

Page 50 1 Q. On each of those five occasions? 2 A. No, I think one -- one of the occasions was a 3 phone conversation with Tom, one of them he wasn't 4 here. So that would leave, what, three? Three, I 5 think. 6 Q. And how long did those discussions last? 7 A. As I said, about three hours maybe. 8 Q. How much time was spent reviewing the 9 documents versus having discussions with the 10 attorneys? 11 A. I spent about three hours going through the 12 documents. One of the trips was to go through the 13 documents and see what was there. 14 Q. And other than the five documents that you 15 produced today, did you obtain copies of any other 16 documents from your view at the law office? 17 A. I retained a copy of a parts catalogue. 18 Q. And what year was that catalogue? 19 A. I don't recall right now. I believe it would 20 be in the mid 70's. 21 Q. And did you review that parts catalogue to 22 see what type of gasket material that Dana was 23 selling? 24 MR. RADCLIFFE: Object to the form. 25 A. No, I didn't.	Page 52 1 MR. RADCLIFFE: Yes, I am. 2 Q. Do you know if anybody at -- any employee of 3 Dana ever filed a workers' compensation claim for an 4 asbestos-related disorder? 5 MR. RADCLIFFE: Object to the form. 6 A. No, I don't. 7 Q. Did any of the records that you reviewed at 8 the law firm contain any workers' compensation 9 records? 10 A. Not that I recall. 11 Q. Besides parts catalogues, what other type of 12 documents were contained within the area where you 13 spent three hours reviewing? 14 A. Service manuals. 15 Q. Were the -- who -- where were the service 16 manuals -- whom were they from? 17 A. The clutch division. 18 Q. So Victor put out a -- I'm sorry, Dana 19 Corporation put out a service manual for how to 20 install and repair their clutches? 21 A. Spicer clutch division of Dana put it out. 22 Q. And what was the earliest service manual that 23 you were able to review? 24 A. I believe there was one in the 60's, but 25 that -- like, '65 or '64, but I can't be sure of the
Page 51 1 Q. Would that type of material be contained 2 within the catalogue? 3 A. No, it wouldn't. 4 Q. Is this a catalogue specifically for 5 clutches? 6 A. Yes. 7 Q. This case is, at this point in time, set for 8 trial on November 17. Do you have any conflicts that 9 would prevent you from coming to Dallas -- I mean, 10 coming to Texas to testify? 11 A. I don't have a calendar in front of me, but I 12 don't believe I do. 13 Q. Other than reviewing documents in preparation 14 for this deposition, have you done any other activity 15 since 1985 regarding Dana Corp. and any issues dealing 16 with asbestos? 17 A. No, I haven't. 18 Q. What conversations did you have with the 19 attorney at the Ohio office? 20 MR. RADCLIFFE: I'm going to object. 21 Mr. Dickson is a consultant for Dana Corporation and 22 the conversations are covered by the attorney-client 23 privilege. 24 MR. SMITH-GEORGE: Are you going to 25 instruct him not to answer?	Page 53 1 exact date. 2 Q. And how many manuals were there, if you can 3 estimate? 4 A. Maybe five or six. There -- 5 Q. And what was the latest one? 6 A. I believe there was one in the late 80's. 7 Q. Was there any indication in those service 8 manuals to use compressed air to blow out dust when 9 replacing a clutch? 10 A. No, there wasn't. 11 Q. Do you recall seeing any warning language or 12 cautionary language in any of those service manuals 13 regarding clutch repair or installation? 14 MR. RADCLIFFE: Object to the form. Go 15 ahead. 16 A. There were warnings in the manuals concerning 17 how to measure things and how to do things. 18 Q. Was there any warnings or cautionary language 19 directed towards exposure to asbestos? 20 MR. RADCLIFFE: Object to the form. Go 21 ahead. 22 A. No, not that I could find. 23 Q. Other than service manuals and the parts 24 catalogues, what other type of documents, if any, were 25 contained within those documents that you reviewed?