

FILE NAME: Kelly Moore (KM)

DATE: 2002 May 31

DOC#: KM048

DOCUMENT DESCRIPTION: Legal - Deposition of Herbert R. Giffins

1 NO. B-150,374-AK  
2 WILLIAM L. COTTON, ET AL ) IN THE DISTRICT COURT OF  
3 )  
4 VS. ) JEFFERSON COUNTY, TEXAS  
5 )  
6 A.P. GREEN REFRACTORIES )  
7 COMPANY, ET AL ) 60TH JUDICIAL DISTRICT  
8 NO. 41,862  
9 VERDA SUTTON AND P.D. ) IN THE DISTRICT COURT  
10 SUTTON ) 7  
11 VS. ) HARDIN COUNTY, TEXAS  
12 )  
13 ACandS, INC., ET AL ) 356TH JUDICIAL DISTRICT  
14

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11 VIDEOTAPED DEPOSITION OF

12 HERBERT R. GIFFINS

13 MAY 31, 2002

14  
15 VIDEOTAPED ORAL DEPOSITION OF HERBERT R. GIFFINS,  
16 produced as a witness duly sworn by me at the  
17 instance of the Plaintiffs, taken in the above  
18 styled and numbered causes on the 31st of May, 2002,  
19 from 10:06 a.m. to 7:02 p.m., before Kathy Miller,  
20 Certified Shorthand Reporter No. 739 in and for the  
21 State of Texas, at the offices of Brown McCarroll,  
22 L.L.P., 2001 Ross Avenue, Suite 2000, Dallas, Texas,  
23 75201 pursuant to the Texas Rules of Civil Procedure  
24 and the provisions stated on the record or attached  
25 therein.

## APPEARANCES:

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and Union Carbide:

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Dallas, Texas 75201

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1 MR. COON: Take it pursuant to the  
2 rules?  
3 MR. HAZEN: Pursuant to the rules,  
4 reserve objections as to form and responsiveness.  
5 MS. WILLIAMS: Do we have an  
6 objection made by one defendant is good for all  
7 defendants?  
8 MR. HAZEN: Good for all.  
9 MR. COON: Sure. What I would like  
10 to do when he is ready, we will get him sworn in and  
11 just have the identity of those that showed up and  
12 who they represent.  
13 THE VIDEOGRAPHER: Everybody ready?  
14 MR. HAZEN: Ready.  
15 THE VIDEOGRAPHER: One moment.  
16 We're on the record. The time is 10:08 a.m., May  
17 31st, 2002, beginning of Tape 1.  
18 HERBERT R. GIFFINS  
19 having been first duly sworn to testify the truth,  
20 the whole truth, and nothing but the truth,  
21 testified as follows:  
22 MR. COON: For purposes of the  
23 record we need the identity of the parties. Brent  
24 Coon on behalf of plaintiffs.  
25 MS. BALLI: Melinda Balli on behalf

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21  
22  
23  
24  
25

1 of Kellogg and Brown & Root Inc.  
2 MS. YANOF: Cindy Yanof here on  
3 behalf of 3M Company.  
4 MS. WILLIAMS: Pam Williams here for  
5 Fluor, F L U O R.  
6 MR. THORPE: Larry Thorpe here for  
7 Quigley and Pfizer.  
8 MS. FULLER: Michelle Fuller here  
9 for Cleaver-Brooks.  
10 MR. VANCLEAVE: Mark VanCleave here  
11 for Borg Warner.  
12 MR. NANTZ: Bill Nantz here for  
13 Certaineed, Union Carbide and Dana.  
14 MR. SHUSTERMAN: Dan Shusterman, A&O  
15 Schwarz -- Smith.  
16 MR. HAZEN: Scott Hazen on behalf of  
17 Kelly-Moore Paint Company.  
18 MR. COON: Ready to proceed?  
19 THE REPORTER: Ready.  
20 EXAMINATION  
21 BY MR. COON:  
22 Q. Good morning, Mr. Giffins.  
23 A. Good morning.  
24 Q. Could I have you introduce yourself to the  
25 Ladies and Gentlemen of the Jury by stating your

1 full name and address, please, sir?

2 A. My name is Herbert Ronald Giffins, that's  
3 spelled G I F F I N S. My home address is 7004  
4 Orchard Hill Court, Colleyville, Texas, 76034.

5 Q. Mr. Giffins, where is Colleyville?

6 A. It's about midway between Dallas and Fort  
7 Worth, going west from here.

8 Q. My firm has noticed to the attorneys for  
9 Kelly-Moore a -- what is called a corporate  
10 representative, or a person to be a spokesperson for  
11 the company, with respect to some asbestos-related  
12 matters, and you are the person that Kelly-Moore has  
13 presented this morning in that regard, and so I want  
14 to ask you some background questions first before we  
15 get into the substantive discussion this morning.

16 First, have you had an opportunity to be a  
17 spokesperson for Kelly-Moore in any matters in the  
18 past, as a -- what you would call a corporate  
19 representative?

20 A. In matters relating to what, sir?

21 Q. Just any type of matters.

22 A. Yes.

23 Q. Could you just give me a general summary  
24 of the type of matters you have been involved as a  
25 corporate spokesperson for Kelly-Moore in the past?

1 A. Primarily related to the asbestos  
2 involvement with Paco.

3 Q. Any circumstances other than being a  
4 representative for Kelly-Moore in asbestos-related  
5 matters?

6 A. I've represented the company in -- at  
7 meetings, and things like that. I am not sure I  
8 understand your question entirely.

9 Q. Okay. Let me bifurcate it then. With  
10 respect to litigation matters, have you been a  
11 corporate spokesperson for cor -- Kelly-Moore in  
12 anything other than asbestos-related matters?

13 A. No, sir.

14 Q. And other than the asbestos-related  
15 matters, have you been a spokesperson for  
16 Kelly-Moore on any other type of litigation of a  
17 corporate nature, or anything like that?

18 A. I was involved years ago in a couple  
19 depositions. One had to do with a -- a product that  
20 was sold through one of our stores, and then another  
21 deposition had to do with a -- a trial, had to do  
22 with an employee at one of the stores that we had  
23 acquired.

24 Q. And you are presently employed by  
25 Kelly-Moore, correct?

1 A. Yes, sir.

2 Q. And what is your title, sir?

3 A. My current title is president, Southwest  
4 Division.

5 Q. And what does the Southwest Division  
6 encompass?

7 A. It takes in basically Texas, Oklahoma,  
8 Colorado, Arkansas and Arizona.

9 Q. Mr. Giffins, how many times in the past  
10 before today have you given any type of testimony  
11 regarding an asbestos-related matter?

12 A. Probably, I'd say, four, maybe five times.

13 Q. And how far back do those go?

14 A. My first one would have been October. It  
15 would have been in the -- probably the fall of 2001.

16 Q. I take it you have had three or four  
17 others since then, before today?

18 A. Yes, sir. Yes.

19 Q. Did you give your testimony by deposition  
20 like you're doing today, or were one or more of  
21 those involving trial testimony where you went to a  
22 courthouse?

23 A. They were depositions, sir.

24 Q. Were they all matters involving a person  
25 who claimed an asbestos-related injury?

1 A. Yes, sir.

2 Q. Did they all involve a claim by the  
3 individual to exposure to asbestos-containing  
4 materials made at some point in time in the past by  
5 Kelly-Moore?

6 A. The depositions were to address those  
7 issues, yes.

8 Q. Were all of those claims pending here in  
9 Texas, or were they outside of Texas?

10 A. There are some outside of Texas.

11 Q. Could you tell me what other states you  
12 have given case testimony in?

13 A. I believe there is one related to  
14 California, and I -- you have -- the problem I am  
15 having, a lot of these were all bunched together.

16 Q. Yes, sir.

17 A. I had, like, two or three, so they may  
18 have -- some of those may have been with the Texas,  
19 or -- and at the same time related to a California  
20 case, but I believe there was a California case, and  
21 then there was probably one in Michigan, or  
22 somewhere up in that area.

23 Q. Before your testimony today, did you have  
24 an opportunity to go back and review the prior  
25 deposition transcripts you have given?

1 A. Yes, sir.

2 Q. Is there anything else that you had an  
3 opportunity to review, to assist you in testifying  
4 today, other than those depositions?

5 A. I've gone through the documents that I  
6 believe that you were provided. There were about  
7 six boxes of documents that you were provided. I --  
8 I went through those. I went through the  
9 depositions as I had mentioned. That was basically  
10 it.

11 Q. Mr. Giffins, are you aware generally of  
12 the history of Kelly-Moore with respect to  
13 asbestos-related litigation?

14 A. Yes, sir.

15 Q. Are you aware of persons being designated  
16 as a corporate representative of Kelly-Moore prior  
17 to yourself?

18 A. Yes, sir.

19 Q. Could you tell me the names of those  
20 persons that you know of as having been the  
21 corporate representative or the spokesperson for  
22 Kelly-Moore before you took over that role in 2001?

23 MR. HAZEN: Objection, form. Go  
24 ahead.

25 A. I'm familiar with Doug Merrill, obviously.

1 A. In 1978.

2 Q. And do you know when they acquired that  
3 facility?

4 A. In '78. Oh, when Kelly-Moore --

5 Q. Yes, sir.

6 A. -- did?

7 Q. Yes, sir.

8 A. The Kelly-Moore -- originally in Broken  
9 Arrow, they opened that facility in 1975, and prior  
10 to that, though, they -- the location was in Tulsa,  
11 and they opened that in '69. So, in tracking it  
12 back, it would have been '69 in Tulsa, '75 they  
13 moved to Broken Arrow.

14 Q. How about Frederick Marquardt? Do you  
15 know Frederick Marquardt?

16 A. I'm not familiar with that name.

17 Q. Okay. How about Patrick McDonald?

18 A. Yes, I'm familiar with Patrick.

19 Q. How is it you know Patrick McDonald?

20 A. He is our vice president of human  
21 resources and auditing.

22 Q. Still employed there, I take it?

23 A. Yes, sir.

24 Q. Have you had an opportunity to review any  
25 of his prior deposition or trial transcripts

1 He's probably the most recent. And as far as I  
2 know, he was the only one that was primarily  
3 representing the company in these asbestos issues.

4 Q. (By Mr. Coon) Okay. Is it your  
5 understanding that Doug Merrill was the -- what you  
6 would call the principal point person for these  
7 types of matters before yourself?

8 A. Yes, sir.

9 Q. Did you know a Doyle Freeman?

10 A. Bill Freeman?

11 Q. I just have Doyle Freeman. Do you know a  
12 Doyle?

13 A. I think it's William Doyle Freeman.

14 Q. And I take it you do know --

15 A. Yes.

16 Q. -- at least William Doyle? How is it you  
17 know him?

18 A. Mr. Freeman owns the Freeman Drywall  
19 Company, in Broken Arrow, Oklahoma, and he had  
20 purchased that -- the assets of that company from  
21 Kelly-Moore.

22 Q. And when was that a Kelly-Moore facility?  
23 Do you know what years?

24 A. When it was last a Kelly-Moore facility?

25 Q. Yes, sir.

1 regarding these matters?

2 A. Sure have.

3 Q. And what about Mr. Merrill, have you  
4 reviewed any of his prior transcripts?

5 A. Yes, sir.

6 Q. Have you had an opportunity to discuss  
7 generally with him the -- the nature of the  
8 questions that he was asked, and what your roles may  
9 be as a corporate spokesperson for Kelly-Moore?

10 A. Sure have.

11 Q. Have you had an opportunity to talk to  
12 other individuals at Kelly-Moore with respect to  
13 assisting you in generally -- just preparing  
14 yourself for being a spokesperson in these matters?

15 A. I have talked to ex-employees of  
16 Kelly-Moore, yes, sir.

17 Q. Could you give me a general idea of the --  
18 the types of things that you did to help prepare  
19 yourself, outside of discussions that you had with  
20 attorneys for Kelly-Moore?

21 A. You want a time line or do you just  
22 want --

23 Q. Yes, sir. Generally you can just tell us.  
24 I mean, we know that you're the spokesperson.  
25 You've had an opportunity to review a number of

1 boxes of documents that Kelly-Moore has regarding  
2 these issues. You have had an opportunity to give a  
3 few prior depositions. You have been able to read  
4 your prior depositions. You have also been able to  
5 talk to some other Kelly-Moore persons that you have  
6 identified, as well as review their transcripts.  
7 And I am saying in addition to that, if you could  
8 just kind of give us a summary of what your other  
9 sources of information or preparation for these  
10 types of proceedings would entail.

11 A. Okay. I think the best way to do it is to  
12 track back how long I have been involved, because a  
13 lot of this has transpired since basically April of  
14 2001. That was when I was first asked to get  
15 involved, and it wasn't until about, oh, I'd say,  
16 August or fall of 2001 that I was involved in a --  
17 from a -- a regular routine. Up until that point it  
18 was a hit and miss.

19 Since then, I have talked to four or five  
20 ex-employees, interviewed them on a one-to-one  
21 basis.

22 Q. Can you give us the identity of those  
23 persons?

24 A. Sure.

25 Q. Do you recall who they were?

1 A. John Winslow, Mr. Don Scranton, Mr. Bill  
2 Harrison, Mr. Freeman, Bill Freeman. There was a  
3 Tom -- I can't think of his last name now. I can't  
4 think of his last name. There was an ex-employee.  
5 It will come to me.

6 Q. Okay. Did you take any recorded  
7 statements or any other kind of written notes with  
8 respect to your meetings with those individuals?

9 A. I took my own notes, as I met with them,  
10 yes.

11 Q. And do you still have those notes?

12 A. I do have them.

13 Q. Are they with Kelly-Moore, their  
14 attorneys, or do you keep them in your personal  
15 possession?

16 A. I had them -- they were in my personal  
17 possession.

18 Q. Briefly, with respect to each of these  
19 gentlemen, why is it that you sought them out, and  
20 what was the nature of the discussions?

21 A. Primarily, because at the time, they were  
22 either in sales or a management position with  
23 Kelly-Moore during the period that Kelly-Moore owned  
24 Paco, and they may have had some indirect  
25 involvement, or whatever, and my purpose of meeting

1 with them was to find out what they knew, and so I  
2 could tie the whole -- tie the whole thing together.

3 Q. With respect to each of these gentlemen,  
4 first Mr. Winslow --

5 A. John Winslow?

6 Q. Yes, sir. When and where did you have an  
7 opportunity to meet with him?

8 A. It would have probably been in the fall of  
9 2001, because I didn't start talking to the  
10 individuals until about that time.

11 Q. And what was his title that would have  
12 caused you to solicit him for additional  
13 information?

14 A. When he left the company, he was vice  
15 president of store operations, and prior to that, he  
16 had held norm -- numerous positions, starting out as  
17 a salesman; and at one time, he was also the sales  
18 manager for the company.

19 Q. Where does he reside now?

20 A. He's retired and he lives in northern  
21 California. I want to say Petaluma area.

22 Q. Did you have an opportunity to personally  
23 meet with him, or just by phone calls?

24 A. No, I have met with him personally, sir.

25 Q. Okay. More than one occasion?

1 A. One.

2 Q. One?

3 A. Personally I have met with him once. I  
4 have talked to him one or two times since then over  
5 the phone asking him a question, but my personal  
6 meeting with him was only once.

7 Q. Okay. Did you know him before looking him  
8 up for these purposes, as just being another  
9 Kelly-Moore employee?

10 A. I had met -- when he left Kelly-Moore, he  
11 went to work for some of our suppliers as a -- as a  
12 manufacturer's rep, and I had met him or got to know  
13 him that way first.

14 Q. Okay. Since we're going to go through a  
15 number of your former employees and people that you  
16 may have had dealings with as an employee of  
17 Kelly-Moore, probably need to back up real briefly.  
18 Could you tell us just real briefly, you know, where  
19 you grew up, and how you got involved with  
20 Kelly-Moore? If you had employment before  
21 Kelly-Moore, what it was, and then once you got --

22 A. Sure.

23 Q. -- to Kelly-Moore if you can kind of walk  
24 us through the chains of progression --

25 A. Sure.

1 Q. -- and promotion?

2 A. Very happy to. I was born and raised in  
3 southern New Jersey. I attended private school  
4 through high school. Went on for two years in the  
5 seminary for religious education. Left that after  
6 two years, went to work for a summer for Chrysler  
7 Corporation on the assembly line, while I decided  
8 what I wanted to do. Then, went to work for  
9 Sherwin-Williams Paint Company, spent about 24 years  
10 -- 24 and a half years with them in various  
11 positions.

12 Q. What year would that have been that you  
13 started at Sherwin-Williams?

14 A. '61.

15 Q. Okay.

16 A. I graduated from high school in '57.

17 Q. Okay. And you were with Sherwin-Williams

18 --

19 A. Either '60 or '61.

20 Q. You were with Sherwin-Williams from '61 to  
21 about '85?

22 A. Yes, sir.

23 Q. And could you briefly tell us the roles  
24 and responsibilities you had in your two-decade  
25 tenure with Sherwin-Williams?

1 ownership, but oversaw the entire operation of the  
2 store as far as sales, operations, and accounting.

3 Q. We're talking about Sherwin-Williams,  
4 we're talking about the national chain that most  
5 people know about.

6 A. Yes, sir.

7 Q. Paint stores?

8 A. Yes, sir.

9 Q. Wallpapers?

10 A. Right.

11 Q. And you retired from there in 1985?

12 A. I -- I didn't retire. I -- I left.

13 Q. Okay. And what was the purpose of leaving  
14 that company in 1985?

15 A. I was approached by Kelly-Moore to join  
16 their organization.

17 Q. Was this something where you were sought  
18 out by them, or you sought them out, or --

19 A. Sort of.

20 Q. -- kind of mutual?

21 A. Sort of. The -- the president of the  
22 company at the time knew me from Sherwin-Williams.

23 Q. And who was that gentleman?

24 A. Joe Christiano. He's our current  
25 president and C.E.O.

1 A. I started out as an assistant -- what we  
2 call -- they called in those days a credit manager  
3 in one of their stores, and credit managers were  
4 primarily assistant managers. And I started out in  
5 a small store in Pennsylvania. I worked there a  
6 couple years, then went to a larger store in  
7 Pennsylvania. I was promoted to a larger store.

8 From there I went to their regional office and  
9 worked in real estate and store planning. Spent a  
10 couple of years doing that, and then was promoted to  
11 their corporate headquarters in Cleveland, whereby I  
12 was part of a start-up store planning department,  
13 where we designed stores and signage and that type  
14 of thing. And from there tried -- went on to  
15 different other departments, different positions in  
16 sales and in operations. And ultimately when I left  
17 Sherwin-Williams in '85, I was a district manager  
18 for them in the bay area, Northern California.

19 Q. And what were your responsibilities at  
20 that time?

21 A. As a district manager?

22 Q. Yes, sir.

23 A. Primarily responsible for about 13 stores.  
24 At that time, the way they were structured is the  
25 district managers had full ownership, or not

1 Q. And where did the two of you meet?

2 A. Oh, boy. You're really testing my memory  
3 here. We first met -- he was a personnel manager  
4 for the North Central Division of the  
5 Sherwin-Williams Company, and I think --

6 Q. Okay. So you knew him first as a  
7 Sherwin-Williams --

8 A. Yes, sir.

9 Q. -- coworker?

10 A. Yes, sir.

11 Q. And, so, you -- you knew him way back when  
12 as another employee at Sherwin-Williams, then  
13 apparently he left Sherwin-Williams at some point in  
14 time prior to you to go to work at Kelly-Moore?

15 A. Correct. And he and I had crossed paths  
16 over the years during my 24 plus years with SW, and  
17 -- in different venues.

18 Q. Do you know if he had made overtures with  
19 respect to other Sherwin-Williams employees to come  
20 to work at Kelly-Moore?

21 A. Uh-huh. Sure did.

22 Q. Do you have any idea generally the -- the  
23 number, the type of people he was looking for to  
24 come to work over there?

25 A. If I can describe Mr. Christiano, he -- he

1 looks for people that are hardworking, honest, and  
2 dedicated to get the job done.

3 Q. And do you know --

4 A. If that's what you're asking.

5 Q. Yeah, generally. And do you know how  
6 Mr. Christiano ended up going to work at  
7 Kelly-Moore?

8 A. I know the story, yes.

9 Q. Okay. What's the story?

10 A. Sherwin-Williams at the time was trying to  
11 buy Kelly-Moore Paint Company.

12 Q. When was this?

13 A. This probably would have been in the early  
14 '80s. I can't give you the exact time. Now, I am  
15 telling you a story third-hand because this is what  
16 Mr. Christiano told me.

17 Q. Okay. We got to know how he got hired,  
18 huh?

19 A. Yeah.

20 Q. Okay.

21 A. John Green, who was at the time the  
22 president of the Sherwin-Williams Company, wanted to  
23 buy Kelly-Moore, and he sent Mr. Christiano, who was  
24 the regional director for the West Coast, over to  
25 meet with Mr. Moore, and that's how Mr. Moore and

1 Mr. Christiano met, and from that relationship, I  
2 believe, Mr. Moore offered him a job.

3 Q. Got to be careful who you send to  
4 negotiate, huh?

5 A. That's correct, sir.

6 Q. Okay. So, Mr. Christiano went over to, as  
7 I understand, talk to Mr. Moore about selling out,  
8 and instead was talked into coming to work for  
9 Kelly-Moore?

10 A. That's correct, in basic terms.

11 Q. And about what year was this?

12 A. I would have to say it would have been  
13 early '80s because I came -- I went to Kelly-Moore  
14 in '85, and Joe had been there -- Mr. Christiano had  
15 been there two to three years prior to that, so it  
16 had to transpire somewhere around '80, '81 but the  
17 initial contact, I'm assuming, was made.

18 Q. Okay. Do you know what position  
19 Mr. Christiano took when he came to work for  
20 Kelly-Moore in the early '80s?

21 A. Uh-huh. He went over as president.

22 Q. President of Kelly-Moore?

23 A. Yes, sir.

24 Q. Was this the role that Mr. Moore had prior  
25 to that?

1 A. Mr. Moore was president prior to that.

2 Q. Okay. So, he hires Mr. Christiano from  
3 Sherwin-Williams to essentially take over his title?

4 A. Correct, sir.

5 Q. And what happened to Mr. Moore after that?  
6 Did he take a senior status or is there a C.E.O.  
7 status above the president or --

8 A. He took a senior status, and I believe for  
9 a while was the C.E.O.

10 Q. And then after Mr. Christiano was working  
11 at Kelly-Moore, he from time to time would go back  
12 to people he knew at Sherwin-Williams and offer them  
13 jobs?

14 A. I can only tell you -- I can only tell you  
15 that he and I had made contact, and I know that he  
16 and Mr. McDonald made contact. Other than that, I  
17 can't tell you who else he may have talked to.

18 Q. Okay. Is this the Mr. Patrick McDonald  
19 you told us about earlier?

20 A. Yes, sir.

21 Q. So he was also a former Sherwin-Williams  
22 employee?

23 A. Yes.

24 Q. Do you know if many employees at this same  
25 time frame were jumping ship, so to speak, from

1 Kelly-Moore to go to work for Sherwin-Williams at  
2 that -- at that same level of management?

3 A. Some of that was going on. I can't tell  
4 you for what other reasons, for all the reasons,  
5 but, yeah, there was a little bit of change going on  
6 at the time.

7 Q. Okay. Was Sherwin-Williams considered to  
8 be a competitor of Kelly-Moore at that time frame?

9 A. You could say that -- I think  
10 Sherwin-Williams looked at Kelly-Moore more as a  
11 competitor than Kelly-Moore looked at  
12 Sherwin-Williams as a competitor.

13 Q. Who were the other competitors in the  
14 market at that time?

15 A. It and -- what -- what market?

16 Q. Just in the markets both of them were in.  
17 I guess we're talking principally paint, are we not?

18 A. Correct.

19 Q. Okay. Let's first talk about the paints.

20 A. Well, Kelly-Moore was -- when I came with  
21 the company in '85, is broad. It's over many  
22 states, so there's numerous competitors. If you're  
23 talking about who was Kelly-Moore's competitor in  
24 the bay area, that's going to be different than who  
25 was -- Kelly-Moore's competitor was in Texas and

1 that type of deal.

2 Q. So they had a lot of regional competitors  
3 as opposed to national competitors?

4 A. There are nationals such as  
5 Sherwin-Williams and Glidden, were involved, but,  
6 then, yes, there were regional-type individuals.

7 Q. Okay. Is Glidden the only one that comes  
8 to mind as another national competitor to  
9 Sherwin-Williams and Kelly-Moore?

10 A. Benjamin Moore comes to mind.

11 Q. Okay. Anyone else?

12 A. Nothing rings a bell.

13 Q. Okay. When you went to work at  
14 Kelly-Moore in '85 --

15 A. '85.

16 Q. -- what were the product lines that were  
17 made or manufactured by Kelly-Moore at that time?  
18 We know mostly paints, correct?

19 A. Well, that's basically all that  
20 Kelly-Moore manufactured was paint.

21 Q. And what type of paints? We know house  
22 paints, interior, exterior. Do they also have  
23 industrial paints? Commercial grade paints?

24 A. No, Kelly-Moore is primarily what we  
25 classify as an architectural house, and makes paints

1 how to make a duck, a kitten, or something, and then  
2 paint it and put it in an oven or something.

3 Q. More ornamental ceramics as opposed to  
4 tiles?

5 A. Yes. Correct.

6 Q. Okay.

7 A. And they were in the mining business at  
8 one time, but this was all prior to me. The ceramic  
9 business was sold not long after I came with the  
10 company.

11 Q. Where were their mining operations? Did  
12 you say mining?

13 A. Yes.

14 Q. Okay. What type of mining?

15 A. Minerals.

16 Q. What type of minerals?

17 A. Different types of things that may have  
18 been used in coatings, or those types of compounds.

19 Q. Are we talking about silvers, platinumums?  
20 Asbestos is a mineral. We talking about asbestos?

21 A. No, it was not an asbestos-type material.  
22 It was more -- I want to say like calcium or -- they  
23 were -- just minerals that were mined that primarily  
24 could be used in coatings. Nonhazardous-type  
25 materials.

1 for residential, commercial-type use.

2 Since I have been there, I am not aware that we  
3 ever were in the industrial coatings. At one time  
4 they did manufacture some lacquers, but that was  
5 quite some time ago.

6 Q. Okay. Now, we also know that they made a  
7 number of textures and joint compounds at one point  
8 in time.

9 A. That is correct.

10 Q. And as of the time you went to work there  
11 in the mid '80s, was Kelly-Moore continuing to  
12 manufacture those types of product lines?

13 A. No, sir.

14 Q. Do you know when they got out of the  
15 manufacture or distribution of those types of  
16 product lines?

17 A. Shut down the operation in 1982.

18 Q. Okay. From 1985 to the present, has  
19 Kelly-Moore been involved in the manufacturing of  
20 other product lines outside paints?

21 A. Well, when I -- at one time they owned a  
22 ceramic company.

23 Q. Is that for ceramic tiles, floor tiles,  
24 wall tiles?

25 A. That was ceramics like you go and learn

1 Q. Okay. Do you know where these mines were  
2 located?

3 A. There was one up in Sacramento, California  
4 area, Tulsa.

5 Q. Okay. And were these using the raw  
6 materials, or the raw minerals that they were mining  
7 out of this in some of their own product lines?

8 A. I believe there was one or two items that  
9 they were using, but most of it was being sold on  
10 the secondary market.

11 Q. Do you know what they were using in their  
12 own products? Was this something they were using in  
13 their joint compounds or paints?

14 A. I do not believe it was used in the joint  
15 compounds. I believe it was more -- went into the  
16 paint product itself.

17 Q. Okay. Did Kelly-Moore have the facilities  
18 to produce their own raw materials for their paints,  
19 or were those typically supplied by outside vendors?

20 A. Typically supplied by outside vendors.

21 Q. Did they have any of their own, what you  
22 would call manufacturing facilities, to make some of  
23 the actual different ingredients that went into the  
24 paints?

25 A. Only thing that we did make for a while

1 was latex. We manufactured our own latex.  
 2 Q. And with respect to the joint compounds  
 3 that were made at some points in the past, did  
 4 Kelly-Moore ever make any of the raw ingredients for  
 5 those products?

6 A. No. Everything was purchased from an  
 7 outside source.

8 Q. Okay. Once you were at Kelly-Moore in  
 9 '85, could you give us a brief summary of the  
 10 different jobs you had over the next 15 years, and  
 11 what each of those roles would have entailed?

12 A. When I came to work with Kelly-Moore in  
 13 1985, I was brought in as a merchandise manager,  
 14 what was called a merchandise manager, and I was  
 15 responsible for the buying of the nonpaint items  
 16 that went into the Kelly-Moore paint stores.

17 Q. Is this like paint brushes, rollers?

18 A. Brushes.

19 Q. Trays?

20 A. Yes, sir.

21 Q. Tarps, all that stuff?

22 A. Correct.

23 Q. Okay.

24 A. And then I was also in charge of the  
 25 advertising department.

1 Q. Was this advertising nationally or  
 2 locally?

3 A. Well, we're a regional company, so it  
 4 would have just have covered the regional needs of  
 5 the company.

6 Q. Okay. And when we're talking about  
 7 Kelly-Moore being a regional company, what do you  
 8 mean?

9 A. It's -- it doesn't -- we don't market  
 10 nationally. We don't go from coast to coast, north  
 11 to south --

12 Q. Okay.

13 A. -- primarily. We're basically -- you can  
 14 almost right now draw a line down from the State of  
 15 Colorado down into Texas and look at us as being  
 16 west of that.

17 Q. Would you say just generically,  
 18 geographically, mostly the southwestern United  
 19 States?

20 A. No. Because it goes all -- we have stores  
 21 in -- in Washington state; we have stores in  
 22 California, in Colorado. So -- we don't have them  
 23 in New Mexico, but pretty much we're a western  
 24 company.

25 Q. Okay. Have -- do you know what states you

1 do have other than the ones you just named? Talked  
 2 about Washington, California, Oregon?

3 MR. HAZEN: Objection, form.

4 A. Yeah.

5 Q. (By Mr. Coon) Do you know if they're in  
 6 Oregon?

7 A. Uh-huh.

8 Q. Do you have stores in Oregon?

9 A. Yeah, we are.

10 Q. Nevada?

11 A. Yes.

12 Q. Utah?

13 A. No.

14 Q. Idaho?

15 A. Yes.

16 Q. Colorado?

17 A. Yes.

18 Q. Arizona?

19 A. Yes.

20 Q. Texas?

21 A. Yes, sir.

22 Q. Oklahoma still?

23 A. Yes, sir.

24 Q. Arkansas?

25 A. Yes.

1 Q. Louisiana?

2 A. No.

3 Q. Okay. So you generally don't go east of  
 4 Texas?

5 A. No, sir.

6 Q. Do you go south of Texas? Do you do  
 7 anything down in Mexico?

8 A. No.

9 Q. Do you do anything outside of the United  
 10 States anywhere?

11 A. As far as company stores?

12 Q. Yes, sir.

13 A. No, sir.

14 Q. What about just sales?

15 A. A few years -- couple years ago they  
 16 started selling some material to China. That's done  
 17 through an export.

18 Q. Okay. All right. So, anyway, I'm sorry,  
 19 we're jumping around again. We're '85  
 20 merchandising?

21 A. Right.

22 Q. Then what?

23 A. And then two years later, I was promoted  
 24 to vice president of store operations.

25 Q. And what did that involve?

1 A. That involved management -- management or  
2 overseeing of all of the company-owned stores as far  
3 as the operations end of it, and that involved the  
4 hiring of the people, the training of the people,  
5 the setting up of the stores, the design of the  
6 stores, anything to do with an operational part of  
7 the store.

8 Q. And after that?

9 A. And after that, I did that until about  
10 1994, when I also took on some responsibility as  
11 president of acquisition in the northwest. And then  
12 in '96, January of '96, I came down to Texas, to  
13 Hurst, as President of the Southwest Division.

14 Q. And the title there is President of the  
15 Southwest Division?

16 A. Yes, sir.

17 Q. Is that the title you still hold?

18 A. Yes, sir.

19 Q. And how many different divisions are there  
20 within Kelly-Moore?

21 A. There's two separate operating divisions:  
22 The Southwest, and Pacific.

23 Q. And what is your territory as president of  
24 the Southwest Division?

25 A. As I mentioned earlier, it takes in Texas,

1 A. Up until four years ago, it was all  
2 privately owned by Mr. Moore, and he sold a portion  
3 of it to the employees about four years ago.

4 Q. And do you know what percentage of the  
5 shares he released back to the employees?

6 A. About 42 percent.

7 Q. Were all employees eligible for --

8 A. Yes, sir.

9 Q. And did they just buy shares for a price  
10 that he set or was it distributed based on seniority  
11 or how did that work?

12 A. No, it's put into a -- it's a retirement  
13 account basically, and then you get so many shares.

14 Q. Is this kind of like a ESOP program?

15 A. ESOP, yes, sir.

16 Q. And your shares are acquired through  
17 contributions, and merit and seniority, or  
18 combination?

19 A. It's all based, I believe on -- I think  
20 the program is based on your salary. You get so  
21 many shares based on your salary.

22 Q. And do you know how the shares are fixed  
23 in terms of value?

24 A. I do not.

25 Q. Is there any floating scale of the value?

1 Colorado, Arkansas, Oklahoma, Arizona. I think  
2 that's it.

3 Q. Okay. And Pacific Division is  
4 predominantly, I guess, California, Oregon and  
5 Washington?

6 A. Pacific would cover Nevada; Oregon;  
7 Seattle, Washington; and Northern California.

8 Q. Has this geographic territory been  
9 relatively stable over the last couple of decades?

10 A. Geographic, are you talking about  
11 Southwest, or --

12 Q. Yes, sir. No. Both. Have you-all  
13 expanded or contracted, generally speaking, or  
14 stayed the same?

15 A. Oh, we've expanded.

16 Q. Okay. What do you do now as president of  
17 the Southwest Division?

18 A. My responsibilities primarily are the  
19 bottom line profitability of the entire division,  
20 and that causes me to interface with the other  
21 departments such as operations, sales, and  
22 accounting, and the factory, to achieve that  
23 objective.

24 Q. Okay. Is Kelly-Moore publicly or  
25 privately held?

1 A. It's re-evaluated every year. I do know  
2 that, because we get a new statement every June or  
3 so which indicates what the value of the shares are.

4 Q. And do we have any idea what the total  
5 asset of the 42 percent of the shares is estimated  
6 to be?

7 A. I couldn't tell you that, sir.

8 Q. Are we talking, I assume, millions of  
9 dollars?

10 MR. HAZEN: Objection, form.

11 A. I couldn't -- I really couldn't tell you.

12 I mean, I was -- you know, anything I tell you would  
13 be an assumption.

14 Q. (By Mr. Coon) Okay. Do you have any idea  
15 what your stake in the company is as a shareholder?

16 A. My personal?

17 Q. Yes, sir.

18 MR. HAZEN: Objection, form.

19 A. I have a -- an idea of what it was a year  
20 ago. I don't know what it is today.

21 Q. (By Mr. Coon) Okay. Let's go a year ago.  
22 We understand market volatility.

23 A. Yeah. Very much so.

24 Q. But, a year ago could you give us just  
25 generally a rough estimate?

1 A. Of the dollar value?

2 Q. Yes, sir, just in terms of shares, shares  
3 times value.

4 MR. HAZEN: Mr. Giffins, I'm going  
5 to object to the form of the question. I am going  
6 to advise you that divulging your personal finances  
7 within the company is not something that you're here  
8 to give in your deposition today. So you can choose  
9 to divulge that information, or if you wish, on your  
10 own decision.

11 THE WITNESS: Actually I prefer not  
12 to, but I mean if I have to, I will.

13 MR. COON: Okay. We agree you don't  
14 have to if your attorney instructs you not to, but I  
15 would -- our level of inquiry there, I'm not  
16 typically interested in anybody's personal assets,  
17 sir. The reason that we're looking into it is  
18 because it may lead to some issues with respect to  
19 your opinions in the matter, if you have a vested  
20 interest in the company that you're testifying for,  
21 so for those reasons we believe it to be relevant.

22 MR. HAZEN: Again, Mr. Giffins, I'm  
23 going to caution you. I'm going to let you make  
24 your decision whether you choose to divulge that  
25 information or not, but I'm going to advise you that

1 you're under no compulsion to divulge that  
2 information.

3 A. Just from a personal thing, I don't see  
4 what that's got to do with what we're talking about.

5 Q. (By Mr. Coon) Okay. Fair enough. Let me  
6 just ask a couple other questions, then. I won't --  
7 we understand you don't want to answer that one  
8 right now.

9 Is your retirement based in part, as I  
10 understand, on the shares that Mr. Moore has  
11 distributed to the employees, which would include  
12 you?

13 A. The ESOP program provides a retirement  
14 vehicle, yes.

15 Q. Okay. And if Kelly-Moore continues to  
16 remain profitable, your retirement would be worth  
17 more than if Kelly-Moore is for whatever reasons  
18 unprofitable?

19 A. Well, from my personal retirement, yes,  
20 because there is no retirement program at  
21 Kelly-Moore.

22 Q. Right.

23 A. The ESOP provides the employees the  
24 ability to have a -- a viable retirement program.

25 Q. Sure.

1 A. All -- all employees.

2 Q. If Kelly-Moore went bankrupt, went out of  
3 business, or whatever, for whatever reasons, your  
4 -- the shares that you have set aside as part of  
5 your retirement under your ESOP, would then have  
6 nominal or no value?

7 MR. HAZEN: Objection, form.

8 A. I don't know all the legal issues about  
9 that type of thing, but it sounds logical.

10 Q. (By Mr. Coon) Okay.

11 A. But I can't tell you for sure what the  
12 legal issues are.

13 Q. Okay. Is there a listing of -- with the  
14 various persons that are in management at  
15 Kelly-Moore, what their titles are, and what they  
16 make? Is that something that's available to all the  
17 employees?

18 MR. HAZEN: Objection, form.

19 A. I have never seen anything like that.

20 Q. (By Mr. Coon) Okay. Is there a -- a  
21 board? Is there -- could you tell me basically how  
22 the structure works? Is there an operating board  
23 for Kelly-Moore?

24 A. There is a board of directors for  
25 Kelly-Moore.

1 Q. Okay. Do you know who is on the board of  
2 directors?

3 A. I know a couple of the people that are on  
4 there. I know of a couple of people that are on  
5 there.

6 Q. Are they all employees of Kelly-Moore?

7 A. No.

8 Q. Are any of them employees of Kelly-Moore?

9 A. Yes.

10 Q. Do you know any of the individuals who are  
11 not members of Kelly-Moore who still have a board  
12 position there?

13 A. Would you repeat that again, please?

14 Q. Yes. Do you know -- there are people --  
15 as I understand, you know there are people on the  
16 Kelly-Moore board that are not Kelly-Moore  
17 employees.

18 A. Correct.

19 Q. Do you know who they are and what they do?

20 A. They're family.

21 Q. Okay. I am just trying to find out why  
22 they would have people on the board that aren't  
23 employed there. You just answered that.

24 A. They're family.

25 Q. Family members?

1 A. Yeah.  
 2 Q. This is family members of Mr. Moore?  
 3 A. Yes.  
 4 Q. The founder?  
 5 A. Yes.  
 6 Q. Is there a Kelly, a Mr. Kelly in the  
 7 Kelly-Moore?  
 8 A. There used to be, he's since deceased.  
 9 Q. Oh, so if we were to go back on the  
 10 history of Kelly-Moore, you had Mr. Kelly and  
 11 Mr. Moore and they formed the company known as  
 12 Kelly-Moore?  
 13 A. Yes, sir.  
 14 Q. And Mr. Moore became the president at some  
 15 point in time and then he hired Mr. Christiano to  
 16 replace him a number of years ago?  
 17 A. That's correct. Basically.  
 18 Q. Mr. Christiano still holds that title?  
 19 A. He's president and C.E.O.  
 20 Q. Okay. He is president and C.E.O. now?  
 21 Who do you report to?  
 22 A. Mr. Christiano.  
 23 Q. And who has the same hat that you do on  
 24 the Pacific Division?  
 25 A. There is no one else.

1 Q. Okay. Well --  
 2 A. He runs -- he's -- he basically is the guy  
 3 who -- for the Pacific Division.  
 4 Q. Okay. So, he does what you do for the  
 5 Pacific Division?  
 6 A. Correct. And for the whole company in  
 7 theory. He's -- he basically is my boss.  
 8 Q. Okay. Is that the only boss you have?  
 9 A. Yes, sir.  
 10 Q. Okay. So you're second in command?  
 11 A. I don't know if -- I guess you could say  
 12 that, but there are many people out there, basically  
 13 think they're my bosses, but no.  
 14 Q. Is your wife one of them?  
 15 A. Mine -- yes.  
 16 Q. Okay. Mr. Giffins, could you give us just  
 17 a basic history of Kelly-Moore?  
 18 A. Sure. Very happy to.  
 19 Q. Your understanding of their development.  
 20 I mean, you told us a little bit about the regional  
 21 nature in paints, but if you could just go back and  
 22 enlighten us a little bit about who they are and  
 23 where they came from.  
 24 A. The company was founded, I -- in '46, by  
 25 Mr. Moore, when he -- he had just come back from

1 combat. He was in the Navy during the second world  
 2 war, and he came back to the bay area, started the  
 3 company. Hooked up with Mr. Kelly, who at that time  
 4 had retired from the Glidden Paint Company, and  
 5 Mr. Moore knew him from when he worked for Glidden.  
 6 He worked as a salesman, I believe, at one time for  
 7 Glidden, and that's how he and Mr. Kelly sort of new  
 8 each other.  
 9 And started the company in '46, and then bought  
 10 Mr. Kelly out somewhere in the early '50s, and has  
 11 since owned the company since -- well, since then.  
 12 Q. Were they originally a California located  
 13 company?  
 14 A. Yes.  
 15 Q. So they generally, expanded west -- or  
 16 east over time?  
 17 A. Yes, sir.  
 18 Q. Do you know when they first acquired  
 19 offices in Texas?  
 20 A. We first moved to Texas in 1963 when we  
 21 bought Hanna Paint Company who was based here in  
 22 Dallas.  
 23 Q. And what other facilities has Kelly-Moore  
 24 acquired in Texas since then?  
 25 A. I am not aware that we acquired any

1 facility -- you say facilities. Are you talking  
 2 about companies?  
 3 Q. Sure. Either -- either any other  
 4 companies that you acquired where you retained an  
 5 additional presence here other than in Dallas. Or,  
 6 just new offices set up by Kelly-Moore here in  
 7 Texas.  
 8 A. Well, we bought Hanna in '63, and then  
 9 built our plant in Hurst, Texas in '70.  
 10 Q. Okay.  
 11 A. Opened that in '70.  
 12 Q. And what did the plant do?  
 13 A. Made paint.  
 14 Q. Does it still make paint?  
 15 A. Yes, sir.  
 16 Q. And did the facility that you acquired in  
 17 '63 -- what was their name?  
 18 A. Hanna.  
 19 Q. Hanna?  
 20 A. Excuse me, Hanna. I believe it was  
 21 H A N N A.  
 22 Q. And was Hanna also a -- just a paint  
 23 manufacturer?  
 24 A. They were a paint manufacturer.  
 25 Q. Do you know if they made anything else

1 other than paint?  
 2 A. I could not tell you, sir. Could not tell  
 3 you.  
 4 Q. Do you know if they made any textures,  
 5 joint compounds, anything like that?  
 6 A. I couldn't tell you. I don't believe so.  
 7 I wouldn't swear to it.  
 8 Q. Okay. Prior to the acquisition of the  
 9 Hurst facility to make paints, where else was  
 10 Kelly-Moore actually manufacturing their paints?  
 11 A. Okay. The Hurst facility, we built.  
 12 Q. Right.  
 13 A. We owned. We bought the land and built  
 14 that. So we didn't -- that's something that --  
 15 Q. It was not an acquisition?  
 16 A. It was not an acquisition. Yes, sir. We  
 17 have plants in California. We have a plant in  
 18 Arizona. We have a plant in Seattle, Washington.  
 19 Those are the operating plants today.  
 20 Q. For the Southwest Region, where are the  
 21 headquarters? Hurst?  
 22 A. Hurst, yes, sir.  
 23 Q. Is that where you typically report to?  
 24 A. That's where I sort of sit down, yes.  
 25 Q. That's where your office is when you're in

1 record at 10:53.  
 2 (A recess was taken.)  
 3 THE VIDEOGRAPHER: Back on the  
 4 record. The time is 11:09.  
 5 Q. (By Mr. Coon) Mr. Giffins, during the  
 6 break I went back over the notes. There was a  
 7 couple things I wanted to pick up with you that I  
 8 had not completely covered. We went on to something  
 9 else. You told me about the four gentlemen that you  
 10 had talked to as -- helping you make notes on the  
 11 subject matters you may be discussing today. One is  
 12 Mr. Winslow. You told us about him. Mr. Harrison,  
 13 where does he live?  
 14 A. Bill Harrison?  
 15 Q. Yes, sir.  
 16 A. He is retired, and he is living in Oregon.  
 17 Q. Do you know what city?  
 18 A. I keep -- I want -- Bend comes to mind but  
 19 I'm not sure that's true.  
 20 Q. Okay. Mr. Freeman?  
 21 A. He lives in Oklahoma.  
 22 Q. And what city?  
 23 A. I can't answer that. It's somewhere near  
 24 Broken Arrow.  
 25 Q. Okay. What was his title?

1 your office?  
 2 A. When I'm in my office, yes.  
 3 Q. Are you on the road a lot?  
 4 A. Yes and no. This -- this thing has taken  
 5 up a lot of my time, lately.  
 6 Q. This thing being --  
 7 A. The Paco asbestos issues with Kelly-Moore.  
 8 Q. Okay. Well, let's talk about that.  
 9 MR. HAZEN: Hey, Brent.  
 10 THE WITNESS: Can we take a break?  
 11 MR. HAZEN: Yeah, I'm just saying  
 12 if we are going to move into that, we have been  
 13 going about an hour, maybe we can make a short  
 14 break.  
 15 MR. COON: Oh, sure. And anytime,  
 16 Mr. Giffins, I know you have got some back problems,  
 17 any time you need to take a break, stand up, walk it  
 18 off, let me know, okay?  
 19 THE WITNESS: Actually my back is a  
 20 little bit better than my ability to stay out of to  
 21 the bathroom. I drink a lot of water.  
 22 MR. COON: Okay. Either way. We're  
 23 happy to break for either one. Okay?  
 24 THE WITNESS: Thanks.  
 25 THE VIDEOGRAPHER: Going off the

1 A. His title when he was with the company?  
 2 Q. Before he retired. Yes, sir.  
 3 A. Well, when he -- when he left the company,  
 4 he was a -- in charge of the factory. He was  
 5 general -- I guess you can call him the general  
 6 manager of the factory. He was involved with the  
 7 sales part of it --  
 8 Q. Okay.  
 9 A. -- in Broken Arrow.  
 10 Q. Okay. And Mr. Scanton?  
 11 A. Don Scanton?  
 12 Q. Was it Scanton?  
 13 A. Scanton.  
 14 Q. Okay. Mr. Scanton?  
 15 A. S K R A N T O N.  
 16 Q. Where is he at now and what was his title?  
 17 A. He is retired. He lives in Palm Springs,  
 18 California, and he was a vice president of sales at  
 19 one time for the company.  
 20 Q. Okay. We talked a lot about the different  
 21 types of facilities you had and over the break I  
 22 picked up one of your brochures. This is  
 23 Kelly-Moore Exhibit 1129, and it appears to be one  
 24 of -- I didn't see the date on it. But it appears  
 25 to be one from the '60s. If you look at some of the

1 photos, the cars seem to be from that era. And I --  
 2 there is a number of things in here I want to  
 3 briefly talk with you about, kind of help us get a  
 4 better idea of some -- some of the issues. Inside  
 5 there I think there is a picture of Mr. Moore and  
 6 Mr. Kelly, the founders?  
 7 A. That's correct.  
 8 Q. And I can't tell much off of that. But,  
 9 you get to here, talks about the main office being  
 10 in San Carlos, California, is that still the main  
 11 office headquarters?  
 12 A. That is correct.  
 13 Q. At this time, it listed -- again, I don't  
 14 know what year, but the factories, paint and  
 15 drywalls was Dallas, Houston, Ontario and San  
 16 Carlos. Are all those offices still open?  
 17 A. Let me see this a minute, if I may.  
 18 Q. Yes, sir.  
 19 A. Dallas is not -- is no longer open.  
 20 Q. Has that been replaced with the Hurst  
 21 facility?  
 22 A. That has been, correct.  
 23 Q. And that's because that opened in '70, so  
 24 you did not need the Dallas office anymore?  
 25 A. No, that was closed down when we opened

1 Q. (By Mr. Coon) Okay. It appears to be  
 2 somewhat of a summary that was done by Mr. Merrill  
 3 at some point in the past, that kind of set out some  
 4 of the shops and the years they were open.  
 5 A. It was done in -- evidently based on the  
 6 signature here, it looks like 12 of '82 --  
 7 Q. Okay.  
 8 A. -- is when he prepared this.  
 9 Q. That's based on what looks to be his  
 10 signature below it with a date?  
 11 A. That's correct.  
 12 Q. Okay. And he indicated in here, I think  
 13 on Page 1, the Houston facility was open around  
 14 '67. It was a drywall manufacturing operation, and  
 15 closed around '74?  
 16 A. Four.  
 17 Q. Does that sound about right?  
 18 A. Yeah. I would trust this better than my  
 19 recollection.  
 20 Q. Okay.  
 21 A. I was close on the opening.  
 22 Q. Sure.  
 23 A. But I was a little short on the closing.  
 24 Q. Okay. And then if we go back to this  
 25 chart, the next area, we have the subsidiary

1 the -- the Hurst building.  
 2 Q. Sure.  
 3 A. Houston, as far as a factory, and -- and  
 4 drywall, that's closed down. Ontario is closed.  
 5 Q. Okay. With Houston, do you know the years  
 6 that they were open and closed?  
 7 A. I want to say '66 to maybe '72, because  
 8 they were -- I think there was still some work done  
 9 in Houston after Hurst was built. I think it would  
 10 be around '66, '65, maybe, to '71, '72.  
 11 Q. Okay. Let me show you something to read  
 12 contemporaneously with it. This is Kelly-Moore  
 13 1003. It looks like notes from Mr. Merrill. I am  
 14 presuming that was probably Douglas Merrill. Have  
 15 you seen that before?  
 16 MR. HAZEN: And, Brent, is that a  
 17 Bates stamp you're referring to down in the bottom  
 18 corner or --  
 19 A. It's a KM --  
 20 MR. HAZEN: Yeah, can you just tell  
 21 me that number? KM 1003?  
 22 A. Yes.  
 23 MR. COON: Yes, sir.  
 24 MR. HAZEN: Okay.  
 25 A. I have seen this at one time, yes.

1 manufacturing facilities, what are those?  
 2 A. Fresno --  
 3 Q. Fresno, California?  
 4 A. Yes.  
 5 Q. Is that facility still open?  
 6 A. No. I'm not sure what that would have  
 7 been, sir, in Fresno.  
 8 Q. Okay. What are we talking about when we  
 9 say the subsidiary manufacturing facilities, versus  
 10 -- versus the ones you described earlier as the  
 11 factories?  
 12 A. Okay. At the time, I mentioned they --  
 13 they were in the ceramic business.  
 14 Q. Yes, sir.  
 15 A. They were also in the mineral business.  
 16 And --  
 17 Q. Being the mining?  
 18 A. Mining.  
 19 Q. Right. I think the brochure talks about  
 20 that.  
 21 A. Okay. And they also at the time made the  
 22 metal for the -- when you do drywall, the metal that  
 23 goes around the corners, and that type of thing.  
 24 Q. Okay.  
 25 A. And I believe that's what the Newark

1 reference is. I am not sure about Oxnard, nor the  
 2 -- the Van Nuys. I really can't tell you what they  
 3 would have been at that time.  
 4 Q. Okay. And those were other facilities in  
 5 California apparently at one time?  
 6 A. Yes, sir.  
 7 Q. Okay. Then we have the mining operations  
 8 listed under that. That would be the ones you just  
 9 described earlier?  
 10 A. That's correct.  
 11 Q. It lists those, apparently four or five  
 12 mining operation locations in California and Nevada?  
 13 A. Correct.  
 14 Q. Okay. And do you know if any of those are  
 15 in operation at this time?  
 16 A. I believe they are not.  
 17 Q. Okay. And then a reduction --  
 18 A. Well, it may -- I -- we don't -- we're not  
 19 involved with them.  
 20 Q. Right.  
 21 A. You know, they may be in operation by  
 22 somebody else, but we don't have anything to do with  
 23 them.  
 24 Q. You would have sold them out?  
 25 A. Yes, sir.

1 Q. Okay. The reduction mill. What is that?  
 2 A. I have no idea. I -- my interpretation  
 3 would be that that's where they process some of the  
 4 minerals, by reduction, but again, this was before  
 5 my time.  
 6 Q. Okay. Maybe where they take the raw ore  
 7 and reduce it to something in their processing?  
 8 A. That would be my assumption, yes.  
 9 Q. Okay. And then we have sales branches  
 10 listed next.  
 11 A. Correct.  
 12 Q. First California and Nevada, and I guess  
 13 it just lists a lot of different cities where they  
 14 have sales offices?  
 15 A. That would be basically stores, outlets,  
 16 yes.  
 17 Q. Okay. And then you have below that -- let  
 18 me first ask you where we're talking about the sales  
 19 branches here, we didn't go into much specifics  
 20 earlier, but Kelly-Moore, as I understand, you have  
 21 corporate headquarters in several different states,  
 22 where your offices are like Hurst, Texas, correct?  
 23 A. Well, your corporate headquarters would  
 24 only be -- there is only one corporate office and  
 25 that is San Carlos, California.

1 Q. Okay. That's the main headquarters?  
 2 A. That's the main headquarters.  
 3 Q. And then in Texas where is the main  
 4 facility? Is it here in Hurst?  
 5 A. It would be Hurst, yes.  
 6 Q. Do they have any, what you would describe,  
 7 corporate activities at the Hurst facility? I  
 8 mean, you're the manager, president of the Southwest  
 9 Division and your offices are there, correct?  
 10 A. That is correct.  
 11 Q. Okay. To some degree it's a corporate  
 12 office?  
 13 A. If you want to define it that way, yes, I  
 14 guess -- I guess you can look at it that way.  
 15 Q. It is just not the main headquarters for  
 16 the company?  
 17 A. That is correct.  
 18 Q. Okay. With respect to Texas, is the Hurst  
 19 facility the main facility?  
 20 A. That would be correct.  
 21 Q. Both from a manufacturing standpoint, as  
 22 well as where the decision makers for the company  
 23 are?  
 24 A. We're decentralized to the point that we  
 25 -- we have programs and things that are applicable

1 to Texas, and the Southwest Division, which might be  
 2 different than the -- the other division.  
 3 Q. Okay.  
 4 A. If that's what you're talking about.  
 5 Q. Yes, sir. With respect to the Southwest  
 6 Division, is -- I was presuming that you being the  
 7 president of the Southwest Division, and officing in  
 8 Hurst, that Hurst was kind of the hub for the  
 9 Southwest Division?  
 10 A. That's correct.  
 11 Q. Okay. The states that you also oversee,  
 12 do they each all -- do each of those states also  
 13 have a corporate office?  
 14 A. They have what we call a district office.  
 15 Q. Okay.  
 16 A. And --  
 17 Q. Does each state have one district office?  
 18 A. No. Huh-uh. Not each state. We have  
 19 district offices that are set geographically like --  
 20 as an example, we have a district office in  
 21 Colorado, Fort Collins, Colorado. That district  
 22 office, those people in there manage the Colorado  
 23 stores as well as the Oklahoma.  
 24 Q. Okay.  
 25 A. Majority of the Oklahoma stores.

1 Q. So you may not have a district office in  
 2 every state if --  
 3 A. We do not.  
 4 Q. -- if it's close enough to where  
 5 geographically you could handle two states, you do  
 6 so?  
 7 A. Right.  
 8 Q. Are there states where you have more than  
 9 one district office?  
 10 A. In Texas, in Hurst, in the Hurst building,  
 11 we have two district offices that both serve the  
 12 Metroplex here. We have the district office that  
 13 serves the Dallas area, and we have a district  
 14 office that serves the Fort Worth area.  
 15 Q. Okay. Any other district offices in  
 16 Texas?  
 17 A. We have one in Abilene. We have one in  
 18 Houston. That's it.  
 19 Q. Okay. And does each district office  
 20 oversee the local retail outlets?  
 21 A. They oversee the local stores, that's  
 22 correct.  
 23 Q. Okay. And generally speaking, how many  
 24 local stores does each district have  
 25 responsibilities for? I am sure it varies some.

1 A. Yeah, basically -- it's around 13 to 15  
 2 per district.  
 3 Q. So, the basic hierarchy, as I understand,  
 4 you have got the main headquarters in California,  
 5 and then your second to that headquarters here in  
 6 Hurst, where your offices are?  
 7 A. (Indicating.)  
 8 Q. And then you have five or so other  
 9 division district offices?  
 10 A. District. They would be called district.  
 11 Q. Okay. And then below those, you have  
 12 multiple little retail shops that answer to each of  
 13 those districts?  
 14 A. That's correct.  
 15 Q. Okay. Are there any other parts of that  
 16 hierarchy that we missed? Are there lateral  
 17 hierarchies, or anything that we missed?  
 18 A. As it relates from Hurst on down to the  
 19 stores, no, that would be basically the flow.  
 20 Q. Okay.  
 21 MR. HAZEN: And, Brent, just a point  
 22 of verification. You're talking today, right, with  
 23 respect to the hierarchy?  
 24 MR. COON: Sure. Sure. And I think  
 25 there are some differences here that will be

1 explained when we go through the rest of this chart.  
 2 Q. (By Mr. Coon) We next have the bottom, it  
 3 talks about sales branches. Are the sales branches  
 4 different than the district divisions?  
 5 A. Yes. Now, we call them stores today.  
 6 Okay? I -- and, again, this -- and I was trying to  
 7 see the date that this was printed.  
 8 Q. Sure.  
 9 A. Usually on a piece of literature like  
 10 this, the date is usually on the last page in the  
 11 back, and I don't see that it's aligned. I don't see  
 12 it.  
 13 But, here, back -- in those days, they called  
 14 -- I believe they called the stores sales branches,  
 15 and if you notice, they have got this broken down in  
 16 Texas division, and then listing the sales branches  
 17 which are really the stores.  
 18 Q. Okay.  
 19 A. And the same thing under California and  
 20 Nevada. They're really the stores that are within  
 21 that basic area.  
 22 Q. Fair enough. And if we looked at the  
 23 front of this, some of the literature, it appears  
 24 when you give the history, they are talking about up  
 25 through the early '60s, so I am -- or I think it's

1 early '70s, so I am presuming that was the time  
 2 frame involved here. But, again, I didn't see any  
 3 dates. So, if there is differences between the way  
 4 the chart or this brochure lays out the corporation  
 5 as it existed then from now, you can clarify those  
 6 with us.  
 7 A. Sure. Be very happy to.  
 8 Q. In going through this there was some basic  
 9 structural information, showed -- this again is  
 10 kind of a corporate hierarchy, if we look at the  
 11 charts, shows the president and then management  
 12 committees. And I want to ask you here, it shows  
 13 the division under the president of an industrial  
 14 minerals division. Is this where you were talking  
 15 about they made the mining?  
 16 A. The mining, yes, sir.  
 17 Q. And then over here we have the Paco  
 18 textures?  
 19 A. That would be Paco.  
 20 Q. Paco?  
 21 A. They call it Paco. Goes by Paco, yes.  
 22 Q. Okay. And then underneath it we have  
 23 Cal-Pacific Trucklines, Management Data Services,  
 24 and Drywall Tape Company?  
 25 A. Correct.

1 Q. Were those all entities that operated  
2 under the -- the Paco umbrella, or --

3 A. No. They -- they would have been -- Paco  
4 would have been a subsidiary, Paco manufactured  
5 drywall equipment.

6 Q. Okay.

7 A. Or not equipment, but the -- the patching  
8 compounds. Cal-Pacific was another subsidiary. All  
9 these are individual subsidiaries. As you asked me  
10 earlier, who were these people up here under this  
11 breakdown, where it was talking about subsidiaries.  
12 Okay?

13 Q. Okay.

14 A. Cal-Pacific, we owned the truck --  
15 Kelly-Moore owned a truckline at one time.

16 Q. Okay. When and where did they own a truck  
17 line? We talking about a -- like Allied Trucklines,  
18 that kind of a truckline?

19 A. We owned our own trucks for transporting  
20 of material to our stores from the factories.

21 Q. Okay. So instead of hiring an outside  
22 company to transport your product from the  
23 manufacturing facility to your retail stores,  
24 you-all had your own trucking company to do so?

25 A. That is correct.

1 Q. Did they do any distribution for any  
2 companies other than for Kelly-Moore?

3 A. No, sir.

4 Q. Okay.

5 A. To the best of my knowledge, it was  
6 strictly in-house.

7 Q. Okay. Made sense to them to just  
8 internalize that part of it, probably because of a  
9 bottom line expense cost?

10 A. I don't know for what reason they had, but  
11 that would sound logical.

12 Q. Okay. You also had the Management Data  
13 Services?

14 A. Yeah. From -- and, again, I am very vague  
15 on this one. This was a -- a subsidiary at one time  
16 that made accounting-type equipment. I guess they  
17 were getting -- it goes back in the days when they  
18 were getting automated as far as accounting-type  
19 things, and this was an accounting service.

20 Q. Okay. Do you know what happened to --  
21 well, first let's go to the last one there, the  
22 Drywall Tape Company.

23 A. Correct.

24 Q. Do you know anything about that company?

25 A. I believe that was the company that made

1 -- we -- when we went into the Paco business, they  
2 also bought a -- a tape company as well as a metal  
3 company, and the tape company, I believe, is the one  
4 that -- originally where you buy the -- the tape  
5 that goes on the wall.

6 Q. Okay. Is this the rolls of the --

7 A. Yes.

8 Q. -- sheet tape --

9 A. Yes, sir.

10 Q. -- that you use to float between the  
11 sheetrock and fill in the cracks?

12 A. Yes, sir.

13 Q. Okay. Do you know where that was located  
14 at?

15 A. I believe it was in the East Bay. I want  
16 to say Hayward, but I am not sure that's correct. I  
17 know the -- the metal company was located in  
18 Hayward, so I may be confusing it. So --

19 Q. Okay.

20 A. I really can't say.

21 Q. If we compare that list with what Mr.  
22 Merrill had signed on this document, which is 1003,  
23 he talks about the Paco Textures Corporation was  
24 founded in '58, and was located in Richmond,  
25 California. Does that sound consistent with your

1 memory?

2 A. That is correct.

3 Q. And that it manufactured drywall, joint  
4 compounds and wall textures, and sold to  
5 distributors, principally in Northern California, of  
6 which Kelly-Moore was the largest distributor, does  
7 that sound correct?

8 A. That is correct.

9 Q. Okay. Now I want to ask you the next  
10 thing there, which is distributorships. When  
11 Kelly-Moore has their product lines, did they also  
12 have outside distributors that would carry their  
13 product lines under some other name to other  
14 facilities?

15 MR. HAZEN: Objection, form.

16 A. Are you talking about paint?

17 Q. (By Mr. Coon) Yeah. I guess that's a  
18 good question. Let's first talk about paints. Did  
19 they have agreements to have anyone else distribute  
20 their products to facilities other than Kelly-Moore  
21 facilities?

22 A. Oh, okay. All right.

23 MR. HAZEN: Objection, form.

24 Q. (By Mr. Coon) Does that make sense?

25 A. Yes, sir.

1 Q. Okay.

2 A. It does.

3 Q. And the answer?

4 A. The philosophy of the company from day  
5 one, and we even have that philosophy today, is that  
6 the company markets to its own stores. We have not  
7 been in the distributor business or the dealer  
8 business or whatever, so the philosophy has always  
9 been sell through your own stores.

10 If I understand your question, you wanted to --  
11 your one question was did we ever repackage any of  
12 our products for resale outside of the organization.

13 Q. Yes, sir.

14 A. I am not aware that we ever did that with  
15 paint. I am aware that there was a rebranding  
16 agreement between Kelly-Moore Paint Company and  
17 Georgia Pacific that goes back to '68, and I think  
18 that ended in '71. But other than that, I am not  
19 aware of anything else where we would have rebranded  
20 or relabeled products for somebody else.

21 Q. Okay. Do you know what products would  
22 have been involved in that rebranding agreement with  
23 Georgia Pacific?

24 A. There were about four or five products. I  
25 -- I'd have to go back to the file. I don't recall

1 A. As far as an agreement between --

2 Q. Kelly-Moore and Georgia Pacific.

3 A. I have seen a copy of that, yes.

4 Q. Okay. Do you know whether or not the  
5 reverse was true, that other persons like Georgia  
6 Pacific made products, rebranded them under the  
7 Kelly-Moore name?

8 A. To the best of my knowledge, no, because  
9 Mr. Moore has always been very -- give you a little  
10 bit of background here. He's always been very,  
11 very, very protective of the Kelly-Moore name and  
12 the integrity of the company, and he didn't --  
13 anything that our name went on, he wanted to make  
14 sure it was made a right way, a certain way, and the  
15 quality. So I have never seen anything -- until  
16 recently they started to rebrand some sundry items.  
17 But that there was never anything in the  
18 organization where there was any rebranding of paint  
19 or anything like that.

20 Q. Okay. And what do you mean by the  
21 rebranding of some sundry items?

22 A. Roller covers is an example. Roller  
23 covers, there might be some out in the stores now  
24 that have Kelly-Moore name on the wrapper, but it's  
25 a cover that we buy from somebody else.

1 exactly but it was -- it was a -- a fairly limited  
2 line.

3 Q. Were they the joint compounds or textures?

4 A. They were joint compounds and textures,  
5 yes, sir.

6 Q. And were those some of the  
7 asbestos-containing products that the Paco Textures  
8 had made at one time?

9 A. Yes, sir.

10 Q. Do you know which ones under the Paco  
11 lines were the same ones that were rebranded for  
12 Georgia Pacific?

13 A. I actually don't recall off the top of my  
14 head. I would have to go back to my notes and take  
15 a look at that, but I -- my assumption would be it  
16 would have been the -- the better moving items, but  
17 I can't tell you exactly which ones they are off the  
18 top of my head.

19 Q. Okay. And just off the top of your head,  
20 what were the better moving products?

21 A. Oh, the textures, and the Ready Mix Joint  
22 Compound.

23 Q. Okay. Do you know whether or not there  
24 still exist any copies of the rebranding agreements  
25 that were in place in that '68 to '71 time frame?

1 Q. Okay. And what's a roller cover? Talking  
2 about paint rollers?

3 A. Rollers -- yeah, I'm sorry, paint roller  
4 cover you put on a handle and paint the walls.

5 Q. The replacement rollers for the trays?

6 A. Yes.

7 Q. Okay. Okay. The truckline company, is  
8 that something that still is in the organization,  
9 Cal-Pacific Trucklines?

10 A. That was dissolved a few years ago in  
11 California, but we still own our truckline here in  
12 -- in Hurst.

13 Q. Okay. The truckline in Hurst, is that  
14 also a Cal-Pacific or is that another brand?

15 A. It's not called that, sir, but I -- I  
16 can't tell you under what classification it goes by.

17 Q. Is that wholly owned by Kelly-Moore?

18 A. Yes, sir.

19 Q. Does it do any distribution of product  
20 lines for any -- anyone other than Kelly-Moore?

21 A. No, sir.

22 Q. Okay. The Drywall Tape Company, is that  
23 still in existence?

24 A. No. Not as Kelly-Moore.

25 Q. Do you know if they closed that facility

1 or sold it?  
 2 A. I can't answer that.  
 3 Q. Okay.  
 4 A. I shouldn't say I can't answer. I don't  
 5 know.  
 6 Q. Don't know? Okay. If we go on through  
 7 the brochure, it starts talking about setting up  
 8 what they call a -- I am trying to remember the  
 9 name. Retail -- it looked like little mini Home  
 10 Depots?  
 11 A. Home improvement.  
 12 Q. Home improvement centers.  
 13 A. Right.  
 14 Q. When did Kelly-Moore get in the home  
 15 improvement centers and do they still have any?  
 16 A. We're no longer if that business. It goes  
 17 back, I believe, to the early sixties. We acquired  
 18 a couple large facilities, and made home improvement  
 19 centers out of them, where they sold paint, and  
 20 gardening, and that type of thing.  
 21 Q. So they would have sold not only  
 22 Kelly-Moore products there, but products from other  
 23 vendors?  
 24 A. The paint that was sold through those  
 25 outlets was Kelly-Moore paint.

1 Q. Okay.  
 2 A. The other products would have been  
 3 numerous suppliers from other companies, yes.  
 4 Q. Okay. And if this picture -- it's kind of  
 5 grainy, but it looks like they're selling lamps, and  
 6 lights, and flowers and all kind of stuff.  
 7 A. Correct.  
 8 Q. Okay. So this would be like just a  
 9 smaller version of, I guess, a Home Depot or Lowe's  
 10 or something today?  
 11 A. Actually, I'd like to classify this as the  
 12 beginning of Home Depot, because Mr. Moore had a --  
 13 quite a vision with this thing, and -- this was the  
 14 early days of the home improvement centers.  
 15 Q. And did he sell out those home improvement  
 16 lines or did they just close of their own accord?  
 17 A. We just closed them down.  
 18 Q. Was that an idea before its time?  
 19 A. Actually it was -- worked very well, until  
 20 the Home Depots and all those started to move into  
 21 the market, then they made it real tough.  
 22 Q. Okay. This next talks about clutches and  
 23 brakes. Do you know anything about Kelly-Moore  
 24 being involved in manufacturing, making or  
 25 distributing brake or clutch lines?

1 A. Yeah. We bought a clutch company  
 2 primarily because -- as I understand it, the  
 3 clutches that were -- this company manufactured were  
 4 clutches that we were able to use on some equipment,  
 5 spray equipment, that we were also making.  
 6 Q. Was that the Sprayline product line?  
 7 A. Yes, sir.  
 8 Q. Okay. We will talk about that in a  
 9 minute.  
 10 A. And so they bought this clutch company.  
 11 Now, -- and I just learned something today. It was  
 12 originally in Van Nuys, so that explains the Van  
 13 Nuys subsidiary.  
 14 Q. Okay.  
 15 A. The clutch company was moved to Ontario.  
 16 Q. Canada?  
 17 A. No. Ontario, California.  
 18 Q. Okay.  
 19 A. So --  
 20 Q. Was that still in operation --  
 21 A. They started it then.  
 22 Q. I'm sorry. Is that still in operation?  
 23 A. No.  
 24 Q. What happened to it?  
 25 A. We sold it.

1 Q. Okay. Do you know what types of those --  
 2 of clutches and brakes they made there? What they  
 3 were used for?  
 4 A. Primarily they were small clutches. I  
 5 can't really tell you exactly, but they went on -- I  
 6 think some of them went on golf carts, and some went  
 7 on equipment, that type of thing.  
 8 Q. Okay. Did they manufacture the components  
 9 there at their facility? Was this the manufacturing  
 10 facility?  
 11 A. I think it was more of an assembly where  
 12 you bought components from different people, you  
 13 know, and then sort of like a car assembly line.  
 14 Q. Okay.  
 15 A. Put them all together.  
 16 Q. A lot of cars and trucks during this time  
 17 frame had asbestos clutches and brakes. Do you know  
 18 whether or not this facility assembled  
 19 asbestos-containing clutch pads or brake pads or  
 20 anything of that nature?  
 21 A. I can't answer that. I really can't, sir.  
 22 Q. Do you know who would have been in charge  
 23 of running that facility during the time it was  
 24 open?  
 25 A. I really don't. No. I can't tell -- help

1 you.  
 2 Q. Okay. Next we have the Chem-Guard  
 3 Products. Says it was founded in 1958. Makes wood  
 4 preservatives, canning and food packing industry.  
 5 Is that facility still open?  
 6 A. No.  
 7 Q. What happened to it?  
 8 A. Sold, probably, or closed down.  
 9 Q. Okay.  
 10 A. Have to understand early on in the  
 11 company's existence, we were involved with many  
 12 different types of businesses. It was around 1982  
 13 when it was decided that we'd concentrate on paint,  
 14 and so a lot of these things then started to go by  
 15 the wayside. And since then we have concentrated  
 16 solely on making paint. I can't tell you what  
 17 happened to that particular.  
 18 Q. Okay. Then we have Cal-Pacific  
 19 Trucklines. That's the one I believe you have just  
 20 described for us?  
 21 A. Yes.  
 22 Q. And it shows a fleet of vehicles there,  
 23 one of the pages of the brochure, and talks  
 24 generally about the trucking fleet and shows some of  
 25 the drums of cargo and stuff like that.

1 the basic industrial minerals, and that was one of  
 2 the providers of the ingredients to make the  
 3 ceramics you told us about earlier?  
 4 A. Yes. Yes.  
 5 Q. It says they also used oil well drilling  
 6 muds. Do you know anything about that line of the  
 7 Basic Industrial Minerals products?  
 8 A. I sure don't, sir.  
 9 Q. Okay.  
 10 A. Sure don't.  
 11 Q. A lot of drilling muds at times in the  
 12 past contained asbestos. Do you know whether or not  
 13 the drilling muds that Basic Industrial Minerals  
 14 prepared or manufactured contained asbestos?  
 15 A. Do not.  
 16 MR. HAZEN: Objection, form.  
 17 A. Do not.  
 18 Q. (By Mr. Coon) Okay. Next we have KM  
 19 Drywall Finishing Equipment. Was that a separate  
 20 product line? Was it another company?  
 21 A. This is where that equipment I talked to  
 22 you about with the clutches --  
 23 Q. Yes, sir.  
 24 A. -- went into the equipment.  
 25 Q. Uh-huh.

1 Okay. Next, what do we have here? Is this the  
 2 mining facility?  
 3 A. Yes. That's what it looks like.  
 4 Q. That's basic industrial minerals?  
 5 A. I can read that. I can't read the rest of  
 6 it.  
 7 Q. We're having to read it sideways off the  
 8 brochure.  
 9 A. Let me move over.  
 10 Q. You're fine. It talks about -- I think we  
 11 need to keep you square with the camera.  
 12 MR. HAZEN: Yeah, come back over.  
 13 You're going to get out of camera focus.  
 14 Q. (By Mr. Coon) -- diversifying into pottery  
 15 and ceramics industry with air floated clays as well  
 16 as oil well drilling muds. Read that correct?  
 17 A. Now I understand -- now I understand where  
 18 the ceramic people got some of their minerals for  
 19 the ceramic division.  
 20 Q. They internalized everything at  
 21 Kelly-Moore, didn't they?  
 22 A. Yeah.  
 23 Q. Okay.  
 24 A. Mr. Moore was pretty sharp.  
 25 Q. So in making the ceramics, you acquired

1 A. This is part of it. This was equipment  
 2 that they -- this particular case, manufactured  
 3 machines for the mixing of dry powder products with  
 4 water spraying them on.  
 5 Q. Okay.  
 6 A. Like to do with drywall.  
 7 Q. Now, what we have here under the  
 8 Kelly-Moore drywall finishing equipment, was that a  
 9 separate company, or is that just one of the product  
 10 lines that Kelly-Moore made under their same  
 11 corporate umbrella?  
 12 A. This was one of the subsidiaries.  
 13 Q. Okay.  
 14 A. This would have been the subsidiary, and I  
 15 noticed here it says Fresno, California, so that  
 16 would have been going back here to what you were  
 17 talking about --  
 18 Q. Okay.  
 19 A. -- when you asked me about the  
 20 subsidiaries.  
 21 Q. Sure. Was that what was called the  
 22 Sprayline Company?  
 23 A. Yes.  
 24 Q. Okay. And, so, you had this separate  
 25 company out there that would actually apply the

1 materials as well as sell the equipment, or just --  
 2 A. No. We made --  
 3 Q. Did you sell the equipment?  
 4 A. We made the equipment. We didn't apply  
 5 it.  
 6 Q. You-all were not applicators, you-all just  
 7 sold the equipment to apply?  
 8 A. That's correct, to the best of my  
 9 knowledge.  
 10 Q. This would have been equipment that you  
 11 would have used to apply the textures? You could  
 12 blow the textures on, and trowel it out, the  
 13 spackles and stuff like that for the ceilings and  
 14 the walls?  
 15 A. Correct.  
 16 Q. Would this have been something that would  
 17 have been sold to contractors, or individual folks  
 18 who wanted to try to do it -- do repair jobs, or  
 19 renovation jobs on their homes or what?  
 20 MR. HAZEN: Objection, form.  
 21 A. I would not think that this type of  
 22 equipment would go to the normal consumer. This  
 23 type of equipment would have to be handled by a  
 24 professional, who you -- you know, works with --  
 25 that's -- that's his or her livelihood on a daily

1 basis. I would --  
 2 Q. (By Mr. Coon) So it would have been  
 3 drywall contractors principally?  
 4 A. Yes.  
 5 Q. Okay. I assume large and small  
 6 contractors?  
 7 A. I would say so, yes.  
 8 Q. Do you know whether or not that type of  
 9 equipment was ever available for lease at any of  
 10 your retail shops, that someone went in and bought  
 11 your texture to -- to do their house, they could  
 12 rent the equipment from you there to apply it  
 13 themselves?  
 14 A. I can't say that that ever -- that did or  
 15 did not happen. I do not recall. Knowing the  
 16 company's philosophy about renting equipment, up  
 17 until recently, I would -- my guess would be no. My  
 18 guess would be no.  
 19 Q. Okay.  
 20 A. But I can't swear to it, sir.  
 21 Q. Okay. Next we have Kelly-Moore and The  
 22 Drywall Industry, and wanted to talk about there --  
 23 it shows some stacks of something. The photo is not  
 24 particularly good?  
 25 A. Oh, this is the tape. We go back to the

1 subsidiary here --  
 2 Q. Okay.  
 3 A. -- where it says the tape company.  
 4 Q. Sure.  
 5 A. This is the rolls of tape --  
 6 Q. Okay.  
 7 A. -- in the process.  
 8 Q. This is a grainy picture, but this  
 9 actually shows us, and this is stamped KM BB 5696.  
 10 I don't see the actual page on here.  
 11 A. Yeah.  
 12 Q. But it shows, I guess, a lot of rolls of  
 13 flat tape.  
 14 A. Yeah, if it hadn't been for this, I would  
 15 have thought it would have been rolls of cheese.  
 16 Q. Yeah.  
 17 A. It says, "Electronic process spark punches  
 18 tiny holes in the tape."  
 19 Q. Okay.  
 20 A. So that would be the tape process.  
 21 Q. These were the tapes that were used to  
 22 float the sheetrock out?  
 23 A. Yes, sir.  
 24 Q. Did Kelly-Moore have for the heavy  
 25 industrial users or large commercial users a -- a

1 wholesale distribution system that bypassed the  
 2 retail shops?  
 3 A. Let me make sure I understand your  
 4 question. Are you asking did we distribute product  
 5 other than through our own stores?  
 6 Q. Yes, sir. Directly to end users.  
 7 A. No.  
 8 Q. Okay. Say, I am a -- hypothetically, I am  
 9 a drywall contractor in Houston, Texas.  
 10 A. Okay.  
 11 Q. I do a lot of drywall business and I want  
 12 to get a better deal. Could I call Kelly-Moore and  
 13 say, I want to do big volumes of business with you  
 14 guys, but I want you-all to cut me a deal and ship  
 15 it straight to me? Do you-all ever do anything like  
 16 that?  
 17 A. No.  
 18 Q. Could you have the commercial users that  
 19 would buy in volume go to a retail store and get  
 20 more, what you would call, a wholesale or discount  
 21 price, volume pricing?  
 22 A. Everything went through the stores.  
 23 Q. But could you get volume pricing if you  
 24 were a large customer?  
 25 A. Oh, yes.

1 Q. Okay. So, each of the retail shops you  
2 have told us about could have different pricing  
3 schedules dependent upon the individual customer  
4 issues?

5 A. That is correct.

6 Q. Were those all fixed prices that were set  
7 in criteria by upper management, or were the  
8 individual retail stores allowed to negotiate the  
9 various rates based on the volume of the demand?

10 A. I can only tell you what I know since I  
11 have been the company. The price schedules are  
12 preprinted, and they're set, and you have to work  
13 off of those schedules.

14 Q. So you can have a -- your regular retail  
15 if somebody wants to come in and just buy one gallon  
16 of paint or one bucket of this or that, you have got  
17 the retail price; and if a guy wants to come in and  
18 buy a thousand gallons of paint because he's a  
19 commercial painter, or a commercial drywaller, he  
20 can get a fixed --

21 A. He would get a different schedule.

22 Q. Get a different scheduled price?

23 A. Right. That's correct.

24 Q. Okay. Is that pretty much how  
25 Sherwin-Williams operates as well?

1 departments, something like that?

2 A. We have a quality control department.

3 Q. Where was quality control at?

4 MR. HAZEN: Objection, form.

5 A. I --

6 Q. (By Mr. Coon) They have more --

7 A. I need to understand what you mean by  
8 quality control. We may be talking about two  
9 different things.

10 Q. We may be. You tell me what kind of  
11 quality control place you-all had.

12 A. Okay. Every plant has a quality control  
13 lab, so that when they make a batch of paint, and I  
14 am going to have to use paint because that's  
15 basically what we look at today.

16 Q. All right.

17 A. Every batch, some of that is taken out of  
18 the batch, taken back to the lab and evaluated to  
19 make sure it was made according to specification.  
20 It's brushed out. It goes into a various ovens,  
21 that type of thing.

22 Once that's done, once the quality control lab  
23 releases the product, then that batch can be filled.  
24 It's put in cans, and then put in the warehouse.

25 Q. Okay. With respect to a facility like the

1 A. They used to. I can't tell you how they  
2 operate today, sir.

3 Q. Okay. This photo talks about Kelly-Moore  
4 paint company and it said Trilite Corporation. Do  
5 you know what the Trilite Corporation was?

6 A. Yeah, that's in Houston. It was in  
7 Houston. They made aggregate for texture paints.  
8 It was perlite, vermiculite that type of thing.

9 Q. Okay. Vermiculite, where did the  
10 vermiculite come from?

11 A. Africa.

12 Q. Do you know whether or not the vermiculite  
13 had asbestos in it?

14 A. I can't answer that. I would -- I know  
15 that vermiculite that they were buying at the time  
16 came from Africa, but I can't tell you what the  
17 composition of it was.

18 Q. Okay. Did -- did Kelly-Moore have anybody  
19 that was in a -- a lab, I guess, in a lab position,  
20 where they would actually analyze the products that  
21 they were buying, the raw ingredients to meet  
22 specifications, to determine whether or not there  
23 were contaminants, things like that?

24 MR. HAZEN: Objection, form.

25 Q. (By Mr. Coon) Quality control

1 Trilite Corporation here, would there have been a  
2 quality control at that facility for the raw  
3 ingredients that were coming in, vermiculite and  
4 aggregate?

5 A. They would had to have some kind of a  
6 quality control before they resold it to somebody,  
7 to make sure that it met certain specifications.

8 Q. Okay.

9 A. How it works when the stuff comes in?

10 Q. Yes, sir.

11 A. We rely on the manufacturer of the  
12 material to supply to us all the data relevant to  
13 that raw material, so that's the information we use  
14 to basically determine what kind of product it is.

15 Q. Okay. Do you know what years vermiculite  
16 was ordered for this particular facility?

17 A. I was afraid you were going to ask me  
18 that. I have to go back to my notes. I am going to  
19 have to -- I really don't recall. It would had to  
20 have been in the sixties, but I really can't give  
21 you an exact year, sir.

22 Q. Was this Houston facility where they  
23 actually manufactured that product?

24 A. No, they brought it in and then did a  
25 processing of the product somehow to get it in the

1 form that they could repackage it and then resell  
2 it.

3 Q. Okay. I am not quite getting the picture.  
4 We got the Houston facility. It's called the  
5 Kelly-Moore Paint Company, Trilite Corporation, and  
6 is Trilite a subsidiary of Kelly-Moore, or is that  
7 just a combined name they have just on that  
8 manufacturing facility or what?

9 A. Well, Trilite was a company that they  
10 purchased down there. Why they put Kelly-Moore  
11 paint company name on it is -- is beyond me. It was  
12 Trilite. That's all they handled was the  
13 vermiculite and the perlite that went into texture  
14 coatings.

15 Q. Okay. And I -- maybe I don't have a good  
16 understanding of what that company actually did. Did  
17 they actually sell a paint that had vermiculite in  
18 it at that facility?

19 A. No.

20 Q. Is that what they made?

21 A. No. They sold the vermiculite and the  
22 perlite to the company itself for use in drywall  
23 products, as well as other companies were buying it  
24 to put into their products.

25 Q. Okay. So this was a facility that not

1 acquiring that same vermiculite after it had been  
2 processed at this Trilite Corporation in Houston?

3 A. I can't answer that. I don't know who  
4 else bought it from us.

5 Q. How would we go about finding out who the  
6 other customers of that facility would have been?

7 MR. HAZEN: Objection, form.

8 Q. (By Mr. Coon) Are there -- do you know if  
9 there were records that are kept? Let me back up.  
10 Is the store still there?

11 A. No. It wasn't never a store. I don't know  
12 why -- as I say, I don't know why the name  
13 Kelly-Moore Paint Company is on it, because, to the  
14 best of my knowledge, it was never a store.

15 Q. So they did not sell out of that facility,  
16 it was distributed elsewhere?

17 A. Did not sell paint out of that facility.  
18 Did sell, resell the vermiculite and the perlite out  
19 of that facility.

20 Q. Could you have walked into that facility  
21 in Houston and bought a bag of vermiculite that had  
22 been processed at that plant?

23 MR. HAZEN: Objection, form.

24 A. Could I as a consumer?

25 Q. (By Mr. Coon) Yes, sir.

1 only bought the raw ingredients, say the vermiculite  
2 from where? Africa?

3 A. Vermiculite came from Africa.

4 Q. Okay. So they would buy the vermiculite  
5 from Africa. It would come into this Trilite  
6 Corporation facility in Houston, and once there it  
7 would go somewhere else within Kelly-Moore for use  
8 in their products?

9 A. Yeah. It would be washed or whatever and  
10 then put in a content that would go into the  
11 Kelly-Moore products, or it could be sold to a --  
12 another person who was using --

13 Q. Okay.

14 A. -- making similar products.

15 Q. First of all, what product lines do you  
16 believe Kelly-Moore was making during this time  
17 frame where you would have had vermiculite as one of  
18 the ingredients?

19 A. It would have had to have been the texture  
20 products.

21 Q. Okay. The Paco lines?

22 A. Yes, sir.

23 Q. Okay. And what other companies outside of  
24 the Kelly-Moore Corporation, or structure, or  
25 family, however you want to call it, would have been

1 A. I -- I doubt it.

2 Q. Okay. You believe they sold mostly to  
3 other manufacturers?

4 A. Yes, sir.

5 Q. So we don't -- you don't -- you did not  
6 anticipate or did not -- you're not aware of  
7 customer -- end user customers going in and buying  
8 the -- the product there at the factory?

9 A. Anything is possible, but I mean that --  
10 that stuff is processed in bulk, you know --

11 Q. Okay.

12 A. -- in big bags, and I mean for the average  
13 person that would walk in off the street, you know.

14 Q. Wouldn't typically have a need for it?

15 A. Huh-uh.

16 Q. Unless they were in the business of taking  
17 it and using it in larger fashion, like Kelly-Moore?

18 A. My guesses are it was strictly in bulk to  
19 -- to other end users.

20 Q. When this vermiculite was processed at  
21 this particular facility, do you know how it was  
22 that it got to the Paco facilities where it was  
23 actually made, blended into the textures? I mean  
24 was it bagged up there and then shipped on one of  
25 the Cal-Pacific Trucklines, or --

1 A. Well, Cal-Pacific was a truckline in  
2 California only.  
3 Q. Okay.  
4 A. Okay. This was in Texas.  
5 Q. You're talking about a Houston truckline?  
6 A. Yeah, we have a truckline out of Hurst.  
7 At that time -- it would be speculation. It could  
8 have come --  
9 Q. All right.  
10 A. -- either with a truck going down there  
11 and picking it up, or it could have been shipped by  
12 common carrier from there to -- to one of the  
13 facilities.  
14 Q. Okay. Do you know what happened to that  
15 facility?  
16 A. No. I do not.  
17 Q. Is the building still there? Do you know  
18 if they sold the building or kept the building?  
19 A. I have no idea.  
20 Q. Or the building is torn down? Do you know  
21 where the street location of that facility was?  
22 A. I -- oh, I have heard it. It's on the  
23 south end of Houston. That's all I know. I may --  
24 I could find that, but I don't know it off the top  
25 of my head.

1 Q. Okay. Do you know if the actual facility  
2 and the land there is still there?  
3 A. I would assume the land is. I can't tell  
4 you about the facility.  
5 Q. Let's hope the land is still there anyway.  
6 A. Yeah.  
7 Q. But -- but I am just saying the integrity  
8 of the complex, the original property, whatever  
9 vacant land was there and the building, if that's  
10 all still there? If it's all been torn down,  
11 something has been built on top of it?  
12 A. I can't answer that.  
13 Q. Okay.  
14 A. I can't answer that.  
15 Q. So you don't know if you could go down  
16 there and see anything that looks anything like the  
17 photo there now?  
18 A. No, I could not.  
19 Q. Okay. Who would know more about that at  
20 Kelly-Moore now?  
21 MR. HAZEN: Objection, form.  
22 A. I really don't know. The --  
23 Q. (By Mr. Coon) Were the --  
24 A. Some of the ex-employees, the old timers  
25 may, but that goes back quite awhile.

1 Q. Where would the Kelly-Moore records be  
2 kept now that would have reflected who the  
3 management people were at that facility while it was  
4 open, as well as any of the other records that were  
5 kept at that facility regarding their sales and  
6 distribution of the product during the time it was  
7 open?  
8 MR. HAZEN: Objection, form.  
9 A. The repository in San Carlos, there was  
10 about 88 boxes there of different information that  
11 was all accumulated relevant to asbestos. I have --  
12 and I have gone through those, but I don't remember  
13 seeing anything in there that addressed it,  
14 addressed Trilite individually. Maybe there could  
15 be something in those boxes that I missed. Other  
16 than that, I have no idea where the material --  
17 where the information could be.  
18 Q. (By Mr. Coon) Do you know why it was that  
19 there was a decision made for Kelly-Moore to import  
20 the vermiculite and wash it, or do whatever you were  
21 describing, processing there, to use it in its  
22 ingredients as opposed to buying it from vendors as  
23 had been done at some point in time?  
24 A. My understanding of the reason of buying  
25 it from Africa at the time was that it was the

1 better quality, and it was a prime source not only  
2 for Kelly-Moore to get it there, but other companies  
3 as well, and that's my understanding of why it was  
4 Africa.  
5 Q. Do you know how it was shipped to this  
6 facility? Was it in cargo containers off of ships,  
7 or --  
8 A. That would be an assumption. I can't  
9 answer that, sir.  
10 Q. Any idea of the type of volume of raw  
11 material that went through the facility year to  
12 year?  
13 A. I have not researched that.  
14 Q. Do you know what years that facility was  
15 open doing the vermiculite process you have  
16 described?  
17 A. I wanted to say early sixties, but again,  
18 I'd have to go back and research the dates. That  
19 was a short -- from my recollection, that was a  
20 short-term operation.  
21 Q. Okay.  
22 A. So --  
23 Q. Did the -- when this facility closed,  
24 where did the vermiculite come from that was still  
25 being used in the product lines?

1 MR. HAZEN: Objection.

2 Q. (By Mr. Coon) Or was vermiculite still  
3 being used in the product lines?

4 MR. HAZEN: Objection, form.

5 A. This facility was sold. The business was  
6 sold to someone in Arkansas, Pine Bluff, I believe,  
7 somewhere like that. And the business was sold to  
8 them, and then we -- the company in turn was then  
9 buying, I believe, from them.

10 Q. (By Mr. Coon) Okay. So you-all sold this  
11 facility to someone else. They continued to do the  
12 same thing that Kelly-Moore had done while they  
13 owned it and you-all continued to buy the same  
14 product from them?

15 A. We didn't sell them the facility. We sold  
16 them the business rights to the material.

17 Q. Okay.

18 A. And I think everything was transferred to  
19 Arkansas.

20 Q. And you-all kept the building and just  
21 leased it back, leased the premises to them?

22 A. I have no idea, sir.

23 Q. Okay.

24 A. No idea.

25 Q. Again, anybody that you know of that would

1 Q. The vermiculite that was used from this  
2 facility, you understood it to have gone into the  
3 Paco lines, the textures, joint compounds?

4 A. I believe some of that material went into  
5 the Paco lines, that is correct.

6 Q. Okay. And we also understand that  
7 asbestos was used at some point in time in those  
8 product lines?

9 A. Asbestos was an ingredient in the Paco  
10 products, yes, sir.

11 Q. Okay. Do you know if under the  
12 specifications they were using both the vermiculite  
13 from this facility, as well as asbestos from other  
14 facilities, in their texture and joint compounds at  
15 the same time?

16 A. I can't answer that.

17 Q. Okay. Do you know if the asbestos became  
18 a replacement or substitute for the vermiculite in  
19 the products at some point?

20 A. It couldn't have. Asbestos and the  
21 vermiculite are two different types of elements that  
22 you're dealing with. Asbestos is a very thin fiber.  
23 The vermiculite would have been puffy little things  
24 that you put in to give it texture, a roughness.

25 Q. Okay. Do you know how long it was that

1 be more familiar with that business transaction?

2 A. Off the top of my head, it would be -- I  
3 -- whatever I tell you would be an assumption and I  
4 would rather not do that.

5 Q. Okay.

6 A. But it goes back 40 some years, so --

7 Q. Okay. Yeah, we're talking about something  
8 that transpired in the sixties, correct?

9 A. Yeah.

10 Q. Who was the head of -- who had your title  
11 at Kelly-Moore in the sixties, that would have been  
12 likely to have overseen some aspects of those  
13 operations?

14 A. You talking about president?

15 Q. Yes, sir.

16 A. Of this division? Well, we never had one  
17 before. I was the first. So I don't know how they  
18 would have been managed. When we go back to the  
19 chart, it's been helpful. It's not even on here,  
20 but I would assume, it looks like it was -- whoever  
21 it was running it reported directly to the president  
22 at the time, which would have been Mr. Moore. So I  
23 can't answer your question.

24 Q. Okay.

25 A. Wish I could. I can't.

1 the vermiculite from that facility that we have been  
2 talking about was used in the Paco product lines?

3 A. No. Again, I'd have to go back to the  
4 dates, and, again, I have no idea at what time this  
5 thing totally shut down, or how long it was in  
6 business. I just can't answer that, sir.

7 Q. Okay.

8 MR. HAZEN: Hey, Brent, we're at  
9 noon, so if you're at a stopping point, maybe we can  
10 pick up and finish up with the brochure after lunch.

11 MR. COON: Sure. That's fine.

12 MR. HAZEN: Good.

13 THE VIDEOGRAPHER: Going off the  
14 record at 11:56.

15 (A lunch recess was taken.)

16 THE VIDEOGRAPHER: Back on the  
17 record. The time is 1:02.

18 Q. (By Mr. Coon) Mr. Giffins, when we left  
19 off at the break, we were looking through the  
20 brochure. I think page 5698 Bates stamp. I wanted  
21 to ask you a few additional questions regarding the  
22 -- we talked about the Trilite plant. The next one  
23 under here talks about the joint cement production  
24 of Kelly-Moore in the Dallas factory. Could you  
25 tell us about that facility, please, sir?

1 A. My -- my involvement with the Dallas -- my  
2 knowledge of the Dallas factory would only have been  
3 that it was originally Hanna. They obviously were  
4 making some joint compound which I was not aware of.  
5 But the -- that was the factory that was basically,  
6 I think, separate from Hurst, and then we opened  
7 Hurst in 1970.

8 Q. Was that located on the -- generally the  
9 same premises as your Hurst facility?

10 A. No, that would have been here in Dallas.

11 Q. Okay. And you had thought before that was  
12 principally a paint manufacturer that you had  
13 acquired, the Hanna facility?

14 A. Yes, sir.

15 Q. But in -- in reviewing -- I'm trying to  
16 find out, did reviewing this literature make you  
17 aware that they also made textures, or did you  
18 already know that and just had not remembered it?

19 A. Somehow I missed this. I thought the  
20 Hanna deal was strictly Hanna Paint Company, and  
21 that the -- if any joint compounds were made, it  
22 would have been made in that factory when we bought  
23 them, before moving into the Hurst in '70.

24 Q. Okay. And when was that -- Hanna  
25 acquired? Was that '63?

1 Q. Okay. I take it you still don't have any  
2 personal knowledge with respect to whether or not  
3 the Hanna facility made the same joint cements  
4 before Kelly-Moore acquired them?

5 A. I do not, sir.

6 Q. Okay. Do you know how long that facility  
7 had been in operation prior to the time Kelly-Moore  
8 acquired it in '63?

9 A. I do not.

10 Q. Do you know who the ownership was at the  
11 time of acquisition?

12 A. I do not.

13 Q. Would there be archived records with  
14 respect to the identity of the personnel from that  
15 facility?

16 A. Well, there has obviously got to be some  
17 paperwork somewhere, or it's since disappeared, you  
18 know, or gone. But I can't answer that. I don't --

19 Q. If -- I take it you -- do you know whether  
20 or not the -- the texture materials that were made  
21 there would have been the same type of basic  
22 composition as the Paco lines?

23 A. What do you mean, same composition?

24 Q. Same ingredients.

25 A. Well, if there -- first of all, if there

1 A. I think it was '63.

2 Q. So, if the facility was acquired in '63,  
3 it's apparent from this brochure that they made  
4 joint compounds at the Dallas facility, and I am  
5 trying to find out if you know if it was something  
6 they were already making when you bought the plant,  
7 or if it was something that Kelly-Moore continued to  
8 make at that plant after they acquired it in '63?

9 A. I do not know.

10 Q. Okay.

11 A. I do not know.

12 Q. Do you know whether or not they made any  
13 of the Paco lines there post '63?

14 A. Well, it says joint cement production, so  
15 I'm -- I am assuming that probably they would have.

16 Q. Would there be any other records from that  
17 facility that were retained in a repository or  
18 something for Kelly-Moore to go back and look to see  
19 what -- exactly what type of joint compounds, or  
20 joint cements, or texturing cements were made out at  
21 that plant, and what the name of the products were?

22 A. Again, I think any records, like I  
23 mentioned earlier, that would be available would be  
24 part of the repository, the eighty some boxes that  
25 are listed there.

1 were stuff made there prior to Paco, the products  
2 were pretty similar. A lot of the competitive  
3 products were fairly similar. So if the  
4 composition, the basic composition may have been  
5 similar, but how they were put together and the  
6 amount of raw material might could have been  
7 different from supplier to supplier.

8 Q. Do you know what type of trade name the  
9 Hanna facility operated under? Do they have  
10 different identifying trademarks --

11 A. My knowledge --

12 Q. -- for their products?

13 A. -- is that it was Hanna Paint Company and  
14 that's how they identified their -- their material  
15 as well.

16 Q. Was it just called Hanna paints?

17 A. Hanna, right.

18 Q. Do you know -- I take it you don't know if  
19 they made the textures before Kelly-Moore bought it?

20 A. I can't answer that, sir.

21 Q. So you do not know if there was a Hanna  
22 texturing compounds or joint compounds product line?

23 A. No, I do not.

24 Q. Do you know if the facility that was  
25 acquired there was one that was a manufacturing

1 facility, where they actually manufactured the  
2 product there?

3 A. When we bought Hanna, there was a plant,  
4 because they were making their own paint.

5 Q. And what happened to that facility?

6 A. I have no idea.

7 Q. Do you know if it was sold, if there's  
8 still manufacturing processing there, if the  
9 building is still there?

10 A. I can't answer that. I am not even sure I  
11 know where it is, but it was -- it was somewhere  
12 here in Dallas.

13 Q. To your knowledge, were any joint  
14 compounds or texturing compounds sold by Kelly-Moore  
15 after the acquisition of Hanna under names other  
16 than the Paco line?

17 A. At -- after the acquisition of Hanna?

18 Q. Yes, sir.

19 A. Sold where?

20 Q. Anywhere.

21 A. Well, we got into the business in '60.

22 Q. Right. With Paco?

23 A. So -- with Paco. So, yes, if -- I mean we  
24 -- we would have sold Paco after -- we would have  
25 been selling Paco at the time we bought Hanna.

1 Q. Sure. But do you know whether or not  
2 there were other names on any of the joint  
3 compounds, or texturing material sold by Kelly-Moore  
4 other than the Paco line?

5 A. I do not know. I have not seen anything  
6 directly that says that we did, but again, prior to  
7 1960, before we got into that business, there was  
8 material out there on the market. Now, whether, in  
9 fact, Kelly-Moore was buying somebody else's  
10 material, I don't know that; but prior to 1960,  
11 before we got into it, it could have been.

12 Q. Well, that was another thing I wanted to  
13 ask you a little more about later, with respect to  
14 rebranding as it relates to texturing materials, but  
15 since you brought it up, do you know whether or not  
16 Kelly-Moore sold any of the products like joint  
17 compounds and texture materials before '60, under  
18 either their name, or under another vendor's name at  
19 their stores?

20 A. I am not aware. The only one I -- only  
21 one that I am aware of that was sold under a  
22 different brand name was that Georgia Pacific that I  
23 mentioned to you.

24 Q. If we thumb briefly through the rest of  
25 the brochure, it's a pretty extensive brochure, but

1 if we go through some more pages of this real  
2 quickly, it talks about diversifying, moving,  
3 expanding geographically. Do you know about -- "The  
4 Do-It-Yourself Trade." Here is a section on "The  
5 Professional Side." Talks about some of the control  
6 aspects, I think talks about their quality  
7 control --

8 A. Yeah, this --

9 Q. I think it's talking about maybe dealing  
10 with professional contractors here.

11 A. Uh-huh.

12 Q. Or have I missed it? Is that what this is  
13 discussing?

14 A. No, it's primarily talking that the stores  
15 are set up as a full service center for the painting  
16 contractor.

17 Q. Okay. Real briefly on that subject  
18 matter, you had a lot of retail stores where an  
19 individual customer such as you or I could go in to  
20 buy some paint or texturing compound, correct?

21 MR. HAZEN: Objection, form.

22 A. Well, stores are open for anybody to come  
23 in and buy from us, sure.

24 Q. (By Mr. Coon) Sure. So, I could just  
25 drive my car down -- say this is 1965, I could have

1 drove my car down to one of your local retail shops  
2 and bought a gallon of paint, or a bucket, or a bag  
3 of texturing compound?

4 A. You -- you could do that. You could do  
5 that.

6 Q. Just as an individual customer?

7 A. The only difference is the paint is  
8 packaged in a way that the individual customer could  
9 have purchased it, and used it effectively. The  
10 drywall material was packaged in large 25-pound  
11 bags, which the normal consumer, retail, like you  
12 and I, would not normally have purchased in that  
13 quantity because they wouldn't have ever used that  
14 much.

15 Q. Okay. What sizes of the Paco containers  
16 were there with the different texturing compounds  
17 and joint compounds?

18 MR. HAZEN: Objection, form.

19 A. There were bags, 25-pound bags, 50-pound  
20 bags in the dries, and then the premix there were  
21 what you might call gallon sizes, and there were  
22 four gallon sizes as far as the quantities.

23 Q. (By Mr. Coon) Did the gallons come in a  
24 can, or a plastic container?

25 A. The gallons came in, like, a

1 cardboard-type thing.  
 2 Q. Okay. Now, if we looked at the brochure,  
 3 apparently there was some degree of effort by  
 4 Kelly-Moore to sell to the contracting trades.  
 5 A. Big effort.  
 6 Q. All right. And that would have been small  
 7 contractors and big contractors, any contractors?  
 8 A. The company's philosophy has always been  
 9 directed toward the painting contractor. And any  
 10 retail business that we do is just what basically  
 11 would have happened just from the store being there,  
 12 but the emphasis was on the painting contractor.  
 13 Q. When they acquired the Paco lines, do you  
 14 know if there was any additional efforts to capture  
 15 a portion of the drywall contractor business?  
 16 A. From what I -- what I have read, and the  
 17 only way I can answer that, sir, is to tell you the  
 18 basis of why that type of business appealed to the  
 19 company at that time, is back in the sixties people  
 20 were -- a lot of painting contractors were also  
 21 doing drywall, and it seemed to be a natural tie-in  
 22 to have that available to our painting contractors,  
 23 since, again, we were primarily in the contractor  
 24 wholesale business, it seemed like a natural tie-in  
 25 to have joint compounds.

1 Q. So as I understand, at that time frame  
 2 most of the contractors or a large portion of the  
 3 contractors you dealt with in the painting sector  
 4 were also the same contractors that were putting the  
 5 sheetrock up, and taping it and floating it and then  
 6 painting it?  
 7 A. During those days, that's basically --  
 8 they did both, a lot of them did both.  
 9 Q. Okay. So it made sense to have the  
 10 texturing compound, the product lines there along  
 11 with the paint since you were already targeting the  
 12 painting contractors in various communities?  
 13 A. It's my understanding, yes.  
 14 Q. I think this -- this -- there are several  
 15 pages of discussion about contractors, and selling  
 16 to contractors, and -- okay. Then we have a couple  
 17 of photographs here that show the Paco textures, and  
 18 home improvement, and K-M paint lines. Is this at  
 19 the California facility?  
 20 A. Yes, it is.  
 21 Q. That's at San Carlos?  
 22 A. Yes.  
 23 Q. And it appears from the way these were  
 24 written on top of the buildings, that all of these  
 25 different facilities were all in the same compound?

1 A. That is correct.  
 2 Q. Was the San Carlos factory the main  
 3 production facility for the Paco texture lines for  
 4 the West Coast?  
 5 A. Yes, it was.  
 6 Q. Where were the other Paco manufacturing  
 7 facilities located?  
 8 MR. HAZEN: Objection, form.  
 9 A. What -- at what time frame are you talking  
 10 about?  
 11 Q. (By Mr. Coon) Okay. Well, let's go back  
 12 to -- first, let's just finish this brochure. I  
 13 don't think there is hardly anything else we need to  
 14 really discuss. It talks about sales. Okay. I  
 15 think that covers that basically.  
 16 Let's talk specifically, then, about the Paco  
 17 product line. Kelly-Moore acquired that facility in  
 18 what? Was it 1960?  
 19 A. That's correct.  
 20 Q. And it was acquisitioned out of a  
 21 previously operating facility?  
 22 A. It was acquisitioned from a gentleman by  
 23 the name of Cliff Woodland, yes, sir.  
 24 Q. And when Kelly-Moore bought out this  
 25 company, what were -- let me back up. What was the

1 name of the company you-all bought?  
 2 A. Paco.  
 3 Q. Okay. It was already named Paco?  
 4 A. That is correct.  
 5 Q. How long had Paco been in business?  
 6 A. Two years.  
 7 Q. So, they started in '58?  
 8 A. '58.  
 9 Q. And what were the product lines that they  
 10 manufactured?  
 11 A. At that time, they were primarily  
 12 manufacturing the dry joint compounds.  
 13 Q. And what was the market for the dry joint  
 14 compounds?  
 15 A. Market as --  
 16 Q. Intended use.  
 17 A. To seal the -- to cover, fill in the  
 18 joints of drywall, and make the drywall appear  
 19 smooth, so that you have a continuous wall.  
 20 Q. Part of the taping and floating  
 21 procedure --  
 22 A. Yes, sir.  
 23 Q. -- is that you're engaged with drywall or  
 24 sheetrock?  
 25 A. Yes.

1 Q. And, as I understood, the desire by  
2 Kelly-Moore to acquire this facility was because of  
3 this hand-in-hand philosophy of painting contractors  
4 and drywall contractors?

5 A. It's my understanding that it was -- at  
6 that time that was part of the reason for doing  
7 that, yes.

8 Q. And at the time this facility was  
9 acquired, where were their operating facilities and  
10 manufacturing facilities located?

11 A. Whose? Kelly-Moore's or --

12 Q. Paco's.

13 A. Paco's? Paco's was in Richmond,  
14 California.

15 Q. And was that their operating facility or  
16 manufacturing or both?

17 A. That was both, to my understanding.

18 Q. Did they have any other facilities?

19 A. No, not that I'm aware of.

20 Q. Did they have a distribution system?

21 A. Not -- I -- I can't answer that, sir. I  
22 don't know.

23 Q. After the facility was acquired in 1960,  
24 what type of expansion took place within that  
25 division?

1 A. I assume to provide better facilities.

2 Q. Was it a bigger facility or more  
3 efficient, or better geographic location?

4 A. I wasn't -- I wasn't part of the -- around  
5 at that time, so anything I tell you would be an  
6 assumption.

7 Q. Okay. What happened to the facility in  
8 Richmond?

9 A. I do not know.

10 Q. Was it still operating by some other  
11 entity? Did somebody else buy it, continue to make  
12 dry joint compound there?

13 A. To the best of my knowledge, no. All that  
14 entire operation was moved into San Carlos.

15 Q. Do you know if they actually moved the  
16 physical equipment from Richmond to San Carlos?

17 A. It's my understanding they did.

18 Q. So they just picked up the plant and moved  
19 it to another location?

20 A. Correct.

21 Q. And was it your understanding that in  
22 addition to moving the original equipment in  
23 Richmond, that they also expanded on the facility to  
24 make either more of the product or different  
25 products?

1 MR. HAZEN: Objection, form.

2 A. Within the Paco division?

3 Q. (By Mr. Coon) Yes, sir.

4 A. I don't know if there was any expansion.  
5 Maybe I am -- maybe I won't answer your -- your  
6 question correctly, but when it was purchased in  
7 '60, we continued to operate it at that location up  
8 through '64; and that material, that drywall  
9 material, is what went into Kelly-Moore stores in  
10 that area that were serviced by --

11 Q. Okay.

12 A. -- that facility.

13 Q. Any idea of what type of volume of the dry  
14 joint compound was produced each year, those four  
15 years?

16 A. I can't answer that, sir.

17 Q. Do you know whether or not Kelly-Moore  
18 retains any records that would reflect the volume of  
19 manufacturing of those goods at that facility?

20 A. If there's records available, they would  
21 be in that repository.

22 Q. And what happened in 1964?

23 A. The Richmond facility was located -- was  
24 moved to San Carlos.

25 Q. And what was the reason for the move?

1 A. Well, they didn't make anymore products,  
2 they just brought over what they were making.

3 Q. Okay.

4 A. I -- having never seen Richmond, I can't  
5 tell you if it was an expansion or not, to be honest  
6 with you.

7 Q. And how long did the San Carlos facility  
8 continue to operate, from '64 until when?

9 A. As far as making Paco?

10 Q. Yes, sir.

11 A. The -- they -- we finished -- we ceased  
12 making Paco in 1982. That was suspended --

13 Q. Okay. Now --

14 A. -- as a company.

15 Q. Now, when we're talking about Paco and  
16 ceasing production in '82, are we talking about the  
17 -- the Paco dry joint compound, or other product  
18 lines that they also manufactured at later days?

19 A. When I talk about '82, that's when the  
20 company decided to get out of the business, so  
21 whatever products they were making at the time,  
22 everything was discontinued.

23 Q. Okay.

24 A. During the earlier period from 1964 on,  
25 there were some product lines that were added to the

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1 Paco assortment; but in '82, everything was  
2 eliminated.

3 Q. Okay. So as I understand that, from '60  
4 to '64, the only product that was made at the  
5 facility, which was then located in Richmond, was  
6 called Paco dry joint compound?

7 A. To the best of my knowledge, it was the  
8 joint compounds.

9 Q. Okay. And that was, I believe, an  
10 asbestos-containing material, was it not?

11 A. That is correct.

12 Q. And then from '64 to '82, the facility  
13 operated in its new location in San Carlos,  
14 California?

15 A. Correct.

16 Q. And during that time frame, not only did  
17 they continue to make the dry joint compound for  
18 some period of time, but they also expanded into  
19 some other product lines under the Paco name?

20 A. Correct.

21 Q. Okay. And then in 1982, they quit making  
22 anything under the Paco name, or they shut down the  
23 plant? What did they do?

24 A. We shut -- all the Paco operations were  
25 shut down throughout the company.

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1 Q. Okay. Did that shut down that whole  
2 facility, or was the facility in 1982 making things  
3 other than the Paco product lines?

4 A. Well, as the map indicates, that area was  
5 also on the paint plant.

6 Q. Okay. So they expanded into Paco other  
7 Paco product lines between '64 and '82, and also  
8 other product lines other than Paco?

9 MR. HAZEN: Objection.

10 Q. (By Mr. Coon) Like paint?

11 MR. HAZEN: Objection, form.

12 A. I'm confused now.

13 Q. (By Mr. Coon) Okay. I am, too. From  
14 '64 to '82, the San Carlos facility continued to  
15 make Paco product lines of various sorts?

16 A. Yes, sir.

17 Q. Did they make anything at that facility  
18 during those years other than the Paco product  
19 lines?

20 A. In the actual building, where Paco was  
21 located?

22 Q. Just the same facility. Not necessarily  
23 in the same building. I don't know how many  
24 buildings you have there.

25 A. We made paint.

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1 Q. Okay. When did they start making paint  
2 there?

3 A. We moved to that location in 1952 -- '56,  
4 I believe.

5 Q. Okay.

6 A. Now, I -- don't hold me to it.

7 Q. Okay. So, I better understand, and you  
8 probably said this earlier, but when the Richmond  
9 plant closed in '64 and moved to San Carlos, they  
10 moved to the same location where there was already  
11 an existing Kelly-Moore paint facility?

12 A. Yes, sir.

13 Q. Okay. Now, I understand. So, you already  
14 had paint there, and then you bring the texturing  
15 in, in '64?

16 A. Correct.

17 Q. And then '82, you shut down the texturing,  
18 or all the Paco lines, correct?

19 A. Correct.

20 Q. And you still have the paint product lines  
21 that were there before '64 and after '82?

22 A. Correct.

23 Q. Okay. Anything else other than the paint  
24 lines?

25 A. Anything -- where, at that facility?

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1 Q. Yes, sir.

2 A. Well, one of the home improvement centers  
3 was there.

4 Q. Okay. And what years was the home  
5 improvement center there?

6 A. Oh, I think that particular one started  
7 around mid '70s, and that was shut down in 19 --  
8 around '87, '88.

9 Q. And would they have sold their Paco  
10 product lines right there at their home facility?

11 A. I believe they would have, yes.

12 Q. And I take it their paints would be sold  
13 there at the home improvement facility as well?

14 A. Yes, sir.

15 Q. Anything else other than the Paco lines;  
16 the paint business, and the home improvement  
17 facility that was there for a period of time in the  
18 '70s and '80s?

19 A. Not to my knowledge.

20 Q. Okay. Let's next talk, then, more about  
21 the Paco product lines.

22 Over the years, how many different Paco product  
23 lines were made, if you know?

24 MR. HAZEN: Objection, form.

25 A. Over the years? Since when? From --

1 Q. (By Mr. Coon) From the time you first  
2 acquired the Paco product lines in 1960 until the  
3 present.

4 A. So it would be '60 through '82. I am just  
5 trying to count them up in my head. I'd say there  
6 was probably about maybe 15 or 16 different product  
7 lines.

8 Q. Okay.

9 A. Now, when I -- I'm sorry, I got to clarify  
10 that. I don't think there were that many different  
11 product lines, because some of those products had  
12 two different -- some of them came in dry, and some  
13 of them came in wet, so there may have been a couple  
14 -- a few products where you had both dry and wet,  
15 and that's what I am calling the total of 16, but in  
16 essence, it could have been only one type of  
17 product.

18 Q. Okay. Let's -- let me show you what I  
19 have. We have been provided with the boxes that you  
20 told us you looked at earlier.

21 A. The six boxes that we gave you?

22 Q. Yes, sir. Yes, sir. We -- I have looked  
23 at those, and some folks in my office have looked at  
24 those, and we tried to go through and sort some  
25 things out. Let me show you what we have. There

1 MR. COON: Yeah, that's fine.

2 MR. HAZEN: Let's just go off real  
3 quick and just make sure.

4 THE VIDEOGRAPHER: Going off the  
5 record at 1:26.

6 (A recess was taken.)

7 THE VIDEOGRAPHER: Going on the  
8 record. The time is 1:39 p.m., May 31st, 2002.  
9 Beginning of Tape 2.

10 Q. (By Mr. Coon) Okay. Mr. Giffins, we  
11 have taken another brief break to go back and look  
12 at some photographs and some additional charts that  
13 you have in front of you. And I want to first go  
14 back as a matter of housekeeping, and ask you before  
15 the break about the different kinds of products that  
16 Kelly-Moore had manufactured that at one point in  
17 time had asbestos. And you had identified a number  
18 of them, I think, to try to make a rough  
19 guesstimate.

20 This is what's identified as KM 1019, counsel  
21 also KM BB 6549. It was provided to us as a list of  
22 31 products. Have you had an opportunity to look at  
23 that?

24 A. I don't recall having seen this particular  
25 sheet. I am familiar with some of the products that

1 are some photographs of a number of Paco -- what I  
2 believe to be Paco products. If I could have you  
3 identify these for us, might have a few additional  
4 questions of you.

5 MR. HAZEN: Brent, if you would, as  
6 you go through them, would you read off for me the  
7 document number down on the right-hand side and that  
8 way I can track them? I won't have to look at them.

9 MR. COON: Yes, sir. Although, the  
10 numbers that are on these are our identifying  
11 numbers, if that's okay with you.

12 MR. HAZEN: Okay. So you've -- do  
13 you mind, I am going to come around and just take a  
14 peek at them real quick.

15 MR. COON: Yeah. These may be ones  
16 -- I am looking for what you-all had as the BB  
17 numbers.

18 MR. HAZEN: Right. Did you go over  
19 the BB numbers?

20 MR. COON: These don't have -- no, I  
21 don't think so. I don't think these had BB numbers,  
22 which makes me wonder if these came out of the boxes  
23 or not.

24 MR. HAZEN: You want to go off the  
25 record real quick?

1 are listed on here. Yeah.

2 Q. Okay. The -- the first thing I wanted to  
3 ask on there, of the 31 products that were  
4 identified as containing asbestos, how many of those  
5 were under the Paco umbrella?

6 Obviously, a number of them are because they  
7 actually had the Paco name, but I don't know if all  
8 of them are or some of them are.

9 A. To the best of my knowledge, they all  
10 would have been. They all would have been.

11 Q. Okay. So, if we look at the list of the  
12 31 there that are identified, even if it doesn't say  
13 Paco in front of it, we believe it to be a Paco  
14 product?

15 A. Yeah, the taping compound. Yeah, I'd have  
16 to say that is true. Yes.

17 Q. Okay. Do you have a recollection of  
18 Kelly-Moore ever making any of those products under  
19 any name other than the Paco umbrella?

20 A. I am not aware of that, sir.

21 Q. Okay. So the only ones we would have in  
22 addition to this, from what you recall, would be the  
23 possibility of what was rebranded with Georgia  
24 Pacific at some point in time in the late '60s,  
25 early '70s?

1 A. Could you ask me that question again,  
2 please?  
3 Q. Yes, sir. The only products that we have  
4 here that were Kelly-Moore's asbestos-containing  
5 products that would supplement this would be those  
6 that were rebranded through Georgia Pacific, to the  
7 best of your recollection?  
8 A. The Georgia Pacific products would have  
9 not have been sold through a Kelly-Moore store.  
10 Q. Okay. So you wouldn't have them on a list  
11 like this anyway because you considered those to be  
12 separate because they were rebranded?  
13 A. That's correct.  
14 Q. Okay. We next have -- let me ask you one  
15 more question. Of the list here, does anything seem  
16 to be inaccurate with respect to this list, being  
17 one of those products that contained asbestos?  
18 In other words, can you look at the list and  
19 say this one shouldn't be on there because I know  
20 for a fact that one did not contain asbestos?  
21 A. What -- are you talking in -- from the  
22 time -- from the beginning to '60 through '82? Some  
23 time frame some of these were converted to not  
24 contain asbestos.  
25 Q. I understand that. Probably the -- first,

1 is can you look at the list and say I know for a  
2 fact this product never had asbestos in it?  
3 A. I can't say that.  
4 Q. Okay. Now, we next have a number of what  
5 I believe to be photographs of various bags or  
6 containers of Paco product lines.  
7 A. I got it.  
8 Q. And I'll show you what are marked KM 1025  
9 through 1041, and there may be a couple of them  
10 missing, but there is a -- pretty much a package  
11 here. Are -- can you tell us, and looking at --  
12 let's just look at the first one there, and actually  
13 if you don't mind, if we can just flip that around  
14 and show it to the camera so we have got an idea of  
15 what we're looking at.  
16 This says Paco Joint Compound, and the Paco  
17 would be the -- I guess the trade name for the  
18 product?  
19 A. That's correct.  
20 Q. Okay. Now, we have a number on it, for  
21 that one is 5515. Is there any particular  
22 identifications of that number? Does that tell you  
23 something?  
24 A. No. That's the number assigned to that  
25 particular product. The product itself would be All

1 Purpose Joint Compound.  
2 Q. Okay. Was there a particular reason that  
3 you would have big numbers, 5515 on there? Does  
4 that have any particular significance?  
5 A. I can't say that it would. Sometimes  
6 contractors buy by numbers and they -- or they buy  
7 by names, and so it -- this probably was there more  
8 as a convenience thing.  
9 Q. Okay.  
10 A. We do that with our paint.  
11 Q. Okay. Do you know whether or not when  
12 Kelly-Moore acquired this product line if those  
13 numbers were already there, the bags looked similar  
14 to this at the time you acquired the facility?  
15 A. No, I do not. I have not seen bags from  
16 what they looked like when we bought Paco.  
17 Q. Okay. So do you know whether or not there  
18 was even a Paco -- Paco logo like that one on any of  
19 the bags?  
20 A. I -- I don't know, sir.  
21 Q. Do we know if the Paco logo existed in any  
22 form like that prior to the acquisition by  
23 Kelly-Moore?  
24 A. I do not know that.  
25 Q. Okay. And we don't know if the 5515 there

1 means anything with respect to the ingredients or  
2 anything like that?  
3 A. Well, that would be a product number. It  
4 has -- has nothing at all to do with the  
5 ingredients.  
6 Q. Okay. And then it says joint compound.  
7 Now, what would that product have generally been  
8 used for?  
9 A. That would have been used to seal the --  
10 the basic joints.  
11 Q. Okay.  
12 A. And then you lay the tape on top, and then  
13 put a finish coat on top of that.  
14 Q. Is this the dry joint compound you talked  
15 to us earlier about?  
16 A. This is the dry and -- the material in the  
17 bag would be the dry, correct.  
18 Q. And would that have come in the 25- and  
19 50-pound bags?  
20 A. Correct.  
21 Q. And would this kind of be a -- for people  
22 that have not -- can't readily put their -- picture  
23 on what it would look like, would it look kind of  
24 like the bags of ready-mix concrete you could buy  
25 from a home improvement store, that kind of bag,

1 just a tear-off top?

2 A. Yeah, I guess you could say that.

3 Q. Okay. Do you recall the colors of the  
4 bags? Kind of brown? White?

5 A. Sort of grocery store brown type thing in  
6 different colors depending at the time whatever the  
7 bags were printed.

8 Q. Did Kelly-Moore have a typical supplier of  
9 the bags for the various joint compounds and  
10 cements?

11 A. To the best of my knowledge, Saint Regis  
12 is the one that supplied the bags to the company.

13 Q. And would Kelly-Moore just tell them how  
14 they would want the bags logoed and stencilled?

15 A. Kelly-Moore would have influence on that,  
16 but Saint Regis also since they had a staff of  
17 professionals that did this kind of thing, I am sure  
18 probably provided some input as well.

19 Q. Okay. Now, if we look -- do you know when  
20 these photographs were taken?

21 A. I have no idea.

22 Q. Okay.

23 A. When these were taken right here?

24 Q. Yes, sir.

25 A. I have no idea.

1 Q. Let's talk briefly about the next one. We  
2 have a bag. This one's 1026, this one says, Paco  
3 Vinyl Joint Compound, and it's got kind of a  
4 striping pattern to it.

5 A. Right.

6 Q. What was that used for?

7 A. That was used for the same thing as the  
8 All Purpose Joint -- but this could only have been  
9 used in joint compounds, or doing joints. This  
10 could have been used doing a few other little  
11 things, such as you might want to use it as a -- as  
12 a top coat as well.

13 Q. Okay. And the top coat, for the Ladies  
14 and Gentlemen of the Jury that are not familiar with  
15 the drywall -- drywall processing, what would that  
16 be?

17 A. Okay. You have two pieces of drywall that  
18 come together --

19 Q. Okay. This would be like in your house if  
20 you have a four-foot by eight-foot sheet of drywall,  
21 what a lot of people just call sheetrock because of  
22 the popularity of that trade name, but if you buy  
23 sheetrock or drywall, and you put it up on the wall  
24 and nail it up, you got your cracks, correct?

25 A. Where the two sheets butt up together,

1 yes.

2 Q. And then you may have some indentations in  
3 the sheetrock where the nail was embedded into the  
4 sheetrock?

5 A. The nails are countersunk. That is  
6 correct.

7 Q. Sure. So you go back and you would take  
8 this, mix it with the water to a make kind of a mud  
9 or something that's -- has a composition kind of  
10 like mud?

11 A. Similar, yes.

12 Q. And then you would take a trowel or  
13 something and spread it over the cracks to fill in  
14 all the cracks?

15 A. Correct.

16 Q. And you would also fill it in over the  
17 indentions where the hammers knock the nails in to  
18 hold the wall -- the sheetrock up?

19 A. Correct.

20 Q. Okay.

21 A. And then you put the tape on top of the  
22 seam, and then you put generally another coat on top  
23 of that as a finishing coat.

24 Q. So, if we looked at the rolls that you  
25 showed us earlier, the big rolls of paper, that

1 would be the tape that would come out in pools and  
2 you would just -- like giant rolls of -- I guess if  
3 you do something by analogy, it would be like a -- a  
4 bathroom paper or something, comes in a long roll  
5 and you just pull it out, off of the seam?

6 A. You could. It's a lot thicker than  
7 bathroom paper. It's a lot thicker.

8 Q. Right. And in bigger rolls, but similar  
9 analogy?

10 A. Yes.

11 Q. Okay. And you peel out whatever you need,  
12 and tear it off. You can tear it off by hand or  
13 with your tool I suspect?

14 A. Correct.

15 Q. And then you put it over the crack and  
16 then you smooth out the paper with your trowel as  
17 well?

18 A. Correct.

19 Q. And then you have a finished surface to  
20 work with, correct?

21 A. And then you would put -- you put a top  
22 coat on top of it.

23 Q. Okay. Now, what would be involved in  
24 putting a top coat on?

25 A. You would trowel that on like you would

1 have troweled the base coat.  
 2 Q. Okay. And there are a lot of different  
 3 ways you can apply the sheetrock with your texturing  
 4 compounds to give it different types of finishes for  
 5 your ceilings and your walls? You can have a lumpy  
 6 finish or you can have a wavy finish, all kinds of  
 7 different tools to leave different patterns in the  
 8 wall?

9 A. Well, that's different than the mud. The  
 10 mud is what we refer to as mud.

11 Q. Okay.

12 A. The joint compound is what fills the  
 13 joints, beds the tape, and then goes on top of the  
 14 -- of the tape. When you do the texture, the wall  
 15 texture, that's a separate step. That's -- that's  
 16 done after all this is done, and it's a different  
 17 type of material.

18 Q. Okay. So, in a commercial or residential  
 19 application, you put your boards up, the studs, the  
 20 wall frame, and then you take the sheetrock, or  
 21 drywall, nail it up to the studs to have a solid  
 22 wall, correct?

23 A. Correct.

24 Q. And then you would take the mixtures you  
 25 have described here and you fill in the cracks and

1 Q. More three dimensional.

2 A. Yes.

3 Q. Okay. Well, let's talk about these other  
 4 products and how they were used. The next one you  
 5 have was the taping compound. This was Number 5525.  
 6 That also came in 25-pound and 50-pound bags?

7 A. Yes, sir.

8 Q. And what was it used for?

9 A. It was also -- this was -- it gets a  
 10 little confusing. There was in the early days a lot  
 11 of these. There were many different types of  
 12 products. This taping compound could also be used  
 13 like the joint compound. It just performed a little  
 14 bit differently. So, these three products could all  
 15 have been used to do the same thing, only they just  
 16 -- this particular product may have performed a  
 17 little bit differently than the All Purpose. So, a  
 18 lot of -- some of this became preference to -- from  
 19 the contractor.

20 Q. Did all three of those products basically  
 21 have the same ingredients?

22 A. That -- if you're talking about  
 23 ingredients as far as raw materials?

24 Q. Yes, sir.

25 A. They may have varied, but they were

1 the nail indentions, to get a finished surface to  
 2 work with?

3 A. Correct.

4 Q. And from there you can either put some  
 5 other finishing touches on it or paint or whatever?

6 A. You can leave it the way it is, and just  
 7 have the bare flat drywall, which would look like  
 8 what we have in this room, or then you can take and  
 9 put -- or you could put a texture finish on it to  
 10 give it a little bit of a texture and then paint it.

11 Q. Okay. And same with the ceilings, a lot  
 12 of homes and commercial businesses would have the  
 13 drywall nailed to the ceiling as well, to the  
 14 ceiling joists?

15 A. Correct.

16 Q. And you would do the same process, fill  
 17 in the cracks, fill in the flail holes, and many  
 18 times the ceilings would have more of a textured  
 19 composition than the walls, where they would do it  
 20 with brooms and all kinds of different ways to give  
 21 it patterns?

22 A. When you say more of a texture, talking  
 23 about a more defined texture?

24 Q. Sure.

25 A. Yes.

1 similar, yes.

2 Q. Did all three of those have asbestos as  
 3 one of the ingredients?

4 A. Yes.

5 Q. Okay. Let's go next to 1029, looks like  
 6 just some of the writing that's on one of the bags?

7 A. Yeah.

8 Q. So we will go to 1030, that is Wall  
 9 Texture. Okay. Could you tell us about that one?

10 A. It's got wall and ceiling texture on it.  
 11 Do you need to see this, Scott?

12 Q. And if we were to show this one, if we  
 13 could hold it up, it says, again, the Paco logo, and  
 14 it's called Paco-TEX Wall Texture. The other ones  
 15 did not have Paco-TEX. Was there something in  
 16 particular that would cause that one to have an  
 17 additional trade name on it?

18 A. Well, other than I think the Tex applied  
 19 to the fact that this was texture.

20 Q. Okay.

21 A. That's a yes.

22 Q. Okay. And then what was it used for?

23 A. The wall texture -- it's a dry powder.

24 The wall texture is used to give that sort of a  
 25 little bit of an effect on the wall, and the ceiling

1 texture was the texture that went on the ceilings.

2 Q. Okay. That's the other bag next to it,  
3 that was -- says Paco Textures and then it says  
4 Number 6373, Deco-Tex?

5 A. Decorative ceiling texture.

6 Q. Okay. And was that pretty much the same  
7 kind of material as the wall texture material? What  
8 was different about it?

9 A. It had a different type of aggregate in  
10 it. It was a little bit rougher --

11 Q. Okay.

12 A. -- because you had a different finish.

13 Q. Okay. Gave it a -- an ability to have a  
14 little more of a three-dimensional --

15 A. Yes.

16 Q. -- effect to it?

17 A. Uh-huh.

18 Q. Did it also come in 25-pound bags?

19 A. Yes.

20 Q. It was a powder?

21 A. Yes.

22 Q. Dry powder, mix it with water?

23 A. Yes.

24 Q. Stir it all up and use it?

25 A. Right.

1 compared to something you would have as a kitchen  
2 blender just on a bigger scale?

3 A. Yeah, the equipment that we were looking  
4 at earlier this morning --

5 Q. Okay.

6 A. -- the Sprayline --

7 Q. Right.

8 A. -- type material, that was made to spray  
9 the material on. And what you would do, it was  
10 somehow -- and I haven't seen the equipment, because  
11 -- that particular equipment, but the powder goes  
12 in, the water goes in and then combines, and it  
13 squirts out.

14 Q. Right. And we talked about the Sprayline  
15 products. You could actually -- if you had a lot of  
16 this to do, you would not want to do it by hand just  
17 because of the labor costs? So if you could spray  
18 it on with equipment it might be more time -- time  
19 saving?

20 A. I -- I don't know if that's true, because  
21 a professional who knows how to use this, and if  
22 it's used properly, can go on rather quickly and  
23 easily.

24 Q. What would have been the benefits of using  
25 the Sprayline equipment, then?

1 Q. How would these products typically be  
2 mixed with water? We have gone through five or six  
3 different 25-pound bags of this. When you opened  
4 them up, they were really just full of the dry  
5 ingredients?

6 A. Correct.

7 Q. The clays, the cements, and whatever the  
8 aggregates were, the asbestos, all of that was still  
9 in powder form, kind of like a giant bag of flour,  
10 right?

11 A. Correct.

12 Q. And if you -- and actually the bags are  
13 kind of like big bags of flour, where you could tear  
14 them open, paper bag and you tear them open, and  
15 then you would dump them in the buckets and add  
16 water?

17 A. Yes, sir.

18 Q. And then how would mix it up? Just stir  
19 it up with a stick or whatever you had?

20 A. Whatever you had as to -- had to mix it  
21 through.

22 Q. For commercial applications where a lot of  
23 this was used, did the contractors many times have  
24 some sort of blending units, or equipment, mixing  
25 equipment? Like giant blenders that you would --

1 A. If --

2 Q. A different effect?

3 A. No. You -- on the joint compounds, you  
4 really had to do that by hand. The spray was more  
5 applicable to the texture when you're doing this  
6 whole room, so you have gone through and done the --

7 Q. You have taped and floated?

8 A. You have done all that, which is basically  
9 mostly done by hand, although there were -- there  
10 was some mechanical equipment that would help put  
11 the tape on with the -- with the bedding. But when  
12 you get to the texturing, you're doing large  
13 expansive areas, and that's where the machines came  
14 in handy.

15 Q. Okay. Now, you had a machine that would  
16 -- once all of this was mixed, you opened up these  
17 bags and mixed them with water, and got them all  
18 stirred up. Then you could have the machines spray  
19 it out for you?

20 A. Uh-huh.

21 Q. Did the machine also mix it up for you?  
22 Could you dump the 25-pound bags into some hopper on  
23 the machine, and add water when you do that?

24 A. Yes, sir.

25 Q. Okay.

1 A. It's my understanding that's how they  
2 worked.

3 Q. So you think it was a one-step piece of  
4 equipment. You didn't have to go mix it, and then  
5 dump it in the equipment, you think you could dump  
6 the powder in there and it had a hose connected to  
7 it or something where the water would blend it into  
8 a mud, and ready to go?

9 A. My recollection, you could do it both  
10 ways. People would do that, mix it and put it in  
11 some type of a hopper, small one, and you do it by  
12 hand.

13 Q. Okay.

14 A. Or you had machines where you dumped it in  
15 and it all did it for you.

16 Q. Okay. Now, we go to the next one, this  
17 just says Paco Textures, 1032. Is that maybe the  
18 side of another bag?

19 A. Yeah. It says Semi-Liquid, so this would  
20 have been what we call ready-mix.

21 Q. Okay. Ready-mix. Yeah, I see on the --  
22 if we look at this one, if we held it up, and showed  
23 this is not a flat bag, correct? This is something  
24 else?

25 A. That's a box.

1 able to put it in -- on.

2 Q. Do you know whether or not there was a  
3 significant difference in the volume of sales  
4 between the powdered stuff that was mixed by the  
5 contractors versus that that was already premixed  
6 with the water?

7 A. This -- this was our -- probably one of  
8 our better selling products, the Ready-mix.

9 Q. Ready-mix?

10 A. Yes, sir.

11 Q. Okay. And let's go to the next one. This  
12 is a called Paco Textures --

13 A. Joint Compound --

14 Q. -- Quik-Set?

15 A. -- Quik-Set, yes.

16 MR. HAZEN: Number, Brent.

17 MR. COON: This is 1033.

18 Q. (By Mr. Coon) And what are we talking  
19 about with Paco Quik-Set Joint Compound?

20 A. What's -- what is the product precisely?

21 Q. Yes, sir.

22 A. The Quik-Set Joint did the same thing as  
23 the other joint compounds did, the only thing is  
24 this dried a lot faster. This was more like a  
25 plaster-type thing, and there were three different

1 Q. Okay. This is in a box. So we got a  
2 little bit different shape to it?

3 A. Yeah. I am trying to find you a better  
4 picture.

5 Q. And on the side of the box it says,  
6 "Semi-liquid, do not drop, protect from freezing."  
7 Did I read that correct?

8 A. Yes.

9 Q. Okay. So what you have there is the  
10 containers that would be sold by Kelly-Moore that  
11 had already taken the dry powder that we've talked  
12 about in these 25-pound bags and mixed it up with  
13 the water so it's ready to go?

14 A. Correct.

15 Q. Okay. And would it still have the same  
16 purposes for use as the ones that came in the powder  
17 form?

18 A. Yes, sir.

19 Q. What would be the reasons that you would  
20 have some of your contractors or customers wanting  
21 it in a ready-mix form?

22 A. That's really a preference by the  
23 contractor. It's a matter of convenience in that  
24 you don't have to go out and have a supply of water  
25 on new construction. You just open it and you're

1 variations, speed at which it would dry. Then this  
2 primarily was not meant to go and do a house or a  
3 room with, because it dries quickly. It's a little  
4 bit different type of product. This is more for a  
5 smaller-type job.

6 Q. And this also came in the 25- and 50-pound  
7 bags?

8 A. I know it came in 25. I'd have to go back  
9 and refresh my memory if it came in anything bigger.

10 Q. And did it essentially contain the same  
11 ingredients with the exception of something that was  
12 more of a drying additive?

13 A. No, I believe this was compositioned a  
14 little bit differently because of its Quik-Set  
15 characteristics.

16 Q. Okay.

17 A. A normal contractor, with this material,  
18 had a habit -- stay wet for a while so they could  
19 really work with it because it's done a lot of it by  
20 manual. This, on the other hand, was more of a  
21 concentrated, smaller area.

22 Q. And do you know if that one also contained  
23 asbestos?

24 A. It did.

25 MR. HAZEN: Objection, form.

1 Q. (By Mr. Coon) Okay. Next we have Paco  
2 Spray Texture Number 5580.  
3 MR. HAZEN: 1034?  
4 MR. COON: Yes, sir. 1034.  
5 Q. (By Mr. Coon) How does that one differ  
6 from the other ones?  
7 A. This is a sand finish.  
8 Q. And what is a sand finish?  
9 A. I guess the only way I could explain it is  
10 you put some glue on the wall and you throw sand on  
11 it, and that's -- it gives you a rougher-type  
12 finish.  
13 Q. Okay.  
14 A. Coarser finish.  
15 Q. It had a grittier finish --  
16 A. Yes.  
17 Q. -- or texture to it? Was it because they  
18 put sand or something in it?  
19 A. I believe -- I can't answer -- I believe  
20 so. I don't know what the composition of this  
21 particular was.  
22 Q. Okay. Did that also come in 25-pound  
23 powder form?  
24 A. Yes.  
25 Q. Asbestos a -- an ingredient in it?

1 out a lot easier as you trowel it on.  
2 Q. And what do we mean by less bodied?  
3 A. I don't know. I guess it's like making a  
4 cake. You girls probably could help me.  
5 You might have something that's a little bit  
6 more viscous than something else. I mean, it's  
7 primarily made the same way but it just doesn't have  
8 the body, when you -- when you have got it mixed.  
9 It -- it could be a little bit thinner somehow. And  
10 I don't know how to explain it. I'm not a technical  
11 guy.  
12 Q. Could you get the same effect by using one  
13 of the other compounds and diluting it with more  
14 water, or did you lose some integrity of the product  
15 if you did that?  
16 A. I can't answer that. I don't know that.  
17 Sorry.  
18 Q. Okay. Next one we have Paco Textures, is  
19 that another box?  
20 A. This is the Ready-mix topping.  
21 Q. Okay.  
22 MR. HAZEN: 1037?  
23 A. Yes.  
24 MR. COON: This is 1037.  
25 Q. (By Mr. Coon) And what is Ready-mix

1 MR. HAZEN: Objection, form.  
2 A. Yes.  
3 Q. (By Mr. Coon) Okay. Let's go to the  
4 next one. This is Document 1036, Paco Textured  
5 Number 5535 Finishing Compound. Also in 25-pound  
6 bags?  
7 A. Yes.  
8 Q. Also powder?  
9 A. Yes.  
10 Q. Also with asbestos?  
11 A. Yes.  
12 MR. HAZEN: Objection, form.  
13 Q. (By Mr. Coon) How was it used?  
14 A. This would have been -- if you were using  
15 this material in place of an all purpose, this would  
16 have been the last coat. This would have been the  
17 top coat that you put on, above -- on top of the  
18 tape.  
19 Q. And what would be the purpose of going  
20 back with a finishing coat, from a contractor's  
21 standpoint, with this product?  
22 A. This product in itself was not as bodied  
23 as the first coat. The first coat has to be bodied,  
24 to fill -- help fill in those voids. This was a  
25 little less body, which allowed it to be smoothed

1 topping?  
2 A. It's this product here, in theory, already  
3 premade.  
4 Q. Okay. The finishing compound that's  
5 already mixed with water?  
6 A. Right.  
7 Q. Okay.  
8 A. In essence, that's the difference.  
9 Q. And next -- this is part of a bag says  
10 Paco -- Paco, maybe V-100?  
11 A. You got two different deals there.  
12 Q. Well, we can't read. One is the side of a  
13 Quik-Set.  
14 A. That's Quik-Set. That's different.  
15 Q. We talked about it. Then there is a side  
16 of something that says -- is that a V-100 Texture?  
17 A. Yes.  
18 Q. Was that off the --  
19 A. V-100 Texture Vinyl something.  
20 Q. Do we know what that was?  
21 A. It was -- it's a texture. In this case,  
22 it's the ceiling, the V-100 is the ceiling texture.  
23 Q. Okay. Was that also in a 25-pound bag?  
24 A. Yes. Oh, wait a minute. It looks like --  
25 there is a 35-pound. This looks like a 35-pound

1 bag. All right.  
 2 Q. Okay. And powdered?  
 3 A. Yes.  
 4 Q. Mixed with water?  
 5 A. Yes.  
 6 Q. Do you know whether it contained asbestos?  
 7 MR. HAZEN: Object.  
 8 A. It did.  
 9 Q. (By Mr. Coon) It did?  
 10 A. Uh-huh.  
 11 Q. Okay. The next one, the Quik-Set, we have  
 12 talked about it, have we not?  
 13 A. Now, first of all, I want to clarify  
 14 something.  
 15 Q. Yes, sir.  
 16 A. You asked me about containing asbestos.  
 17 Q. Sure. We understand that --  
 18 A. Since we started this conversation about  
 19 '60/'64, I am telling you what these products had in  
 20 them at that time.  
 21 Q. Sure.  
 22 A. Okay. I just want to make sure.  
 23 Q. We do understand at some point in time  
 24 asbestos was reduced or removed from some of these  
 25 product lines.

1 application or finish?  
 2 Q. Akin -- what would be the closest product  
 3 that you made to that one?  
 4 A. There -- I don't know if there is anything  
 5 that is close. Texture paint would be the closest,  
 6 but I can't say you could compare the two.  
 7 Q. Okay.  
 8 A. I mean texture, wall texture.  
 9 Q. Okay.  
 10 A. Deco-Tex.  
 11 Q. Now, did this have a color to it? This is  
 12 a paint but you mix it. It's a powder, right?  
 13 A. It's a powder.  
 14 Q. And you mix it with water?  
 15 A. Right.  
 16 Q. And you put it on the sheetrock or  
 17 drywall?  
 18 A. Right.  
 19 Q. When you did that, would it have a  
 20 finished painted look to it?  
 21 A. No, you would have to paint over it.  
 22 Q. Okay. Why was it called texture paint?  
 23 It was a texture for paint?  
 24 A. I am assuming it was called texture paint  
 25 because you could put it on with other vehicles

1 A. We started removing it in 1972.  
 2 Q. And we will talk more about that in a  
 3 little bit.  
 4 A. Okay.  
 5 Q. And next we have 1039. This is called  
 6 Paco Texture Paint Number 5563.  
 7 A. Right.  
 8 Q. 25-pound bag?  
 9 A. Yes. Appears to be.  
 10 Q. Powdered?  
 11 A. Appears to be.  
 12 Q. Contained asbestos at some point?  
 13 A. It would have, yes.  
 14 Q. And used for what, sir?  
 15 A. This is where you -- where you want -- I  
 16 don't know how to explain it. It gives you like a  
 17 texture, but it's more of a paint. With the  
 18 textures you had to spray. You could mix this with  
 19 water and put it on with a brush.  
 20 Q. Okay.  
 21 A. And it would give you a textured type  
 22 effect, little bit different.  
 23 Q. And it would be most akin to what other  
 24 product?  
 25 A. Well, for the -- akin as far as

1 other than trowels and -- or machines.  
 2 Q. Okay. And that was because of the  
 3 viscosity?  
 4 A. Yes, sir.  
 5 Q. Okay. Next we have got Document 1040.  
 6 This is called Paco Texture Vinyl Base V-100. I  
 7 think we saw a side of that bag --  
 8 A. Yes.  
 9 Q. -- at 1038.  
 10 A. Yeah.  
 11 Q. Is that the same -- is that the side of  
 12 that bag?  
 13 A. Appears to be, yes.  
 14 Q. Okay. And I think you described that  
 15 product for us. It says, Number 6373, Decorative  
 16 Ceiling Texture?  
 17 A. Correct.  
 18 Q. Anything else about that you have not  
 19 already told us about?  
 20 A. Huh-uh.  
 21 Q. And 1043, or actually that's 1041 --  
 22 A. 1041.  
 23 Q. -- appears to be the sides or bottoms of  
 24 some of the bags as well?  
 25 A. Hard to tell.

1 Q. Okay. Now, over the years, with these  
2 products -- let me back up. First, we don't have  
3 photographs here of each of the 31 product lines  
4 that we have under Document 1019, do we?

5 A. You don't have --

6 Q. Do you know whether or not Kelly-Moore has  
7 from its archives or -- or from whatever purposes,  
8 copies of the other product lines that are on  
9 Document 1019, to supplement the ones we have just  
10 discussed?

11 A. I have seen copies of labels or packaging  
12 in the archives, in the repository. Now, whether  
13 all these are within that stack, I don't -- I do not  
14 know that, sir. But a lot of what is on here is  
15 what you have got there.

16 Q. Yeah. I think we have got 10 or 15 of --  
17 looks like we have looked at photographs of about  
18 half of those products that are on the list.  
19 Ballpark.

20 A. Yeah, because you keep in mind some of  
21 these are all the same, only they're like the  
22 Quik-Set, you have three different products.

23 Q. Okay.

24 A. You have a fast, medium, and slow dry, so  
25 that -- but that bag would be the same for that one,

1 Q. Okay.

2 A. So, even though it had the same basic  
3 ingredients in it, it was -- it was made a little  
4 bit differently to appeal to the Texas market, the  
5 Texas users, and a lot of the products had different  
6 alpha numbers on them, or letters.

7 Q. Okay.

8 MR. HAZEN: Hey, Brent, can we take  
9 five for a quick bathroom break?

10 MR. COON: Sure.

11 MR. HAZEN: We've been going about  
12 an hour or so.

13 MR. COON: That's good.

14 THE VIDEOGRAPHER: Going off the  
15 record at 2:11.

16 (A recess was taken.)

17 THE VIDEOGRAPHER: Back on the  
18 record, the time is 2:25.

19 Q. (By Mr. Coon) Okay. Mr. Giffins, we  
20 just took another break and now that we're back on,  
21 we were last going through the product lines, and in  
22 looking at the bags, a number of them have a  
23 caution. I believe we can go back -- look at this  
24 one by example. It says, "Caution, contains" --

25 A. Right.

1 except that it would identify on the bag if it was  
2 fast, medium or slow.

3 Q. Well, for instance, I don't recall seeing  
4 one that said "Radiant Heat Fill."

5 A. No.

6 Q. Do you know what that was?

7 A. I have no idea.

8 Q. I did not recall one that said "Triple  
9 Duty, Bestex D." Do you know what that was?

10 A. I think at one time Triple Duty, Bestex D  
11 was the predecessor to the All Purpose, but I don't  
12 want to swear to it.

13 Q. What about Bestex A?

14 A. You want to get real confused?

15 Q. Not really, but I am probably going to get  
16 there.

17 A. Bestex product could have been made as  
18 Bestex, say for ceiling texture, but there were  
19 different formulas because some areas you had to  
20 make a formula where it dried differently. The  
21 formula for Texas is entirely -- was basically  
22 different in a way, not basically, but there was a  
23 difference in the formula than the Bestex would have  
24 been in California, because of our humidity and heat  
25 here from a drying point.

1 Q. -- "asbestos fibers, avoid breathing  
2 dust."

3 A. "Avoid creating dust."

4 Q. Okay. "Avoid creating dust. Breathing  
5 asbestos dust may cause serious bodily harm."

6 Is that a label or warning notice that you have  
7 seen on other bags of the Paco textured product  
8 lines?

9 A. Yes.

10 Q. Now, it's fair to say that that did not go  
11 on to any of the bags that contained asbestos prior  
12 to 1972, correct?

13 A. That is correct.

14 Q. Okay. So, you are not aware of any of the  
15 Kelly-Moore product lines that contained asbestos  
16 having any type of additional labeling on it, such  
17 as what we just read, on any of the products before  
18 1972?

19 A. I had not seen anything with a warning on  
20 it prior to the items that were produced in '72.

21 Q. Okay. Now, in looking at these  
22 photographs of the products, since they have this  
23 label on the bottom, looks like it's mostly on the  
24 bottom back of each of the bags, doesn't it?

25 A. I believe it appears to be at the bottom

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1 of the bag, yes. In the back.  
 2 Q. And it's on the backside of the bag --  
 3 A. Yes.  
 4 Q. -- below the instructions, and  
 5 ingredients --  
 6 A. Correct.  
 7 Q. -- and all that other stuff? So it's fair  
 8 to say that when we're looking at these photos, for  
 9 it to have those labels on them dealing with  
 10 asbestos, we know that these pictures were taken in  
 11 '72 or sometime thereafter, certainly not before  
 12 '72?  
 13 A. I think it's a fair assumption, yes, sir.  
 14 Q. But, you don't know what year they were  
 15 taken?  
 16 A. I have no idea, sir.  
 17 Q. Okay. Now, if we were to look at these  
 18 same bags from, like, 1965, or 1970, for those  
 19 products that still had asbestos in them, and we  
 20 will talk more about that later, but for those  
 21 products that still had asbestos in them, would any  
 22 of them had any kind of labeling to identify that  
 23 asbestos was in the bags?  
 24 MR. HAZEN: Brent, I'm sorry, what  
 25 was your time frame again? I just missed it on that

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1 one.  
 2 Q. (By Mr. Coon) At any time prior to '72  
 3 for any of the products that had asbestos.  
 4 A. As I --  
 5 Q. Would there have been any labeling, to  
 6 your knowledge, that would have identified the bag  
 7 as containing asbestos?  
 8 A. No, as I said a little bit earlier, I am  
 9 not aware that there was anything on the bags prior  
 10 to '72, nor have I seen anything --  
 11 Q. Okay.  
 12 A. -- that would indicate that.  
 13 Q. And it's a two-fold question. One is,  
 14 you're not aware of the bags identifying asbestos as  
 15 one of the ingredients prior to '72?  
 16 A. That's correct.  
 17 Q. And in addition to that, you're also not  
 18 aware of any of the bags having any kind of warnings  
 19 or cautions about the fact that asbestos was in the  
 20 bag?  
 21 A. It's -- that's correct.  
 22 Q. Okay. Now, with respect to --  
 23 A. I have not seen any of that.  
 24 Q. Okay. Do you have reason to believe that  
 25 there were any types of labeling of the nature that

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1 we just identified on any of the bags, before 1972?  
 2 A. Again, I -- I can't answer that because I  
 3 haven't seen any of the bags prior. What I have  
 4 seen is what we -- what we have right here, sir.  
 5 Q. Okay. And it's fine. Mr. Giffins, I  
 6 guess just when you're telling me you haven't seen  
 7 any bags like that, it leaves me with the impression  
 8 that you may still believe that for some reason  
 9 there were labels like that on the bags, and so,  
 10 maybe it's just a misunderstanding. I just want to  
 11 be clear with you. Do you have any reason to  
 12 believe here today that there were any types of  
 13 labelings like what we have just looked at on these  
 14 bags, on any of the products before 1972?  
 15 MR. HAZEN: Objection, form.  
 16 A. Again, I don't know what was on those bags  
 17 prior to '72.  
 18 Q. (By Mr. Coon) Okay.  
 19 A. I know what was put on in '72, but I don't  
 20 know what was on there prior, sir.  
 21 Q. Okay. But as a corporate representative  
 22 for Kelly-Moore, has -- have other management  
 23 people, or people in the marketing or labeling or  
 24 bagging, or anyone, told you that they had warnings  
 25 like this on any of the bags before '72?

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1 A. This particular warning was not put on the  
 2 bags until '72.  
 3 Q. Okay. And --  
 4 A. That particular warning.  
 5 Q. Okay. Now, and again you're saying that  
 6 particular warning, was there any other kind of  
 7 warning on any of the bags before 1972?  
 8 A. As I have indicated, I don't know, sir.  
 9 Q. You're not aware of any?  
 10 A. I am not personally aware of any. No.  
 11 Q. Do you have an understanding or reason to  
 12 believe for some reason that there were such  
 13 warnings?  
 14 A. I can't speculate. I really can't, sir --  
 15 Q. Okay.  
 16 A. -- to be frank with you.  
 17 Q. You don't have any reason to believe that  
 18 there were. Nobody at the plants told you that  
 19 there were or anything like that?  
 20 A. Nobody said there were, nobody said there  
 21 weren't.  
 22 Q. Okay. All right. Next, we have one other  
 23 that was in the series of photographs. This one,  
 24 counsel, is 1027. It says, "Monospray," and that  
 25 was in with the middle of these photos. Do you have

1 any reason to know why that was with those?  
 2 MR. HAZEN: Objection, form.  
 3 Q. (By Mr. Coon) Because it has a -- you can  
 4 barely read it here, but it says Baldwin, Ehret,  
 5 Hill. Have you heard of that company?  
 6 A. No, I sure haven't. I am not familiar  
 7 with that at all.  
 8 Q. Do you know whether or not Kelly-Moore had  
 9 any relationships with Baldwin, Ehret, Hill?  
 10 A. I don't even know who they are.  
 11 Q. The product line that was in the photo  
 12 called Monospray, have you ever heard of Monospray?  
 13 A. Have not.  
 14 Q. Don't have any reason to know why this  
 15 would be part of the records in the repository?  
 16 A. I do not.  
 17 Q. Okay.  
 18 A. First time I have seen that, sir.  
 19 Q. Okay. Do you know whether or not the  
 20 Monospray would have been something that would have  
 21 competed with the Sprayline products that you guys  
 22 had?  
 23 A. I have no idea.  
 24 Q. Okay. Do you know who any competitors  
 25 were of you-alls Sprayline product lines?

1 Q. -- rebranded yours?  
 2 A. They were rebranding with other people,  
 3 too, I believe, but they --  
 4 Q. Do you know if they made any product lines  
 5 of their own as well as rebrands?  
 6 A. I believe they did, but not to the  
 7 extensive offering that maybe suppliers such as us  
 8 had to offer.  
 9 Q. You believe you-all were the largest  
 10 supplier of the rebranded market for GP under those  
 11 years?  
 12 A. No way. No way.  
 13 Q. You think there were other people that  
 14 rebranded more for them from '68 to '71?  
 15 A. I don't know that for a fact but my  
 16 assumption was they were -- what I understand, they  
 17 were rebranding geographically.  
 18 Q. Okay. Do you know who else they were --  
 19 do you know who else GP bought product for to  
 20 rebrand?  
 21 A. I do not.  
 22 Q. Okay. And as I recall, GP was the only  
 23 one you recall rebranding for?  
 24 A. That's the one I'm aware of.  
 25 Q. We also mentioned the -- the plant in

1 A. When you're talking about Sprayline,  
 2 you're talking about the equipment that put it on?  
 3 Q. Yes, sir.  
 4 A. Oh, I know there was -- there is other --  
 5 I am -- I understand there were other people out  
 6 there who made similar equipment. For me to give  
 7 you their names, I wouldn't know off the top of my  
 8 head.  
 9 Q. Do you know any competitors of Kelly-Moore  
 10 that made any of the products like the ones we just  
 11 went through on documents 1027 through 1040?  
 12 A. Oh, there are numerous. I say numerous.  
 13 Had Hamilton --  
 14 Q. Let's go back to the '60s/'70s time frame.  
 15 Do you know any of the competitors regionally or  
 16 nationally at that time for the joint compounds and  
 17 textures?  
 18 A. I do not know them. I know of them.  
 19 Q. Okay. And who would those have been?  
 20 A. Hamilton was a big player. Oh, man, I'm  
 21 drawing a blank now. I am trying to think of the  
 22 company that bought Westco.  
 23 Q. I take it Georgia Pacific made some since  
 24 they --  
 25 A. Yes.

1 Houston where you made the vermiculite, or cleaned  
 2 it up?  
 3 A. Trilite.  
 4 Q. Trilite. The Trilite plant. The  
 5 vermiculite that was then used for your joint  
 6 compounds and textures, you told us about. Do you  
 7 have any recollection of who any of the other  
 8 purchasers of your -- of your vermiculite would  
 9 have been?  
 10 A. No, and I think I mentioned -- I think I  
 11 mentioned that earlier. I had no idea who that  
 12 would have been.  
 13 Q. Okay.  
 14 A. And maybe it was an assumption on my part.  
 15 I know that that material was supplied to Paco. I  
 16 had not seen any documentation that -- that  
 17 specifically said it was also sold to duh, duh, duh,  
 18 duh. But in the normal business, I think it -- it  
 19 could have happened, but, again, I'm only aware  
 20 specifically of it going from Trilite to Paco.  
 21 Q. Do you know whether or not Trilite would  
 22 have distributed the vermiculite to other companies  
 23 that were making the similar product lines that  
 24 Kelly-Moore was using it for; that is, joint  
 25 compounds and textures, or were they supplying it to

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1 markets that were totally unrelated to your joint  
 2 compounds and textures?  
 3 A. I don't --  
 4 MR. HAZEN: Objection, form.  
 5 A. I don't know that, sir.  
 6 Q. (By Mr. Coon) You just really don't have  
 7 any clue who the other purchasers of the product  
 8 were?  
 9 A. Do not.  
 10 MR. HAZEN: Objection, form.  
 11 Q. (By Mr. Coon) Nor what their uses were?  
 12 MR. HAZEN: Objection, form.  
 13 A. It would be speculation.  
 14 Q. (By Mr. Coon) Okay. Now, Mr. Giffins, we  
 15 next have Document 1086. This is a few years later.  
 16 This is November of '77, are the handwritten notes  
 17 here, and it's typed also, November 2, '77 here.  
 18 This is a Paco invoice, and it lists a long number  
 19 of product lines, also has Kelly-Moore Paint Company  
 20 stencilled on the left margin. Do you know what  
 21 would have generated that document?  
 22 A. First of all, do you want the Bates  
 23 number?  
 24 MR. HAZEN: Please.  
 25 A. It's KM BB 4836.

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1 MR. HAZEN: Thank you.  
 2 A. This is an order form.  
 3 Q. (By Mr. Coon) And how would these order  
 4 forms work?  
 5 A. This would have been a store order form.  
 6 If you go back to that brochure earlier where it  
 7 said branch, sales branch --  
 8 Q. Okay.  
 9 A. -- this identified here as branch, it  
 10 would have been a store, and it would have been a  
 11 Store Number 6135, or whatever it is, and this was  
 12 how they would have ordered their products.  
 13 Q. Okay. When a contractor came in, would  
 14 they fill out a form like this with one of the sales  
 15 reps in the store, or is this from the store to the  
 16 -- your factory?  
 17 A. Now, this -- this is the -- this is --  
 18 appears to be the order form that the store would  
 19 have placed with the factory.  
 20 Q. Okay. So, if you look at -- if the store  
 21 was low on supplies, of certain product lines, they  
 22 would fill out a requisition form, send it back to  
 23 Kelly-Moore's manufacturing facilities and say ship  
 24 us more of this stuff?  
 25 A. Yes.

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1 Q. Okay. And was this something they did  
 2 what, weekly? Monthly? Quarterly?  
 3 A. I don't -- it depends on the situation.  
 4 Some stores today order three times a week. Other  
 5 stores only order once a week. It just depends on  
 6 the sales volume.  
 7 Q. Could the stores get that type of  
 8 supplies or resupplying by making phone calls, or  
 9 was there a written procedure or protocol that  
 10 needed to be followed all the time?  
 11 A. The only -- the only way I could explain  
 12 it to you is what I am familiar with since I have  
 13 been with the company in 1985, and I think what the  
 14 -- the way we -- the way it's done today, is the way  
 15 it's done for a long time; and that is, when the  
 16 stores place an order, they have to provide  
 17 documentation.  
 18 Q. Do you know --  
 19 A. They --  
 20 Q. I'm sorry.  
 21 A. They have to provide something that says,  
 22 this is what I want.  
 23 Q. Do you know if Kelly-Moore made an effort  
 24 at the headquarters of tracking how much each store  
 25 was requesting of different products to know what

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1 they were selling and what they were not selling,  
 2 and the overall volume of business?  
 3 A. I have seen records that indicate that we  
 4 know what was shipped out of the warehouse.  
 5 Q. To each store?  
 6 A. No. In -- in total, in a given time, in a  
 7 given month. So much of this went out, so much of  
 8 that. But the -- to the -- to the location, up  
 9 until recently, that type of information was not  
 10 readily available.  
 11 Q. So, for instance, in Houston, if you had  
 12 -- how many stores did you have in Houston, back in  
 13 the '70s?  
 14 A. What part? Early?  
 15 Q. Just -- sure. Early.  
 16 A. Two or three.  
 17 Q. Okay. So, if you had three stores in  
 18 Houston, each of them may be doing different volumes  
 19 of business, and may be doing more business in one  
 20 area than another for whatever reasons, correct?  
 21 A. Conceivably.  
 22 Q. Would Kelly-Moore have any way of tracking  
 23 the information to determining -- to try to  
 24 determine that Store Number 1 is selling, say, 100  
 25 bags of joint -- dry joint compound a month, but

1 Store Number 2 is only selling two bags, and try to  
2 determine why it is that one store is selling so  
3 much more of a particular product than another?

4 MR. HAZEN: Objection, form.

5 A. Well, it's two questions. One, being back  
6 in the early '70s, around that time, everything was  
7 all manual, so if a -- you wanted to know what a  
8 store was selling, you'd have to go through the  
9 invoices and keep track, and go back and sort  
10 something out.

11 The second part of your question, I think, was  
12 applying to the geographic area. A lot of that had  
13 to do with customer preference, and you could have  
14 different customer preferences within the same city,  
15 just geographically. So --

16 Q. (By Mr. Coon) The bags that we looked at  
17 here, would they pretty much look like that through  
18 the years, or were there a lot of changes to them  
19 for some reason or another?

20 A. The ones that I've seen, basically, the  
21 primary design was pretty consistent. There may  
22 have been some color changes, or something, or maybe  
23 a print size change or whatever, but --

24 Q. Could anyone else order any of these  
25 products other than the local store?

1 been able to sell to non Kelly-Moore stores in the  
2 geographic area that was allowed. Anytime you had a  
3 Kelly-Moore store within a certain geographic area,  
4 it was all through a Kelly-Moore paint store.

5 Q. Okay. They kind of had a -- a zone around  
6 each of them that you couldn't sell to the -- the  
7 public without going through the retail store?

8 A. It wasn't the intention of the company to  
9 sell other than through its own stores to begin  
10 with.

11 Q. Do you know what their typical radius was?

12 A. I can't answer that.

13 Q. 20 miles, or 50 miles or --

14 A. I can't answer that. The only thing I can  
15 tell you would be my speculation.

16 Q. How would -- you said Mr. Freeman.  
17 Mr. Freeman was one of the sales reps?

18 A. Mr. Freeman was the gentleman who opened  
19 the plant in Tulsa in 1969, and then subsequently  
20 moved the plant to Broken Arrow in 1975, and then  
21 subsequently bought the business in 1978.

22 Q. Okay. Do you know whether or not there  
23 were any field salesmen in any of the geographic  
24 areas that went out to either commercial prospects,  
25 business prospects, whether it was a company that

1 A. You mean outside of the company?

2 Q. Yes, sir.

3 A. Outside of the store employee?

4 Q. Yes, sir.

5 A. No.

6 Q. Was that tightly regulated?

7 A. Well, if it's anything like it is today,  
8 yes.

9 Q. Okay. Do you know how it was in the '60s  
10 or '70s?

11 A. As I say, we pretty well operate today the  
12 way we did then as far as processing of the orders,  
13 and there's -- it's pretty definite on how these  
14 things are placed.

15 Q. Okay. And to your knowledge, there were  
16 no distributors that would have allowed these  
17 product lines to have gone out to the open market  
18 without going through a Kelly-Moore local retail  
19 store?

20 A. As I indicated earlier, the company's  
21 objective from day one was to market through its own  
22 stores, and to sell its own products through its own  
23 stores. Paco was sold through the Kelly-Moore  
24 stores.

25 At one point, like Mr. Freeman, he may have

1 did a lot of drywall work, whether or not it would  
2 have been another mom-and-pop store out in the  
3 woods, that was not competitive to the local  
4 Kelly-Moore store, any other places where they could  
5 try to sell the product and improve their market  
6 share?

7 MR. HAZEN: Objection, form.

8 A. The -- the salesmen from whom?

9 Q. (By Mr. Coon) Kelly-Moore.

10 A. From a Kelly-Moore store?

11 Q. From a Kelly-Moore store, or from the  
12 Kelly-Moore corporation.

13 A. Okay. The way -- the way it functions is  
14 you've got Store A. Out of Store A, you could have  
15 one sales rep, or you could have more than one  
16 depending on the sales volume of that store. That  
17 sales rep basically -- all -- went out and called on  
18 painting contractors. He could call on the owner of  
19 this building, to try to get that person to utilize  
20 the paint product, or any of our products in that  
21 building. He got compensated on commission based on  
22 what he sold to the painting contractor, or actually  
23 what he sold.

24 The company's directive was not to sell people  
25 other than those that were serviced through the

1 Kelly-Moore paint stores.

2 So, the normal sales organization was not  
3 structured and not encouraged in any way to go out  
4 and look for a mom and pop, or dealer store, to sell  
5 the product through. It would be very difficult --  
6 well, you have to understand our -- our commission  
7 schedule. And it would not have benefitted the rep  
8 to do that anyway, because of the way our commission  
9 schedule is structured.

10 I don't know if that answers your question or  
11 not.

12 Q. That would mean he wouldn't get a -- a  
13 sale, if he had a seller -- wholesale to somebody  
14 else, he wouldn't get a commission?

15 A. For him --

16 MR. HAZEN: Objection.

17 A. -- to sell it to a mom and pop, for  
18 somebody that's going to resell it, for him to make  
19 a reasonable income on that sale, he'd have to sell  
20 it to them at a price that would make it almost  
21 impossible for them to competitively resell it.

22 Q. (By Mr. Coon) Okay. What about the  
23 industrial suppliers? You were telling us there are  
24 contacts with them. Could they go in, meet a  
25 commercial user, industrial/commercial heavy user,

1 He puts it on these buildings, you know, or will put  
2 it on a house.

3 Q. (By Mr. Coon) Would typically go to a  
4 Kelly-Moore store and have his preferred customer  
5 buying arrangement with them and go from there?

6 A. No, the painting contractor would go to  
7 the store and buy it from the store.

8 Q. Right. And you get -- I think you said  
9 they typically got a scheduled discount for being a  
10 contractor?

11 A. Based on their volume, correct.

12 Q. Right.

13 A. There were different -- different price  
14 schedules. Okay?

15 Q. Okay. Now you're talking about your  
16 mom-and-pop painting contractor, or drywall  
17 contractor?

18 A. Now, I want to clarify the industrial  
19 thing.

20 Q. Okay.

21 A. I just want to make sure we're on the same  
22 wavelength.

23 Q. Sure.

24 A. Okay. You got the regular painting  
25 contractor who paints houses and he has one or two

1 target customer and direct sell to them, and not go  
2 through the local store?

3 A. I want to make sure I understand what  
4 you're talking about on industrial because my  
5 terminology of industrial and maybe yours are  
6 different.

7 Q. Well, I agree industrial and commercial  
8 may have different connotation.

9 A. Yes.

10 Q. But for either one of them. For instance,  
11 say you have a construction company that does tons  
12 of drywall work with their subcontractors, and they  
13 may have an economic motivation to buy product  
14 wholesale for either themselves or for their  
15 subcontractors. Could Kelly-Moore go to them, as a  
16 prospect, and sell directly to them in bulk and have  
17 it even shipped to them in bulk?

18 MR. HAZEN: Objection, form.

19 A. As you explain it, that scenario could  
20 happen, but we need -- we need to make sure -- at  
21 least from my clarification, to make sure I am not  
22 giving you the -- bad information here.

23 There are basically three types of customers.  
24 You have what we call the painting contractor. He's  
25 the basic guy who buys the architectural product.

1 guys that they work out of a car or out of a truck  
2 and they do painting.

3 Then you'll have what's called commercial.  
4 These guys will have a large crew. They're  
5 primarily into doing shopping centers. They're into  
6 doing high-rises such as this. They're a different  
7 type customer than the regular painting contractor.

8 Q. Sure.

9 A. Then the industrial is the customer who --  
10 who has a construction site, or runs machinery, or  
11 that type of deal. We don't deal with them as  
12 industrials. We deal with the commercial and the  
13 painting contractor.

14 Q. With respect to the commercials, for those  
15 that did large volume, like I say, maybe they build  
16 shopping centers where there is a huge volume of  
17 drywall or sheetrock, and a huge need for the joint  
18 compounds and floats and textures, would Kelly-Moore  
19 ever service them directly instead of going through  
20 the local stores?

21 A. No.

22 Q. Would they ever service them by going  
23 through the local store in terms of giving them  
24 credits but making shipments directly to job sites?

25 A. Now, that may be, because I was going to

1 come back and correct this. All sales go through  
2 the store. The store is the base for the sales  
3 transaction because, again, that sales rep who works  
4 out of Store A, he gets compensated by the sales  
5 that go through that store.

6 If the factory were to by chance -- let's say  
7 that sales rep had a big order, and it was five  
8 pallets of paint, just in theory, and it was a -- at  
9 a job site that was close to the factory. He could  
10 arrange for the factory to deliver those five  
11 pallets of paint to the job site, but all that  
12 billing goes through the store and the dealing with  
13 the customers through the store.

14 Q. Okay. All right. Now, I want to  
15 understand this type of invoice. Would this be a  
16 comprehensive invoice, or does this just deal with  
17 the -- looks like this sheet just deals with the  
18 Paco lines.

19 A. I believe so. Yes.

20 Q. And then there is a Page 2, which is BB  
21 4837. What is that one?

22 A. It's Paco. It's listing some of the other  
23 products like the asbestos-free wall texture.

24 Q. Why would -- I'm sorry, why would this  
25 form be different than this one?

1 were your in-store items; and then you had what I  
2 understood to be sundries, being the other things  
3 you bought from other vendors like paint brushes --

4 A. Uh-huh.

5 Q. -- rollers and stuff like that. But when  
6 I look at this list I see, like, Paco Quik-Set Fast,  
7 Paco Quik-Set Slow, and it lists the volume and the  
8 25-pound bags. These are on the sundries list, but  
9 I understood these to be things that were not  
10 sundries because they were internal products.

11 A. Okay. It's a good point. Going back,  
12 everything in the store that was sold through a  
13 store, would have a preprinted sheet like this. So,  
14 you would have a preprinted sheet for the paint.  
15 You would have a preprinted sheet for the Paco. You  
16 would have a preprinted sheet for all the sundries,  
17 the brushes, rollers, sandpaper, and all that.

18 The store would take this, and this is -- make  
19 an order off of these sheets.

20 Q. Okay.

21 A. By terminology, Kelly-Moore today, in  
22 thinking of terms of today, everything we make is  
23 our own manufacture. Anything that we don't make is  
24 sundries. I have no idea of what the date of this  
25 is here, but this is showing on the sundry form, and

1 A. Well, I think it's the same. It's just  
2 that we don't have a copy of everything. So  
3 somebody got shortchanged.

4 Q. Okay.

5 A. That's what it looks like. Got  
6 shortchanged. Yes, somebody covered -- this has  
7 been covered here. Just somebody wrote on that, to  
8 give you that breakdown.

9 Q. Okay. Similar -- is this a later form,  
10 later dated form, one used at a different time?

11 A. This says Arvada, which was our store in  
12 Colorado, this says sundries, so this was a sundry  
13 order form. We don't -- we didn't -- this was  
14 considered a sundry.

15 Q. Okay.

16 A. Let me see if any of these items are on  
17 this page.

18 Q. That's why I am wondering. If you look  
19 here on the sundries, this is part of the sundries  
20 here, this is all preform, right?

21 A. Right.

22 Q. And I had understood your testimony  
23 earlier to be that you had your Kelly-Moore product  
24 lines, which would have been your Kelly-Moore  
25 paints, your Paco stuff, things that you guys owned,

1 it could have, because it's not a paint item, but  
2 generally sundries would be stuff that we did not  
3 manufacture. So that's a little confusing.

4 Q. Okay. So, to clarify, would the Paco  
5 products normally be something that should be put on  
6 the sundries line, or should they have normally gone  
7 on this other kind of form?

8 A. They were probably classified as a sundry  
9 because it was only a small part of the business,  
10 very small part of the business we didn't -- I mean,  
11 we were primarily a paint house.

12 Q. Okay.

13 A. Paco was just a small entity.

14 Q. The other line of questions that I had for  
15 you earlier that you didn't have a lot of  
16 information on, Mr. Giffins, concerned the actual  
17 information that you may have regarding the  
18 production and sale of drywall materials. Remember  
19 I asked you something about that before, if you knew  
20 actually anything about the volume of business, or  
21 the total amount of product that was sold. And I  
22 found what's -- this is KMX 2085, it's our Document  
23 1099.

24 MR. COON: And, counsel, that's 2085  
25 sequential through 2102.

1 MR. HAZEN: Thank you.  
 2 Q. (By Mr. Coon) But if you look at that, it  
 3 appears to be some in-house documents at Kelly-Moore  
 4 that identify various locations, and over the  
 5 different calendar years, the total volume of  
 6 different types of product sales.  
 7 Have you seen that document before, sir?  
 8 A. I don't think I have seen this page. I  
 9 don't think I have seen this before. I really don't  
 10 recall. It -- if it came out of the repository, I  
 11 probably have seen it, but I really don't recall it.  
 12 Q. Okay. As I understand reading this, what  
 13 we would do is we would look at -- for instance,  
 14 this is the Richmond, California facility? Was that  
 15 the Paco facility?  
 16 A. Yes.  
 17 Q. Okay. And if we look at the 60 through 64  
 18 here, they don't have much information here in the  
 19 early years with respect to the production numbers,  
 20 correct, just sales volume?  
 21 A. It appears that way.  
 22 Q. Okay. Then if we go to the next page we  
 23 have San Carlos, California, and picks up that next  
 24 year '64, and would this be as a result of the  
 25 facility moving from Richmond to San Carlos?

1 A. It would be my assumption that it was,  
 2 yes.  
 3 Q. Yeah. I think even here comments. I  
 4 think it says facility was moved from Richmond, so I  
 5 think that explains it. And it starts giving us  
 6 better numbers with respect to the volume of  
 7 employees and things like that, correct? But we  
 8 still have information on the total number of  
 9 purchase of pounds of product until '67, right?  
 10 A. Appears so.  
 11 Q. If we look at the -- at the fourth column  
 12 in '67, we now are getting information not only on  
 13 the amount of sales and the number of employees,  
 14 number of people in production, but as we get close  
 15 to the bottom, we actually have a total production  
 16 in tons of the product, as well as total amount of  
 17 asbestos purchases in tons for the product, correct?  
 18 A. Correct.  
 19 Q. So if we look at '67, for the San Carlos,  
 20 California facility for the Paco product, we can see  
 21 that there was 9927 tons of product made, according  
 22 to this. Is that correct?  
 23 A. Appears to be correct.  
 24 Q. And of that, there would have been 585  
 25 tons of asbestos purchased for that product line?

1 A. About six percent of the total tonnage was  
 2 in asbestos, yes.  
 3 Q. All right.  
 4 A. That's about consistent.  
 5 Q. I was going to ask you that. If you look  
 6 at 585 being close to 600 and 9927 being close to  
 7 10,000, we're looking at about 6 percent by weight  
 8 being the asbestos, to the total production?  
 9 A. Correct.  
 10 Q. And it's -- we haven't discussed this, but  
 11 generally the Paco product lines that contained  
 12 asbestos were typically between five and eight or  
 13 nine percent asbestos, were they not?  
 14 MR. HAZEN: Objection, objection,  
 15 form.  
 16 A. No. It was around six percent is the  
 17 number that I recall.  
 18 Q. (By Mr. Coon) Pretty consistent six with  
 19 all of them?  
 20 A. If you look at averaging it out, the  
 21 average is around 6 percent.  
 22 Q. Okay.  
 23 A. In the beginning.  
 24 Q. Okay. And we will talk about that.  
 25 A. Again, I want to go back to that '60/'64

1 time frame in the early days, because that's when  
 2 those numbers occurred. But in 1972 --  
 3 Q. Right.  
 4 A. -- we started to change the products, and  
 5 that changed that whole balance dramatically.  
 6 Q. Sure. And we will talk about that. So if  
 7 we look at '68, we have 11,500 tons, and a ton is  
 8 2,000 pounds, right?  
 9 A. Uh-huh.  
 10 Q. So, if we multiplied this number by 2,000  
 11 it will tell us the total amount of pounds bought?  
 12 A. Correct.  
 13 Q. And, again, in '68 for the purchase of  
 14 asbestos, there was 844 tons of asbestos bought for  
 15 that facility that year?  
 16 A. Correct.  
 17 Q. And, again, it looks like that's still  
 18 running about six percent?  
 19 A. It's a little bit over six, but yeah.  
 20 Q. Six or seven percent?  
 21 A. Right.  
 22 Q. And we go to '69 through '73, and again,  
 23 we can look at the numbers. We have 11,000 tons,  
 24 and 844 tons of asbestos for '69, correct?  
 25 A. Correct.

1 Q. 12,000 tons of product, using 654 tons of  
 2 asbestos in '70?  
 3 A. Correct.  
 4 Q. That's actually maybe just under six  
 5 percent total weight, would it not be?  
 6 A. Yes. Appears to be.  
 7 Q. And '71 we have 14,000 plus tons of  
 8 product, and 953 tons of asbestos, correct?  
 9 A. There was a little bit of a tip there.  
 10 Q. Right.  
 11 A. It was an increase.  
 12 Q. And so in that year, the percentage of  
 13 asbestos in the products actually went up to  
 14 probably closer to 7 or 8 percent, it appears,  
 15 correct?  
 16 A. Yes. According to those numbers, yes.  
 17 Q. Okay. And then in '72, you have 11,000  
 18 tons of product made, and, again, when we're talking  
 19 product, this is all the Paco products, correct?  
 20 A. Correct.  
 21 Q. We had 11,000 tons of Paco made at the San  
 22 Carlos facility with 534 tons of asbestos, so we're  
 23 down to about five percent again, correct?  
 24 A. Uh-huh.  
 25 Q. And then in '73 we have almost 9,000 tons

1 others had no asbestos, the total amount of asbestos  
 2 you bought would go down?  
 3 A. Should be going down. Plus some of the  
 4 other products had -- were reformulated to contain  
 5 less asbestos.  
 6 Q. So, as we look through the '70s, we see  
 7 two different dynamics: One is some of your  
 8 products don't have asbestos in them, so the total  
 9 amount of asbestos you buy would go down from that,  
 10 correct?  
 11 A. Correct.  
 12 Q. And you also reduced the amount of  
 13 asbestos in some of our your other products, which  
 14 would be another reason the number would go down  
 15 some?  
 16 A. That's correct.  
 17 Q. And if we look through '74 through '77,  
 18 again, we have about 9,000 tons of product in '74,  
 19 with 245 tons of asbestos, correct?  
 20 A. Uh-huh.  
 21 Q. Next year 7700 tons to 235 tons of  
 22 asbestos, correct?  
 23 A. Correct.  
 24 Q. And then '76, '55, almost 5600 tons of  
 25 product, with 130 tons of asbestos. And then in

1 of product, with 442 tons of asbestos being used for  
 2 the product?  
 3 A. Correct.  
 4 Q. Again, right about five percent?  
 5 A. Five percent. But the -- obviously the  
 6 amount of tonnage of asbestos is declining in  
 7 relationship to the amount of tonnage of production.  
 8 Q. Okay. It actually -- yeah, it actually  
 9 looked like it was about six percent for several  
 10 times and around '71 it actually went up and then  
 11 '72, '73 went down again a little bit?  
 12 A. Yeah. That's because in '72, wait a  
 13 minute. Or '73, I believe is when we came out with  
 14 an all asbestos-free product --  
 15 Q. Okay.  
 16 A. -- which was one of our better selling  
 17 products.  
 18 Q. But you had some products starting in the  
 19 early '70s that did not have asbestos in them, so  
 20 therefore, the total amount of asbestos purchases in  
 21 -- in any given year would not have been that same  
 22 six or seven percent as it had been?  
 23 A. That's logical, yeah.  
 24 Q. Some of the products would have still had  
 25 the same amount of asbestos in them, but since some

1 '77, we have about 5450 tons of product made, with  
 2 about 181 tons of asbestos?  
 3 A. And then at this rate we're talking about  
 4 two-and-a-half percent.  
 5 Q. Right.  
 6 A. So --  
 7 Q. So two-and-a-half percent of the total  
 8 weight of your products made at that facility by  
 9 1976 and '77 were asbestos?  
 10 A. Correct.  
 11 Q. And that was because --  
 12 A. Roughly if you're going by these numbers.  
 13 Q. Because some products had no asbestos in  
 14 it and some still had four or five percent?  
 15 A. (Indicating.)  
 16 Q. And then in 1978, we don't have numbers  
 17 off of this. Do you know why?  
 18 A. Because we stopped making asbestos,  
 19 products with asbestos.  
 20 Q. At the San Carlos, California facility?  
 21 A. In 1977.  
 22 Q. Okay. So the last you made  
 23 asbestos-containing products under the Paco name at  
 24 the San Carlos facility was in '77?  
 25 A. Throughout the company.

1 Q. Okay. Well, we will also ask you about  
2 the other facilities.  
3 Over these years -- let's back up real quick.  
4 For '60 through '66, where we do not have numbers of  
5 total volume or the number of tons of asbestos  
6 bought, do you have any reason to believe that the  
7 ratio of asbestos to total tonnage would have been  
8 much different than it was in the late '60s?  
9 A. It would be speculation on my part. I --  
10 I really don't know. I had -- I don't know what --  
11 you know, I can't tell you what was, sir.  
12 Q. Okay. You don't have any reason today to  
13 believe that there was significantly less or  
14 significantly greater percentage of asbestos of the  
15 product in the early years from '60 to '66 as there  
16 was from '67 to the early '70s, do you?  
17 MR. HAZEN: Objection, form.  
18 A. I really don't know, honestly.  
19 Q. (By Mr. Coon) Okay.  
20 A. I really don't know.  
21 Q. Okay. Well, Mr. Griffins --  
22 A. At that time asbestos was used in all  
23 drywall products --  
24 Q. Right.  
25 A. -- not just with ours, so I have no idea

1 of the composition in the earlier years, sir.  
2 Q. Okay. But, you do agree that the products  
3 that were made at Paco from '60 to '66 had asbestos  
4 in them?  
5 A. From '60 to '66 had asbestos at an average  
6 -- a weighted average of about five percent of the  
7 total material, total package was about five  
8 percent.  
9 Q. Sure. So even though we don't see  
10 asbestos being bought from '60 to '66, is just  
11 because they have NA, which they did not have  
12 available information?  
13 A. Somebody didn't have the records for  
14 whatever reason.  
15 Q. Right. Didn't mean they didn't buy  
16 asbestos, just meant they didn't have any  
17 information available in the early years to go back  
18 and determine how much asbestos they actually bought  
19 for the Paco lines in the first six years?  
20 MR. HAZEN: Objection, form.  
21 Q. (By Mr. Coon) And that's what it  
22 indicates, right?  
23 A. Well --  
24 Q. Where it says not available?  
25 A. If it says not available, it means they

1 didn't have the information.  
2 Q. Okay. But in all fairness sitting here  
3 today, we know that for those first six years, even  
4 though there is no numbers here, we know that they  
5 bought asbestos in a five or six percent ratio to  
6 the total amount of their tonnage of product?  
7 A. Only -- I am not going -- I can't comment  
8 on the percentage, on the balance, sir. I really  
9 can't. I don't know.  
10 Asbestos was the prime product used in all  
11 drywall products at that time, so there had to be  
12 some purchasing of it would be my assumption.  
13 Although it doesn't indicate it here, I don't doubt  
14 that they didn't have the records up. As far as  
15 percentage, I cannot speculate on that. I cannot.  
16 Q. Okay. But, we know that we had sales, and  
17 we know where we had product made, we just don't  
18 know from a lack of records how many tons of product  
19 were made, nor how many tons of asbestos was bought  
20 to make the product?  
21 A. That's apparent on this, yes.  
22 Q. Okay. But we -- I thought we did have an  
23 understanding that the products through those early  
24 years contained five to six percent asbestos by  
25 weight?

1 MR. HAZEN: Objection, form.  
2 A. I know what it contained basically from  
3 about the -- the '70s, and the late '60s, based on  
4 some of the information we have. What happened  
5 here, when you get into the early '60s, well, this  
6 was when we bought the Paco thing, as you can see  
7 they obviously didn't keep very good records, but  
8 the point is, I have no idea what was involved in  
9 it, sir.  
10 Q. (By Mr. Coon) Okay.  
11 A. No idea.  
12 Q. Well, and I guess here is what I am trying  
13 to find out, Mr. Giffins, is as the corporate  
14 representative today, I am here to try to find out  
15 what we can about the product lines that had  
16 asbestos, and how much asbestos was in them. I  
17 guess the dilemma I have is that we know that the --  
18 the main lines that Kelly-Moore made that had  
19 asbestos in them were the Paco product lines,  
20 correct?  
21 A. They were the only ones.  
22 Q. And we know that that happened from 1960  
23 when they bought the Paco facility all the way  
24 through the later '70s, correct?  
25 A. Correct.

1 Q. And what I am trying to find out for my  
2 information and my clients is whether or not there  
3 was asbestos in the Paco products in 1960, '61,  
4 '62, '63, '64, '65, and '66, and I was of the  
5 impression that it was, but you're not telling me  
6 that it was.

7 A. I am looking at this. You and I both  
8 agree this says NA, not available.

9 Q. Right.

10 A. I think I did say, sir, that at that time,  
11 all drywall products primarily were made with some  
12 amount of asbestos.

13 Q. Okay. Let me -- two-fold. One, when you  
14 say all drywalls, you're talking about products  
15 Kelly-Moore made --

16 A. The industry.

17 Q. -- and everybody else made?

18 A. Correct.

19 Q. Everybody's drywall product had asbestos  
20 in it, to the best of your knowledge?

21 A. Yes.

22 Q. And to the best of your knowledge,  
23 Kelly-Moore being in that industry, theirs had  
24 asbestos in it, too?

25 A. I have to assume it did.

1 Q. Okay. Mr. Giffins, in the four or five  
2 other depositions that you have given since you have  
3 been brought in to be a spokesperson for Kelly-Moore  
4 on these issues, have the other attorneys in these  
5 cases asked you about the composition of asbestos in  
6 these products in the '60 to '66 time frame?

7 MR. HAZEN: Objection, form.

8 A. No, I don't think I can say that they  
9 asked as much about the composition of the product.  
10 I am no chemist. I didn't structure the material.  
11 I -- I have seen the batch tickets. I understand a  
12 little bit of the raw material implications, but I  
13 don't recall on the other -- I'd have to go back and  
14 review them, but I don't know if there has been as  
15 much emphasis put on the earlier days here, as far  
16 as the composition, sir.

17 Q. (By Mr. Coon) So, as we sit here today,  
18 we know that asbestos was in the -- all the product  
19 -- Paco product lines from '60 to '66, but we just  
20 don't know if the composition of asbestos in them  
21 was more or less than it was in the later '60s?

22 A. I am assuming asbestos was part of it, and  
23 I have no idea of the balance.

24 Q. Okay. Could have been more, could have  
25 been less?

1 Q. Okay. And you believe that percentage of  
2 weight of asbestos in the products to be five or six  
3 percent?

4 A. I can't say that. I have no idea what it  
5 was in these earlier days, sir.

6 Q. Okay. What would be a way for us to -- or  
7 who would we talk to, to get a better -- a chance of  
8 a better understanding of the amount of asbestos  
9 that was in use in the Paco product lines in the  
10 first five or six years that Kelly-Moore owned it?

11 MR. HAZEN: Objection, form.

12 A. Well, first of all, all the records are at  
13 the repository. It's open for anybody to go in  
14 there. Most everybody has gone through it, and  
15 there are production batch tickets in there and so  
16 forth, so I would think that if somebody is  
17 interested in that, they can, you know, make a trip  
18 to the repository --

19 Q. (By Mr. Coon) Okay.

20 A. -- with all the records.

21 Q. Okay. Have they --

22 A. I can't tell you what that --

23 Q. Sure.

24 A. -- percentage is, if those records are  
25 there.

1 A. Sure could.

2 Q. Now, with respect to where the asbestos  
3 came from, when we look at this, you know, 600 tons,  
4 700, 800, 900 tons of asbestos --

5 A. Excuse me.

6 Q. -- is a lot of a product, so --

7 MR. HAZEN: Objection, form.

8 MR. NANTZ: Objection, form.

9 Q. (By Mr. Coon) Well, that's more than a  
10 dump truckload, isn't it?

11 MR. HAZEN: Objection, form.

12 A. Yeah. But you're still looking at only  
13 from anywhere from nothing to two-and-a-half to  
14 maybe five percent of the total mix of the product.

15 Q. (By Mr. Coon) Okay. Well, sure. And if  
16 we look here when we talk about 11,000 tons of  
17 product, that's a lot of product, too, right?

18 A. Uh-huh.

19 MR. HAZEN: Objection.

20 MR. NANTZ: Objection, form.

21 Q. (By Mr. Coon) We're talking about you  
22 would have to multiply that number by two and put  
23 three more zeros behind it, so we're talking about  
24 22 million pounds of product, right?

25 A. Possibly, yes.

1 Q. Well, I mean, if you just take that number  
2 and multiply it times 2,000, that's about how much  
3 product, Paco product, they made that year?

4 A. Okay.

5 Q. And you call -- is that a lot of product  
6 to you? A lot of anything to you, just by weight,  
7 something that's 22 million pounds?

8 MR. HAZEN: Objection, form.

9 MR. NANTZ: Objection, form.

10 A. Well, it's kind of hard. It just depends  
11 on, I guess what part of -- perspective you're  
12 trying to put it in. When I look at our plants,  
13 that California makes 10 million gallons a year, and  
14 if you equate that to pounds, I think it would far  
15 exceed this.

16 The Paco part of the business was a very --  
17 was a small part of the total business. Now, if you  
18 look at this poundage in relationship to this, it  
19 seems like a lot. Okay? But in the scheme of  
20 things, this was a very, very small part of our  
21 business.

22 Q. (By Mr. Coon) Okay. With respect to the  
23 -- let's take '69 here, for example. The 844 tons  
24 of asbestos, that would have been about  
25 one-and-a-half million pounds of asbestos?

1 years?

2 A. I do.

3 MR. NANTZ: Objection, form.

4 Q. (By Mr. Coon) And who were they, sir?

5 A. Carey Canadian out of Canada, Union  
6 Carbide and Johns-Manville.

7 Q. Were they the three predominant suppliers  
8 over the '60 through late '70s time frame?

9 MR. NANTZ: Objection, form.

10 A. From what I have seen of records, they  
11 were the only suppliers.

12 Q. (By Mr. Coon) Okay. In any given year,  
13 did Kelly-Moore deal with all three of those  
14 companies, or was that a year-to-year contract?

15 MR. NANTZ: Objection, form.

16 Q. (By Mr. Coon) Or did it vary on -- over  
17 the time frames over the years?

18 A. You know, in looking at the -- in looking  
19 at the spread out, I think there were some years  
20 where there may -- some -- asbestos was bought from  
21 all three, but the varying degree, certain ones were  
22 larger suppliers to the company than others.

23 Q. Okay. Was there a particular reason that  
24 asbestos was bought from those three companies? Was  
25 there a -- a pricing issue, or a quality of the

1 A. You're talking -- right here, the 844?

2 Q. Yes, sir.

3 A. Okay.

4 Q. Been a little over a million and a half  
5 pounds. I think actually about 1.7, close to 1.7  
6 million pounds?

7 A. I'll trust your calculation.

8 Q. I'm not the best at math but that's  
9 ballpark. Where would that kind of load of asbestos  
10 come from?

11 MR. NANTZ: Object to form.

12 Q. (By Mr. Coon) How would it get shipped to  
13 you guys? I mean, this is obviously not enough --  
14 the volume is such you can't go pick it up in your  
15 pickup truck, right?

16 A. Huh-uh.

17 Q. Okay.

18 A. No.

19 Q. How was this stuff supplied? Was it --

20 A. A lot of --

21 Q. -- 18 wheelers or railcars?

22 A. A lot of it came in railcars and then some  
23 of -- I believe was delivered by tractor-trailer.

24 Q. And do you know who the suppliers of the  
25 asbestos were for the Paco product lines over these

1 fiber, or the fiber composition, or what? If you  
2 know.

3 A. No, I really don't. I can only -- I can  
4 only assume, so I -- I would have to say I don't  
5 know.

6 Q. Do you know anything about the different  
7 fiber types of asbestos? You hear anything about  
8 the different fiber types?

9 A. Vaguely familiar, yes.

10 Q. Do you know the differences between the  
11 amphiboles and the serpentine fibers?

12 A. Vaguely.

13 Q. What's your understanding of those  
14 differences?

15 A. Serpentine is what -- basically is what  
16 the Chrysotile asbestos came from, is what we used  
17 in all of our products.

18 Q. That was the next line of questions, if  
19 you had an understanding of the principal types of  
20 asbestos fibers that you-all bought. You believe to  
21 be Chrysotile?

22 A. That's all we bought.

23 Q. Was there a particular reason that for  
24 your products the Chrysotile was a preferred fiber  
25 type?

1 A. I think it had to do with the -- with the  
2 length. It was a little bit shorter, little bit  
3 finer than some of the others and, therefore, worked  
4 well in the drywall products.

5 Q. Next we go to under the same chart --  
6 counsel, we're up to about pages 2089 of it -- the  
7 Ontario, California facility. Did that one ever  
8 make any of the Paco lines?

9 A. Yes.

10 Q. The chart starts at '68. Is that the  
11 first year that they started making it at the  
12 Ontario facility?

13 A. Do you have that letter again?

14 Q. Yes, sir.

15 A. I can tell you.

16 Q. I think this says '68 on Mr. Merrill's  
17 letter.

18 A. I am trying to find it on here.

19 Q. It's the bottom of the first page.

20 A. Here it is, first page, second par --  
21 third paragraph from the bottom. In '68 they added  
22 the drywall material to Ontario, and then they shut  
23 it down in '75.

24 Q. Okay. Now, the Ontario facility, was that  
25 already an operating facility of Kelly-Moore before

1 joint compounds, and it -- I don't know what that  
2 means -- as fillers, it does show numbers here, but  
3 they weren't carried down.

4 Q. Okay. Do you know whether or not that is  
5 all that was manufactured at that facility, with  
6 respect to Paco lines, were the ready-mix joint  
7 compounds?

8 A. I don't know, sir.

9 Q. Okay. Because the ones under it was  
10 production tons of the dry powder --

11 A. Dry powder.

12 Q. -- products joint compounds?

13 A. It could have been. Again, I am only  
14 going by this sheet.

15 Q. Okay.

16 A. It could have been that that was the only  
17 product that they made there.

18 Q. Okay. So, it could be that in looking at  
19 1420, that number could have carried down to the  
20 bottom, but we just don't know if that's the only  
21 product they made?

22 A. That is correct.

23 Q. And, likewise, we don't have any  
24 information on the first two years with respect to  
25 the quantity of asbestos used in those products?

1 they went into the drywall manufacturing there? If  
2 you know, was it already --

3 A. I don't know. I think that was basically  
4 put in there to be part of an emphasis to be able to  
5 get into southern California.

6 Q. Okay. Well let me ask -- if I read this,  
7 maybe this will answer it. It says, "We added a  
8 drywall manufacturing facility to our Ontario,  
9 California paint factory."

10 A. Right.

11 Q. So --

12 A. So that would imply they came after.

13 Q. It would imply there was already a paint  
14 factory there and they expanded to provide drywall?

15 A. I'll buy that.

16 Q. Okay. And that operated from '68 until  
17 1975?

18 A. Five.

19 Q. And if we look at this chart, again, we  
20 have, unfortunately, no information on the total  
21 production in tons of Paco products in '68, nor the  
22 amount of asbestos that was used, correct?

23 A. Well, I don't know if that's true. It  
24 looks like somebody didn't carry a number down. If  
25 you go by this, production in tons of ready-mix

1 A. Evidently it's not showing there.

2 Q. Okay. If we get to the third year, '70,  
3 it shows 20 tons of asbestos purchased. And, again,  
4 we don't have a total production in tons but we do  
5 have production of ready-mix, correct?

6 A. Of this, yes. The first full year is  
7 '72.

8 Q. Right. And then the next year, '71, we  
9 don't have any information on any of the amounts of  
10 production of the ready-mix, or dry, but we do have  
11 65 tons of asbestos purchased.

12 A. Oh, you're talking about '71.

13 Q. Yes, sir.

14 A. Yes. I'm sorry, you're right.

15 Q. And for '72, again we actually have better  
16 information that shows this year in '72, they  
17 actually had the determination of how much ready-mix  
18 was made as well as the dry powder, which is 2193  
19 tons, correct?

20 A. And, again, -- that's correct. If I look  
21 at this, then I assume it was -- again, I have to  
22 look and see, but this tells me the same information  
23 I think it's telling you, is that these are correct,  
24 they didn't make the dry powder until 1975.

25 Q. Okay. So, then we look in '75, we got a

1 number and then it gives us a -- two subtotals and  
2 one total of 4100 tons of product and 126 tons of  
3 asbestos bought there?

4 A. Right.

5 Q. And for '73, '74 and '75, it shows 129  
6 tons in '73, and 117 tons in '74, and apparently  
7 none in '75, and it indicates that -- it's kind of  
8 hard to determine here, but it looks like that early  
9 in the year they shut down the plant.

10 A. Yes. And it could be that they were only  
11 making the asbestos-free product at that time.

12 Q. Okay.

13 A. Because that asbestos-free product was  
14 available by then on one of the textures.

15 Q. Right. But we went from 5 or 6,000 tons  
16 of product a year, down to 4,000 something in '73,  
17 and only 400 in '75 indicates it was winding down?

18 A. Yes, sir.

19 Q. Okay.

20 MR. HAZEN: Hey, Brent, can we take  
21 a break? I'm having a coughing attack.

22 MR. COON: Oh, yeah. Sure.

23 THE VIDEOGRAPHER: Going off the  
24 record at 3:17.

25 (A recess was taken.)

1 A. I do not know, sir.

2 Q. What happened in '72?

3 A. Closed it down.

4 Q. Was it sold to -- the equipment sold off  
5 to anyone else or did they just shut it down?

6 A. Closed the factory down and continued to  
7 operate a store out of there for a while, and then  
8 subsequently moved from that facility and located  
9 elsewhere now.

10 Q. Okay. And if we look at the forms there,  
11 which is actually on KMX page 2091, we have the  
12 Kirkland, Washington facility identified, '69 to  
13 '72, and it shows the amount of products and  
14 employees and total amount of production for seventy  
15 -- '69 through '71, but there was not any available  
16 information on the amount of asbestos contained in  
17 those products. Is that correct?

18 A. That's what it shows here.

19 Q. Okay. If we go to -- now, on this one  
20 where it says, NA, it's for total asbestos, we  
21 understand this form to be the identity of those  
22 companies that says, "Products Containing Asbestos,  
23 Factory Location." It's on the top of each page  
24 here I think.

25 A. Right.

1 THE VIDEOGRAPHER: Back on the  
2 record. The time is 3:33.

3 Q. (By Mr. Coon) Mr. Giffins, we took another  
4 break. I want to go back through real briefly. We  
5 still have a lot of information to cover, but let me  
6 run through some more of these documents with  
7 respect to the production records.

8 We have the Kirkland, Washington facility next,  
9 and if we go back and look on Mr. Merrill's summary,  
10 there is some additional information about when and  
11 where that facility was opened and operated?

12 A. It was a short time if I recall. It was  
13 like three or four years. If I could find it on  
14 here.

15 Q. This chart indicates '69 to '72.

16 A. That's about right, because it was not  
17 open for that long.

18 Q. Okay. Was this an acquired facility?

19 A. Yes.

20 Q. Who had it before?

21 A. Oh, I was afraid you were going to ask me  
22 that. I can't recall.

23 Q. Did they make drywall compounds there  
24 prior to the acquisition, or was it a converted  
25 facility?

1 Q. So, I am presuming that when we look at  
2 this, based on the title, that there was asbestos in  
3 the product, but we just don't have any information  
4 on how much?

5 A. Our assumptions would be similar.

6 Q. Okay. Do you know which Paco products  
7 were made at this facility?

8 A. Not off the top of my head. I think that  
9 information is available but I don't -- I don't  
10 recall off top of my head.

11 Q. Okay. So the next page, we have Hurst,  
12 Texas. Now, this is the facility that you work at?

13 A. Yes, sir.

14 Q. And it opened in '70/'71.

15 A. It was opened in -- well, the plant was  
16 opened officially in late '70, yes.

17 Q. And we have full year production records  
18 starting in '71 apparently?

19 A. Evidently.

20 Q. Correct?

21 A. Yes, according to this.

22 Q. And unfortunately, the first two years do  
23 not show the amount of product made, but it does  
24 show the amount of asbestos purchased?

25 A. That is correct.

1 Q. And for '71 it was 678 tons; and Year 2,  
2 827 tons?  
3 A. Correct.  
4 Q. And then in Year 3, which is 1973, we  
5 actually start seeing the index reflecting the total  
6 amount of product, which is 17,000 plus tons, and  
7 the amount of asbestos which is now 400 tons,  
8 correct?  
9 A. Correct.  
10 Q. And '74 and '75, numbers again speak for  
11 themselves, correct?  
12 A. Yes. And then this number would obviously  
13 be well below five percent in 1973, if you look at  
14 the tonnage.  
15 Q. Okay. And that's again because of phasing  
16 out asbestos in some products and reducing the  
17 amount in others?  
18 A. That was started in '72, and the first  
19 asbestos-free product came out in '73, and it -- and  
20 could have been influencing that, yes, sir.  
21 Q. And then we carry over to '78, and the  
22 record reflects in '76, 13,000 plus tons of product,  
23 and 342 tons of asbestos in those products?  
24 A. That's correct.  
25 Q. 15,000 tons plus in '77 of product, and

1 A. I mean '82, yes, excuse me. Thank you.  
2 Q. Okay. So we believe the Paco products  
3 line reflected here would have carried forward from  
4 the late '70s on into the early '80s, but they would  
5 have just not -- they would have been asbestos-free  
6 then?  
7 A. That's correct.  
8 Q. So that would not have been reflected on  
9 the chart because this only shows products when they  
10 had asbestos?  
11 A. That's correct.  
12 Q. And then we look at the ledger for Dallas,  
13 this starts -- that was the '63 to '70 facility?  
14 A. That was the year that we bought Hanna  
15 Paint, yes.  
16 Q. Hanna Paint? And that would have been to  
17 1970, correct?  
18 A. Correct.  
19 Q. And then you closed that facility because  
20 you got a new facility in Hurst?  
21 A. Correct.  
22 Q. So, if we look at the years here from '63  
23 to '70, we don't have good information on the amount  
24 of product made, or total production, or asbestos in  
25 those products until '67, correct?

1 600 plus tons of asbestos, correct?  
2 A. Correct.  
3 Q. And the last year is '78, we're down to  
4 1884 tons of product and 23 tons of asbestos?  
5 A. Correct.  
6 Q. And that was due to that facility  
7 discontinuing the Paco product lines?  
8 A. We in 1977 made a decision to get out of  
9 -- at that point making asbestos products. So this  
10 obviously was the tail end of it.  
11 Q. Okay. Now, did the facility in '78  
12 continue to make products that did not contain  
13 asbestos --  
14 A. In -- in Hurst?  
15 Q. -- in '78? Yes, sir.  
16 A. Hurst? Yes, I believe they did.  
17 Q. And for how long did they continue to make  
18 products there after they discontinued making  
19 asbestos-containing products?  
20 A. I don't recall off the top of my head, but  
21 as I said earlier, the -- the entire Paco thing was  
22 shut down in 1982, and I think Hurst may have been  
23 one of the last facilities that was shut down. So,  
24 they probably tailed more toward the end of '72.  
25 Q. '82?

1 A. That's the first time it shows any  
2 asbestos, that's correct.  
3 Q. Yeah. And so for whatever reasons there  
4 was just not good information made available on the  
5 amount of product made, or how much asbestos was  
6 bought until that year. In '67 we see 93 tons of  
7 asbestos bought for that product line?  
8 A. Again, that's 40 years ago, and it could  
9 have been --  
10 Q. Sure.  
11 A. -- records weren't readily available.  
12 Q. Or maybe they're there now and just still  
13 haven't been located in the right format or  
14 whatever.  
15 A. Could have been.  
16 Q. You're talking '67, 93 tons purchased,  
17 correct? Are these also the Paco lines, this Paco  
18 product?  
19 A. Yes, sir.  
20 Q. Then we get to '68, '69 and '70, we still  
21 did not have information on the total production or  
22 the amount of production, but it shows the amount of  
23 tons of asbestos each of those three years being 173  
24 tons, 53 tons, and 197 tons respectively?  
25 A. Correct.

1 Q. Okay. Then we have the Denver, Colorado  
2 facility. This also made Paco products?

3 A. It sure did.

4 Q. Same types we have been talking about?

5 A. I -- they may not have made all of those,  
6 but they made some Paco products, that is correct.

7 Q. Okay. And then we go '73 through '76 with  
8 that facility? What happened in '76? Were they  
9 closed?

10 A. It was closed.

11 Q. And how was it this facility first opened  
12 in '71? New facility or acquired facility?

13 A. It was an acquired facility, if I recall.

14 Q. Did they make product containing asbestos  
15 at that facility before '71?

16 A. I don't know. We bought that, I believe,  
17 from Professional Paints, or what they called Pro  
18 Paint at the time. Here in 1971 we added a drywall  
19 manufacturing facility to our Denver -- so in '71 --  
20 so we had to buy this prior because it was the  
21 paint --

22 Q. Okay.

23 A. It was prior.

24 Q. This preexisted '71 as a paint operation  
25 of Kelly-Moore?

1 A. Right.

2 Q. Is that correct?

3 A. Yes.

4 Q. Okay. And for those years, '67 through  
5 '74, the Houston office would have made the same  
6 Paco product lines we have been talking about?

7 A. They would have made some of them, because  
8 not all plants necessarily made everything.

9 Q. Okay. And if we look here, it shows for  
10 the first -- actually for all years, '67 through  
11 '74, there is no information on the amount of  
12 production of tonnage of product?

13 A. Of total tonnage, correct.

14 Q. Right. Or of the amount of ready-mix or  
15 dry powder mix?

16 A. Right.

17 Q. It just shows the number of employees each  
18 year?

19 A. It does show the sales.

20 Q. The sales and employees?

21 A. And get an idea of the growth of the --

22 Q. Okay.

23 A. From that standpoint.

24 Q. Okay. And it looks like a bell curve,  
25 started out kind of low, went up, peaked, peaked in

1 A. Evidently, yes, sir.

2 Q. And then in '71 it was expanded to include  
3 a Paco product line?

4 A. Correct.

5 Q. And that existed through, apparently '76,  
6 correct?

7 A. That's what it appears to be.

8 Q. And unfortunately we have some records on  
9 the total production in tons, but there was no  
10 record keeping of the amount of asbestos bought for  
11 that facility for any of the calendar years,  
12 correct?

13 A. It appears that way.

14 Q. We next look at Houston, Texas, and this  
15 was -- is this the facility we talked about earlier,  
16 the vermiculite facility?

17 A. I don't believe so. I think there were  
18 two separate facilities, sir.

19 Q. Okay. So we had the vermiculite plant,  
20 and then we had the separate facility open in  
21 Houston from '67 until '74.

22 A. That's what this says, right.

23 Q. And then it indicates that facility was  
24 closed, and the Houston area got supplied from the  
25 Hurst, Texas facility?

1 the early '70s, and then went back down into '74 as  
2 they started phasing it out?

3 A. Right.

4 Q. And the asbestos composition, we can see  
5 it for each of the years: 23 tons, '67; 75 tons in  
6 '68; and unknown amount in '69. Again, most likely  
7 record keeping?

8 A. Either that or records weren't available.

9 Q. 1970, 83 tons; 1971, 87 tons; 1982, 319  
10 tons; 1973, 365 tons; and 1974, 184 tons. Correct?

11 A. Correct.

12 Q. And then last we have the Tulsa,  
13 Oklahoma --

14 A. Excuse me, can I look and see something a  
15 minute here?

16 Q. Yes.

17 A. It's interesting. On the same amount of  
18 sales in '71, they only used 87 tons of asbestos,  
19 and similar sales in '72.

20 Q. '72 and '73, and --

21 A. It's interesting.

22 Q. Yeah. Interesting spike in the amount of  
23 asbestos?

24 A. Yeah.

25 Q. You don't know what that was due to?

1 A. I do not, sir.  
 2 Q. Okay. If we look at the Documents 21 --  
 3 this is 2100, counsel -- we're talking about the  
 4 Tulsa, Oklahoma facility now, and this made Paco  
 5 products from '69 until '74?  
 6 A. '75 is when they moved to Broken Arrow.  
 7 Q. Okay. There are some comments on the  
 8 bottom about relocating to Broken Arrow in '75.  
 9 A. In August of '75.  
 10 Q. And I bet you if you look at the next  
 11 page, there it is, Broken Arrow is the last one.  
 12 '75 through '77?  
 13 A. Right.  
 14 Q. So that's the relocation of the Tulsa  
 15 facility?  
 16 A. That is correct.  
 17 Q. And for records of '69, '70, and '71, we  
 18 apparently don't have any for anything other than  
 19 the sales for each year?  
 20 A. Evidently, going by this.  
 21 Q. Yeah. So we don't know how much product  
 22 made, how many Paco products made, total tonnage of  
 23 Paco, or the asbestos purchased for those  
 24 facilities, correct?  
 25 A. Correct.

1 Q. '72, we have it only for asbestos being  
 2 235 tons; '73, 236 tons; and '74, 298 tons, correct?  
 3 A. Correct.  
 4 Q. And we still don't have any information on  
 5 the total amount of products for those years,  
 6 though, do we --  
 7 A. Not for that, no.  
 8 Q. -- for this? And if we get to when they  
 9 relocated at Broken Arrow in '75, we now have better  
 10 information on the production. We have 2400 tons of  
 11 ready-mix, 400 tons of dry powder, for a total of  
 12 2800 plus tons with a hundred and seventy --  
 13 A. Eight.  
 14 Q. -- eight tons of asbestos, correct?  
 15 A. Appears to be.  
 16 Q. And in '76, we have 9700 plus tons of  
 17 product on 252 tons of asbestos; and in '77 we have  
 18 13,600 tons of product on 492 tons of asbestos,  
 19 correct?  
 20 A. Correct.  
 21 Q. All right. We have covered a lot of  
 22 ground there. Does this appear to be a pretty  
 23 comprehensive index of the facilities that made Paco  
 24 products, and the years that each of those  
 25 facilities was in business, and the products they

1 made?  
 2 A. You're talking about the locations  
 3 themselves?  
 4 Q. Yes, sir.  
 5 MR. HAZEN: Objection, form.  
 6 Q. (By Mr. Coon) Are there other facilities  
 7 that made Paco products that we have not discussed  
 8 here?  
 9 A. I don't believe so. It appears to be all  
 10 of them.  
 11 Q. Okay. Next, real briefly, Mr. Giffins, we  
 12 have the -- this is Document 1020, four pages. This  
 13 appears to be a -- some sort of form instructions  
 14 that go with the different products. Have you seen  
 15 those types of documents before?  
 16 A. I don't think I have seen this one per se,  
 17 but -- but I know what it is. It appears -- appears  
 18 to be directions, like on the back of a package.  
 19 Q. Okay. Were those directions that would  
 20 typically be handled -- handed out by the local  
 21 store, or is that something retyped from what's on a  
 22 bag or what, if you know?  
 23 A. This is probably what was typed that went  
 24 onto the bag. Generally instructions are typed out,  
 25 and then they get printed onto the bag as to how

1 they're supposed to go. So, either somebody copied  
 2 this off the bag, or it was done the other way  
 3 around. Instructions were written, and then they  
 4 were printed onto the bag.  
 5 Q. Okay.  
 6 A. There's some more? Okay. I didn't look  
 7 at those.  
 8 Q. So, this would reflect instructions on how  
 9 to use the Ready-mix All Purpose Joint Compound?  
 10 A. It's for Taping Compound, Finishing  
 11 Compound, Topping Compound, and Joint Compound, All  
 12 Purpose.  
 13 Q. Okay.  
 14 A. Now, I would like to point out --  
 15 Q. Yes, sir.  
 16 A. -- from my experience, when directions are  
 17 put together, they're put together as it relates to  
 18 the product. Then the other things that have to be  
 19 added, based on government requirements, or state  
 20 requirements, generally are added when the bags are  
 21 printed. So, this may not -- I don't know when this  
 22 was typed up, but generally this covers what would  
 23 have been prepared regarding the product itself as  
 24 far as the application.  
 25 Q. Okay. Did -- did Kelly-Moore ever go back

1 and restencil additional information on any of their  
2 bags, additional logos, labels, anything else?  
3 Anything that would have been added to the bags  
4 after they came from Saint Regis?

5 MR. HAZEN: Objection, form.

6 A. Not that I'm aware of. The only thing  
7 where stickers were added was when the OSHA  
8 requirements came out. In order to comply, a  
9 sticker was made up and put on the bags until the  
10 bags were printed with that on there.

11 Q. (By Mr. Coon) Okay.

12 A. But I am not aware that any other  
13 modification was made to the bags.

14 Q. Okay. I have got another document here.  
15 This is a 1018.

16 MR. HAZEN: Is that your number?

17 MR. COON: Our number. It's  
18 previously marked KM 94 by somebody.

19 Q. (By Mr. Coon) But can you identify that  
20 set of records there, sir?

21 A. This appears to be a listing of various  
22 raw materials that were purchased from different  
23 companies, and it's headed "Paco Products" so I'm  
24 assuming it has to relate to Paco products.

25 Q. Would it have been the different vendors

1 the raw ingredients.

2 A. Yes. I was just trying -- oh, there they  
3 are. I was just trying to look further. That's  
4 what it appears to be.

5 Q. Okay. And if we looked under the pigments  
6 and fillers, this was at Page 2 of the document,  
7 when it talks about pigments and fillers, we have  
8 different ingredients. You have the limestone,  
9 ground styrene, and it talks about Mica, and then  
10 there is two listings here, 7RF02 asbestos,  
11 Johns-Manville, and another is 7M05 asbestos,  
12 Johns-Manville.

13 A. Right.

14 Q. Do you know what those codings meant? Was  
15 that a quality or grading of the product?

16 A. I believe, and, again, I am not a chemist,  
17 I didn't -- but I believe the 7RF is what they  
18 called a float, and the one without the RF on it was  
19 a basic Chrysotile. Both of these were Chrysotile,  
20 but this was what's called a float. It's a little  
21 bit different fiber. Don't ask me how to explain  
22 it. It's processed through water from what I  
23 understand.

24 Q. Okay. Would this have reflected that both  
25 types of asbestos would have been used in the Paco

1 or suppliers of the raw ingredients that --

2 A. Of the raw materials.

3 Q. Of the raw materials you used to make the  
4 different Paco products?

5 A. Correct.

6 MR. NANTZ: Objection, form.

7 Q. (By Mr. Coon) And it actually goes back  
8 to -- I think one page is even you have St. Regis.  
9 That would have been your bag supplier?

10 A. I mentioned St. Regis earlier. That's the  
11 bag supplier that serviced San Carlos and there  
12 could have been maybe somebody else different in  
13 some of the other plants, but St. Regis was, I  
14 believe, the -- one of the key suppliers of San  
15 Carlos.

16 Q. Now, the bagging processes all took place  
17 at the manufacturing facility, correct?

18 A. Yes.

19 Q. Okay. You-all didn't ship -- you-all  
20 didn't mix it all up and make the product and then  
21 ship it somewhere else to have it bagged?

22 A. No, it was the other way around. The bags  
23 were made, shipped to us and we filled them.

24 Q. Okay. Anything else about that? That's  
25 just kind of a listing of the various suppliers of

1 textures, or were they picked from one or the other  
2 on various Paco products?

3 A. I'm not sure I understand your question.

4 MR. HAZEN: Objection, form.

5 Q. (By Mr. Coon) Okay. Are the things that  
6 are listed on here as ingredients -- are all these  
7 ingredients what went into the Paco product, or did  
8 some go in some products, some go into others?

9 A. I have to believe not all these went into  
10 any one product. I think since the products were  
11 used for different uses, for different purposes,  
12 that this was the total list of raw materials at  
13 that time for the Paco products.

14 Q. Okay. And this is chopped off. It looks  
15 like December of --

16 A. '75.

17 Q. -- '75?

18 A. By the second page.

19 Q. There we go. December of '75?

20 A. Right.

21 Q. So, it appears, at least at this time  
22 frame, you told us about the three suppliers as  
23 being of the raw material asbestos, Manville was one  
24 of them, and it appears from this form that for  
25 1975, at this particular facility, at least during

1 that time frame, Manville was the supplier of the  
2 asbestos for the Paco products?

3 A. He's listed on there, yes.

4 Q. Okay.

5 A. But what you need to understand also, if I  
6 may interject, these types of lists were made up  
7 periodically throughout the year, so that we always  
8 had a record of raw material suppliers.

9 Q. Okay.

10 A. So when this one was made in 12 of '75, it  
11 reflected that Johns-Manville was the supplier; but  
12 there could have been a list that was six months  
13 before that, or the one that's 12 of '74 could have  
14 had a different supplier.

15 Q. Sure. It could have been Carey Canada?

16 MR. NANTZ: Objection to form.

17 A. Could have been.

18 Q. (By Mr. Coon) Mr. Giffins, did -- I might  
19 have asked you this, but did Sherwin-Williams make  
20 any joint compounds or textures?

21 A. Not that I know of when I was with them.

22 Q. Okay, sir. And that would have been from  
23 '60s through '85?

24 A. I went to work for them in '61 and left  
25 them in '85.

1 Q. All right. And in the time frame of the  
2 '60s, this is before you went to work at  
3 Kelly-Moore, but do you have an understanding today  
4 of who the competitors were in the Paco product  
5 lines with Kelly-Moore through the '60s and '70s?

6 A. Man. Any name I would give you would be  
7 speculation on the -- on the names that I am  
8 familiar with. I am very -- you know, Hamilton,  
9 been around for a long time. In the bay area, there  
10 was a company called Westco that made material.  
11 Geez, there is a lot of names that escape me at the  
12 moment, but to tie it into specific dates, that's --  
13 or time frames, that's a little tough.

14 Q. Okay. Have you heard of a company called  
15 Proco?

16 A. Oh, sure. Yeah, I'm sorry.

17 Q. Would they have been a competitor?

18 A. They have been, yes.

19 Q. Synkoloid?

20 A. Synkoloid is more in patching, I believe.

21 Q. Georgia Pacific, which I think you-all  
22 actually sold some rebranded stuff to, correct?

23 A. Correct.

24 Q. National Gypsum, are you -- U.S. Gypsum?

25 A. That's the -- that's the one that bought

1 Westco, yes. Thank you.

2 Q. Any other ones come to mind?

3 A. Drawing a blank.

4 Q. Okay. Mr. Giffins, I want to next turn --  
5 we have covered a lot of information with respect to  
6 the various manufacturing facilities, and the  
7 products that Kelly-Moore made that -- that had  
8 asbestos in them, and I realize that at some point  
9 in time after OSHA came out, Kelly-Moore took some  
10 actions with respect to their products, but instead  
11 of going through them ad hoc, I want to go back and  
12 take a separate trail with you now, sir, and that is  
13 what I call generally the internal corporate  
14 information upon what Kelly-Moore did, and when they  
15 did it, and why they did it with respect to  
16 asbestos.

17 And there were a number of boxes that  
18 Kelly-Moore's produced to us, in addition to some  
19 other information that we have obtained from some  
20 other sources, all of which I think originated from  
21 Kelly-Moore. But I want to walk you through them  
22 and just ask you if you have seen the documents  
23 before, and if you know anything about them, and  
24 maybe ask questions for you.

25 I have tried to take most of these in

1 chronological order. And in going through the  
2 boxes, when we had basically asked for information  
3 concerning Kelly-Moore's asbestos products, and  
4 internal documents concerning their discussion with  
5 asbestos, the vast majority of the documents I have  
6 received, or at least been able to review, were  
7 generated after 1972, or at least after the first of  
8 the year in '72. In that regard, I want to first  
9 ask you about documents before '72. And you are not  
10 employed with Kelly-Moore until '85, correct?

11 A. That is correct.

12 Q. Have you ever been involved in  
13 assimilating information on behalf of Kelly-Moore  
14 responsive to the asbestos litigation?

15 MR. HAZEN: Objection, form.

16 A. What do you mean, assimilating?

17 Q. (By Mr. Coon) Well --

18 A. Actually collect -- going out and  
19 collecting it?

20 Q. Sure. Have you ever been one of the  
21 persons that was contacted by Kelly-Moore at some  
22 level saying, can you help us get this information?  
23 This is what the attorneys have asked for, this is  
24 what somebody has asked for, and we need you to try  
25 to round this type of information up?

1 A. I have not. It wasn't until April of 2001  
2 when I got the call and asked to get involved with  
3 this, the first time I was aware of all that was  
4 going on, and I was never involved with actually  
5 going around, picking up documents, and putting it  
6 together.

7 Q. And in the years prior to 2001 you had not  
8 been asked to just assimilate information, not to be  
9 the corporate representative, but just to assimilate  
10 information for somebody else who may be the  
11 corporate representative?

12 A. Prior to April of 2001, my knowledge of  
13 the as -- Paco and the asbestos issue would output  
14 on the tip of a pin.

15 Q. Well, basically you didn't go to work  
16 there until a number of years until after most of  
17 the Paco product lines had already been shut down?

18 A. That's correct.

19 Q. And so, you, here today to be the  
20 corporate representative to discuss a lot of these  
21 issues, had to go back and look at historical  
22 information and talk to people?

23 A. (Indicating.)

24 Q. And I think you have done that, right?

25 A. Oh, yes, sir.

1 Q. Talked to a number of people that worked  
2 there back in the old days even before you were  
3 there, and looked at a lot of these documents that  
4 Kelly-Moore had in their repository?

5 A. I have gone through every box in that  
6 repository, and you're welcome to do it, too.

7 Q. How many boxes are there in the  
8 repository?

9 A. 88.

10 Q. 88 boxes?

11 A. Roughly 88.

12 Q. And where are these additional records  
13 kept? In San Carlos?

14 A. At San Carlos, yes, sir.

15 Q. Are they kept in a particular room that  
16 just deals with these issues, or is it part of a  
17 larger repository of all their information?

18 A. It's in a room that's partitioned off and  
19 it only contains documents relevant to this issue.

20 Q. Okay. In your reviews of that information  
21 before, did you see much in terms of the  
22 correspondence, internal memos and letters dealing  
23 with these issues prior to 1972?

24 MR. HAZEN: Objection, form.

25 A. No, because it wasn't until '72 that the

1 information started to come out regarding the  
2 asbestos. All the information from OSHA began to  
3 really start to surface, and all the other  
4 information. So, materials that I was looking at,  
5 was related to when the company was -- got involved.  
6 Anything I have seen is related to around that  
7 period forward.

8 Q. (By Mr. Coon) Okay. With respect to the  
9 product lines, we know that Kelly-Moore made  
10 asbestos-containing products going back to, I think,  
11 1960, correct?

12 A. Correct.

13 Q. From that standpoint, let me ask you first  
14 a separate line of questions before we get into  
15 documents. Do you know any -- from your talks with  
16 Kelly-Moore representatives -- you have talked to  
17 Mr. Merrill, correct?

18 A. I have, sir.

19 Q. Talked to a number of the other people  
20 that were there back when. Were you ever able to  
21 determine that Kelly-Moore had done any types of  
22 testing of the Paco product lines before they  
23 released them into the stream of commerce?

24 MR. HAZEN: Objection, form.

25 A. What do you mean by testing?

1 Q. (By Mr. Coon) Okay. Testing with respect  
2 to any potential health hazards associated with  
3 asbestos in those products.

4 A. We did testing of the product, primarily  
5 the application of the product, how it went on, that  
6 type of deal.

7 Q. Had to do with viscosity, making sure it  
8 adhered right, making sure it didn't crack and peel  
9 and chip?

10 A. Uh-huh.

11 Q. Just in terms of it being a product that  
12 did what you said it would do?

13 A. That's correct, sir.

14 Q. Okay. With respect to potential health  
15 hazards, are you aware of any testing that was done  
16 by Kelly-Moore in the early years of their making of  
17 this Paco product line, as it related to any  
18 potential health hazards with asbestos?

19 MR. HAZEN: Objection, form.

20 A. Could you help me out, and maybe give me a  
21 little bit idea on what kind -- I mean, what do you  
22 mean testing with health?

23 Q. (By Mr. Coon) Well, sure. Did they do  
24 anything to determine, for instance, in stirring up  
25 the boxes, or the bags of asbestos-containing --

1 Let me back up. Let's talk about just the  
2 textures.

3 A. Okay.

4 Q. And you had 25-pounds bags of it, right,  
5 powder form?

6 A. Correct.

7 Q. And you could add water and stir it up.  
8 Do you know if Kelly-Moore ever did any dust testing  
9 to see how much asbestos dust, or dust was released  
10 from the dumping of the bag into a bucket, adding  
11 water and stirring it all up?

12 A. You have got to be talking about once it  
13 got in the user's hands? It would have to --

14 Q. At any point. Even -- in the plant we can  
15 talk separately about two different issues. You're  
16 probably familiar with the difference between field  
17 studies versus plant studies.

18 A. Correct.

19 Q. Okay. Let's talk about first the field  
20 studies. Just with making the product, were there  
21 any tests done at any point in time from 1960 when  
22 they made the product until -- when was it they  
23 quit? The late '70s?

24 A. Making it with asbestos?

25 Q. Yes, sir.

1 That doesn't indicate that something hadn't been  
2 done.

3 Q. With respect to the asbestos in the  
4 products, and your review of the records, and  
5 talking to anyone about this matter, do you have a  
6 feel for when it was that Kelly-Moore was first  
7 aware of -- let's talk about just diseases first --  
8 was first aware of the disease of asbestosis?

9 A. The first documentation that I have seen  
10 that anything came to the table on diseases was in  
11 the spring of '72 when the Asbestos Institute sent a  
12 letter to Mr. Merrill, I believe, it was either  
13 Mr. Merrill or Bob Miller saying that a certain  
14 survey had been conducted, and that there were some  
15 indications that exposure to dust over a long period  
16 of time could cause some health problems. And that  
17 was in the spring of '72, and that's the first thing  
18 I have seen that was any indication from a medical  
19 standpoint that there was a problem with asbestos.

20 Q. Was --

21 A. Where actually --excuse me, where the  
22 diseases were mentioned, sir.

23 Q. Right.

24 A. Where there was a --

25 Q. Do you have an understanding as to whether

1 A. '77.

2 Q. '77. Okay. From the 1960 to 1977 time  
3 frame, was there any information you were able to  
4 determine where Kelly-Moore did any testing of the  
5 product in a field circumstance to determine the  
6 dust release and asbestos release in that dust?

7 A. I am not aware of what they did then,  
8 although I can tell you what we do today, I think,  
9 was basically how things were done then, and that's  
10 where two -- two aspects, two things happened.

11 One, when the product is made, it's always  
12 tested as far as the application and the performance  
13 of the product. And it's always geared to the  
14 painting contractor, and how that professional is  
15 going to use the product. We do that today, and I  
16 believe that was done back in those days. Was that  
17 philosophy still applied to Paco? I -- it's part of  
18 our daily operating procedure so I would assume  
19 maybe it was.

20 There were times where you would go out, and  
21 take the product and go out on the job site, and  
22 actually mix it so that we get a feel for that type  
23 of thing. As far as tests, doing a measurement of  
24 how much dust was emitted from the material, I have  
25 not seen anything that says that, but I don't know.

1 or not Kelly-Moore was what you call a subscriber to  
2 workers' compensation in Texas back in the '60s and  
3 '70s?

4 A. What do you mean, subscriber?

5 Q. Did they have workers' comp coverage for  
6 their employees?

7 A. As far as I know we did. Again, it's an  
8 assumption but, I mean, we do now.

9 Q. Okay. Any reason to believe that they did  
10 not have workers' comp in your earlier days?

11 A. Not if it was a requirement, no.

12 Q. Okay. Well, I think an employer has the  
13 option of getting workers' comp for their employees.  
14 You don't know one way or another if they had  
15 workers's comp?

16 A. I can't answer that.

17 Q. Do you know whether or not, with respect  
18 to the California facilities, whether or not the  
19 employees were covered with workers' comp?

20 A. At what time period?

21 Q. In the '60s.

22 A. Well, again, I didn't come until '85, so  
23 from my own personal experience, but I -- I don't  
24 know for a fact if it did or it didn't. I do know  
25 that there is only indication of one workman's comp

1 claim that came out of the San Carlos factory, and  
2 that was in 1981. So -- and that person was working  
3 in the plant for years prior to that.

4 Q. Okay. And I was going to ask you two  
5 different lines of questions on that and you brought  
6 up the second line. The first line was when you  
7 were aware, or from -- there is probably a  
8 difference between when you were personally aware  
9 versus when you believe the corporation was aware,  
10 but that Texas under it's workers' compensation  
11 prior to the time that Kelly-Moore acquired the Paco  
12 product lines, that under Texas law, that you could  
13 have a recognized disease of asbestosis, which was  
14 compensable under the worker's compensation  
15 statutes?

16 MR. HAZEN: Object.

17 Q. (By Mr. Coon) Do you know -- do you know  
18 when Kelly-Moore would have been aware of that?

19 MR. HAZEN: Objection, form.

20 A. No, I do not.

21 Q. (By Mr. Coon) And the same thing with  
22 respect to California. Do you know -- have any  
23 understanding of when Kelly-Moore was aware that the  
24 California workers' compensation statutes provided  
25 for the compensability of occupational dust disease

1 record. The time is 4:21 p.m., May 31st, 2002,  
2 beginning of Tape 3.

3 Q. (By Mr. Coon) Mr. Giffins, I want to go  
4 back to just a couple other things. We have here --  
5 and unfortunately it's not even identified with a KM  
6 number. It's an attachment to a set of  
7 interrogatories.

8 Counsel, show you as Exhibit "A" to the  
9 attached set, but Kelly-Moore had filed answers to  
10 discovery before. You're familiar with  
11 interrogatories, questionnaires you fill out, file  
12 with the court?

13 A. Yes.

14 Q. This was an Exhibit "A" attachment to a  
15 set that had been filed, and listed are a number of  
16 the product lines that Paco made that had asbestos,  
17 and it lists the years that those products were made  
18 as well as the years asbestos was discontinued in  
19 them. Have you seen that before?

20 A. I do not -- I don't recall seeing this  
21 particular sheet, but I have seen something similar  
22 to this, which lays out similar information, but in  
23 a little bit different format.

24 Q. Okay. Kind of shows you -- if we look at  
25 that it would tell us basically the composition of

1 like asbestosis?

2 MR. HAZEN: Objection, form.

3 A. No, I don't know when that fit into  
4 workmen's comp. We do all -- we -- all of us know,  
5 I believe, that OSHA was promulgated back in '70,  
6 published in '71, and was about that time OSHA,  
7 which regulated the workplace, indicated -- was  
8 coming out with dust controls.

9 Now, if workmen's comp was prior to that, I  
10 don't know that, sir. I really don't. I assume it  
11 came after that as it related to that, because  
12 that's when the whole thing about asbestos started  
13 to come forward.

14 Q. (By Mr. Coon) Okay.

15 A. So, I assume it would have been after  
16 '70.

17 THE VIDEOGRAPHER: Excuse me. Can  
18 we go off the record for a tape change?

19 MR. COON: Sure.

20 MR. HAZEN: Why don't we just take  
21 five?

22 THE VIDEOGRAPHER: Going off the  
23 record at 4:09.

24 (A recess was taken.)

25 THE VIDEOGRAPHER: Back on the

1 asbestos over the various years from the time it was  
2 fully used in the product until the time it was  
3 excluded from the product, correct? As well as  
4 dates of manufacture, and dates asbestos was  
5 excluded?

6 A. It shows on market, and the use of when  
7 asbestos was -- the date when use of asbestos was  
8 discontinued, and it does show the amount of  
9 asbestos per product line.

10 Q. Okay.

11 A. How it varied, so forth, right.

12 Q. Okay. If we can just -- I tell you what,  
13 I'll just draw in the bottom here that this was  
14 Exhibit "A" to interrogatory. We will use that for  
15 purposes of identification on the attachment. Okay?

16 All right. We were talking about from a  
17 historical context your review of Kelly-Moore's  
18 archives, and things, what they knew about asbestos,  
19 and you brought up -- we were talking about testing  
20 for asbestos dust, and you brought up a worker's  
21 compensation claim, and could you tell me --

22 A. Before we --

23 Q. -- a little more about that?

24 A. Before we do that, can I go back? I want  
25 to clar -- I think I need a clarification, or we do

1 here.  
 2 Q. Sure.  
 3 A. When you asked me about testing --  
 4 Q. Yes, sir.  
 5 A. -- for some reason, I kept -- I was  
 6 responding to you in the time frame prior to OSHA,  
 7 which was '70, '71.  
 8 Q. Right.  
 9 A. I thought that was what your question was.  
 10 Q. Okay. We can make it that if you need to  
 11 clarify it. Prior to the OSHA Regulations, was any  
 12 testing done by Kelly-Moore of the atmospheric  
 13 release of asbestos on their products?  
 14 A. No.  
 15 Q. Okay.  
 16 A. Not that I'm aware of.  
 17 Q. Okay.  
 18 A. Because there was testing done after that  
 19 point.  
 20 Q. Sure.  
 21 A. But, again, from that time frame, I was  
 22 thinking in terms that you were asking me prior to  
 23 OSHA or prior to --  
 24 Q. Right.  
 25 A. -- the regulation.

1 Q. We will talk about that.  
 2 A. Okay.  
 3 Q. One other side-note, you had brought up an  
 4 issue about a worker's compensation claim?  
 5 A. Yes, sir.  
 6 Q. As I understood it, you were aware of an  
 7 employee of Kelly-Moore making a claim for  
 8 asbestos-related health problems back around '80,  
 9 '81?  
 10 A. The claim goes back, it was filed in '81,  
 11 yes.  
 12 Q. Okay. Is that the only one that you were  
 13 aware of filed prior to 1980 that dealt with an  
 14 employee of a facility alleging some health related  
 15 problems from working around asbestos?  
 16 A. A workman's comp claim?  
 17 Q. Yes, sir.  
 18 A. That is the only one, yes, sir.  
 19 Q. I have got -- counsel, this is our  
 20 Document 1145, BB 6497 -- this was a summary sheet  
 21 included in our forms that talk about the Paco  
 22 factories, 1974. Have you seen that before?  
 23 A. I have seen a form similar to this, yes.  
 24 I don't know if it was this.  
 25 Q. Well, it doesn't provide a lot of

1 information, but in looking at it, it indicated that  
 2 there were three occupational facilities -- three  
 3 occupational injuries at that facility. And then  
 4 there was one, looks like Item Number 22, one for  
 5 dust disease to the lungs, and there was one claim  
 6 at the facility that year as well. Am I reading  
 7 that correct right here in Line 22?  
 8 A. It says, "Dust diseases of the lungs, one,  
 9 number of cases involved permanent transfer, one;  
 10 number of lost workdays, one."  
 11 Q. Do you have any idea what that related to?  
 12 A. No. It says Paco factory in 1974. I'm  
 13 familiar with the form but I'm not familiar with  
 14 this particular one here.  
 15 Q. What would the Paco factory be, since we  
 16 know that there were several different Paco  
 17 factories? Do you know which Paco factory that was?  
 18 A. No. It's an OSHA form, and -- but I can't  
 19 -- it's no way to tell which factory it is, sir.  
 20 Q. And it indicates that there was a claim  
 21 for what's called pneumoconiosis. You're aware that  
 22 asbestosis is a type of pneumoconiosis?  
 23 A. Yes, sir.  
 24 Q. Just -- it is a dust disease?  
 25 A. Yes, sir.

1 Q. But you do not know from this, or from any  
 2 other information, whether or not that individual  
 3 had a specific claim for an asbestosis injury, or  
 4 some other form of dust disease there in the plant?  
 5 A. No. I do not.  
 6 Q. Okay. Do you know if there were any other  
 7 claims by any employees prior to 1980 for an injury  
 8 associated with what I'll call more generically just  
 9 occupational dust disease or pneumoconiosis versus a  
 10 claim for asbestosis?  
 11 A. I am not aware of any -- the only  
 12 workmen's comp information that I have seen relevant  
 13 to any disease, or any issue such as this, was that  
 14 one that was filed in 1981.  
 15 Q. Okay. Now, with respect to things other  
 16 than asbestosis, you're familiar that asbestosis  
 17 also causes other health-related problems such as  
 18 lung cancer? You're aware of that, are you not?  
 19 A. Well, I guess it could. I see them as  
 20 three different issues, or two different issues,  
 21 lungs cancer and asbestosis being different.  
 22 Q. Sure. But you understand asbestos,  
 23 exposure to asbestos fibers can cause lung cancer?  
 24 A. I understand that could be, that could  
 25 happen, yes.

1 Q. Okay. Now, with respect to lung cancer,  
2 are you aware of any of your employees at  
3 Kelly-Moore, at any of these Paco facilities, making  
4 a claim for workers' compensation benefits for a  
5 diagnosis of lung cancer as opposed to asbestosis?

6 MR. HAZEN: At any time? I am just  
7 trying to clarify.

8 Q. (By Mr. Coon) I'm sorry, before 1980. You  
9 have told us you were aware of just this one claim  
10 in 1981 for asbestosis, correct?

11 A. Right.

12 Q. And we know --

13 A. Again, it was a workman's comp claim and  
14 I'm not sure it was asbestosis, but I'm aware that  
15 there was that one workman's comp claim in '81.

16 Q. Okay. I'm sorry, maybe I misunderstood.  
17 Was the claim in '81 for just a claim for exposure  
18 to asbestos, or was it a claim for asbestosis, or  
19 was it a lung cancer, or do you know?

20 A. No, it was a claim by a gentleman by the  
21 name of Waller Lawrence, who had worked in the Paco  
22 plant for sometime prior to that, for payment of  
23 around -- an \$806, \$800 of his medical bills. And  
24 the prognosis, the final determination that came  
25 back from the doctor was that he did not have any

1 that can cause mesothelioma?

2 A. Well, I -- to me on mesothelioma, asbestos  
3 can cause -- it's a fatal disease, but -- and I am  
4 no medical doctor, for say.

5 Q. Sure.

6 A. And I'm not -- but I also, you understand,  
7 you can get that without being exposed to  
8 asbestosis.

9 Q. Do you have an understanding of what else  
10 can cause mesothelioma --

11 A. No.

12 Q. -- other asbestos fibers?

13 A. I do not.

14 Q. Okay. Do you know whether or not you have  
15 had any employees who have been diagnosed with  
16 mesothelioma?

17 A. I do not.

18 Q. Do you know whether or not you had any  
19 employees -- when I say employees, I am talking  
20 about ones that worked around any of your asbestos  
21 facilities like the Paco facilities -- do you know  
22 whether or not any of them have suffered a diagnosis  
23 of a lung cancer?

24 A. Again, no. I -- again, the only thing I  
25 have ever seen is that deal from 1981.

1 asbestos-related disease.

2 Q. Okay. So -- and that was in 1980, or  
3 '81?

4 A. That was '81, sir.

5 Q. And that's the first instance you're aware  
6 of somebody thinking they may have some asbestos  
7 related health problems from working around the  
8 product at the plant?

9 A. That's the only workmen's comp one that I  
10 have seen, yes, sir.

11 Q. Okay. Are you aware of anyone prior to  
12 that time having a claim for something that could be  
13 more generic like lung cancer, from just working at  
14 the plant?

15 A. No. I have not.

16 Q. Are you familiar with a term called  
17 mesothelioma?

18 A. Yes, sir.

19 Q. Are you familiar that that's also another  
20 highly associated cancer from working around  
21 asbestos fibers?

22 A. Mesothelioma can be caused by asbestos,  
23 but it also, I believe, can also be caused by other  
24 things.

25 Q. What's your understanding of other things

1 Q. Okay. And post '81, is that one in '81  
2 the only one you have seen, or was that the first  
3 one you have seen?

4 A. That's the only workmen's comp claim that  
5 I have seen.

6 Q. Okay. Who handles the workers'  
7 compensation issues at Kelly-Moore? Do those get  
8 funneled through somewhere at -- in California or  
9 Hurst or both or what?

10 MR. HAZEN: Objection, form.

11 A. They're usually funneled -- I think they  
12 all end up in our personnel department --

13 Q. (By Mr. Coon) Where is that at?

14 A. -- at some point. In San Carlos.

15 Q. It's in San Carlos? Is there a separate  
16 repository where people track the injury claims from  
17 people that work out at Kelly-Moore?

18 MR. HAZEN: Objection, form.

19 Q. (By Mr. Coon) Is it just a different  
20 department from other departments or is it where  
21 they handle all of the financial issues, and --

22 A. Well, I can't answer that because --  
23 medical records are confidential and, so, therefore,  
24 I don't know how they end up. I do know that our  
25 personnel department generally will get involved

1 where we have an issue with the workmen's comp claim  
2 or something, but where all those records are, I  
3 can't tell you for a fact.

4 Q. Okay. All right. We were talking about  
5 from the historical standpoint when it was your  
6 understanding that Kelly-Moore first had an  
7 awareness of asbestos diseases, and I want to first  
8 ask you, you were telling us about OSHA being in the  
9 early '70s, the entity that created a heightened  
10 awareness at Kelly-Moore with respect to these  
11 potential problems. Is that generally what you were  
12 saying?

13 A. I -- that's when I think we -- we started  
14 to get -- being aware of it but I don't think we  
15 were the only ones. I think the industry as a whole  
16 became more aware of asbestos in the early '70s.

17 Q. Was there an organization that dealt with  
18 joint compounds and textured materials? Was there a  
19 Drywall Manufacturers Association or something?

20 A. Well, there probably was.

21 Q. Do you know if there still exists any such  
22 type of organization?

23 A. I can't really say that.

24 Q. Do you know whether or not Kelly-Moore was  
25 a member of any organizations that dealt with these

1 called again?

2 A. The Dry -- Drywall Institute Trust Fund.

3 Q. Okay. And what do you know about that  
4 organization?

5 A. That's an organization that basically what  
6 -- how do I put it? It was almost like a clearing  
7 house for drywall information, and they provided  
8 some information to us, or we got some information  
9 from them back in '82 relevant to what is starting  
10 to develop with asbestos.

11 Q. Do you know how long that organization had  
12 been in existence?

13 A. I can't answer that.

14 Q. Do you know how long Kelly-Moore had been  
15 a member of that organization?

16 A. I don't ever think we were a member.

17 Q. You just think you-all provided  
18 information from them, although you were not a  
19 member?

20 A. I think we may have gotten the information  
21 because of one of raw material suppliers may have  
22 requested they send it to us or whatever, but --

23 Q. Okay.

24 A. But I don't believe we were ever a member.

25 Q. Okay. I don't have some documents here

1 specific product lines they made like the drywalls,  
2 texturing products?

3 A. I have not seen anything that would  
4 indicate that we were members, or associated with  
5 any association in the drywall industry.  
6 Information was available to us through various  
7 organizations, but I don't -- haven't seen anything  
8 where we were an active member of any organization,  
9 or -- there is a couple organizations from the paint  
10 side that we are involved with that goes back to  
11 mid, late '70s. There is only one or two, but as a  
12 whole, they're the only ones I can recall ever  
13 seeing.

14 Q. You mentioned earlier the -- you said the  
15 AI was -- Asbestos Institute, I think, is that the  
16 Asbestos Institute of America?

17 A. Oh, the --

18 Q. The AIA?

19 A. I'm drawing a mental blank. The Asbestos  
20 Institute Trust Fund, I believe is the head -- is  
21 the clarification.

22 MR. HAZEN: Drywall.

23 A. Drywall, yes, excuse me. I'm sorry.  
24 Thank you.

25 Q. (By Mr. Coon) Okay. Now, what's that

1 that I have reason to believe are in existence. I  
2 don't know if Kelly-Moore has seen them but I have  
3 seen them in other circumstances, but one of your  
4 raw material providers was Johns-Manville, correct?

5 A. Johns-Manville, yes.

6 Q. And you mentioned a couple others, I think  
7 Carey Canada?

8 A. Carey Canadian.

9 Q. And Union Carbide?

10 A. That's correct.

11 Q. Did any of those companies ever provide to  
12 Kelly-Moore, prior to OSHA, let's talk pre '72, did  
13 any of them ever provide Kelly-Moore with any  
14 information regarding potential health hazards  
15 associated with exposure to asbestos?

16 MR. NANTZ: Objection, form.

17 A. Did I hear something?

18 MR. HAZEN: Go ahead. You can  
19 answer.

20 A. Oh, okay. Prior to '72?

21 Q. (By Mr. Coon) Yes, sir.

22 A. So you would have said '71 prior?

23 Q. Yes, sir.

24 A. No. I haven't seen anything.

25 Q. Okay. Are you familiar with material

1 safety data sheets?  
 2 A. Uh-huh.  
 3 Q. Does Kelly-Moore have those for the Paco  
 4 product lines?  
 5 A. Would we have made those up and supplied  
 6 MSDS sheets?  
 7 Q. Yes, sir.  
 8 A. You know, I can't answer that. It's a  
 9 good question. I can't answer that.  
 10 Q. If such documents had existed, where would  
 11 they be kept?  
 12 A. MSDS sheets became a requirement, a  
 13 federal requirement at one point. I don't know what  
 14 year that was. So I am sure we would have done it,  
 15 but I -- I just -- I can't recall when that would  
 16 have happened.  
 17 Q. I am going to backtrack one more time.  
 18 There was another document I found at the break.  
 19 Counsel, this one is KMX 183. It's ours KM 1239.  
 20 We talked about these different Paco products  
 21 containing asbestos, and there was a memo here. See  
 22 if you have seen this. It was to Mr. Merrill, which  
 23 you talked about earlier, that talked about asbestos  
 24 fibers in a paint product. And were you aware that  
 25 Kelly-Moore had made paints containing asbestos for

1 different numbers were applied to those. This --  
 2 here it is right here. You look at it, Paco  
 3 products, right here.  
 4 Q. Okay. And what are those? Paco product  
 5 225, 235 and 521?  
 6 A. I am not totally familiar with those.  
 7 They obviously were very small volume.  
 8 Q. Do we know what they looked like?  
 9 A. I have no idea.  
 10 Q. Do you know why they would have included  
 11 paint with asbestos?  
 12 A. Well, again, it goes back to even that  
 13 terminology of that one dry product. It was called,  
 14 I believe, texture paint. Right?  
 15 Q. Right.  
 16 A. And that was dry. So anything that would  
 17 be put on with an applicator other than a spray  
 18 unit, or a trowel, it could be applied with a brush,  
 19 or textured with a brush, they -- my -- it looks  
 20 like they called paint.  
 21 Q. It indicates -- I think we read it here it  
 22 came in one, three or five-gallon?  
 23 A. It looks like one and five gallon pails.  
 24 Q. One and five gallon pails?  
 25 A. Right.

1 a -- I think it's about a five-year time frame?  
 2 Wasn't it '63 to '68?  
 3 A. I don't know -- see, these could be the  
 4 products that were -- there was a texture paint that  
 5 asbestos was also used in, and I don't know if that  
 6 was -- is any of these. I think some of these  
 7 numbers are, I think, from that Paco list.  
 8 Q. You think that those were made -- you  
 9 talking about the texture paint that we talked about  
 10 in this earlier document?  
 11 A. There was a dry powder, and then I believe  
 12 there was also a liquid.  
 13 Q. Okay. They have -- well, maybe I didn't  
 14 understand. You think there was a liquid texture  
 15 paint as well as the powder that we talked about in  
 16 the bag?  
 17 A. Texture paints were part of the industry  
 18 for many years in the early '70s. Not just  
 19 Kelly-Moore but these numbers, I -- I -- these look  
 20 like they're Paco numbers. You have that sheet that  
 21 showed the cross-reference? Oh, here we go.  
 22 This doesn't have the numbers on it.  
 23 Q. The texture paint is 5563.  
 24 A. Yeah, but it was also identified -- that  
 25 was what's on the bag, but there is a different --

1 Q. Okay.  
 2 A. These are Paco products.  
 3 Q. So those would have been under Paco?  
 4 A. Yes, sir.  
 5 Q. Okay. Going back to your product  
 6 suppliers, you're not aware of Manville or Carey  
 7 Canadian or Union Carbide providing any types of  
 8 notices to Kelly-Moore of any health-related  
 9 information concerning the raw asbestos they  
 10 provided, at least before '71?  
 11 MR. NANTZ: Objection, form.  
 12 A. I am not aware that any information was  
 13 provided to Kelly-Moore prior to '71.  
 14 Q. (By Mr. Coon) And in '71 did either or  
 15 any of those three companies start providing  
 16 information, or were you still using it as their  
 17 time line?  
 18 MR. NANTZ: Objection, form.  
 19 A. If you get into '72, I can answer your  
 20 question.  
 21 Q. (By Mr. Coon) Okay. Let's go to '72.  
 22 A. Anything '71 and prior, no.  
 23 Q. Okay. '72, any information from any of  
 24 the material providers?  
 25 A. We had that letter, as I indicated, from

1 the Drywall Institute, and then in '73 Mr. Merrill  
2 attended a Johns-Manville -- Johns-Manville seminar,  
3 and whereby health issues and asbestos were  
4 discussed, and then in '72 we had information from  
5 our Liberty Mutual, who did the inspections on our  
6 plant, and in one of their reports, they mentioned  
7 in their detailed report about the aspects of the  
8 diseases that asbestos could cause.

9 So, around '72 is when all this information --  
10 '72 and then into '73 is when it started to surface.

11 Q. Okay. If we go back here. I have got  
12 January of '72 -- we have got a number of documents  
13 here I am going to try run through here pretty  
14 quickly with you, sir, but we have got 1058. This  
15 was a letter to Mr. Merrill from the vice president  
16 of sales at Carey Canadian and it attached with it  
17 the EPA proposed regulations dealing with asbestos.  
18 You're familiar with those, are you not?

19 A. Yes, sir.

20 Q. And that's kind of what you were talking  
21 about awhile ago, that OSHA was coming in, and that  
22 was part of the EPA project to start restricting or  
23 controlling the -- the dust released from asbestos?

24 A. Yeah, OSHA controlled the workplace.

25 Q. And in the OSHA or EPA's desire to protect

1 looking at other fibers as a replacement for their  
2 asbestos, and to look at eliminating asbestos as a  
3 raw material in their formulations, correct?

4 A. It says, "In view of the hard look that is  
5 being taken at asbestos, we have started to look at  
6 other fibers as replacement." Yes, that is correct.  
7 And this is February of '72.

8 Q. Okay. And what did Kelly-Moore do  
9 following that memo with respect to following up  
10 with the recommendations made?

11 A. Recommendations as to what?

12 Q. Recommendations made by Mr. Murphy with  
13 respect to looking for substitutes for asbestos and  
14 eliminating it in their formulations.

15 A. Based on the information I have seen,  
16 there was a very concentrated effort to begin to  
17 look for substitutes. A lot of different aspects  
18 were looked at. In fact, Mr. Merrill, who was the  
19 chemist at the time, or was involved with the  
20 chemistry of putting the products together between  
21 '72 and '77, actually worked on around 236 different  
22 formulas to revise those products.

23 Q. And when did products first become revised  
24 as a result of this additional research?

25 A. Well, the first one was in '73, when we

1 the levels of dust in the workplace, that would  
2 concomitantly result in the ability to continue to  
3 make the product based on keeping the dust counts  
4 low enough in the factory to make the product?

5 A. OSHA set requirements as to what were  
6 acceptable airborne contents, yes.

7 Q. Okay. And we know at least as to '72 that  
8 the manufacturers were trying to keep Kelly-Moore  
9 abreast with respect to ongoing developments with  
10 respect to the potential for regula -- federal  
11 regulation of asbestos?

12 A. (Indicating.)

13 Q. Correct?

14 A. Can I see this?

15 Q. Sure.

16 A. Sure. This is the letter to Mr. Merrill  
17 dated January the 24th, 1972, indicating that he was  
18 attaching the federal register regulations for  
19 proposed standards, and advising us that there was a  
20 hearing slated for a certain date.

21 Q. Okay. And shortly after that, we have  
22 1022. We have a letter dated February of '72 from  
23 Dan Murphy at Paco to Mr. Merrill and other  
24 Kelly-Moore representatives that states at Page 2,  
25 that due to those issues Kelly-Moore needed to start

1 came out with the asbestos-free wall texture.

2 Q. Was this a Paco product?

3 A. Yes, sir.

4 Q. And over the next number of years, how  
5 long was it before asbestos was phased out of all of  
6 the Paco products?

7 A. That was phased out in '77. But, between  
8 '72 and '77, there were formulas that were revised  
9 and different raw materials were looked at to get  
10 the product -- to substitute the asbestos. The  
11 asbestos was taken out of some of the products in  
12 different percentages and went from a six percent  
13 down to maybe a two. We had a couple of  
14 non-asbestos products, but in '77 asbestos was out  
15 of everything.

16 Q. Okay. I would take it one of the  
17 immediate concerns at Kelly-Moore would have been to  
18 continue to be able to make the product, the Paco  
19 products, and stay in compliance with the new OSHA  
20 restrictions on the dust counts within the facility?

21 A. Yes, sir.

22 Q. Do you know --

23 A. And we did.

24 Q. Do you know what was done by Kelly-Moore  
25 as a result of the new OSHA standards on the dust

1 releases to get them within compliance to the new  
2 standards?

3 A. Yes. And -- boy, maybe this is a time,  
4 too, to clarify something. I want to go back to  
5 prior to the break when you were asking me about  
6 testing. Okay. I had in my mind that it was prior  
7 to '70, and I want to make sure we don't get messed  
8 up here.

9 Our testing was done -- a lot -- some testing  
10 was done beginning in '72 because of Liberty Mutual  
11 was our industrial hygienist. We also did some  
12 product testing in '75. So, there were tests --  
13 there was testing done on the products, but I  
14 believe I may have mislead you because I thought you  
15 were asking me about '70, prior to '70.

16 As it relates to this, what did Kelly-Moore do  
17 to bring to -- to comply with OSHA, we had the  
18 industrial hygienist visit the plants, check them,  
19 and make -- tell us what we needed to correct and we  
20 corrected them.

21 A whole new exhaust system was installed in San  
22 Carlos. The respirators were made available to the  
23 employees on -- on a regular basis. There were  
24 physical examinations done from that point on for  
25 new hires, existing people, and on terminations.

1 Handling of the clothing, everything.

2 So, we responded to everything that was  
3 required by OSHA and our industrial hygienist to  
4 comply with the law.

5 MS. YANOF: Object to  
6 responsiveness.

7 Q. (By Mr. Coon) And one of the things that  
8 was done, as I understand it, were to comply with  
9 government regulations, was to provide a notice on  
10 the bags, the Paco bags, that the products contained  
11 asbestos?

12 A. That was one of OSHA's requirements,  
13 correct.

14 Q. Right. And as a result of the OSHA  
15 mandate to inform the purchasers of the product,  
16 Kelly-Moore provided what we looked at earlier on  
17 these photos of the bags of what was described as a  
18 cautionary label. We can go back and look at 1030.  
19 I think they all read the same. It says --

20 A. Yeah. "Caution, contains asbestos fibers,  
21 avoid creating dust, breathing asbestos dust may  
22 cause serious bodily harm."

23 Q. Now, with respect to those types of  
24 cautionary labels, who devised those at Kelly-Moore?

25 MR. HAZEN: Objection, form.

1 Q. (By Mr. Coon) Did Kelly-Moore devise them?  
2 Where did that language come from?

3 A. Oh, the language was provided by OSHA.

4 Q. Okay.

5 A. By the government.

6 Q. Okay. So, they said this is the minimum  
7 you have to provide on your bags so that's what  
8 you-all did?

9 MR. HAZEN: Objection, form.

10 A. No, they didn't say minimum. If you read  
11 the OSHA requirements, specifically says you shall  
12 put this statement on your material.

13 Q. (By Mr. Coon) Did it restrict the ability  
14 of Kelly-Moore to provide any additional  
15 precautionary language on their bags?

16 A. I don't recall in the regulation itself if  
17 it allowed for additional, but I -- they were very  
18 emphatic in what was to go on as far as what they  
19 wanted on the bag.

20 Q. Okay. For instance, as a result of the  
21 OSHA involvement in '72, certainly you would agree  
22 that Kelly-Moore was aware by then asbestos caused  
23 asbestosis, lung cancer, mesothelioma?

24 MR. HAZEN: Objection, form.

25 A. I can't say that, sir.

1 Q. (By Mr. Coon) Are you --

2 A. First indication of the disease asbestos,  
3 mesothelioma, seemed to come out of that  
4 Johns-Manville seminar which was in 1973.

5 Q. Okay. Did the labeling that we looked at  
6 on those photos ever change for the duration of the  
7 time that Kelly-Moore continued to make Paco  
8 products with asbestos in them?

9 A. No, sir.

10 Q. So --

11 A. Well, excuse me.

12 Q. Yes, sir.

13 A. What label are you talking about?

14 Q. The labeling that we have on the bags, I  
15 think they all read the same on the photos there.  
16 Did that labeling ever change over the next few  
17 years that Kelly-Moore continued to make products  
18 with asbestos in them?

19 A. Are you talking about the caution label?

20 Q. Yes, sir.

21 A. No. That was -- that was the label that  
22 was on the products until day one -- from day one.

23 Q. Okay. And we do know that the product was  
24 made through '77 or '78, correct?

25 A. '77.

1 Q. At least some with asbestos in them?  
 2 A. Right.  
 3 Q. And some was still sold in 1978 with  
 4 asbestos in it?  
 5 A. Yes. We could have sold it through --  
 6 well, you could even have sold some of the -- the  
 7 spray textures after '78, but basically through '78  
 8 was the end, yes.  
 9 Q. And to the best of your knowledge, the  
 10 label that we just described that was one put on in  
 11 '72 did not change over the remaining years that  
 12 they sold the products?  
 13 A. That is correct. In fact, I think that's  
 14 still part of the OSHA requirement today. I don't  
 15 think that ever changed.  
 16 Q. Mr. Giffins, next have a memo, this one is  
 17 KMX 1938, it's ours 1056. It's dated April '72, and  
 18 I want to turn your attention to the second page of  
 19 this document. It talks about major problems being  
 20 developed.  
 21 A. I need to familiarize.  
 22 MR. HAZEN: Objection, form.  
 23 A. Okay.  
 24 MR. HAZEN: Can I look at that real  
 25 quick?

1 Did I read that correct?  
 2 A. Yeah, they were indicating there was  
 3 possible asbestos, asbestosis exposures.  
 4 Q. Okay. And this is back in -- this is  
 5 '72, right?  
 6 A. April of '72.  
 7 Q. April '72? So we know that at least  
 8 Kelly-Moore's discussions with their carrier in '72  
 9 that that was something that they were made aware  
 10 of?  
 11 A. As I say, it was in '72 that we started to  
 12 become aware. Liberty Mutual was the first one that  
 13 reported back to us any aspect about a disease, and  
 14 then subsequently our seminar that we went to with  
 15 Johns-Manville where it talked about diseases.  
 16 Q. Okay. Now, let's talk about this next one  
 17 real quick. This was a document from Drywall  
 18 Industry Trust Fund that you talked about. And as  
 19 early as the summer of '72, they sent a letter to  
 20 Mr. Pickens, and he is president to the Paco  
 21 Textures. Do you know them?  
 22 A. I know of him.  
 23 Q. Okay. Do you know Paco Texture? Is that  
 24 Paco Textures?  
 25 A. That's Paco, yes. That should be PA.

1 THE WITNESS: Sure can.  
 2 Q. (By Mr. Coon) Let me show you this one  
 3 while he is looking at that one. Are you done?  
 4 MR. HAZEN: Just one second.  
 5 MR. COON: I am trying to cover a  
 6 lot of ground in a short period of time, Scott.  
 7 A. That happens to be -- that happens to be  
 8 the top sheets distribution to various corporate  
 9 executives, and the rest of it has to do with a  
 10 report that was prepared by Liberty Mutual which was  
 11 our industrial hygienist after their visit to the  
 12 plant in April of '72.  
 13 Q. (By Mr. Coon) And their visit was  
 14 promulgated or precipitated by the OSHA regs?  
 15 A. OSHA Regulations.  
 16 Q. Okay. And if we look at the second page  
 17 there, it talks about concerns.  
 18 MR. COON: If I can have it back  
 19 real quick, counsel.  
 20 MR. HAZEN: Okay.  
 21 Q. (By Mr. Coon) Page 2, under Line 8, major  
 22 problems are being developed by -- and it lists two  
 23 as material handling; and then B, potential  
 24 asbestosis exposures in drywall products departments  
 25 in mixing dry ingredients and filling containers.

1 Q. That should be Paco, that's you guys,  
 2 right?  
 3 A. Yeah, Paco.  
 4 Q. And this letter is sent from Mr. Spence as  
 5 Safety Committee Chairman from the Drywall Industry  
 6 Trust Fund advising him as president that they had  
 7 been in attendance to meetings with Dr. Irving  
 8 Selikoff, it says Selikoff's -- it's Selikoff. Do  
 9 you know or have you heard of Dr. Selikoff?  
 10 A. Sure have.  
 11 Q. Okay. It talks about his studies at that  
 12 time, showing that there was a significant increased  
 13 risk of lung cancer amongst those in the sheetrock  
 14 taping industry, correct?  
 15 A. It talks about the three-year study that  
 16 -- on the effects of dust, that is correct.  
 17 Q. Okay. So we know that as of the summer of  
 18 '72, the president of Paco Textures had been  
 19 apprised of studies showing that people that worked  
 20 in that industry were susceptible to cancer of the  
 21 lung from working around those products?  
 22 A. Well, it talks of -- it talks about that  
 23 fact about cancer, yes. But again, it's like I said  
 24 earlier, this was -- we got this information, when  
 25 -- you asked me about when did we start to learn

1 about the issues. It came with an industrial  
 2 hygienist inspection, this letter, and  
 3 Johns-Manville's seminar.  
 4 Q. Okay. But we do know that for the next  
 5 seven or eight years there was still no additional  
 6 supplemental warnings or cautionaries on the bags  
 7 that contained asbestos from Kelly-Moore, that the  
 8 products could cause asbestosis, or the products  
 9 could cause lung cancer, exposure to the asbestos in  
 10 those products?  
 11 A. Well, I don't know what else you can say  
 12 except what that -- the caution. I think that's  
 13 pretty explanatory.  
 14 Q. Okay. Well, and I understand that your  
 15 standing by the precaution that's on there, but you  
 16 would agree that the caution does not say that you  
 17 can get asbestosis, does it?  
 18 A. Well, it doesn't say that, but it says it  
 19 can be -- cause serious bodily harm.  
 20 Q. It does not say you can get lung cancer,  
 21 does it?  
 22 A. It does not. It says serious bodily harm.  
 23 Q. But never did say you could get cancer  
 24 from it?  
 25 A. Well, when -- I interpret it as being very

1 products?  
 2 A. Respirators were even available to the  
 3 employees prior to that.  
 4 MS. YANOF: Object to  
 5 responsiveness.  
 6 A. At this point it became mandatory.  
 7 MS. YANOF: Responsiveness.  
 8 Q. (By Mr. Coon) Okay. So there was  
 9 voluntary usage before and in light of the  
 10 heightened awareness and regulations, respirators  
 11 within the facilities became mandated in certain  
 12 work areas?  
 13 A. Yes.  
 14 MS. YANOF: Form.  
 15 A. They were always there for the employees  
 16 to use.  
 17 MR. COON: And, counsel, it's  
 18 Documents 1138 and 1143.  
 19 MS. YANOF: Objection,  
 20 responsiveness.  
 21 Q. (By Mr. Coon) And after that, there are  
 22 additional follow-up meetings in October '72, and  
 23 there was Bob Miller on this committee. Do you know  
 24 who Bob Miller was?  
 25 A. Yes. He was the plant manager --

1 emphatic that it could cause some kind of major  
 2 problem regardless if it's cancer or whatever.  
 3 Q. Now, you told us that as a result of the  
 4 Liberty Mutual meetings and the OSHA mandates, that  
 5 the Paco facilities initiated some additional  
 6 protocols. One would be chest x-rays for the  
 7 employees you had to start doing each year, correct?  
 8 A. Correct.  
 9 Q. And that was because they were at high  
 10 risk of getting lung disease from working around  
 11 asbestos, correct?  
 12 MR. HAZEN: Objection, form.  
 13 Q. (By Mr. Coon) So you-all had to monitor  
 14 that?  
 15 A. I would just -- I don't know if high risk  
 16 is an appropriate word, but they were at risk, yes.  
 17 Q. They were at risk. They were at a higher  
 18 risk than a nonexposed population?  
 19 A. Possibly.  
 20 Q. And so Kelly-Moore initiated programs with  
 21 respect to their own employees to give them an  
 22 annual chest ray -- chest x-ray, correct?  
 23 A. Correct.  
 24 Q. And provide respirators, they had to start  
 25 using respirators where they were working around the

1 Q. Okay.  
 2 A. -- in charge of the plants.  
 3 Q. Okay. And in Document 1108 reflecting the  
 4 Paco production meeting indicates that he advised  
 5 the other committee members that Kelly-Moore must  
 6 now have a warning on each product container to  
 7 indicate that asbestos is in the formula.  
 8 MR. HAZEN: What's the document  
 9 number on that, Brent?  
 10 MR. COON: This is 5319.  
 11 A. KM BB 5319.  
 12 Q. (By Mr. Coon) Okay.  
 13 A. This is dated October of '72.  
 14 Q. Right. Now, was it in response to this  
 15 that we see the cautionary labels that are on the  
 16 various pictures that we talked about earlier?  
 17 A. Yeah. This is when -- when OSHA came down  
 18 and started to perm -- and publish the regulations,  
 19 this was part of it, that the warning had to be put  
 20 on there. This addresses that. And so to comply  
 21 immediately, we had -- they had pressure sensitive  
 22 stickers made up and put on the bags until all of  
 23 the bags could have the actual caution that you see  
 24 there printed.  
 25 Q. Now, was that done as a result of this

1 meeting?  
 2 A. Yes.  
 3 Q. Okay. So, in October of '72, we -- we  
 4 start putting -- or preparing for labels for the  
 5 bags?  
 6 A. Yes.  
 7 Q. And then we have KMX 1379, shortly  
 8 thereafter is when it was necessary to put in the  
 9 vent -- ventilation equipment to further reduce the  
 10 dust counts in the manufacturing facilities, where  
 11 they were making the Paco products.  
 12 A. Yes. This was --  
 13 Q. Okay.  
 14 A. This is just information from Mr. Merrill  
 15 to Bob Miller of the activities that were taking  
 16 place relevant to OSHA and the labeling.  
 17 Q. Okay. And subsequent to that -- and,  
 18 counsel, this is KMX 0619, our document 1257. It's  
 19 dated January 4, '73, from Liberty Mutual. They  
 20 actually did an industrial hygiene study at the --  
 21 one of the Kelly-Moore facilities. This is at the  
 22 Ontario plant in California. They made Paco  
 23 products there, correct?  
 24 A. Yes. By the way --  
 25 Q. Yes, sir.

1 MR. COON: I know everybody wants  
 2 to --  
 3 MR. HAZEN: I don't want to rush him  
 4 now.  
 5 MR. COON: That's fine.  
 6 MR. HAZEN: He's been very  
 7 cooperative.  
 8 MR. COON: He has.  
 9 A. Yeah, it did indicate that the fibers in  
 10 the areas that were tested, where the samples were  
 11 taken did exceed five fibers which was the -- I  
 12 think that's a five. It has to be.  
 13 Q. (By Mr. Coon) Okay. Do you know what the  
 14 standard was before the OSHA reduction of the --  
 15 A. 12.  
 16 Q. You think it was 12 fibers per cubic  
 17 centimeter?  
 18 A. Yeah.  
 19 Q. Do you know what it was before that?  
 20 A. No.  
 21 Q. Okay.  
 22 A. The five was an emergency deal. They came  
 23 out and said we're going to do 5 to get the thing  
 24 going.  
 25 Q. Okay. And Liberty Mutual tested the other

1 A. -- they were the ones who inspected most  
 2 of our plants.  
 3 Q. Okay.  
 4 A. Okay?  
 5 Q. And in their inspection of the facility  
 6 for the atmospheric asbestos dust counts, it was  
 7 determined that the levels exceeded the permissible  
 8 limits for the employees, correct?  
 9 MR. HAZEN: Objection, form.  
 10 A. This letter is dated January 4th, 1973.  
 11 Q. (By Mr. Coon) Can we just read the first  
 12 couple sentences off the second paragraph?  
 13 A. That's what I am reading.  
 14 MR. HAZEN: And, Mr. Giffins, I am  
 15 going to caution you to take your time to read each  
 16 and every document --  
 17 THE WITNESS: Yeah, I am.  
 18 MR. HAZEN: -- that you're being  
 19 asked to. We're not going to start rushing at this  
 20 point. No need to.  
 21 MR. COON: Scott, it's fine. I don't  
 22 have to be home until Sunday.  
 23 MR. HAZEN: We will give you your  
 24 six hours. You will get it and if we have to here  
 25 until 8:00, we'll do it.

1 facilities where the Paco products were made?  
 2 A. Correct.  
 3 Q. Do you know what the general results were  
 4 from the other inspections of the other facilities  
 5 around that same time frame?  
 6 A. The San Carlos one needed some work, which  
 7 you indicated, but from what -- everything that I  
 8 have been able to see and detect, as soon as  
 9 anything was determined that was out of line with  
 10 what the requirements were, corrective action was  
 11 taken immediately to get it fixed.  
 12 Q. Okay. Do you know whether or not  
 13 Kelly-Moore had initiated any industrial hygiene  
 14 inspections of those facilities before OSHA?  
 15 A. I can't answer that. I don't know for  
 16 sure. I believe there were people that inspected  
 17 the plants for a period of time. Whether it was  
 18 Liberty Mutual prior to OSHA or not I don't know,  
 19 sir.  
 20 Q. Okay. Now, there were some additional  
 21 regulations that dealt with spray-on products in the  
 22 '72 standards, correct?  
 23 A. May I see that, please?  
 24 Q. Okay. Well, I don't think it's on -- on  
 25 there but I was just asking if you were generally

1 aware when the OSHA regs came in '72 if there was a  
2 -- at that time a ban that went into effect  
3 immediately with respect to certain types of  
4 asbestos applications?

5 A. OSHA addressed the condition of the  
6 workplace both in the factory and where the people  
7 -- when they used the product. Okay? They -- there  
8 was a ban by the Consumer Products Safety  
9 Commission, I believe, in '78 which forbid the use  
10 of asbestos in joint compounds.

11 Prior to that, everything was from -- if I am  
12 answering your question correctly, based on the  
13 standard established by OSHA which was the 5 fibers  
14 per milliliter. Now, they also banned the use of  
15 asbestos in fire retardant and pipefitting-type  
16 stuff which was the main issue. That was banned, I  
17 believe, early in -- in '73, '7 -- '72, '73.

18 Q. That would have been thermal insulation  
19 and spray-on applications --

20 A. Right.

21 Q. -- for fireproofing?

22 A. That's right. Did not affect the products  
23 that Kelly-Moore was making at the time.

24 Q. And I think there was some concern --  
25 reading through the correspondence there was a

1 general concern to some degree at Kelly-Moore that  
2 the ban on spraying asbestos for fireproofing could  
3 apply to the spray-on application of the textures  
4 and joint compounds?

5 A. That is correct. And we inquired with the  
6 E -- EPA to find out if, in fact, our products were  
7 covered, and they said no.

8 Q. They said it just applied for those  
9 fireproofing purposes?

10 A. That is correct, sir.

11 Q. Did not apply for tex screening and so  
12 therefore Kelly-Moore made the decision they could  
13 continue to make that product and not be afoul of  
14 OSHA regs?

15 MR. HAZEN: Objection, form.

16 A. Well, OSHA said you could continue to make  
17 the product if you met these qualifications. We met  
18 the qualifications.

19 MR. COON: Next we have 0168.  
20 Counsel, this is our document 1236.

21 MR. HAZEN: Okay.

22 Q. (By Mr. Coon) This one is dated November  
23 13, '73. It appears to be another industrial  
24 hygiene sample. It's called "Airborne Asbestos  
25 Fiber Counts." And these were collected by Union

1 Carbide, and you told us earlier that Liberty Mutual  
2 was your company -- I take it Liberty Mutual was  
3 you-all's -- they were probably your workers'  
4 compensation carrier, I would guess; is that  
5 correct?

6 A. Uh-huh.

7 Q. Okay. And so they wanted to initiate  
8 these dust counts within your facilities for  
9 purposes of the workers' comp?

10 MR. HAZEN: Objection, form.

11 A. Could you repeat that please?

12 Q. (By Mr. Coon) Yes, sir.

13 A. I was looking at this and not paying  
14 attention to you.

15 Q. I'm sorry, I was asking a question while  
16 you were reading something.

17 I would assume Liberty Mutual was out doing  
18 dust counts at the plants for purposes of the  
19 workers' comp premiums?>

20 A. For workmen's comp premiums? You mean to  
21 take the counts for their benefit?

22 Q. Well, if -- if Liberty Mutual is your  
23 workers' compensation carrier, they probably want to  
24 get some idea of what the risk issues are, and want  
25 to go out and inspect the plant for overall plant

1 conditions because they're going to have to cover  
2 the medical bills for employees, right?

3 A. Sounds logical.

4 Q. Okay. I am -- was there any other reason  
5 that Liberty Mutual was the one selected to do your  
6 industrial hygiene studies?

7 A. I can't answer that.

8 Q. Okay.

9 A. I know they did them and, as I say, they  
10 may have even been doing studies prior to OSHA.

11 Q. But they were not an industrial hygiene  
12 organization? Liberty Mutual was not. They're an  
13 insurance company?

14 A. Yeah, but they -- I believe they have a  
15 division which does that. They have people that go  
16 out and do the inspections and measure --

17 Q. Sure.

18 A. -- which they did.

19 Q. Right. And they went out to you-all's  
20 plants because they were your -- you were their  
21 insured? Kelly-Moore was their insured?

22 A. I'll agree with you, I guess.

23 Q. Okay. Well, I was presuming that but did  
24 not know. I mean, were you-all hiring Liberty  
25 Mutual to come out and inspect them because they had

1 an industrial hygiene division, or were you-all  
2 doing it because they were your insurance carrier?

3 A. I can't answer that. I wasn't there. I  
4 don't know how that came about.

5 Q. Okay.

6 A. But I know they did inspect the plant and  
7 they told us where we complied and where we didn't  
8 comply, and as a result of that we did what they  
9 asked us to do.

10 Q. Okay. And so where you were out of  
11 compliance, where the dust counts were too high, you  
12 had to go in and provide additional ventilation, or  
13 other procedures to lower the counts to get them  
14 within the OSHA limits as set at that time?

15 A. That's correct.

16 MR. HAZEN: Object to form.

17 THE WITNESS: Oh, sorry about that.

18 MR. COON: Scott, how we doing on  
19 time?

20 MR. HAZEN: Why don't we take five  
21 minutes real quickly and we will add it up and see  
22 where we are?

23 MR. COON: Okay.

24 THE VIDEOGRAPHER: Going off the  
25 record at 5:10.

1 (A recess was taken.)

2 THE VIDEOGRAPHER: Back on the  
3 record. The time is 5:38.

4 Q. (By Mr. Coon) Ready?

5 A. Yes, sorry.

6 Q. Mr. Giffins, we next have 1061. Counsel,  
7 this was your document 1380.

8 MR. HAZEN: Okay.

9 Q. (By Mr. Coon) This is July 25, '72. It  
10 appears to be addressed to each employee at Paco  
11 textures. Would that be at all their facilities  
12 that were in place in 1972?

13 A. It appears it would be, yes.

14 Q. Okay. And subject is Paco status?

15 A. Paco status concerning OSHA requirements  
16 for asbestos exposure.

17 Q. Okay. And what was the first statement  
18 for Mr. Merrill?

19 A. He says, "You should be aware that we are  
20 presently exceeding the exposure limit set by the  
21 Occupational Safety and Health Act for asbestos.  
22 And this was a result of the Liberty Mutual --

23 Q. Okay.

24 A. -- visit which was prior to this.

25 Q. So, when Liberty Mutual came out and did

1 the industrial hygiene studies, found the excess  
2 fiber counts, this was a follow-up letter to the  
3 employees to let them know that that was an issue,  
4 and that there were going to be certain protocols  
5 with respect to OSHA and trying to get into  
6 compliance?

7 A. I assume that's what that implies, yes,  
8 sir.

9 Q. Okay. Now, one of the things it talked  
10 about in here -- I want to turn your attention to  
11 number 3. It says, "Rotation of" -- there you go.  
12 Got it? "Rotation of schedules to minimize  
13 exposure."

14 A. Correct.

15 Q. Do you know what that means?

16 A. Part of original OSHA requirement said  
17 that if you were in -- if, in fact, an area was not  
18 in compliance, you had the ability to rotate people  
19 until you brought it into compliance.

20 Q. Okay. And that was because OSHA  
21 Regulations had a certain level of permissible  
22 exposure in a given hour, based on an eight-hour  
23 day, correct?

24 A. On an eight-hour day, it was -- based on  
25 an average, it was five.

1 Q. Right. And are you familiar with the TWA?

2 You know what that meant?

3 A. TWA?

4 Q. The time weight average.

5 A. Oh, I've heard of it, but --

6 Q. Did you know how the OSHA standards took  
7 place with respect to measuring the fiber counts in  
8 the particular areas of the plant?

9 A. I failed that test.

10 Q. Okay. Are you aware -- I take it you are  
11 aware that if the amounts of dust exceeded the  
12 permissible amount on an hourly basis, that what you  
13 would do is you could have an employee just work  
14 there a few hours a day, and get a full day's dose  
15 and then be taken out of that area where he's not  
16 exposed anymore?

17 A. It could go up to a maximum, I believe, of  
18 10 over that eight-hour period if it did not exceed  
19 five hours per day.

20 Q. So, what Kelly-Moore decided to do,  
21 apparently, from this memo, was to take employees  
22 that normally worked eight hours a day in certain  
23 areas that were getting overexposed, under those  
24 OSHA limits, and to say you're not going to work  
25 there eight hours anymore, you're going to work

1 there just a few hours, and we are taking you off  
2 and putting somebody else in there?

3 MR. HAZEN: Objection, form.

4 A. Well, that says that you could do that.

5 Whether they did or not, sir, I don't know.

6 Q. (By Mr. Coon) Okay. Well, it did say  
7 that we are taking the following actions to comply  
8 with the requirements?

9 A. That is correct.

10 Q. So, by all indications from Mr. Merrill,  
11 one of the ways Kelly-Moore was going to continue to  
12 keep their plants fully operational was to rotate  
13 people out of the high-exposure areas?

14 MR. HAZEN: Objection, form.

15 A. Again, that was a -- that was a process  
16 that was provided, or OSHA said could be done within  
17 -- within their guidelines.

18 Q. (By Mr. Coon) Sure. I mean, OSHA allowed  
19 y'all to rotate them out?

20 A. That's correct.

21 Q. So y'all did it, right?

22 A. That's correct.

23 Q. So, y'all are playing with within the  
24 rules --

25 A. Right.

1 A. I can't answer that, sir. I don't know

2 what they knew at that time other than what I have  
3 read.

4 Q. Did the employees that worked out at the  
5 Paco facilities all have uniforms that they left  
6 there every day?

7 A. They wore certain -- I don't know -- like  
8 coveralls, I would have to say. Something like  
9 that.

10 Q. Were these provided by the plant, or were  
11 these their own that they brought as part of their  
12 regular attire?

13 A. I can't answer that. I don't know if they  
14 were provided or not.

15 Q. Okay. We next have this letter from the  
16 Drywall Industry Trust Fund. I think you mentioned  
17 them earlier. Actually, I think we discussed this  
18 one.

19 A. Yes.

20 Q. Okay. I want to ask you one other thing  
21 here. Did you know Mr. Spence?

22 A. Mr. Spence from the Drywall Industry Trust  
23 Fund?

24 Q. Right.

25 A. No.

1 Q. -- but you're not -- but to play within  
2 the rules, your guy couldn't even work there for an  
3 eight-hour shift?

4 MR. HAZEN: Objection, form.

5 Q. (By Mr. Coon) That's why you had to  
6 rotate them out, right.

7 A. Yes.

8 Q. Okay. And one of the other things it  
9 mentions that Kelly-Moore decided to do was improve  
10 the handling of work clothes. Do you know what that  
11 addressed?

12 A. Specifically, I don't know what they did  
13 then, but at the -- when they put all that  
14 ultimately into effect, a lot of the clothing was  
15 put in bags when they were changed. And the way  
16 they dusted themselves off was looked at  
17 differently. I can't get into the specifics of what  
18 was actually implemented, but it all had to do to  
19 comply with the handling of the clothing in line  
20 with OSHA Regulations.

21 Q. Do you know whether or not Kelly-Moore was  
22 aware at that time with the employees having the  
23 clothing on their -- the dust on their clothing that  
24 that could be taken outside the workplace, taken  
25 back to their vehicles, back to their homes?

1 Q. Did you have any involvement with the  
2 Drywall Industry Trust Fund?

3 A. No, sir.

4 Q. From the times you worked there from '85  
5 since, do you know whether or not that organization  
6 is even still in existence?

7 A. I can't tell you that.

8 Q. Do you know if there were any other  
9 organizations like the Drywall Industry Trust Fund?

10 A. I cannot tell you that, sir.

11 Q. Okay. Well, this one said for the  
12 advancement of drywall in California. Do you know  
13 if they had a state-by-state type of organization,  
14 they had the same type of deal in Texas, for  
15 instance?

16 A. I don't know that for a fact.

17 Q. Do you know if there was any national  
18 industry like the drywall industry? If there was a  
19 national organization?

20 A. I don't think I have seen anything so --  
21 but it doesn't mean there wasn't.

22 Q. Okay. Next, I don't think we have talked  
23 about this one yet. This is KM 1060.

24 Yours 1381, counsel.

25 This was a Paco production meeting letter, I

1 would guess Mr. Marquardt and Bob Scudder?

2 A. This was a -- this is production meeting  
3 notes, meetings where they -- they had a meeting and  
4 took notes.

5 Q. Okay. Who took the notes? Do you know?

6 A. I don't know who took the notes.

7 Q. Okay. Now, we were talking about this one  
8 I think before we took that break. This is where it  
9 said, "Bob Miller reports that the latest bulletin  
10 on the use of asbestos in joint cement and paint  
11 products indicate we will not have to eliminate it  
12 from our formulations immediately."

13 A. "However, it will be necessary for us to  
14 provide proper respiration-type devices for men and  
15 have lung x-rays made of the workers at least once  
16 each two years. Further information on this will be  
17 put out to each of the manufacturing operations by  
18 Bob Miller."

19 MS. HAAG: Object to the  
20 nonresponsive portions.

21 Q. (By Mr. Coon) All right. Do you know as  
22 a result of this what was done by this group? Let  
23 me ask first, who are these guys? Was there a  
24 separate committee of representatives of Kelly-Moore  
25 that just dealt with these kind of issues with Paco

1 A. So this was prior to even the industrial  
2 hygienist coming in to -- this was right after all  
3 this started to surface. So, what they're passing  
4 on is information to the group that were  
5 responsible, this is what we know -- we've heard  
6 this, but there is some -- a lot of it kept changing  
7 and kept getting added to.

8 Q. Sure. And as I read this, it said that --  
9 I thought what was relevant here, where it said, we  
10 will not have to eliminate it -- when we're talking  
11 about asbestos says, we will not have to eliminate  
12 from our formulas immediately. Could you tell from  
13 that and other correspondence in your historical  
14 review if they had reason to believe that there was  
15 still going to be additional restrictions coming  
16 down the pipeline to where asbestos was going to  
17 have to be excluded?

18 MR. HAZEN: Objection, form.

19 A. I can't read that into this. What I can  
20 read into this is there was a misinterpretation on  
21 what their requirements were originally, and they  
22 may have thought at a prior meeting that they had  
23 eliminated it entirely and since found out that was  
24 not the case. That's the only way I can interpret  
25 that, sir.

1 after OSHA came out?

2 A. No. I can tell you Doug Miller -- or Doug  
3 Merrill -- yeah, Doug Merrill was the chemist for  
4 the Paco products. Bob Miller is in charge of the  
5 plants. Bill Moore owned the company. Dan Murphy,  
6 I am not sure what -- he had something to do with  
7 the plant. Walter Pickens was president of Paco at  
8 that time.

9 Q. Okay.

10 A. Okay?

11 Q. Was -- could you tell from this that there  
12 was an understanding or impression from the people  
13 involved, particularly from the reporting of  
14 Mr. Merrill, that the first phase of the OSHA  
15 Regulations of 1972 were going to result in the  
16 future with additional restrictions?

17 MR. HAZEN: Objection, form.

18 A. I think the only way I can answer your  
19 question, your comment, is around this time, there  
20 was a whole bunch of different information coming  
21 down. And, in fact, I think if you look at this, it  
22 says, "Lung x-rays made of workers at least once  
23 every two years." The final regulation said they  
24 had to be done every year.

25 Q. (By Mr. Coon) Right.

1 Q. (By Mr. Coon) Okay. Earlier you also  
2 talked to us about the Johns-Manville program. And  
3 you talked about the notice that Kelly-Moore had,  
4 with respect to asbestos hazards. You talked about  
5 OSHA and then the Johns-Manville program.

6 A. Johns-Manville seminar?

7 Q. Yes, sir. We have what's KM 1002 and  
8 1014. This appears to be a cover letter, form  
9 letter sent by Manville to the various customers  
10 advising them of this program, and that there was a  
11 transcript available, and this was also in your  
12 repository which is the transcript of the symposium  
13 itself, dated December 3 and 4 --

14 A. Correct.

15 Q. -- 1973, titled, "Asbestos and Health  
16 Presentation." And obviously that was a program  
17 that was called pretty much just to discuss asbestos  
18 and its health ramifications. Do you know if there  
19 was --

20 A. Plus that same program, they talked about  
21 the industry as a whole, and where they fit in --  
22 fit it into the industry, and duh, duh, duh as well.  
23 It was a multi-purpose meeting.

24 Q. Do you know whether or not there were any  
25 attendees of this program that were representatives

1 of Kelly-Moore or Paco?  
 2 A. Doug Merrill.  
 3 Q. You understood Mr. Merrill actually  
 4 attended that program?  
 5 A. Yes, sir.  
 6 Q. And do you know where this program was  
 7 held?  
 8 A. Somewhere in San Francisco.  
 9 Q. So, we could pretty much presume that the  
 10 contents of this seminar, if the notes were all  
 11 taken accurately, were things that would have been  
 12 conveyed to Mr. Merrill as a result of being at the  
 13 meeting?  
 14 A. As I understand it, Mr. Merrill attended  
 15 the meeting, took notes, was able to -- they handed  
 16 out some material for him to bring back. This  
 17 letter confirms his attendance, and the fact that  
 18 they are going to send out the transcripts, the hard  
 19 copies, from the meeting for his further review.  
 20 And that's what those are.  
 21 Q. Okay. Now, obviously if you -- have you  
 22 had an opportunity to read this, the transcript of  
 23 the symposium?  
 24 A. Yes, sir.  
 25 Q. Okay. And you are aware that in it, it

1 talked about various health problems associated with  
 2 asbestos, which --  
 3 A. Right.  
 4 Q. -- included asbestosis, lung cancer and  
 5 mesothelioma?  
 6 A. I don't know if it mentions each -- the  
 7 three of them, but it does talk about their -- I  
 8 don't recall each three, but it does talk about  
 9 health issues, yes.  
 10 Q. Okay. I'll even point you to some pages,  
 11 Page 6 of the transcript specifically talking about  
 12 different disease categories. Do you understand  
 13 bronchogenic cancer to be lung cancer?  
 14 A. Right.  
 15 Q. Right?  
 16 A. Okay.  
 17 Q. And, of course, talks about mesothelioma  
 18 here, right?  
 19 A. Correct.  
 20 Q. So we know that at least by late '73,  
 21 Mr. Merrill, as a senior spokesperson for  
 22 Kelly-Moore, is aware of these issues being caused  
 23 and associated to asbestos?  
 24 A. Those were brought up in that seminar  
 25 also, but I think if you read some of the other

1 contents of that thing, it also says that under  
 2 controlled environments it's -- you continue -- that  
 3 it's safe to use the material.  
 4 Q. Under certain circumstances?  
 5 A. Under certain circumstances, correct.  
 6 Q. And we next go to September '74. This  
 7 appears to be additional internal memos. It's the  
 8 Paco production. I can't read it all. It said memo  
 9 or meeting.  
 10 MR. HAZEN: Brent, what's the number  
 11 on that one?  
 12 A. This is -- oh, his number is -- ours is  
 13 KM-47. And this is dated September 30 of '74, and  
 14 it looks -- it's got ME. I guess it meant Paco  
 15 production meetings.  
 16 Q. (By Mr. Coon) It talked about -- I think  
 17 one of the things that was discussed here is the  
 18 potential for reformulating their product.  
 19 A. Yeah. You want me to read it?  
 20 Q. Yeah, if you don't mind.  
 21 A. Okay. Paragraph 3 says, "The change in  
 22 our acoustic formula using a different form of  
 23 asbestos instead of titanium has worked out very  
 24 well in our field tests. We have had no complaints  
 25 and some customers actually like it better. It has

1 resulted in a lower cost for us; therefore, it has  
 2 been agreed that we will make this change in the  
 3 formula and not indicate it on the bag. However, we  
 4 will be making some batches of the old material  
 5 until the present raw material supply is used up.  
 6 Because of this decrease in cost, we will not have  
 7 to" -- I believe that word is -- "increase the price  
 8 of our acoustic."  
 9 I can't read those next two words. With an --  
 10 something about the next price increase.  
 11 "This applies to 6373 B and L formulas only."  
 12 Q. Do you know who the provider was of the  
 13 other types of asbestos that were being substituted?  
 14 A. They were testing the Union Carbide  
 15 product.  
 16 Q. And do you know what the purpose of  
 17 substituting these products were other than the  
 18 price? Appears that there was something that  
 19 triggered the substitute?  
 20 MR. NANTZ: Objection, form.  
 21 A. My understanding is that -- that material  
 22 is being tested was the raw material that was being  
 23 promoted by Union Carbide at the time, provided a  
 24 few benefits. One being that it came with titanium  
 25 fused to the fiber. Normally most of the fiber you

1 buy, you got to put the asbestos in and then you put  
2 titanium in.

3 What they were calling -- I think it was HPO or  
4 something -- came with the fiber and titanium glued  
5 onto it. You know, I'm not a technical person so  
6 don't hold me to it. And as a result you also  
7 didn't have to buy titanium and put in it, and they  
8 also were saying that you would use less asbestos  
9 because it was a higher, more-efficient-type fiber.

10 Q. (By Mr. Coon) Okay. Next we have --  
11 MR. NANTZ: What was the number on  
12 that?

13 MR. COON: 1051. This is -- ours is  
14 1063.

15 Q. (By Mr. Coon) Okay. Next you got 1051.  
16 This is the full content of a document we discussed  
17 earlier. I'll be real brief with this. We  
18 discussed this one here. This is the occupational  
19 injuries and illnesses. We talked about the one  
20 person indicated here in '74 as having a dust  
21 disease. Do you remember that?

22 A. Indicated they thought they had a dust  
23 disease, yes.

24 Q. And if we look back at the rest of this  
25 attachment includes some additional forms, and

1 non-asbestos ceiling texture. That was ceiling  
2 texture formula that was developed back in '73.

3 Q. So we now have a substitute for the  
4 ceiling that's a non-asbestos?

5 A. Yes. We had that since '73.

6 Q. Okay. And the standard formula still  
7 contained a small percentage of asbestos apparently?

8 A. In California. California, back in '75,  
9 regulated the amount of asbestos that could be in --  
10 excuse me -- spray-on material, ceiling textures.

11 And they -- they just came out and first said you  
12 could have no more than one-half of one percent.

13 Fortunately, the company had developed that  
14 ceiling texture formula for California in '73, so  
15 the only thing that was really pushed by this was  
16 the wall texture issue.

17 Q. All right. So you had a couple of issues.  
18 One was compliance with the OSHA regs that come out  
19 in 1972, and then you still may have a  
20 state-by-state compliance issue based on the  
21 vagaries of state law?

22 A. California --

23 Q. California being one?

24 A. -- came out with their own regulations.

25 Q. Sure?

1 production manager --

2 A. Can I clarify this?

3 Q. Sure, if you don't mind.

4 A. When you showed this to me, I didn't  
5 remember, but I hadn't seen this until recently.  
6 There was an indication with a worker in the plant,  
7 by the name of Bowers. I can't think of his first  
8 name. Martin Bowers maybe. I don't know.  
9 Something like that. And the x-ray indicated that  
10 there was a spot, and it was determined that the  
11 spot was not caused by asbestos.

12 Q. Okay.

13 A. And that's maybe what this is. Okay?

14 Q. And would the person signing off there  
15 have been production manager at that particular --

16 A. Doug Merrill.

17 Q. Okay. That's Doug?

18 A. Yes.

19 Q. Next we have a series I think of three or  
20 four documents. This one is KM 1110, prior KM  
21 Number 5327. This was from Doug Merrill again to  
22 Bill Freeman. It's dated June 27, 1975. And there  
23 are three or four letters there, memos.

24 A. Okay. This one is addressing the fact  
25 that he is sending him some material of a

1 A. That's correct. And what he's saying here  
2 is we had this non-asbestos product that we can make  
3 for you, try this formula. See if it works with  
4 your people. But there was also the asbestos  
5 product that was available in other plants outside  
6 of California, because it was still -- you know, it  
7 was satisfactory to go ahead and make it.

8 Q. You could use it in states other than  
9 California?

10 A. You sure could.

11 Q. Okay. But it was something that  
12 California statutes had precluded use of?

13 A. In June or July of '75, California said  
14 that you could not put -- have sprayed products,  
15 spray texture products that had more than one-half  
16 of one percent of asbestos in it.

17 Q. Right.

18 A. In July of '76, that went to zero.

19 Q. And that was pursuant to --

20 A. Total.

21 Q. Well, we have got a copy of the statute  
22 here but I don't think we need to reference it.

23 You had July of '75, when California passes its  
24 law --

25 A. Right.

1 Q. -- the amount of asbestos typically in  
 2 your products at that time was still running about  
 3 five or six percent, was it not?  
 4 A. This is only addressing spray textures.  
 5 Q. Right.  
 6 A. You have to keep in mind that we had a  
 7 non-asbestos ceiling texture that was being sold in  
 8 California at the time very successfully.  
 9 Q. Right.  
 10 A. So --  
 11 Q. But you also had the asbestos-containing  
 12 product line that was still marketed as well?  
 13 A. We had the wall texture product. This  
 14 only addresses the textures.  
 15 Q. Right. And my understanding was, though,  
 16 is that you had two different product lines. You had  
 17 an asbestos-containing product and you had a  
 18 non-asbestos-containing product that were used for  
 19 the same purpose, as of 1975?  
 20 MR. HAZEN: Objection, form.  
 21 A. Yeah. That -- that could be, yes, because  
 22 the ceiling texture was non and asbestos containing.  
 23 Q. (By Mr. Coon) Right. So you now had two  
 24 product lines, one that complied with the general  
 25 OSHA regulations -- actually both did in '75. The

1 A. Immediately.  
 2 MR. HAZEN: Objection, form.  
 3 Q. (By Mr. Coon) Okay. And after they  
 4 addressed those problems, they were able to still  
 5 make the product and stay within compliance of the  
 6 OSHA limits on exposure in the workplace?  
 7 A. Uh-huh.  
 8 Q. Okay. Correct?  
 9 A. Uh-huh.  
 10 Q. And so that enabled them to continue to  
 11 make the product with asbestos in it for use in  
 12 whatever states they wanted to sell it in, correct,  
 13 except for California?  
 14 A. Well, in -- California in '75 decided that  
 15 they were going to eliminate that in any spray-on  
 16 products to begin with --  
 17 Q. Right.  
 18 A. --so -- but up until that point, yes, we  
 19 complied in the way we made the product according to  
 20 the federal requirements.  
 21 Q. Okay. So after 1976 when California had a  
 22 complete ban on those products that contained  
 23 asbestos, you were still able to manufacture it with  
 24 asbestos for sale in some states and have an  
 25 asbestos-free product for California, as well as

1 asbestos-containing and the non-asbestos-containing,  
 2 still met the OSHA limits on usage?  
 3 A. I'm getting a little confused, because  
 4 OSHA addressed the workplace and the amount of fiber  
 5 that was basically released.  
 6 Q. Okay.  
 7 A. Okay?  
 8 Q. And you could make the product in  
 9 compliance with OSHA --  
 10 A. That's correct.  
 11 Q. -- with asbestos?  
 12 A. Yes, sir.  
 13 Q. With the five or six percent, with the  
 14 additional things you did rotating employees,  
 15 putting in ventilators, stuff like that, you were  
 16 able to get the counts down to continue making the  
 17 products, right?  
 18 MR. HAZEN: Objection, form.  
 19 A. I don't know if I can answer -- I don't  
 20 know if I would put it in those words or not.  
 21 Q. (By Mr. Coon) Okay. Well, we know that  
 22 in 1972 when Liberty Mutual came out and inspected  
 23 the plants, they said here is the problem. And to  
 24 address the problem, we saw the memos where they  
 25 took certain steps to address that.

1 anybody else that wanted it?  
 2 A. Yeah. Well, it's -- the interesting part  
 3 of that California law, California addressed the  
 4 application of the product. They said you could not  
 5 apply a product in 1976 that contained any amount of  
 6 asbestos in the spray textures. They did not say  
 7 you could not manufacture it, nor did they say you  
 8 could not sell it.  
 9 Q. Sure.  
 10 A. The contractor could not apply it.  
 11 Q. Right. And you were still making this  
 12 product in California, you just could not use it in  
 13 California?  
 14 A. That is correct.  
 15 Q. And you could sell it to other places? I  
 16 guess you could still sell it in California, you  
 17 just couldn't use it in California, right?  
 18 A. It could not be applied.  
 19 Q. Yeah, but you could sell it to somebody in  
 20 California --  
 21 A. Sure.  
 22 Q. -- they just couldn't use it?  
 23 A. In theory you could have. We didn't.  
 24 Q. No good for them to buy it if they can't  
 25 use it, right?

1 A. There was a heavy demand by people for the  
2 old product.

3 Q. Okay.

4 A. But --

5 Q. But --

6 A. The asbestos-free product, the ceiling  
7 product that we were -- had selling was very  
8 successful, was well accepted in California so --

9 Q. I just want to make sure we understand  
10 something though. California was making -- your  
11 California facility was making the spray-on product  
12 with asbestos in it, after California had a ban on  
13 using those same products in California?

14 MR. HAZEN: Objection, form.

15 A. I can't say that they actually did. They  
16 could have, but I don't know if, in fact, they did.

17 Q. (By Mr. Coon) Okay. Which facility was  
18 making the spray-on product?

19 A. Whatever -- well, Hurst.

20 Q. Okay.

21 A. Right here in Texas.

22 Q. We're talking -- wasn't one of the  
23 California facilities still making it?

24 A. In '85?

25 Q. No, sir, '76.

1 Different regions of the country preferred different  
2 types of products. We were in the effort of trying  
3 to get all of those other products converted to meet  
4 the requirements of those various contractors.

5 So, there was a difference in how the product  
6 was used or accepted in different markets. So, to  
7 keep in mind is, however, that formulas that were  
8 developed in the California deal, any material that  
9 would have come out of that California facility,  
10 would have come out at less than one-half of one  
11 percent at the most.

12 Q. Okay. Well, the way I read this, the  
13 attached memo was that in the other markets, like in  
14 Tulsa, people were trying to get the non-asbestos  
15 ceiling texture and couldn't get it from you guys.

16 A. No, that's not true.

17 Q. Here.

18 MR. HAZEN: What document are you  
19 referring to, Mr. Giffins?

20 THE WITNESS: He's referring to KM BB  
21 5328. This is dated November 12th, 1975. And I --  
22 the first paragraph states, "In June of this year,  
23 Bill Freeman, Tulsa, requested a non-asbestos  
24 product to be available to him since he was losing  
25 business on jobs that stated no asbestos. In early

1 A. I mean '76? Ontario closed down, what?  
2 In '77?

3 Q. Uh-huh.

4 A. We have to go back and look at his record,  
5 but I -- he -- they may have been -- they may have  
6 converted to -- to the non-asbestos product. But it  
7 would have been -- up until '76, San Carlos and  
8 Ontario could have made it. But after '76, they  
9 probably did not, because there was the acceptance  
10 of the -- of the ceiling texture product was  
11 accepted well in the California markets.

12 Q. Okay.

13 A. It was not accepted well in the other  
14 markets.

15 Q. They were able to go ahead and phase out  
16 and go into the transition of non-asbestos for  
17 California?

18 A. That's correct.

19 Q. Why did Kelly-Moore not go ahead and phase  
20 out that same product with asbestos in it in all the  
21 other states where the law had not precluded them  
22 from selling it yet?

23 A. Well, as that indicates, that particular  
24 letter to Bill Freeman, that there were some samples  
25 being sent to him. Now, he was in Oklahoma.

1 July, 56 backs of non-asbestos ceiling texture were  
2 sent to him for testing. Upon his approval of this  
3 material, Wayne Harp made a batch at Hurst and sent  
4 it to Tulsa. It is not -- it is my understanding  
5 nothing has been done beyond the testing of this  
6 product."

7 The free products were sent to Tulsa for  
8 his testing and acceptance by his customers. So he  
9 had asked for a non-asbestos product because of  
10 specifications. And was in the process of that -- I  
11 interpret that as in the process of evaluating.

12 Q. (By Mr. Coon) Okay. Let's get to the  
13 next one, June '75. This one is KM 1235. This  
14 appeared to be the airborne fiber counts at the Paco  
15 facility at Los Gatos. Where would that be?

16 A. Los Gatos, California? It's a town south  
17 of San Carlos.

18 Q. Okay. I had not recalled us talking about  
19 that as being one of the Paco manufacturing  
20 facilities?

21 A. It's not. That was a test. That was one  
22 of the tests that was -- it was done in 1975, for  
23 two reasons.

24 Q. Okay. But it said the test is at -- for  
25 Paco's at Los Gatos?

1 A. Paco product at Los Gatos is a city, town,  
2 and it was done on new construction, new houses.

3 Q. Okay. So, they went out to where one of  
4 the Paco jobs was taking place?

5 A. They went out to a job site where houses  
6 were being built and used Paco products on those,  
7 that is correct.

8 Q. Got it. And then the -- the summary and  
9 fiber count speaks for itself when you look at the  
10 airborne fiber counts, I guess, at the third and  
11 fourth pages, in terms of --

12 A. May I look at it, please?

13 Q. Sure. Do you know what the purpose of  
14 going out to actually do a field study of the --

15 A. Sure do.

16 Q. -- asbestos product release would have  
17 been?

18 A. Sure do.

19 Q. What was that?

20 A. First of all, to further evaluate the  
21 Union Carbide product that we talked about earlier,  
22 that was discussed in 1974. The fiber that had the  
23 titanium glued to it.

24 Q. Right.

25 A. And also to evaluate the fiber -- level of

1 A. I -- I can't tell, sir.

2 Q. Okay.

3 A. But they're the same letter.

4 Q. Okay. It looks like there were comments  
5 about -- this was to Doug Merrill from Michael Love.  
6 Mr. Love was a senior loss prevention representative  
7 for Liberty Mutual?

8 A. Correct.

9 Q. And he provides an analysis of certain  
10 issues with respect to their asbestos survey report?

11 MR. HAZEN: Document number, Mr.  
12 Giffins?

13 THE WITNESS: It's KMX 00577.

14 Q. (By Mr. Coon) And it talks about the  
15 interest in removing asbestos from all the products?

16 A. Correct. He's talking about our interest  
17 in -- to remove asbestos from all our products,  
18 correct.

19 Q. And this is back in '75, December of '75?

20 A. '75. Correct.

21 Q. And then if you look at the two letters, I  
22 guess the question was, there -- this letter we have  
23 a copy of, it doesn't have any notes on it, and then  
24 this copy has two through five, embraced in a  
25 bracket, with a compliance and question mark. Do

1 the airborne fiber count of our products. And of  
2 the -- of the ceiling products I should say. And so  
3 this was -- this test was against the Union Carbide  
4 material, and I believe at that time it was Canadian  
5 -- Carey-Canadian.

6 Q. Okay. And --

7 A. And by the way, on those levels, I think  
8 they were all below the requirement at the time. It  
9 was five. What is -- they're all below five, I  
10 believe.

11 THE REPORTER: Give me just a  
12 second.

13 MR. COON: Ready?

14 THE REPORTER: Ready.

15 Q. (By Mr. Coon) Okay. Next, we have a  
16 December '75, this appears to be another industrial  
17 hygiene study. I take it that Liberty Mutual would  
18 still come out from time to time to determine what  
19 the dust count levels were in the plants?

20 A. On a regular basis, yes.

21 Q. Okay. We also have an August 15 report  
22 that may be part of that. Is that part of that?

23 A. These are both the same letter.

24 Q. Okay. One copy somebody has written on,  
25 the other copy looks like it was the file copy?

1 you know what that meant?

2 A. Somebody's highlighted it.

3 Q. Do they know whether or not at this time  
4 that these things that were supposed to be taking  
5 place were, in fact, occurring, like making sure  
6 operators wore respirators and things like that?

7 MR. HAZEN: Objection, form.

8 A. If they read the letter December 10th,  
9 1975, Number 2 says -- well, Number 1 says, "Present  
10 local exhaust to be totally inadequate on one of the  
11 baggers." Okay. So, that was highlighted.

12 Somebody highlighted that for some reason.

13 Q. (By Mr. Coon) Right.

14 A. "Continue to provide the operator on the  
15 dry texture bagger with coveralls. This is required  
16 to prevent the worker from bringing asbestos home on  
17 his clothing. Continue" -- and this is talking  
18 about continuing this, not implementing this,  
19 continuing.

20 Q. Right.

21 A. "Continue to emphasize that all operators  
22 must wear appropriate dust masks."

23 MS. HAAG: Objection to the  
24 nonresponsive.

25 Q. (By Mr. Coon) This actually brings up

1 something here, too. When I'm talking about two, I  
2 don't guess we have to read all of them from a time  
3 standpoint, but we talked earlier about the clothing  
4 issue.

5 A. Right.

6 Q. And if you look at this, it says, they  
7 were requiring coveralls to prevent the worker from  
8 bringing asbestos home on his clothing. So  
9 apparently there was an awareness. Remember we  
10 talked about that earlier?

11 A. Right.

12 Q. About maybe bringing some of it home?

13 A. And it does say continue.

14 Q. Yeah.

15 A. Which means it was implemented.

16 Q. And these are the types of things that  
17 were implemented to comply with OSHA mandates in  
18 '72?

19 A. Uh-huh.

20 MS. HAAG: Object to form.

21 Q. (By Mr. Coon) Okay. Next we have --  
22 we're up to '76. In February of '76, we got another  
23 one. This is correspondence back to Mr. Love, as  
24 Liberty Mutual loss prevention representative?

25 MR. HAZEN: Document number,

1 to get asbestos out.

2 Q. And then we go to February of '76, this is  
3 from Hughland Brinkley. To Hughland Brinkley from  
4 Mr. Merrill. Did you know Mr. Brinkley?

5 A. Let's see, who does he work for?

6 MR. HAZEN: Number please?

7 THE WITNESS: Number KM-117,  
8 Plaintiff's Exhibit.

9 MR. COON: Ours is 1055.

10 MR. HAZEN: Thanks.

11 A. No, I did not know him, but he was  
12 evidently the director of enforcement for the Bay  
13 Area Air Pollution Control District.

14 Q. (By Mr. Coon) Okay.

15 A. So, he would have been an EPA-type person.

16 Q. And what was the purpose of that letter?

17 A. To reconfirm -- let's see, "Please be  
18 advised that we use asbestos in the course of our  
19 operation, which may be considered an emission  
20 source under Regulation 8, Emission Standards for  
21 Hazardous Pollutants."

22 He's advising the governmental agencies in San  
23 Francisco that we are using asbestos, and that they  
24 needed to be aware it may fit under Regulation 8. I  
25 think he's being right up front telling them, come

1 Mr. Giffins.

2 A. It's -- well -- oh, KM-116.

3 Well, that's Plaintiff's Exhibit. Is that okay?

4 Q. (By Mr. Coon) Ours is 1053.

5 MR. HAZEN: Thank you.

6 A. And this is captioned "Asbestos Handling  
7 Recommendations for San Carlos Factory."

8 Q. (By Mr. Coon) This is the one in  
9 California, correct?

10 A. That is correct.

11 Q. And it talks first paragraph, "In reply to  
12 your letter," which is the letter from Mr. Love,  
13 correct?

14 A. This is from Doug Merrill to Mr. Love, who  
15 is the senior representative of Liberty Mutual.

16 Q. Yeah.

17 A. And he says, "In reply to your letter of  
18 December 10th, 1975, I would like to report that we  
19 have now been successful in eliminating asbestos  
20 completely from our texture products. We are  
21 continuing our work along this line on joint  
22 compound products."

23 Q. Okay.

24 A. As I said, between '72 and '77, there were  
25 236 formulas that they worked on to rework that --

1 out and take a look.

2 Q. Okay.

3 THE WITNESS: Can I take a break?

4 MR. COON: Sure.

5 THE WITNESS: My bladder is about  
6 ready to -- plus I --

7 THE VIDEOGRAPHER: Going off the  
8 record at 6:15.

9 (A recess was taken.)

10 THE VIDEOGRAPHER: Back on the  
11 record. Time is 6:22.

12 Q. (By Mr. Coon) Next we have 1127.

13 Mr. Giffins, we have a March 18, '76 letter from  
14 Liberty Mutual to the Denver facility of Kelly-Moore  
15 -- it's one we talked about earlier -- that made  
16 Paco products, correct?

17 A. Yes, they made joint compounds.

18 Q. Okay. And we had industrial hygiene study  
19 for that facility showed -- I can go back here to  
20 page -- let me see the reports. Okay. Here is our  
21 reports of findings. The range was from one to five  
22 fibers per milliliter in the areas they tested.

23 A. Excuse me, can I see this a minute?

24 Q. Sure.

25 A. Okay.

1 Q. Okay. And I think at that time, the OSHA  
2 standard was still at five?

3 A. No. This was dated in March of '76.

4 Q. Oh, it's gone down to two?

5 A. Two. I believe that's correct.

6 Q. So, do you know what was addressed at that  
7 facility with respect to trying to get back into  
8 compliance with the reduction of the OSHA  
9 permissible level from five to two?

10 MR. HAZEN: Objection, form.

11 A. No, I don't. Wait, I have to go back and  
12 read that in total.

13 Q. (By Mr. Coon) Okay.

14 A. And then the follow-up report.

15 Q. I think this -- okay. Is there an  
16 attachment to this that shows what they did?

17 A. I don't know. I need to see the whole  
18 thing.

19 Q. Well --

20 A. San Carlos.

21 Q. Okay. There is another attachment then.  
22 Could this have been a separate inspection?

23 A. This was conducted in January of '76.

24 Q. Right.

25 A. "Per conversation, you indicate that this

1 A. As I said earlier, there were inspections  
2 done in this as a result of -- in line with OSHA's  
3 requirements but that did not preclude that there  
4 were not inspections by these people prior to the  
5 OSHA deal.

6 Q. Okay. Next we had a document dated July  
7 15, '76. This is Document 1118. It's dated July  
8 15, 1976, from the National Resource Defenses  
9 Council. Are you familiar with that organization?

10 A. I have seen -- I have seen this, yes, sir.

11 MR. HAZEN: What's that KM number,  
12 please?

13 A. KM BB 5428.

14 Q. (By Mr. Coon) It talked about increased  
15 risk of cancer from working around drywall repairs,  
16 and I want to ask you a couple of questions on that.  
17 The products that were made by Paco, sheetrock  
18 repairs, or for sheetrock, tape and floating and  
19 things like that, could those be used for repairs as  
20 well as for new construction?

21 A. Uh-huh. Sure could.

22 Q. Do you know whether or not any testing was  
23 done by Kelly-Moore in houses or remodeling or  
24 something that was taking place just to see, as an  
25 example, what would happen if you were removing the

1 department was closed down, all operations, April  
2 first of '76."

3 Q. As for the Denver facility, correct?

4 A. That is correct.

5 Q. But you have an attachment back here --

6 A. All right. This is the -- this is the  
7 findings, the survey, and --

8 Q. And the numbers we just discussed?

9 A. Right.

10 Q. And I had all this as one document but is  
11 there a separate industrial hygiene study of the San  
12 Carlos, California facility?

13 A. Well, this says San Carlos. I don't know  
14 how that got to be on there.

15 Q. I don't either, but it appears there was a  
16 separate study of the San Carlos facility, same kind  
17 of deal, industrial --

18 A. Well, would have because it was done on a  
19 regular basis.

20 Q. Okay.

21 A. Yeah.

22 Q. Okay. So, you had a number of these that  
23 went on from the time OSHA was implemented in '72  
24 for the duration of time they continued to make  
25 asbestos products at the various Paco facilities?

1 old sheetrock, or the old tapes and floats?

2 A. I don't think there was testing. I really  
3 don't recall. I really don't. I am very -- I am  
4 familiar with the Los Gatos test.

5 Q. There was some with respect to new  
6 construction?

7 A. That is correct.

8 Q. Okay.

9 A. Now, -- okay. Fair enough.

10 Q. Okay. Next we had another memo here.  
11 This one is BB 5463. It's ours, 1161. This was  
12 dated October '76, again from Mr. Merrill. And this  
13 was to Frank Scaggs?

14 A. Scaggs. He was the -- I believe the  
15 district sales manager for the Northwest at that  
16 time, for the Seattle/Portland, Oregon area.  
17 Subject is non-asbestos ceiling texture.

18 Q. Okay.

19 A. And it's KM BB 5463.

20 Q. Okay. Basically talks about one  
21 acknowledgment that they have asbestos-free product  
22 in California, Hawaii and Utah for the customers  
23 there, correct?

24 A. It says, "We have all of our California,  
25 Hawaii, Utah customers using our non-asbestos

1 ceiling texture products."

2 Q. Right. Now, we talked about California.  
3 Did Hawaii and Utah have the same type of ban as  
4 California?

5 A. No.

6 Q. Do you know why they had the Hawaii -- why  
7 they -- why Kelly-Moore had Hawaii and Utah on a  
8 non-asbestos ceiling texture along with California?

9 A. Again, it was -- would have been a  
10 customer preference at the time.

11 Q. Okay. Just a matter of converting the  
12 customers in those states to asbestos-free?

13 A. Have you ever dealt with a painting  
14 contractor when you try to give them something new?  
15 It's not that easy.

16 Q. Okay. So, the -- the Hawaii and Utah  
17 customers were a little more pliable?

18 A. Evidently. Now, the thing that I think is  
19 important about this letter is he's writing Frank  
20 Scaggs in Seattle and telling him, hey, we have  
21 these products available, and even though state  
22 agencies in the northwest have not taken a strong  
23 stand on asbestos, I am sure that day will come.

24 So, he's taken the initiative to let him know  
25 that he better try to do something about getting

1 A. I believe I have seen this, but I -- it's  
2 just not coming right up on the register now.

3 Q. (By Mr. Coon) I didn't see an IH study  
4 that was precipitating this. Do you know whether or  
5 not there was any particular industrial hygiene  
6 study done by Liberty Mutual or someone else that  
7 lists --

8 A. This was done by OSHA. This is in  
9 response to an OSHA inspection.

10 Q. So we know that OSHA came out and did an  
11 inspection, found a number of failings and this is a  
12 memo that resulted?

13 A. OSHA --

14 MR. HAZEN: Objection, form. Go  
15 ahead.

16 A. OSHA had complete -- they governed the  
17 workplace so they could go into any plant they want.

18 Q. (By Mr. Coon) Do you know what would have  
19 precipitated the visit from OSHA?

20 A. No, generally they show up on -- whenever  
21 they want.

22 Q. Okay. One of the comments here, the  
23 recommendations, was to again reduce or eliminate  
24 asbestos content in the ceiling texture. So, they  
25 were still making ceiling texture with asbestos at

1 them converted to the non-asbestos product. To me  
2 that's the important part of that letter.

3 Q. Okay. They anticipate the other states  
4 reacting in a manner similar to California and  
5 banning asbestos products?

6 A. No, I think they anticipated that the deal  
7 on asbestos would get even stronger and that was  
8 dated in what? '75?

9 Q. Yeah. '76.

10 A. '76, yes.

11 Q. And again, encouragement to shift to  
12 non-asbestos ceiling textures?

13 A. Correct.

14 Q. And next we have October 19, '76 another  
15 Paco Textures memo, Doug Merrill. This one is to  
16 Wayne Harp. And it talks about asbestos exposure  
17 problems at Hurst. Now, Hurst was the Texas  
18 facility, right?

19 A. That is correct.

20 Q. Have you seen that document before?

21 MR. HAZEN: Document number,  
22 Mr. Giffins, please.

23 THE WITNESS: Oh, I'm sorry KB -- KM.  
24 BB 5743.

25 MR. COON: It's our Document 1130.

1 the Hurst facility at that time?

2 A. Yes. They could have. That's what they  
3 explained, and he's suggesting they use SWP, I  
4 believe.

5 Q. And do you know when they -- did they  
6 eventually convert to an SWP?

7 A. SWP was tried. I don't know when it --  
8 how -- there, but it was -- stuff didn't work as  
9 well.

10 Q. Okay. They did eventually convert to  
11 something that was asbestos free, correct?

12 A. No, they stopped making it.

13 Q. Okay. Just stopped making it --

14 A. Yes, sir.

15 Q. -- at the Hurst facility?

16 A. That was dated what, '76?

17 Q. Right. So you just quit making it at the  
18 Hurst facility?

19 A. Yes, sir.

20 Q. But it was still being made asbestos free  
21 elsewhere, in California? Didn't y'all continue to  
22 make ceiling texture?

23 A. We did -- would you ask me that question  
24 again?

25 Q. Sure. Did you continue to make ceiling

1 texture after the late '70s?

2 A. Where?

3 Q. Anywhere. Did any of your facilities make  
4 Paco ceiling texture?

5 A. When you say late '70s, are you talking  
6 prior to '77, or are you talking after '77?

7 Q. Well, even at this time in '76, where were  
8 they making -- were they making any Paco  
9 asbestos-free ceiling texture?

10 A. In California.

11 Q. Right.

12 A. And they may have been making some there,  
13 but they were also making non -- they were also  
14 making the asbestos one.

15 Q. And how long did they continue to make an  
16 asbestos-free ceiling texture at any facility?

17 A. How long?

18 Q. Sure.

19 A. Probably until we shut the operations down  
20 in 1982.

21 Q. Okay. Okay. This is another one. This  
22 is dated January 27, '77.

23 Counsel, 1050.

24 Another one from Mr. Merrill. This is to Dean  
25 Pohlenz. Where does Mr. Pohlenz work at?

1 "Harrison's & Crosfield Pacific Inc." It's dated  
2 November 9, '77. It's an invoice date.

3 A. Correct.

4 Q. It indicated that a load of 480 bags of  
5 asbestos --

6 A. HPO.

7 Q. -- was shipped to Paco Textures in San  
8 Carlos, California, correct?

9 A. Correct.

10 Q. And down here at the bottom it says, "For  
11 resale."

12 A. Correct.

13 Q. Do you know who they would have resold  
14 that to, or what that meant?

15 A. They were the local distributor for Union  
16 Carbide.

17 Q. That company was?

18 A. That was, yes.

19 Q. Okay.

20 A. And when they sent -- you send anything to  
21 a manufacturer who is going to reuse that raw  
22 material in a product that they then sell, they do  
23 not charge a sales tax, and that's what the purpose  
24 of this -- I assume it's for resale because that  
25 normally is what shows up on invoices where the

1 A. Dean worked in Hurst, I believe. This is  
2 monitoring of asbestos exposure, dated January of  
3 '77.

4 Q. Okay.

5 A. It is my understanding that Continental  
6 Insurance Company will do outside testing for  
7 asbestos exposure. They're located duh, duh, duh,  
8 duh, Dallas. Phone number is such and such. Please  
9 call them and have the Paco plant checked after the  
10 modification to the baggers has been completed.

11 Q. Okay. Was this a follow-up to the  
12 previous OSHA inspection at that facility?

13 A. I would have believed so. This is January  
14 of '77. It refers to OSHA will run the test.

15 Q. And what else did it say?

16 A. He says, "But I'm afraid they may spot  
17 something else."

18 Q. Okay.

19 A. I think that was more tongue-in-cheek than  
20 anything.

21 Q. I am going through some of these I think  
22 that we don't need to ask about, in mind of the  
23 hour.

24 Okay. I had a question on this one. This one  
25 is KM BB 0386, our number is 1159. It says,

1 product is going to be used in manufacture, or to be  
2 resold.

3 Q. Do you know whether or not in this set of  
4 circumstances, Paco just resold the same asbestos  
5 provided to them from Harrison's elsewhere?

6 A. I don't know that.

7 Q. Would they have been using asbestos in  
8 that quantity in 1977 at the San Carlos facility?

9 A. How many bags?

10 Q. 480.

11 A. Yeah. Sure.

12 Q. Okay. Was this for the --

13 A. Now, you have to remember this is that  
14 material that -- what's the date on this again?

15 Q. 11-77.

16 A. Let me see. I can't read. My eyes are  
17 getting -- failing me.

18 Q. Yeah.

19 A. When you get past 63, things start to  
20 happen.

21 Q. November 9, 1977, Mr. Giffins.

22 A. This was the material that was tested in  
23 part in the Los Gatos testing.

24 Q. Okay. Do you know whether or not  
25 Kelly-Moore, through any of its Paco divisions, ever

1 did resell the asbestos that they had bought in bulk  
2 for use in the various Paco or Paco products?

3 A. I'm not aware of that and I don't believe  
4 they did that. Well, again, I'm not aware of it.

5 Q. Okay. Here is one. This is 1169, dated  
6 January 16, '78, from Mr. Wiseman to  
7 Mr. Stubb, acknowledges the Hurst plant has ceased  
8 production of asbestos-containing materials for  
9 Paco.

10 A. That's KM BB 4991.

11 MR. HAZEN: Thank you.

12 A. Subject, production of non-asbestos Paco  
13 products, and the Hurst plant has ceased the  
14 production of asbestos-containing products for Paco,  
15 with the exception of texture paints and ceiling  
16 paint -- and ceiling texture.

17 Q. (By Mr. Coon) Now, was that in response  
18 to the additional changes with OSHA regulating  
19 further restrictions on the use of asbestos  
20 products?

21 A. Well, as you recall, we decided in '77 not  
22 to make -- to get out of the asbestos business.

23 Q. Right.

24 A. Texture paints were excluded from OSHA and  
25 EPA. They were not part of that ban. So we were

1 who the person that signed that -- Mr. Stubbs?

2 A. Svend Stubb, yes.

3 Q. And that was to Mr. Moore?

4 A. That is correct.

5 Q. President of the company still?

6 A. I -- yes, sir.

7 Q. Okay. And it said, "The ban on the  
8 manufacture of asbestos-containing joint compounds  
9 is now in effect." And they're talking about The  
10 Consumer Products Commission ban?

11 A. Consumer Products Safety Commission ban.  
12 That is correct.

13 Q. "Our plants manufacture only asbestos-free  
14 formulas now." Right?

15 A. On joint compounds.

16 Q. Right. Says, "We now have less than six  
17 months to dispose of asbestos-containing joint  
18 compounds in stock at our stores."

19 A. That is correct. "A recent inventory of  
20 all stores showed current stock of  
21 asbestos-containing material to be 282,000 pounds of  
22 Dry Powder, and 7,580 containers of Ready-Mix. We  
23 plan to take another store inventory on 4-1-78 and  
24 then make plans for disposing of any  
25 asbestos-containing material left in stock."

1 still able to make those products. What he's saying  
2 here is that we are out of the production of  
3 asbestos in the joint compounds, but we're going to  
4 -- with the exception of the texture paints, and  
5 ceiling texture, which was excluded from either  
6 OSHA, or the Consumer Products Safety Commission  
7 ban, they were going to continue to make those  
8 products.

9 Q. Okay. Now, the Consumer Products Safety  
10 ban took effect, what was that, January of '78?

11 A. Yes. No. July of --

12 Q. July of '77?

13 A. I think it was July of '78. No, June.  
14 They -- they put the ban out effective January the  
15 12th, I believe, of '78, and said you could no  
16 longer make it and distribute it. But you had six  
17 months from that point on to -- the stores had that  
18 time to sell out their inventory, which took you  
19 through June or July of '78.

20 Q. Okay. And I don't have those particular  
21 consumer documents in front of me, I don't believe,  
22 but I did want to make sure I understood something.  
23 And that takes us to the next document. This is  
24 1233. It's dated January 23, '78, another  
25 Kelly-Moore memo. This one is from -- can you tell

1 The ban said -- so there was no hardship on  
2 manufacturers, or the retailers, the ban said, you  
3 cannot make it after 12th of January, but any that's  
4 in the field, any that's out in commerce can be  
5 disposed of up through June of '78.

6 Q. Okay.

7 A. June 16, I think, of '78.

8 MR. HAZEN: Brent, at this time I  
9 think we have already exceeded the limit. What I'd  
10 like you to do for me is let's take five minutes  
11 break, maybe look at your documents, tell me how  
12 much longer you think you need.

13 MR. COON: I need about an hour but  
14 I can wrap up in a couple minutes.

15 MR. HAZEN: You want to take a  
16 minute to look at them and peruse them, and that way  
17 maybe we can -- you can --

18 MR. COON: I'd rather just go  
19 through them.

20 MR. HAZEN: Determine what you need.

21 MR. COON: I think we can just go  
22 right forward. If you want to go ahead, you're  
23 welcome to.

24 MR. HAZEN: Why don't we just take a  
25 couple min -- maybe two or three minutes.

1 MR. COON: That's fine.  
 2 MR. HAZEN: Maybe that will speed it  
 3 -- you can take a look at it, make sure of the ones  
 4 you want to cover and then we will come back and we  
 5 will talk about how much longer you need.  
 6 MR. COON: That's fine.  
 7 THE VIDEOGRAPHER: Going off the  
 8 record at 6:42.  
 9 (A recess was taken.)  
 10 THE VIDEOGRAPHER: Back on the  
 11 record. The time is 6:48.  
 12 Q. (By Mr. Coon) Mr. Giffins, we have  
 13 Document 1091. This is December 22, '77, a letter  
 14 from Mr. Myers, as marketing manager, to Doug  
 15 Merrill. But it basically talks about the ban  
 16 taking place from the Consumer Safety folks, I  
 17 believe?  
 18 A. Yes.  
 19 Q. Wasn't that from the Consumer Products  
 20 Safety Commission?  
 21 A. No, it was about that -- it's from  
 22 Mr. Myers, marketing manager for Calidria Asbestos,  
 23 which would have been Union Carbide.  
 24 Q. Okay. And it just kind of gets them up to  
 25 speed on the ban, and the language contained in the

1 hearing procedure. This involves the following  
 2 steps. This was dated in May of 1977, which talked  
 3 about the proposal.  
 4 MR. HAZEN: The document number  
 5 please?  
 6 THE WITNESS: Document number is KMX  
 7 01964.  
 8 MR. HAZEN: The first one there.  
 9 THE WITNESS: You want his?  
 10 MR. HAZEN: Yes.  
 11 THE WITNESS: Oh, I'm sorry. KMX  
 12 01963 is ours.  
 13 MR. COON: Scott, ours is 1093.  
 14 MR. HAZEN: Okay. 1093.  
 15 Q. (By Mr. Coon) Okay. So anyway, we could  
 16 go back through some of these other documents and  
 17 see a line of letters from Union Carbide to  
 18 Kelly-Moore that was apprising them of the -- or  
 19 keeping them updated with respect to the proposals  
 20 with the ban?  
 21 MR. NANTZ: Objection.  
 22 MR. HAZEN: Objection, form.  
 23 A. That last letter had to do with the  
 24 proposal, talking about the proposal. And then the  
 25 following letter in December indicated that this is

1 ban, and how it would relate to some of the product  
 2 lines?  
 3 A. He's saying because of the extensive  
 4 publicity and since we have attempted to keep many  
 5 of you directly informed, okay, we're going to give  
 6 you this information, and it's -- and it talks about  
 7 the ban.  
 8 Q. Okay. And the ban had actually been  
 9 proposed for some period of time before it actually  
 10 took place, right, all through '76, '77?  
 11 A. Yeah. This is dated December 22nd, and  
 12 the ban for manufacturing took place the following  
 13 -- took about two weeks later, 15, 20 days, was to  
 14 go in effect after that.  
 15 Q. Right. But --  
 16 A. We already were well aware.  
 17 Q. Yeah, they were well aware. In fact, I  
 18 had other documents I haven't gone back to with you,  
 19 but there was correspondence back in May of '77  
 20 discussing those same issues in this document, I  
 21 think 1093. Again, same type of information, isn't  
 22 it, just keeping everyone abreast of what had and  
 23 had not been banned and what the Consumer Product  
 24 Safety Commission was working on?  
 25 A. This is talking about the proposal and

1 what the proposal was -- how it was finalized.  
 2 That's how I interpret those letters.  
 3 Q. (By Mr. Coon) Sure. May says --  
 4 MR. NANTZ: Objection,  
 5 nonresponsive.  
 6 Q. (By Mr. Coon) -- here is what they're  
 7 proposing; December letter says here is what the ban  
 8 actually is now that the statute is done, complete.  
 9 We know what we're dealing with?  
 10 MR. NANTZ: Objection, form.  
 11 A. That's how I interpret it, yes.  
 12 Q. (By Mr. Coon) And it advised that there  
 13 was going to be a ban on shipping certain products  
 14 manufactured after January '78, and then you  
 15 couldn't sell them after June '78, I think is what  
 16 you testified to the earlier?  
 17 A. That's what I indicated earlier, yes.  
 18 MR. NANTZ: Objection, form.  
 19 Q. (By Mr. Coon) Okay. So that's  
 20 consistent with the language of the ban?  
 21 MR. NANTZ: Objection, form.  
 22 A. (Indicating.)  
 23 Q. (By Mr. Coon) Now, we were talking about  
 24 after the ban took place, which is after the statute  
 25 is passed, the memos of Kelly-Moore in the following

1 spring and summer, which is, how did they deal with  
2 the products that were now subject to the ban?

3 And so that I'll understand, when the Consumer  
4 Products Safety Commission came out with the ban on  
5 some product lines, it impacted Kelly-Moore with  
6 respect to some Paco product lines?

7 A. The joint compounds.

8 Q. The joint compounds?

9 A. That's what they addressed only was the  
10 joint compounds.

11 Q. And it was Kelly-Moore's understanding  
12 that as a result of this new statute, that there  
13 would be an inability for them to continue to sell  
14 -- to manufacture or sell that product after a  
15 certain time in 1978?

16 MR. HAZEN: Objection, form.

17 A. The ban was very explicit. You could not  
18 manufacture, input into commerce anything after, I  
19 believe, the 12th of January, and that you had then  
20 -- had until June 16th of '78 to sell out the  
21 inventory that was in the field.

22 Q. (By Mr. Coon) Okay. Well, let's talk  
23 about those two dates. With respect to January of  
24 '78, this is the time when you cannot ship anymore  
25 back out from the manufacturer?

1 purpose of the ban, was it not?

2 A. There was a concern about that product,  
3 and the effect when sanding it, yes.

4 Q. Okay. And nonetheless, as I understand,  
5 even though these findings were made, and the ban  
6 was put into place, Kelly-Moore did abide by that  
7 law by discontinuing the manufacture of an  
8 asbestos-containing joint compound, correct?

9 A. Correct.

10 Q. But they also did continue to sell that  
11 product at their local stores for the duration of  
12 the time that the statute allowed them to which was  
13 June 12, 1978?

14 A. That is correct.

15 Q. And do you have any idea how much product  
16 Kelly-Moore sold of those joint compounds from the  
17 January 16 manufacturing cut-off date, to the June  
18 12, '78, no --

19 A. Before I answer that, can I --

20 Q. Yes, sir.

21 A. I'd like to make a point. If you read the  
22 Consumer Products Safety Commission ban, they're  
23 very emphatic about stating that they understood the  
24 impact on businesses by prohibiting the sale, or  
25 cleaning out of the inventory, and it did not want

1 A. Ship it out from the manufacturer?

2 Q. From the manufacturer. That's the  
3 drop-dead date for getting it out of the  
4 manufacturer's facility.

5 A. Whatever that date is, the 12th or 16th.  
6 That was the --

7 Q. January 16th.

8 A. Right.

9 Q. Okay. But for stock that had already been  
10 sent to Kelly-Moore's shelves, these same joint  
11 compounds that were now banned, Kelly-Moore could  
12 legally still sell them up through June 12 of 1978?

13 A. That is correct.

14 Q. Couldn't get anymore shipped to you from  
15 any of the Paco facilities after January 16th, but  
16 you could still sell what you had on your shelves?

17 A. Correct.

18 Q. Or in your inventory, you know, behind the  
19 counter or whatever, right?

20 A. What was already in the pipeline, in  
21 theory, yes, you could.

22 Q. Okay. Now, Kelly-Moore did understand  
23 that the Consumer Products Safety Commission had  
24 banned these products as a potential health hazard  
25 to those people that were using it? That was the

1 to do anything -- it wasn't just Kelly-Moore, it was  
2 the whole industry -- to destroy the economic  
3 situation. So they were very emphatic that they  
4 give -- they were going to give everybody time to  
5 sell it out.

6 They also said, however, that if they had felt  
7 at any point from January through June that there  
8 was an issue that warranted immediate discontinuance  
9 and suspension of the sale of the product, they were  
10 in the ability to control that, and they -- they did  
11 not -- they had that ability to stop it right then,  
12 but they said in all fairness we're going to give  
13 you the six months to clear it out.

14 Q. And you believe that Kelly-Moore would  
15 have suffered a serious economic hardship by not  
16 being able to sell or deplete the remaining stock on  
17 their shelves?

18 A. I don't know. I mean, there would have  
19 been economic hardship on how to dispose of the  
20 product if you had no source to get rid of it.  
21 Serious, I don't know if I'd use that terminology,  
22 but we were -- we, and everybody else in the  
23 industry, functioned exactly -- I know we did.  
24 Okay. We did everything we were supposed to do,  
25 based on the guidelines that were established.

1 Q. Okay. Do you know whether or not  
2 Kelly-Moore took any initiatives after the ban went  
3 into effect --

4 MR. HAZEN: Objection.

5 Q. (By Mr. Coon) -- in January 1978 until  
6 the time they quit selling the product in June 1978,  
7 to provide any additional notices or warnings to  
8 those purchasers of the products, of one -- that's  
9 the predicated question -- one, that the product  
10 had been banned by the Consumer Product Safety  
11 Commission? Do you know if those types of notices  
12 went out to any of the purchasers?

13 MR. HAZEN: Objection, form.

14 A. Between January and June --

15 Q. (By Mr. Coon) Right.

16 A. -- of '78.

17 Q. Right. You quit manufacturing it --

18 A. Right.

19 Q. -- but you could still sell it until June?

20 A. Correct.

21 Q. During that time frame that those products  
22 were still on your shelves, did Kelly-Moore provide  
23 any types of additional notices to the customers  
24 that this was a product that had now been banned for  
25 use?

1 Q. To your knowledge -- to your knowledge,  
2 though, you didn't go out and put any stickers on  
3 the products that were still in the shelves advising  
4 them of the ban, correct?

5 A. Well, it already had the sticker on it.

6 Q. No, advising -- advising the purchasers  
7 that there was now a ban on this product?

8 A. No. I haven't seen anything of that, but  
9 it did have the asbestos, the caution warning on it.

10 Q. The same one we looked at on the other  
11 box?

12 A. Yes, sir.

13 Q. Okay. What happened to the product that  
14 was still on the shelves in June that Kelly-Moore  
15 had been unable to sell for whatever reasons?

16 A. That product that was regulated under the  
17 Consumer Products Safety Commission ban, the joint  
18 compounds, were returned to the factory.

19 Q. And what did the factory do with them?

20 A. They disposed of them in accordance with  
21 whatever the regulations were for disposal.

22 Q. Do you know what the regulations for  
23 disposal of those products were?

24 A. Basically it said that you would put the  
25 material in a tight container, take it to the land

1 A. There was information that went to the  
2 stores that indicated what the ban involved, and as  
3 a result of that, what was to happen, what was to  
4 transpire from January through June went to the  
5 stores.

6 Q. For the edification of the managers and  
7 employees of the store --

8 A. To keep them --

9 Q. -- right?

10 A. -- informed, yes.

11 Q. Right. Was there anything done at  
12 Kelly-Moore to advise the purchaser of the products  
13 that these were products that had now been banned by  
14 the Consumer Safety Product Commission?

15 A. I can't answer that, sir.

16 Q. Okay. Do you have any information to  
17 indicate that such information was relayed?

18 A. I have not seen anything that was formal  
19 information that would -- in that particular case.  
20 Now, there was other cases where our customers were  
21 advised as to the removal of asbestos in our  
22 products, over a certain period during the '70s. We  
23 did send out information advising that. As related  
24 to this specific issue, I -- I don't -- I can't say.  
25 I have not seen it.

1 -- to the dump, to a landfill, and put papers  
2 together indicating how much you were taking to the  
3 landfill, give a copy of it to the EPA, or the  
4 government, take a copy of it to the landfill, and  
5 have it buried.

6 Q. It was treated as a hazardous waste?

7 A. It was buried within -- they said in a  
8 minimum of six inches of soil on top.

9 Q. Right. Had to be treated like a hazardous  
10 waste in compliance with EPA regulations for the  
11 disposal of hazardous materials, correct?

12 A. I have been involved with the disposal of  
13 hazardous materials, as paint is classified, and to  
14 me -- this was hazardous waste disposal, but they  
15 even allowed you to put it in sealed bags, and put  
16 it in the ground. I don't know if that's safe or  
17 not.

18 Q. I'd asked you a question on this, and this  
19 may answer it. This is 1233 dated January '78. The  
20 question I had had was, did you know how much  
21 product you still had on the shelves after you could  
22 not manufacture it anymore. I think this  
23 Mr. Stubb's letter again, this one to Mr. Moore?

24 A. He's sending it to Mr. Moore, the  
25 president, telling him the ban is now in effect, and

1 our plants manufacture only asbestos-free formulas.  
 2 Q. Okay. And then in the second paragraph it  
 3 gives them -- tells Mr. Moore how much of the  
 4 asbestos-containing material they still have in the  
 5 shelves?  
 6 A. This was initially indicating what the  
 7 inventory was at that time in January, yes, or  
 8 about, thereabouts.  
 9 Q. So we had 282,000 pounds of the Dry Powder  
 10 and 7580 pounds of the Ready-mix?  
 11 A. 70 -- no, 77,580 containers.  
 12 Q. Oh, containers of the Ready-mix?  
 13 A. That would have been individual units.  
 14 Q. One gallon and five gallon?  
 15 A. Could be, yes.  
 16 Q. Or -- how big were the containers for the  
 17 Ready-mix?  
 18 A. They could be a gallon, or they could be  
 19 the five gallon.  
 20 Q. Okay.  
 21 A. That large cardboard box that you were  
 22 looking at earlier.  
 23 Q. So, we know that there was this amount  
 24 still on the shelves at Kelly-Moore when the ban  
 25 went into place?

1 A. Correct.  
 2 Q. And do we know how much of that was sold  
 3 between January and June?  
 4 A. Oh, I would say a fair amount, because  
 5 what was returned was a quantity -- we know how much  
 6 was returned.  
 7 Q. Okay. And how much was returned?  
 8 A. Oh, man, I just looked at that. I just  
 9 added that number up the other day. I don't recall.  
 10 It's in my notes. I don't recall. I just added it  
 11 up.  
 12 Q. Okay. Was that the last of the  
 13 manufacturing of asbestos-containing joint compounds  
 14 by Kelly-Moore and the Paco entity?  
 15 A. As far as joint compounds?  
 16 Q. Yes, sir.  
 17 A. It would have had to be.  
 18 Q. And was -- what products were still made  
 19 after the Consumer Products ban that would have  
 20 contained asbestos?  
 21 A. You could have still made -- except in  
 22 California, you could have still made the ceiling  
 23 and wall textures.  
 24 Q. And as I --  
 25 A. We elected not to do that.

1 Q. And so when was the last time that Paco  
 2 made asbestos-containing materials?  
 3 A. Late -- it was '77 or early '78.  
 4 Q. And in compliance with the Consumer Safety  
 5 Products mandate?  
 6 A. That was in joint compounds.  
 7 Q. Okay.  
 8 A. Again, we could have continued to make the  
 9 textures with asbestos in it in areas other than  
 10 California. We elected not to do that, sir.  
 11 Q. Okay. Did they quit making the joint  
 12 compounds and the texture at the same time --  
 13 A. No.  
 14 Q. -- that had asbestos in it in late '77?  
 15 A. I don't really know. I would have to go  
 16 back and look at the various production records.  
 17 THE VIDEOGRAPHER: Excuse me, I --  
 18 MR. COON: That's all right. I have  
 19 no further questions, sir. Thank you.  
 20 MR. HAZEN: We will reserve our  
 21 questions until time of trial.  
 22 MR. COON: Anybody?  
 23 THE VIDEOGRAPHER: Going off -- I'm  
 24 sorry, I need to go off the record. Going off the  
 25 record at 7:02.

1 ERRATA SHEET  
 2  
 3 DEPOSITION OF HERBERT R. GIFFINS  
 4 MAY 31, 2002  
 5  
 6 PAGE LINE CHANGE REASON  
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 25 Signature: Date:

I, HERBERT R. GIFFINS, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted on a separate page and signed by me.

HERBERT R. GIFFINS

THE STATE OF TEXAS  
COUNTY OF HARRIS

Before me on this day personally appeared HERBERT R. GIFFINS, known to me or proved to me on the oath of or through to be the person whose name is subscribed to the preceding instrument and acknowledged to me that he/she executed the same for the purposes and consideration therein expressed.

Given under my hand and seal of office this day of , A.D., 2002.

Notary Public

No. 04769750, which the clerk of the court must tax as costs;

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes all parties of record:

[The names of said attorneys have been provided by counsel and are on file at the office of the court reporter.]

That a copy of this certificate was served on all parties by serving same through their attorney of record, pursuant to Rule 203.3 TRCP, on the day of , 2002.

I further certify that I am neither counsel for, related to, nor employed by any of the parties in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Further certification requirements pursuant to Rule 203 of TRCP will be certified to after they have occurred.

Sworn to by me on the \_\_\_\_\_ day of \_\_\_\_\_, 2002.

Kathy Miller, CSR No. 739  
Certificate Expires: 12/31/2002  
5300 Memorial Drive, Ste. 600  
Houston, Texas 77007  
Phone: (713) 861-0203  
Fax: (713) 861-2324

NO. B-150,374-AK  
WILLIAM L. COTTON, ET AL ) IN THE DISTRICT COURT OF  
)  
VS. ) JEFFERSON COUNTY, TEXAS  
)  
A.P. GREEN REFRACTORIES )  
COMPANY, ET AL ) 60TH JUDICIAL DISTRICT  
NO. 41,862  
VERDA SUTTON AND P.D. ) IN THE DISTRICT COURT  
SUTTON )  
VS. ) HARDIN COUNTY, TEXAS  
)  
ACandS, INC., ET AL ) 356TH JUDICIAL DISTRICT

REPORTER'S CERTIFICATION  
DEPOSITION OF HERBERT R. GIFFINS  
TAKEN ON MAY 31, 2002

I, Kathy Miller, CSR, Certification No. 739 in and for the State of Texas, hereby certify to the following:

That the witness, HERBERT R. GIFFINS, was duly sworn by me and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on , 2002, to Mr. Scott Hazen, for examination, signature, and return to the offices of Nell McCallum & Associates, Inc., by , 2002;

That the amount of time used by each party at the deposition is as follows:

Attorney for Plaintiffs:  
6.22 hours, Mr. Brent W. Coon

That \$ is the deposition officer's charges for preparing the original deposition transcript and any copies of exhibits, charged to Mr. Brent W. Coon, Texas Bar Association

NO. B-150,374-AK  
WILLIAM L. COTTON, ET AL ) IN THE DISTRICT COURT OF  
)  
VS. ) JEFFERSON COUNTY, TEXAS  
)  
A.P. GREEN REFRACTORIES )  
COMPANY, ET AL ) 60TH JUDICIAL DISTRICT  
NO. 41,862  
VERDA SUTTON AND P.D. ) IN THE DISTRICT COURT  
SUTTON )  
VS. ) HARDIN COUNTY, TEXAS  
)  
ACandS, INC., ET AL ) 356TH JUDICIAL DISTRICT

FURTHER CERTIFICATION UNDER RULE 203 TRCP

The original deposition was/was not returned to the deposition officer on , 2002;

If returned, the attached Changes and Signature page contains any changes and the reasons therefor;

If returned, the original deposition was delivered to , Custodial Attorney.

That \$ is the deposition officer's charge to Mr. Brent W. Coon for preparing the original deposition transcript and any copies of exhibits.

That the deposition was delivered in accordance with Rule 203.3, and that a copy of this certificate was served on all parties shown herein and filed with the Clerk.

Certified to by me this \_\_\_\_\_ day of \_\_\_\_\_, 2002.

KATHY MILLER, CSR, RMR, CRR  
Texas CSR No. 739 Exp. 12-31-2002  
Nell McCallum & Associates, Inc.  
5300 Memorial, Suite 600  
Houston, Texas 77010

| A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      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