JV-311	15"x40"x $\frac{1}{16}$ "

Thicknesses, $\frac{1}{32}$ " to $\frac{1}{4}$ "

Prices. Quoted on request. Samples sent if desired.

VICTOR

Victor Sealing Products used thruout the world

THE MOTOR BUILDERS' CHOICE

That Victor gaskets for many years have been the most widely used for original equipment can be attributed to the pioneering of new ideas and the science of gasketing by Victor engineers, the thousands of dies built over the past forty-six years, the exacting specifications covering raw materials demanded by Victor of their suppliers—all of which has been a part of the evolution of a product that must keep not abreast, but ahead, of the rapid progress of automotive engineering.

The dedication of all of its vast facilities by the Victor Company solely to the manufacture of sealing products of wide variety has enabled it to gain and maintain its pre-eminent position in the automotive industry.

PASSENGER- CARS

(In production in 1955)

Buick	Ford	Oldsmobile
Codillac	Hudson	Packard
Chevrolet	Kaiser	Plymouth
Chrysler	Lincoln	Pontiac
DeSoto	Mercury	Studebaker
Dodge	Nash	Willys

TRUCKS AND BUSES

ACF	Federal	Reo
Autocar	Ford	Studebaker
Brockway	FWD	White
Chevrolet	GMC	also various other
Diamond T	International	makes using
Divco	Mack	engines below.
Dodge	Oshkosh	

ENGINES—TRUCK, BUS, TRACTOR, INDUSTRIAL

ACF	Hall-Scott	Waukesha
Buda	Hercules	Wisconsin
Caterpillar	LeRoi	and others.
Continental	Lycoming	

TRACTORS

Allis Chalmers	Ferguson	Minneapolis-Moline
Case	International	Oliver
Caterpillar	Harvester	also other makes
Deere	Massey-Harris	using engines
Ford	McCormick-Deering	listed below.

DIESEL ENGINES

Buda	General Motors	Mack
Caterpillar	Hercules	Murphy
Continental	International	Nordberg
Cummins	Harvester	Waukesha
Fairbanks-Morse		

AIRCRAFT ENGINES

Allison	Franklin	Pratt-Whitney
Boeing	General Electric	Westinghouse
Continental	Jacobs	Wright
Fairchild	Lycoming	

MARINE ENGINES

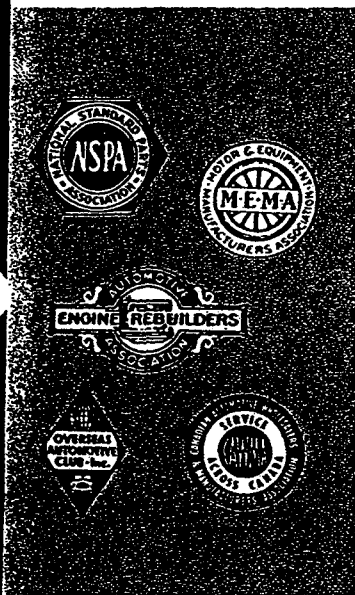
Chris-Craft	Kermath	Sterling
Chrysler	Noyo	Universal
Gray	Scripps	Winton
Hall-Scott	Standard	and others.
Johnson		

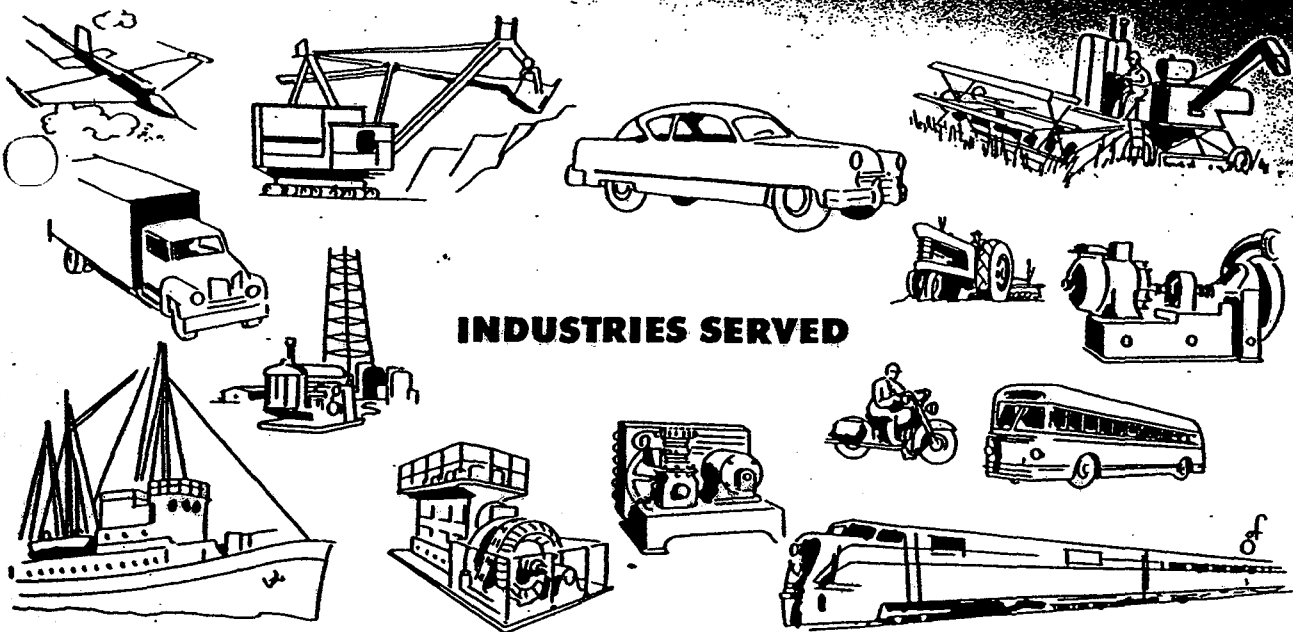
MOTORCYCLES

Harley-Davidson	Indian	and others.
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STREAMLINE TRAIN ENGINES, RAIL CARS

American LaFrance	Electro-Motive	Winton
American	Fairbanks-Morse	(Nearly all stream-
Locomotive	Hercules	line trains are
Baldwin Locomotive	Waukesha	Victor-equipped.)
Brill		





INDUSTRIES SERVED

Automotive Transportation

Passenger Cars
Trucks
Buses
Motorcycles
Tractors

Air Transportation

Plane Engines
Fuselages

Water Transportation

Large Diesel and Gasoline Power Units
Medium Gasoline and Diesel Engines
Steam Power Units
Outboard Motors
Miscellaneous Auxiliary Equipment

Rail Transportation

Diesel Locomotives
Steam Locomotives
Rail Cars
Motor cars and other light units
Freight handling Equipment
Air Brake equipment
Maintenance equipment

Agriculture

Tractors
Various Farm Equipment
Mowers
Miscellaneous Power Equipment

Construction Equipment

Tractors
Bulldozers
Derricks and Hoists
Power Shovels

Graders

Ditch Equipment
Road Construction Equipment
Miscellaneous Power Units

Power and Transmission

Large Diesel Units
Small Diesel Units
Pipe Flanges
Boiler Handholes and Manholes

Oil Industry

Oil Refineries
Oil Transportation

Machinery and Machine Tools

Oil Seals on shafts etc.

Electrical

Motors

Refrigeration and Air Conditioning

Large Commercial Units
Household Units

Household Appliances

Washing Machines
Kitchen Mixers
Miscellaneous

Industry in General

Wherever Gasoline and diesel engines are used there are numerous uses for gaskets, oil seals and other sealing products.

Suppliers of War Equipment

Prime movers, tanks, guns, jeeps, submarines, ships, airplanes and various lighting equipment.

THE SUN NEVER SETS ON THE VICTOR TRADEMARK OR ITS PRODUCTS

Wherever there are American passenger cars, trucks, tractors or engines, the users have learned to depend on Victor sealing products for maintenance. Victor catalogs and the distinctive Victor packages are as well known in the export market as in the domestic. Victor is the acknowledged leader in its field. The Victor trademark is registered in each of the following countries.

Argentina
Belgium
Brazil
Canada
Chile
Colombia

Denmark
France
Holland
India
Italy
Mexico
Peru

Philippine Islands
Puerto Rico
Spain
Sweden
Switzerland
Union of South Africa
United States



STANDARD THE WORLD OVER

*John R. ...
12-14-41*

VICTOR

EXHIBIT

Duncan 2
Rwz 09-12-04



GASKET
17TH EDITION
GUIDE

Anniversary Edition

VMG-25-0000150



John Harvey Victor

1882-1957

Founder of the Victor Manufacturing & Gasket Company in 1909, John Harvey Victor was active in management of the company up to the day of his unexpected death, December 8, 1957, in Wilmette, Illinois. He was chairman of the board. Born in Chicago in 1882, he became a master tool and die maker at an early age, and was but 27 when he launched his gasket business.

Dedication

But could the hand of fate be stayed for a fleeting year, John Harvey Victor would have led the business he founded in Chicago in 1909 to the very dawn of its golden anniversary year.

His anticipation of this event was great—not with a self-centered pride of achievement, for he was a truly modest man. His expectation was the simple, rightful heritage of a courageous business pioneer—seeing the enterprise he launched with little capital become a well-established, vigorous industry leader at its half-century mark.

It was sheer vision, courage and determination in the young man of 27 that gave birth to the Victor Manufacturing and Gasket Company of today. John Victor had an idea for building a better gasket—but he had no machinery, no facilities, no affluent financial backers.

Still, together with his brother, Joseph B., he ventured forth. And when the first machine was acquired and installed in his little basement shop, the future looked bright to John Victor—he was in business to stay.

At this major milepost in the company's history, we proudly salute the spirit and traditions of our founder . . . and therefore, in commemoration of John H. Victor, we dedicate this 50th Anniversary Issue of the Gasket Guide. We are confident this would be the wish of all who knew him.

50

years in sealing products



The first factory—a store building on Chicago's West Side, into which the business moved from a basement shop. Here John H. Victor produced gaskets for the early automotive industries.

There's a distinct parallel in the history of gasket and oil seal development and the 50-year growth of Victor Manufacturing and Gasket Company.

John H. Victor had an idea for building a better gasket than was generally available at the time. Against the toughest odds—for he had no ready access to capital—he was determined to do something about it. A skilled tool and die maker, he had the manufacturing know-how, and already he owned at least one basic patent on gasket construction. But more so, he held the conviction there would always be a market for better-made sealing products.

That was in 1909, and that's how the Victor Manufacturing and Gasket Company was born in an apartment house basement shop. Later that year, still in the modest basement quarters but now with five employees, the business was incorporated.

Quickly John H. Victor took his product to the several similarly pioneering automotive builders. They liked what they saw—a new copper-asbestos gasket construction that promised tighter engine sealing, with longer life and greater protection against blow-out.

It wasn't long before the Victor company became the major gasket supplier to the rapidly growing automotive industry—and young John H. Victor's business philosophy was completely vindicated. On his better-product philosophy his company would grow—and grow it did.

NEW GROWTH ERA

In 1919, after two earlier expansion moves, Victor was established in its own built-to-order plant with quadrupled space. The plant was completely equipped for quality mass production and personnel numbered about 185. But this major move was only the beginning of a new growth era for the still young company.

While automobile manufacturing boomed, new markets across industry opened for Victor. Each new application need was a challenge to design and build the best gasket possible. Each such challenge was met with constantly improving manufacturing techniques, quality control, and testing methods.

Steel and asbestos gasket structures grew in use along with the original copper-asbestos combination. New packing materials were added. Developments in these products enlarged the company's basic patent holdings.

OIL SEALS ADDED

Early in the '30's John H. Victor was ready to expand into oil seal production. Again he saw the opportunity for product improvement; he wasn't satisfied that leather was the best sealing element. In a few short years Victor Research Laboratories—the first in the sealing products industry—pioneered the development of the synthetic rubber sealing element.

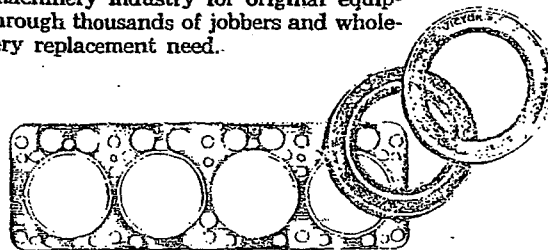
The next decade marked wide expansion in both product lines and production techniques. There was development in packings—asbestos, cork, and rubber compositions. New machinery, much of it built to the company's own specifications, replaced the old.

During World War II, Victor's total facilities worked at full capacity to keep our war machine on the road to victory.

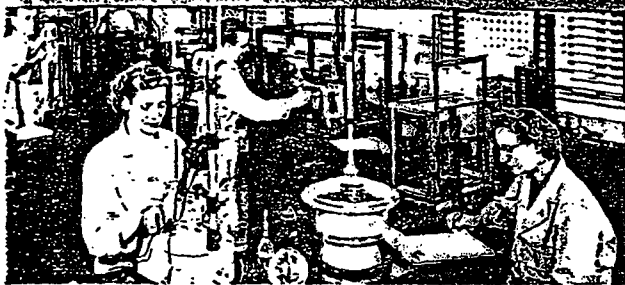
MORE NEW PLANTS

With the war won and business booming, more plants were added to take care of the now worldwide demand for Victor sealing products. These plants included a complete gasket manufacturing unit at St. Thomas, Ontario, Canada.

As a result of this steady growth and expansion, Victor today produces over 100,000 different sealing products—gaskets, oil seals, packings. These products are sold the world over, direct to every automotive and machinery industry for original equipment—and through thousands of jobbers and wholesalers for every replacement need.



VICTOR



"Better Sealing Products Through Research"—a living slogan at Victor. Established in 1933, Victor Research Laboratories steadily have led the industry.



Precision oil seal and gasket manufacturing begins with precision-made dies, tools, and molds—an integral department of Victor since its inception.



Dynamometer testing of sealing products was initiated by Victor, and this department includes the latest type of equipment to insure products dependability.

The World's largest manufacturer of Gaskets...Oil Seals... and Packings

In strong contrast with the company's humble origin, from a small basement shop, Victor plants today comprise more than 1¼ million square feet of manufacturing area in seven separate units.

Victor Sealing Products reach to the four corners of the earth with a world-wide distribution system.

PERSONNEL

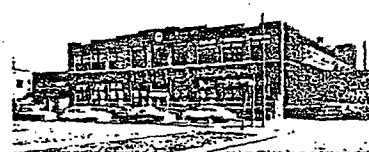
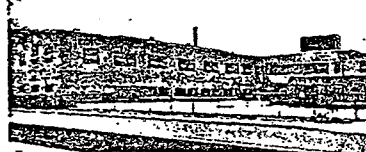
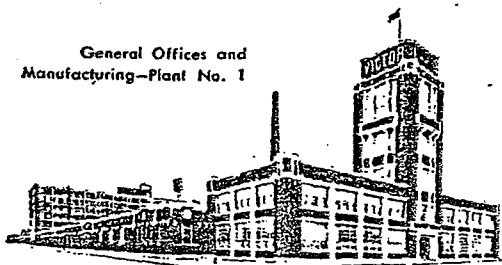
From five employees in 1909, Victor's personnel today numbers in excess of 2000. Fifty per cent of these employees have been with Victor for more than five years. The 25-Year Club has 115 active members and approximately 45 inactive.

RAW MATERIALS

Approximately 1000 carloads of raw materials are needed annually to produce Victor products. These include approximately 4½ million pounds of copper . . . ¼ million pounds of brass . . . 32 million pounds of steel . . . 7 million pounds of asbestos millboard . . . and more than ½ million pounds of synthetic rubber.

MORE THAN ONE MILLION SQUARE FEET OF FACTORY

General Offices and
Manufacturing—Plant No. 1



Commercial Laboratory and Packing Materials
Manufacturing (left)—Research Laboratory
and Asbestos Millboard Manufacturing (right)—
Plant No. 2

Oil Seal Manufacturing—
Plant No. 3



TODAY...



NUMBER OF PRODUCTS

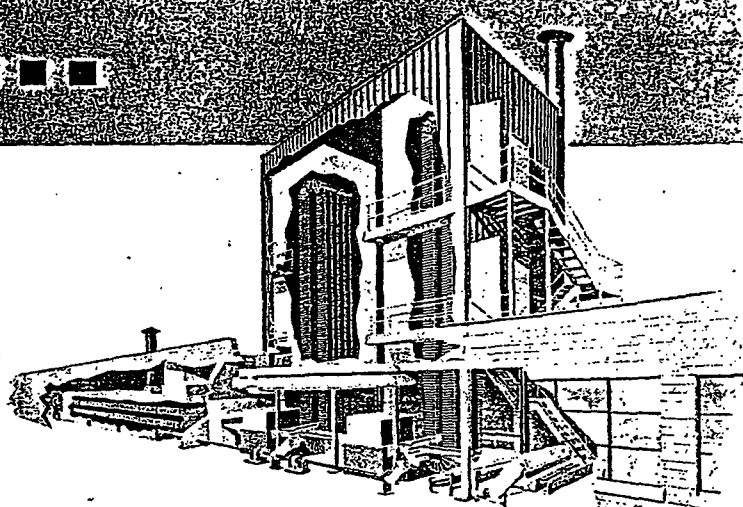
The number and variety of Victor products total more than 100,000 different items—including gaskets, oil seals and packings.

INDUSTRIES SERVED

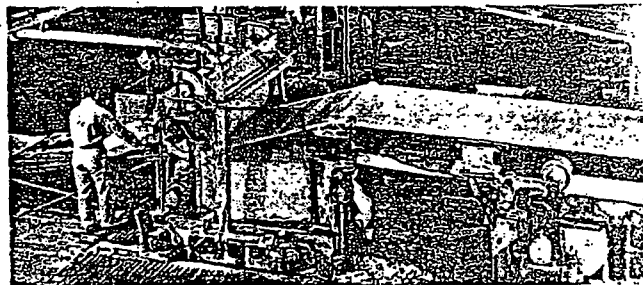
Typical industries served by Victor are: automotive, air, water and rail transportation; agriculture; construction, power and power transmission equipment; the oil industry; machinery and machine tools; electrical, refrigeration and air-conditioning industries; household appliances; and suppliers of war equipment.

DISTRIBUTION

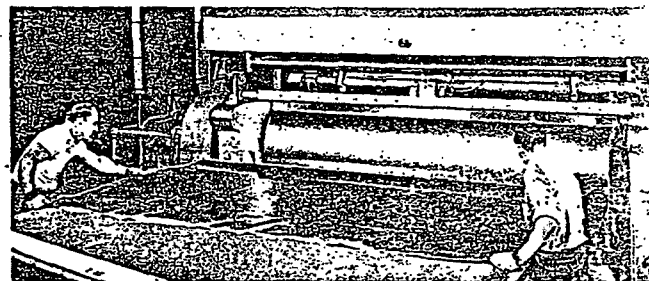
Victor products are distributed in the United States and Canada through thousands of automotive and industrial parts jobbers and distributors. In addition, Victor products are sold in foreign countries from north to south and east to west. The sun never sets on the Victor trade-mark or its products.



Victor's automation techniques include this three story high conveyor system that cleans, applies and bakes on the aluminum coating to steel gaskets all in one continuous operation.



Asbestos millboard—Victor knows and controls the properties of this packing material. Victor has operated its own shooting mill since 1935.



Asbestos fiber and synthetic rubber is mixed and bonded under heat and pressure to form a tough homogeneous sheet of VICTOPAC packing material.

SPACE FOR SEALING PRODUCTS EXCLUSIVELY...

Bulk Stocking and
Labeling Division—
Plant No. 4



Merchandising, Packaged Stock
and Shipping Division—Plant No. 5

Complete Gasket Manufacturing in Canada—
Victor Mfg. & Gasket Co. of Canada Limited
St. Thomas, Ontario



VMG-25-0000154

VICTOR Pioneering Skill

To meet the demand for better gaskets, the Victor Company through the years has developed and patented the principal reinforced designs that are in common use today, some of which are illustrated on these pages. Among them are the steel grommet reinforcement (U.S. Patent 1748582), the United grommet reinforcement (U. S. Patent 1472133), the wire insert reinforcement (U. S. Patent 1819694) and the Victoprene grommet reinforcement (U. S. Patent 2395243).

HYDRO-BRIGHT-ANNEALED COPPER

The early copper gaskets were discolored and sometimes covered with scale due to necessary annealing before forming. Victor first introduced into gasket making, "Hydro-Bright-Annealed" copper that maintained the bright and attractive appearance of copper even after annealing.

ASBESTOS

With the demand for better gaskets came the search for an asbestos sheet of more uniform thickness and density and with improved binder. In 1935 Victor installed its own equipment to make asbestos sheet especially for gaskets. Probably no single development has contributed more to better gasket performance than the type of sheet made on the Victor equipment.

USE OF STEEL

Steel offers greater resistance to burning and pressure than copper, although the softer copper makes a better fluid seal than bare steel. Victor has developed several types of gaskets where the advantage of both metals are retained. Standard practice today is to use tin plate.

PRECOTE

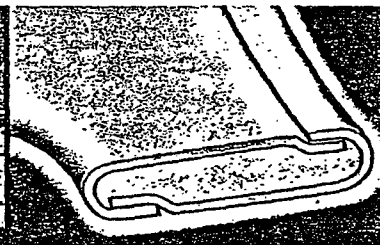
In 1937, Victor developed "Precote" (Reg. U. S. Patent office), a coating that is applied and dried on the headgasket in manufacture. It gives added sealing qualities needed in a steel faced gasket. Victor was the originator of this type of treatment, and today, Victor steelfaced gaskets are precoated.

VICTOCOR

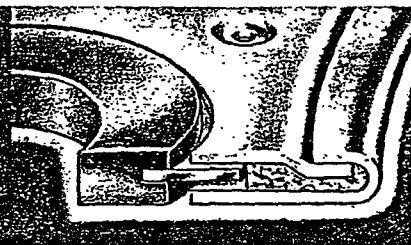
A complete departure from conventional design, Victocor Motor Seal has a metal core with a spe-



Victocor - Special combination of Victoprene and asbestos mechanically clamped to a steel insert by prongs resulting from 800 perforations per square inch.



Vic-2-fold - Using material from top and bottom layers to form overlap in all holes to be sealed assures a balance of compressed thickness at all openings.

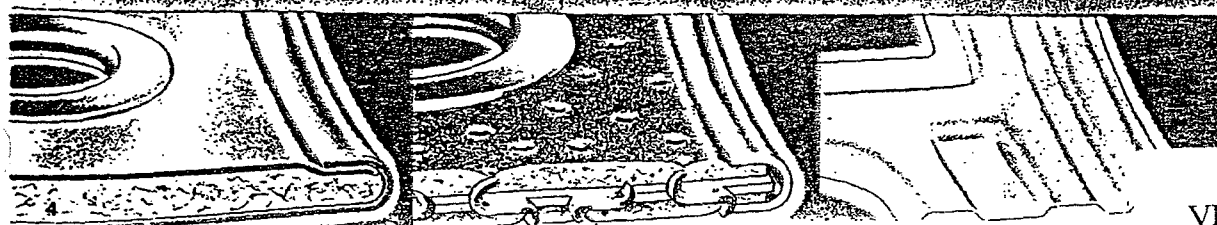


Rubber grommets molded to retaining steel washers inserted in Vic-2-fold or other constructions to assure fluid seal at areas not sufficiently clamped for metal to metal contact. (U.S. Patent 2395243)

Single Overlap - The standard copper-asbestos or steel gasket. Light duty.

Carbestos - Treated asbestos combined to both sides of a perforated steel sheet and surface coated. Grommets applied to cylinder openings and water openings as required.

A single thickness of precoated, special hardness steel, pre-formed to assure concentration of loading at points to be sealed.



Leads Gasket Progress

cial asbestos-elastomeric compound bonded to both faces.

The exclusive core design combines the resilience of rubber, the heat resistance of asbestos and the strength of steel.

The extreme resiliency of Victocor's sealing element helps compensate for head warpage and defects on mating surfaces of head and block.

No pre-coating is needed for installation, yet, there is no sticking if it is necessary later to remove the head.

Approved by leading car builders, Victocor gaskets are available for replacement in most late model passenger cars.

VICTOR PATENTS

The preeminence of the Victor Company in the origination of improvements in gasket design is evidenced by a long list of patents which includes nearly all of the patentable constructions now in common use. Shown at right is a list of patents covering gaskets and oil seals that have been issued to the Victor Company.

VICTOR STANDARDS

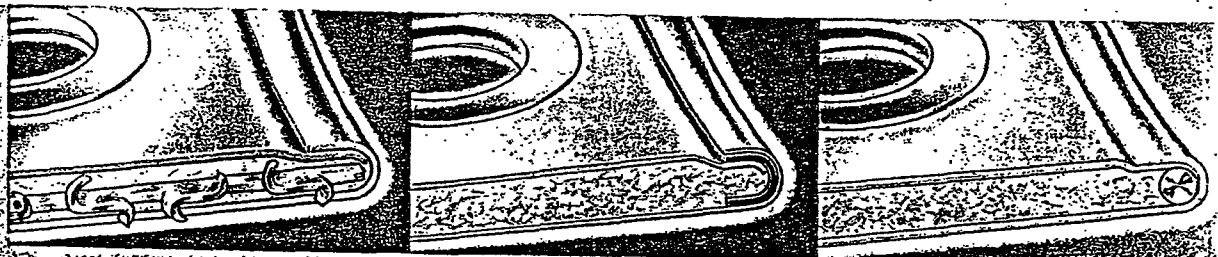
In the Victor laboratories and in a very complete testing department, which includes the various types of internal combustion engines mounted on dynamometers, gasket developments of tomorrow are in process.

LIST OF PRESENT VICTOR PATENTS

GASKETS

1,241,587	1,985,473	2,209,578
1,338,617	1,985,475	2,209,750
1,398,612	1,985,474	2,210,723
1,472,133	2,021,571	2,210,748
1,626,962	2,026,854	2,210,823
1,692,857	2,070,918	2,212,291
1,740,780	2,092,231	2,213,116
1,748,582	2,127,372	2,224,449
1,768,995	2,130,110	2,227,771
1,770,548	2,157,102	2,233,147
1,771,596	2,209,230	2,233,359
1,779,616	2,311,247	2,233,902
1,789,594	2,389,620	2,235,725
1,789,595	2,349,235	2,240,252
1,789,770	2,395,243	2,240,332
1,793,423	2,571,075	2,248,761
1,798,246	2,593,648	2,269,607
1,804,574	2,481,241	2,289,608
1,814,283	2,702,162	2,289,659
1,815,601	2,729,483	2,301,993
1,815,602	2,753,199	2,319,067
1,819,694		2,350,104
1,823,284		2,354,349
1,823,341		2,348,586
1,823,342		2,348,587
1,828,471		2,367,403
1,829,248		2,367,411
1,835,356		2,405,279
1,838,496		2,448,247
1,839,336		2,483,988
1,843,297		2,485,011
1,846,401		2,493,255
1,846,402		2,558,183
1,853,175		2,575,818
1,862,703		2,637,574
1,864,328		2,646,295
1,864,854		2,647,777
1,893,881		2,651,534
1,904,651		2,695,801
1,911,484		2,709,098
1,913,736		2,729,482
1,932,538		2,806,725
1,932,539		2,826,441
1,956,183		2,856,219
1,957,798		2,868,566
1,974,623		2,884,267
		2,208,482

OIL SEALS



A Corbestos layer with a thin metal top and heavy copper or steel (.015-.020) bottom formed at combustion openings.

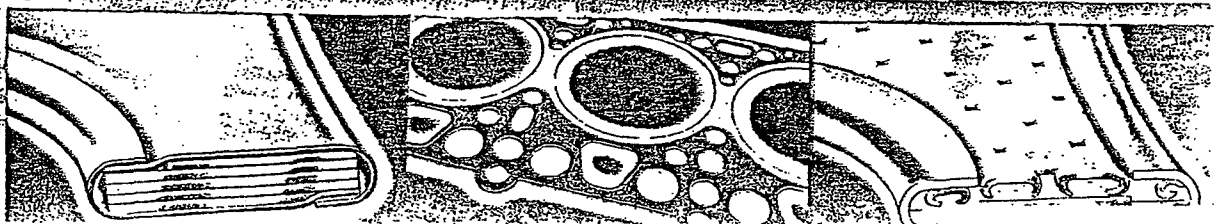
Laminated metal—Metal layers, usually aluminum used as the filler for a basic Vic-2-fold construction to furnish maximum fire power and torque loss resistance.

Steel grommet reinforcement around cylinder openings. Copper or steel layers. U.S. Patent 174858.

Web or united grommets. Flat copper or steel layers with inserted grommets joined together. U.S. Patent 1472133.

Wire insert reinforcement (copper or steel) around cylinder opening. U.S. Patent 1819694.

Twin type Corbestos consists of two sheets of single sided Corbestos held together by individual combustion chamber flanges and other grommets.



Sealing Products Exclusively

The research, production, and distributing facilities of the Victor Company are devoted entirely to the manufacture of gaskets, oil seals, gasket materials, sheet packings, and kindred sealing products. Practically all of these products, with the exception of cork gaskets and sheets, are produced from basic raw materials within Victor Plants.

ORIGINAL EQUIPMENT

The Victor Company is the largest supplier of gaskets and oil seals for original equipment installation to manufacturers and producers of automotive vehicles, passenger cars, light and heavy trucks, tractors, busses, and farm equipment. The same wide variety and quality of product is supplied for REPLACEMENT applications.

INDUSTRIAL

The Victor line embraces a variety of gaskets, oil seals, and packings used in production and maintenance outside of the automotive field. Special catalogs are available for industrial gaskets and oil seals.

RAILROADS

Victor products are widely used in diesel locomotives, steam locomotives, and various railroad devices and equipment.

MILITARY REQUIREMENTS

The builders of heavy duty engines and equipment depend upon Victor to supply most of their cylinder head and other gaskets. Likewise, U. S. Military and the prime contractors have depended upon the wide experience of Victor engineers in the development of oil seals for critical applications.

GASKETS

Full coverage for all automotive installations including cylinder head, manifold, oil pan and miscellaneous applications of various types and constructions designed to function effectively under all operating conditions.

VICTOPRENE OIL SEALS

Victor pioneered the development and manufacture of oil seals using a compounded elastomer sealing element which is now the preferred type for the most severe as well as standard applications and is rapidly replacing other types for general use. Only engine applications of oil seals are listed in this catalog. For a complete listing, including wheel applications, see the latest Victor Oil Seal Guide.

SPECIAL PACKING MATERIALS

Among Victor sealing products are especially compounded packing materials used in fabricating gaskets and oil seals. These, for the most part, are

developed and manufactured from basic materials and for specific requirements.

Asbestocork	Silicone	Victoplate
Asbestopac	Teflon	Victorite
Asbestoprene	Victolene	Victocor
Asbestos Millboard	Victolex	Victocork
Corbestos	Victopac	Victoprene
Solicoz		

ARMSTRONG-VICTOR CORK GASKETS

The Armstrong Company, the world's leading producer of cork products, and the Victor Company are associated in supplying the trade with the finest quality and best merchandised line of cork gaskets, cork sheets, and other cork products. The dimensional accuracy and uniform density of Armstrong-Victor sheet cork, from which gaskets are blanked, is assured by the new dielectric curing process developed by the Armstrong Cork Company.

GASKET SETS

Head gasket sets, general overhaul, and other gasket sets are in wide demand. While Victor Gasket set coverage is by far the most comprehensive, facilities for making sets are constantly being expanded.

NUMBERING AND LABELING

The Victor numbering system is simple and convenient. Packages and sets bear legible printed labels listing the manufacturer's part number and also the corresponding Victor Replacing number in bold figures. Gasket and oil seal numbers are also imprinted upon the product.

CATALOGING

Clear, concise, and comprehensive cataloging is essential to the marketing of any quality product. The Victor Company is justly proud of the wide acceptance and use of their printed matter of which this Guide is an example. Equally well prepared are catalogs covering industrial oil seals and industrial gaskets.

FOREIGN CAR GASKETS

With increased demand for imported cars in the United States and its ultimate need for replacement parts, Victor has made available the entire line of Payen Foreign Car Gaskets. A special list contains the gaskets for replacement on the most popular foreign car makes and models.



VICTOR

FIRST

...in accuracy
...in completeness
...in convenient arrangement
...in the trade's esteem

Again the Victor Gasket Guide provides the trade with the most accurate, complete, up-to-date and best arranged information on gaskets. Since the last issue of the Guide, a staff of experienced people have been accumulating and compiling data on the thousands of gaskets required for the servicing of passenger cars, trucks, tractors, airplanes, marine engines and industrial engines now in service. In this issue there are 4,300 new items and 369 new gasket illustrations, a large part of which have not appeared in any other gasket catalog.

Since the Victor Gasket Guide is usually first to supply full information on the gaskets and oil seals for new models, the information must be compiled from original sources. Hundreds of parts books, specification tables and other sources of information are checked and rechecked to bring under one cover comprehensive data on Victor Products. Shortly after its beginning in 1909, the Victor Company began supplying gasket data to the trade. Prior to the issues listed below the Victor Company published a number of Catalogs and Charts which were the principal sources of information on gaskets for the early models.

VICTOR MANUFACTURING & GASKET COMPANY

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NEW YORK OFFICE: 808-809 Fisk Bldg., 250 W. 57th Street, New York 19, N.Y.

In Canada: Victor Manufacturing & Gasket Company of Canada, St. Thomas, Ontario

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WORLD'S LARGEST GASKET MANUFACTURER

Victor Gasket Guide (1923)	Issued November 1922	25,000 copies
Victor Gasket Guide No. 2	Issued November 1924	28,000 copies
Victor Gasket Guide No. 3	Issued March 1932	40,000 copies
Victor Gasket Guide No. 4	Issued March 1927	35,000 copies
Victor Gasket Guide No. 5	Issued April 1928	38,000 copies
Victor Gasket Guide No. 6	Issued March 1929	40,000 copies
Victor Gasket Guide No. 7	Issued March 1930	45,000 copies
Victor Gasket Guide No. 8	Issued March 1931	40,000 copies
Victor Gasket Guide No. 9	Issued March 1932	40,000 copies
Victor Gasket Guide No. 10	Issued April 1934	43,000 copies
Victor Gasket Guide No. 11	Issued April 1936	54,000 copies
Victor Gasket Guide No. 12	Issued May 1938	50,000 copies
Victor Gasket Guide No. 13	Issued April 1940	50,000 copies
Victor Gasket Guide No. 14	Issued January 1945	60,000 copies
Victor Gasket Guide No. 15	Issued January 1951	65,000 copies
Victor Gasket Guide No. 16	Issued May 1955	75,000 copies
Victor Gasket Guide No. 17	Issued November 1959	80,000 copies

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EXHIBIT

3 Duncan

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QUOTATION AND BILLING RECONCILIATION

CUSTOMER'S PART NO. 46352

CHANGE NO.

VICTOR

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