

FILE NAME: General Motors (GM)

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DOCUMENT DESCRIPTION: Legal - Deposition of Dr. William Krebs

1 IN RE: BALTIMORE CITY * IN THE
2 ASBESTOS CASE * CIRCUIT COURT
3 ORIGINAL * FOR
4 * BALTIMORE CITY

5 * * * * *

6 GABRIEL NOVO, et al., * CASE NO. 24X00000003
7 Plaintiffs, * AUGUST 2001 TRIAL GROUP
8 vs. * HON EDWARD J. ANGELETTI
9 ACandS, INC., et al., * CONSOLIDATED CASE NO.
10 and *
11 A.P. GREEN INDUSTRIES, *
12 INC., a/k/a A.P. GREEN *
13 REFRATORIES, a/k/a *
14 RHI REFRATORIES *
15 AMERICA GREEN BOULEVARD *

1 A. I would say approximately 1973, 1974.

2 Q. After that point were all of the
3 General Motors brake materials shifted to
4 semi-metallic or were just some of them? Did
5 General Motors immediately start making all
6 semi-metallic brakes and no asbestos brakes?

7 MR. THOMPSON: After, as of what
8 year? 1973?

9 MR. RUCKDESCHEL: Seventy-three,
10 when whatever this year you have given me the
11 approximate date.

12 THE WITNESS: No. General Motors
13 did not immediately switch 100 percent of its
14 manufacturing to semi-metallic linings. There are
15 many considerations that go into the development of a
16 braking system and there was very extensive testing
17 that was required and design considerations before a
18 new brake system could be employed in a motor vehicle.

19 Q. (BY MR. RUCKDESCHEL) For vehicles that were
20 produced prior to 1973 did General Motors continue to
21 produce brake linings for those vehicles after 1973?

22 A. For vehicles that were produced prior to 1973
23 brake linings were available for replacement parts for
24 those model years. My recollection is that there
25 would be periodically a run of or a production run to

1 meet need if one should occur.

2 Q. Prior to 1982 if such a reproduction run was
3 made for a General Motors car that was originally
4 designed with asbestos-containing brake materials,
5 would the replacement parts made by G.M. contain
6 asbestos?

7 MR. THOMPSON: Objection, but you
8 can answer.

9 THE WITNESS: Yes. They would very
10 definitely have contained asbestos because one could
11 not move from one friction material to another
12 friction material, because as I was indicating
13 earlier, the brake assemblies are rigorously tested
14 according to the requirements of the Federal Motor
15 Vehicle Safety Standard, and there was no simple
16 replacement for those systems.

17 Q. (BY MR. RUCKDESCHEL) Did there come a time
18 when non-asbestos-containing brake materials were
19 available for G.M. cars that had originally been
20 designed with asbestos-containing brake systems?

21 A. I am unaware of that having occurred.

22 Q. Are you familiar with what companies, from
23 what companies General Motors may have purchased
24 asbestos-containing brake materials during the 1960s
25 and 1970s?