

FILE NAME: Reddaway Manufacturing (REDD)

DATE: 2012 May 17

DOC#: REDD012

DOCUMENT DESCRIPTION: Legal – Deposition – Raymond Lecki

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ERIK ROSS PHILLIPS, ET AL. vs. ALBANY INTERNATIONAL , ET AL.
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Page 2 1 A P P E A R A N C E S: 2 3 WALLACE and GRAHAM, PA 4 BY: JOHN S. HUGHES, IV, ESQUIRE 5 525 North Main Street 6 Salisbury, North Carolina 28144 7 jhughes@wallacegraham.com 8 800.849.5291 9 Counsel for Plaintiff 10 11 12 13 COZEN O'CONNOR 14 BY: DEXTER R. HAMILTON, ESQUIRE 15 1900 Market Street 16 Philadelphia, Pennsylvania 19103 17 215.665.2166 18 dhamilton@cozen.com 19 Counsel for Defendant Reddaway 20 Manufacturing 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000	Page 4 1 EXHIBIT NUMBER DESCRIPTION 2 Exhibit No. 15 Sample Order 63 3 Exhibit No. 16 Document entitled Product 106 4 Information Sheet 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 3 1 I N D E X 2 Testimony of: RAYMOND J. LECKI 3 By Mr. Hughes8, 111 4 By Mr. Hamilton.....96 5 By Mr. Smith.....102, 115 6 - - - 7 E X H I B I T S 8 - - - 9 EXHIBIT NUMBER DESCRIPTION PAGE 10 Exhibit No. 1 Letter to M. Wallace from 7 11 A. Drayton dated 5/4/12 12 Exhibit No. 2 Handwritten Notes 14 13 Exhibit No. 3 Photograph 15 14 Exhibit No. 4 Sales Record 33 15 Exhibit No. 5 Shipping & Receiving 33 16 Exhibit No. 6 Sample Order 33 17 Exhibit No. 7 Sample Order 46 18 Exhibit No. 8 Document entitled 50 19 Redco News 20 Exhibit No. 9 Memo 63 21 Exhibit No. 10 Document entitled 63 22 Material Safety Data 63 23 Sheet 24 Exhibit No. 11 Sample Order 63 25 Exhibit No. 12 Sample Order 63 26 Exhibit No. 13 Shipping & Receiving 63 27 Exhibit No. 14 Sales Record 63	Page 5 1 DEPOSITION SUPPORT INDEX 2 3 INSTRUCTIONS NOT TO ANSWER: 4 Page Line 5 None 6 REQUEST FOR PRODUCTION OF DOCUMENTS: 7 Page Line Description 8 None 9 STIPULATIONS: 10 Page Line 11 None 12 QUESTIONS MARKED: 13 Page Line 14 None 15 16 17 18 19 20 21 22 23 24 25

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Page 6 1 THE VIDEOGRAPHER: This is the 2 beginning of tape number one in the deposition 3 of Raymond J. Lecki in the matter of Eric Ross 4 Phillips versus Albany International 5 Corporation et al, Civil Action number MDL875. 6 Today's date is May 17th, 2012, the 7 time is now 10:17. 8 My name is Scott Lindenbaum, I am the 9 videographer. The court reporter is Jamie 10 Moskowitz. We are here with Huseby Court 11 Reporting. 12 Counsel, please introduce yourselves, 13 after which our court reporter will swear in 14 the witness. 15 MR. HUGHES: John Hughes for the 16 plaintiffs. 17 MR. HAMILTON: Dexter Hamilton, Cozen 18 O'Connor for Reddaway Manufacturing, defendant. 19 MR. SMITH: Patrick C. Smith on behalf 20 of Pneumo Abex LLC. 21 MR. HUGHES: Could the folks on the 22 phone introduce themselves. 23 MS. DRAYTON: Amy Drayton for the 24 defendant Pemco, Inc. 25 MR. HUGHES: Is there anybody else on	Page 8 1 going to agree to dismiss those four defendants 2 without prejudice and reserving their claims 3 against the remaining defendants. And we 4 understand that the defendants I've just listed 5 deny liability. 6 And Amy, is there anything you want to 7 add to that? 8 MS. DRAYTON: Thank you, John. Just 9 real quick, I'll state for the record that the 10 E.C.H. Will GmbH and Korber Paperlink GmbH were 11 never actually served in this case, and Korber 12 Paperlink North America, Inc. and Korber 13 Paperlink North America LLC are no longer in 14 existence. 15 And then finally, as you know, John, 16 the May 4th letter, we need to assert that that 17 letter in no way admits any successor liability 18 of Pemco or continues to accept any liability 19 of Clark-Aiken Matik or the Clark Aiken 20 Company. I think that's it. Thanks, John. 21 MR. HUGHES: Okay. 22 EXAMINATION BY 23 MR. HUGHES: 24 Q Sir, can you state your name for the 25 record?
Page 7 1 the phone? 2 Okay. And then who else do we have in 3 the room here? 4 MR. WALKER: Todd Walker. 5 MR. HUGHES: Okay. And he's here as a 6 corporate representative of Reddaway? 7 MR. HAMILTON: Yes. 8 * * * 9 RAYMOND J. LECKI, after having been 10 first duly sworn, was examined and testified as 11 follows: 12 * * * 13 (Whereupon, Lecki Exhibit 1 was 14 received and marked for Identification.) 15 MR. HUGHES: Mr. Lecki, before I start 16 with you, let me put something on the record. 17 This is regarding some other defendants. 18 I have marked as Exhibit 1, a letter 19 dated May 4th, 2012 from Amy Drayton regarding 20 four entities, E.C.H. Will GmbH is the first, 21 Korber Paperlink GmbH is the second, Korber 22 Paperlink North America, Inc. is the third, 23 Korber Paperlink LLLC is the fourth. 24 Based on the representations in her 25 letter and its attachments, the plaintiffs are	Page 9 1 A Raymond John Lecki. 2 Q Can you spell your last name for the 3 court reporter? 4 A L-e-c-k-i. 5 Q Where do you live? 6 A 53 Cherie, C-h-e-r-i-e, Drive, Brick, 7 New Jersey 08724. 8 Q Okay. And do you work? 9 A Yes. 10 Q Where do you work? 11 A I work for buildings and grounds, Toms 12 River for the Justice Complex. 13 Q Okay. And where's that located? 14 A In Toms River, New Jersey. 15 Q Okay. And how long have you been at 16 the Justice Complex? 17 A Come in August it'll be ten years, 18 this August. 19 Q Okay. And what's your position there? 20 A I'm the night supervisor of jail 21 operations. 22 Q Okay. And are you married? 23 A Yes. 24 Q What's your wife's name? 25 A Erin C. Lecki, L-e-c-k-i, same last

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1	name.		1	A	-- said, well, send him down for an
2	Q	Yes, sir.	2		application. If they like him, he's available,
3		And does she work?	3		they'll hire him. And they hired me.
4	A	Yes.	4	Q	Okay. And where was -- where did you
5	Q	What's her job?	5		go down there to --
6	A	She's in computer crimes in the Ocean	6	A	I went to the --
7		County Prosecutor's Office.	7	Q	I should have also said, you
8	Q	Okay. And how long have y'all been	8		understand you're under oath?
9		married, roughly?	9	A	Yes.
10	A	Twenty-one years.	10	Q	Okay. If you need to take a break at
11	Q	Congratulations.	11		any time let me know.
12	A	Thank you.	12	A	Absolutely.
13	Q	Let me ask you just a little bit about	13	Q	And if you don't understand a
14		your background, okay?	14		question, tell me and I'll try to rephrase it.
15	A	Yes.	15	A	Absolutely.
16	Q	Where did you grow up?	16	Q	All right. So, you went down to
17	A	In Jersey City, New Jersey.	17		Reddaway. Where was the office? Was the office
18	Q	Okay. And how far did you go in	18		part of the plant?
19		school?	19	A	Yes. It was on 32 Euclid Avenue in
20	A	Third year of college, Jersey City	20		Newark.
21		State College.	21	Q	Is that where the plant and office
22	Q	Okay. And tell me about -- at a	22		together was all located?
23		certain point in time you started working at	23	A	Yes.
24		Reddaway, right?	24	Q	Okay. Did Reddaway have any other
25	A	In 1975, late 1975.	25		locations besides that?
Page 11			Page 13		
1	Q	Okay. Just real quick, walk me	1	A	No.
2		through any work experience you had before Reddaway?	2	Q	Okay. And when you went there do you
3	A	I worked in a paint factory, I worked	3		remember who you interviewed with?
4		as a school janitor prior to. Pretty much that was	4	A	Yes.
5		the only jobs when I started working class. My	5	Q	Who did you interview with?
6		uncle got me the job through one of the factory	6	A	He was one of the part owners, Fred
7		workers which was a foreman, Andy Alday, back, and	7		Grassel.
8		said that this company in Newark was hiring. So, I	8	Q	Okay. Do you know how to spell that
9		went out there, filled out an application and I got	9		last name?
10		hired.	10	A	I'm going to wing it, it's
11	Q	Okay. So, you got the job through	11		G-r-a-s-s-e-l, or possibly two Ls.
12		your uncle?	12	Q	Okay. Pronounced Grassel?
13	A	My uncle, yes. He was trucking. I	13	A	Grassel.
14		worked for a company called New Penn, which picked	14	Q	And he was a part owner, to your
15		up at Reddaway.	15		understanding?
16	Q	Okay. And Reddaway is spelled	16	A	Yes. He was one of the part owners.
17		R-e-d-d-a-w-a-y?	17	Q	Okay. Did you meet with anyone else?
18	A	Correct.	18	A	Yes, Warren Conway.
19	Q	Okay. So, your uncle was a trucker	19	Q	Okay.
20		and he knew about Reddaway?	20	A	He was another part owner.
21	A	He met some of the workers down in	21	Q	Anyone else?
22		shipping and receiving, and they explained that, you	22	A	That's all, right -- right -- that
23		know, they were looking for men, hiring. And he	23		day.
24		said, my nephew needs a job, you know --	24	Q	Okay. And this was, what, you said
25	Q	Okay.	25		about 1975?

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1 A July, July of 1975. The date I'm not 2 too familiar. I really can't remember. I knew it 3 was the month of July. 4 Q Okay. And you look -- you brought 5 some notes? 6 A Yeah, just to refresh my memory over 7 the -- you know, it's been a long time. So, I just 8 wrote down some notes on, pretty much from start to 9 finish of the years of what went on and what I did 10 and how I worked through the years. 11 Q Can we -- can we mark those as an 12 exhibit? 13 MR. HAMILTON: Mark those as exhibits. 14 BY MR. HUGHES: 15 Q Can we mark those as an exhibit? 16 A Absolutely. 17 Q Okay. And then you can refer to them 18 whenever ever you need to. 19 A Yes. 20 (Whereupon, Lecki Exhibit 2 was 21 received and marked for Identification.) 22 BY MR. HUGHES: 23 Q So, Exhibit 2 is your notes -- 24 A Uh-huh. 25 Q -- and feel free to refer to them	1 A Grassel. 2 Q -- who you understood to be a part 3 owner; Warren Conway, who you understood to be a 4 part owner. And what did they tell you, what did 5 you tell them as best you recall, it was many years 6 ago? 7 A Well, they wanted to know where I 8 lived and, you know, what I was -- when I was 9 available, which I was -- I said immediately, 10 whenever. So, they told me the type of work that 11 was going to be done or what I was going to get 12 involved in, which they said, you know, this is an 13 asbestos plant, so I said, okay. They go, does that 14 matter to you. I go, no, I'm looking for work, you 15 know, I'll -- so they said you'll be an apprentice 16 in the weaving shed under the guidance of Fred 17 Davies; he was the lead foreman. 18 Eventually what they told me in the 19 long run that he was going to be retiring in a 20 couple of years so if I worked out I was going to 21 take over his position, which in turn I did. 22 Q Okay. So, they said it was an 23 asbestos plant, they used asbestos? 24 A Yes, in brake lining applications. 25 Q So they used asbestos in brake lining
Page 15	Page 17
1 anytime. 2 A Okay. 3 Q And try to say yes or no instead of 4 uh-huh so the court reporter can write it down, 5 okay? 6 A Yes. 7 (Whereupon, Lecki Exhibit 3 was 8 received and marked for Identification.) 9 BY MR. HUGHES: 10 Q And then let me hand you Exhibit 3 and 11 ask you, is that a photo of part of the plant that 12 you're talking about? 13 A Yes. 14 Q Okay. Have you seen that sign before? 15 A Yes. 16 Q How do you know that sign? 17 A I've recently painted it and done work 18 to it, as well as the door, that's the garbage 19 entrance. Right next to it is shipping and 20 receiving and the entrance for the employees. 21 Q So, back when you worked at Reddaway 22 you helped paint the sign? 23 A Yes. 24 Q Okay. So, let's see. So, when you 25 interviewed, you interviewed with Fred Grassel --	1 applications, right? 2 A Yes. 3 Q Okay. And they were -- they said you 4 would be an apprentice in the weaving shed? 5 A Yes. 6 Q And you would work under Fred Davies? 7 A Yes. 8 Q And he was going to retire in a while? 9 A Yes. 10 Q And is that what you started doing at 11 Reddaway? 12 A Yes. 13 Q Okay. And so walk me through what 14 happened from there? What kind of duties did you -- 15 what kind of things did you do in the weaving shed? 16 A Basically everything, as an apprentice 17 learned all the machines which were heavy-duty 18 looms, which wove the brake lining. So you had to 19 know the operations of the raw material that went 20 into the machine; as well as how it ran 21 mechanically, how to fix the machine, how to make 22 cuts, meaning the size footage, take them off, learn 23 how to dry the rolls, get them prepped for shipping, 24 you know, the rest of the process throughout the 25 factory.

Page 18 1 Q Okay. And when you started how many 2 looms were there? 3 A Let me see, it was the jumbo loom, 4 3/8ths, half-inch, quarter-inch and 3/16ths, and 5 three quarters. 6 Q Okay. And when you talk about 7 quarter-inch, three quarters, what does that mean? 8 A That's what comes off the sizes of the 9 brake lining on each machine. Some did -- pretty 10 much all of them did two sizes per loom except one, 11 the 3/8ths just ran 3/8ths. Like the jumbo loom ran 12 an inch, inch and an eighth; three quarters ran 13 three quarters and 7/8ths; half-inch loom ran 14 half-inch and 5/8ths; quarter-inch loom ran 15 quarter-inch and 5/16ths; and the 3/16ths loom did 16 3/16ths, 5/32nds and 1/8th, and two different sizes. 17 You had the regular asbestos and you 18 had ebony, which is a jute type of material with 19 rope and asbestos mixed in. So, it was like a -- 20 and they called it ebony. 21 Q Okay. Did the number of looms ever 22 change over the years? 23 A We added on another quarter-inch loom 24 which was being built in the meantime, oh couple of 25 years down the road Ed Pagano, me and Fred Davies.	Page 20 1 Norfab, Ametex. Ametex actually was the first 2 company which supplied the asbestos, then they 3 changed to Norfab when they got into the 4 non-asbestos. 5 Q Okay. And that would come -- that 6 would be yarn that would come in spools? 7 A Yes, bobbins. 8 Q Okay. They all came in bobbins? 9 A Bobbins, spools. Yeah. 10 Q Okay. And then I've heard a term 11 creel, c-r-e-e-l? 12 A That's what we load the looms which 13 pulls the yarn into the front of the machine. And 14 then a shuttle runs back and forth to bind 15 everything together to make a piece of brake lining 16 up in front, on the different sizes, widths and 17 thicknesses. 18 Q You mentioned a weaving shed. Was 19 that located somewhere in the overall plant? 20 A It was the biggest, major part of the 21 factory, you know, it started right with me on all 22 the raw materials -- 23 Q Okay. 24 A -- to make a product. 25 Q And walk me through the first -- the
Page 19 1 Q How do you spell that? 2 A P-a-g-a-n-o. Pagano, I'm winging 3 that. 4 Q So, at some point a second loom was 5 added that could make the quarter-inch? 6 A And 5/16ths. 7 Q Okay. And do you know what decade, 8 for example, the second loom that could make the 9 quarter-inch and 5/16ths was added? 10 A From my notes around '85. 11 Q Okay. When the second loom was added 12 around 1985, do you remember if it made asbestos 13 brake lining or non-asbestos brake lining? 14 A We had -- we were going to set it up 15 for asbestos, but it actually turned into making 16 samples for the non-asbestos. So it made samples of 17 the non-asbestos, but it was geared up at any 18 particular point for asbestos. It could run 19 either/or. 20 Q Okay. All right. So, when you 21 started there the raw material, what would that be? 22 Would that be spools? 23 A It was yarns. It was different types 24 of yarns. Each yarn was spun differently in 25 thickness with brass and zinc mixed in it from	Page 21 1 first years you worked there and working your way up 2 and what position you got to? 3 A Well, I was apprentice under the 4 foreman of Fred Davies, which I taught and was 5 learning the whole operation of the weaving shed. 6 During the summers, I worked summers learning pretty 7 much the rest of the factory on repairs on other 8 machinery, as well as office. I painted the office 9 a couple of times. Down in shipping and receiving 10 did numerous repairs with Ed Pagano. He was the 11 head machinist. He oversaw all the machinery. So 12 during the summer I used to work with him, either 13 jobbed in the weaving shed if there was any 14 outstanding and throughout the rest of the factory 15 on all repairs. 16 Q How many people worked with the looms? 17 A At the beginning when it was busy, oh, 18 about eight or nine women, plus me, plus Fred until 19 he retired. So you're looking at ten in the weaving 20 shed. 21 Q Okay. And did you become a foreman or 22 a supervisor? 23 A I became foreman, general foreman of 24 the weaving shed under supervision of eight women. 25 Q And when did you become the foreman,

Page 22 1 roughly? Was it still in the '70s; was it in the 2 '80? 3 A No, it was the '80s, I'm going to say 4 '83, '84. 5 Q Okay. And so at that point were 6 you -- tell me what kinds of things you would have 7 to do? What were your responsibilities? 8 A My responsibilities were now any 9 general breakdowns I had to report, you know, to the 10 office or Ed Pagano, fix and repair daily, order 11 yarn, put in my yarn orders or got received orders 12 from the office on what to make on the size on each 13 machine. Basically, it's like a general order on 14 how many rolls to make off each loom. So, to fill 15 production, what they needed, what they took out of 16 stock down in shipping and receiving throughout the 17 factory. 18 Q Okay. 19 A So I replaced any materials that was 20 needed. It started with me. 21 Q And did you know how to actually work 22 on the looms themselves, do what the women were 23 doing -- 24 A I was taught how to run every machine. 25 There wasn't a machine in there I didn't know.	Page 24 1 A Yes. Yes. 2 Q Okay. Walk us through the 3 manufacturing process for the asbestos brake lining. 4 For example, you'd start with the yarn? 5 A Yeah, the ordering of the yarn. 6 Depending on how many rolls were going to come off 7 each loom, I would get that from Fred Grassel 8 sometimes in the morning, afternoon, whatever day it 9 was, and he would give me an order list on how 10 many -- what he needed per month or per week or for 11 each individual loom. And that, I used to give him 12 back what I had in stock in yarn, saying, well, I 13 can make so much but I need this. 14 He then would tell me how much you 15 need and I said to him, well, I'm out of this size, 16 certain sizes. You need to call Ametex or Norfab 17 and order some more. And they used to buy by weight 18 and this is what I need to finish these orders or, 19 you know, get it going and get it rolling. So he 20 said, okay, I'll see when they're being delivered. 21 He goes, do you have enough to run now? I says, 22 yeah, but within a week or so I'm going to need more 23 depending on if you don't change it, meaning add 24 more or delete or switch things around, which he did 25 randomly.
Page 23 1 Q Okay. How old were these looms? 2 A Oh, I think one of the dates was 1849 3 from England. They recently came from England. 4 Q Okay. And how many bobbins or spools 5 would there be on the looms? 6 A The largest loom was a jumbo. The 7 jumbo loom, that ran inch and inch and an eighth. 8 And that was a double decker; it had like two tiers. 9 It almost touched the ceiling. That had over 1,500 10 spools of yarn in it. That had the most. 11 Q That had the most? 12 A Yeah, 1,500 to possibly 2,000 ends, 13 meaning each yarn spun into that machine to gather 14 up in front and then bound together with a shuttle 15 that went across to bind the material woven. 16 Q Was the jumbo loom like -- was it set 17 up like that? Did it exist when you started at the 18 company? 19 A Oh, yes. Yes, that was in place. 20 Q So, as of say 1980, what kind of 21 products was the company making? 22 A Asbestos brake lining. 23 Q Okay. So, the main product was 24 asbestos brake lining. Was it called RBW? Is that 25 an abbreviation for it?	Page 25 1 So instead of making maybe 10-inch and 2 an eighth, we go down to eight to swing the yarn 3 over to the quarter-inch, because the thinner size 4 sometimes were popular, more popular than the big. 5 It all depended on sales. 6 Q Okay. And when the yarn would -- that 7 would get woven on the loom and then what would 8 happen? 9 A Each loom had different footages and 10 widths. The jumbo ran from 25 or 24 width to 28 and 11 a half wide by 30 in -- 30 feet. 3/8 was 27 wide by 12 50 feet, or 51 we made it for excess cut, three 13 quarters was 27 by 30 feet. Half-inch was 27 by 14 51 feet. Both quarter-inch looms was 27 by 76 feet. 15 And the 3/16ths loom was 27 by 76 feet. That's what 16 came off each loom every day, never changed. 17 Q Once it came off the loom, then what 18 would happen? 19 A We would dry it. 20 MR. HAMILTON: I'm going to -- I'm 21 going to just place a request that from here on 22 out this portion of the deposition on the main 23 factory process be marked confidential, because 24 I think it's going to be some proprietary 25 information. The judge will do whatever she'll

Page 26 1 do with it. 2 But for purposes of this case 3 obviously it's going to be used, but I'm just 4 thinking about, he's going to give some 5 detailed information about the manufacturing 6 process so I just note that request. 7 MR. HUGHES: Okay, well, we can -- we 8 can look at that after we get done. 9 MR. HAMILTON: Sure. 10 MR. HUGHES: All right. 11 BY MR. HUGHES: 12 Q After it came off the looms, would it 13 go -- would it get some sort of resin or something? 14 A It would dry first. They had to be 15 totally dry. 16 Q So was it wet? 17 A Because it came off wet. 18 Q Okay. 19 A Asbestos had to be totally wet to a 20 point because it had a total friction. It was like 21 99.9 trying to make this -- because you're dealing 22 with rock. So, it was heavy friction for the 23 machine to run. So, the more we wet it, the better 24 it ran. So, you couldn't give a dry roll to the 25 processing end because compound wouldn't soak in	Page 28 1 A Yes, it was all resins. 2 Q Okay. And then after it came out of 3 the dipping, then what? 4 A It went into the drying racks, which 5 was second level floor. They rolled them out on to 6 racks, I would say, for a couple of weeks, then 7 whatever rolls were finished in that process, they 8 came down, they went into drying coops for another 9 couple weeks, and then they came out whatever was in 10 process to go in. They got rolled again to 11 thickness, put in an oven for another eight hours of 12 cooking under gas temperatures, and then they were 13 done, rolled again, cut to size. 14 They were cut down to 25-foot lengths, 15 or whatever lengths prescribed for an order. Then 16 they were grinded and then they would finish cutting 17 even more on whatever special orders, which went 18 through the finishing department or to specialty 19 departments, meaning smaller sizes. 20 Q And how would they be shipped out? 21 For example, were burlap bags used? 22 A On all rolled goods material, yes, 23 burlap was used on 100 percent of the product, as 24 well as boxes per small parts or the oil fill, which 25 was the brake blocks. And then some crates, if
Page 27 1 wet. It had to be totally dry. 2 So in -- my department had a drying 3 oven, which ran off the boiler, because it was dry 4 air. So we dried about 15 to 16 rolls every other 5 day and then shipping and receiving or finishing 6 department would come in, take them out, and then 7 that process just rolled over every other day in 8 drying rolls, because I had numerous stock of all 9 different sizes. 10 And that's the other thing, after all 11 the finished product on all the different sizes and 12 lengths come off, Fred Grassel would then come and 13 say, okay, I need these dried, these different sizes 14 dried, and they would go in the -- what we call coop 15 and dry them up, or the drying oven. 16 Q Okay. And was there -- the finishing 17 room, what would they do, if you know? 18 A They would then take my rolls, roll 19 them to size, pretty close to the size that the 20 thickness that each size was. They had these big 21 rollers. Then it went into the dipping department 22 on whatever size they needed dipped per process 23 per -- to finish or what they needed for orders. 24 Q And the dipping, that was some sort of 25 resin?	Page 29 1 there was some left over from other products that 2 came in, we used to keep whatever so we didn't have 3 to buy because we were a small company. 4 Q Right. 5 A So, one of the finishing departments 6 used to put some of their smaller brake pads in the 7 crate and then send it down to shipping and 8 receiving. 9 Q So, if you know, for a normal -- a 10 typical order for rolls of the woven lining, would 11 they -- to your experience would they have normally 12 been sent out in the bags, burlap bags? 13 A Yes. Burlap bags, yes. 14 Q Okay. And would those have some sort 15 of caution statement on them? 16 A All -- every box, bag or crate got 17 tagged "caution asbestos product." It was a white 18 tag. 19 Q And were those tags, did you see those 20 from when you first started at the company? 21 A Absolutely, yes. 22 Q Okay. Now, was there something called 23 a material card or production card, cards, 24 c-a-r-d-s? 25 A On each loom, whatever material size,

Page 30 1 whether I started with the basic size, let's take 2 for example, 3/8ths, 3/8ths, every -- whatever -- 3 they usually made four rolls a day if the machine 4 ran well. Each one had a number, date and my 5 signature on that card. And then that number 6 followed through the process, because if there was 7 any screw-ups, you can find out what was wrong with 8 that particular material from start to finish. 9 Q Would the cards say anything about 10 whether the product had asbestos or not? 11 A Yes, yes. 12 Q Okay. What would it say? 13 A Well, it would just -- the beginning 14 of my card read "asbestos." I just put, you know, 15 on the card asbestos until we changed. 16 Q Okay. Describe for me the process of 17 changing from the asbestos to the non-asbestos? 18 A Well, we had to liquidate all of the 19 asbestos, and that ran about -- in the middle of '87 20 we were finishing out all the asbestos. That means, 21 some of the looms we were stripping because we 22 didn't make any more heavy-duty equipment, which was 23 the inch, inch and eighth, because it had so much 24 yarn in that, we liquidated and stripped out of that 25 and pushed it to the other thinner sizes to finish	Page 32 1 A That's office. That's all was left at 2 the factory. That never came home with me. It 3 stayed. That was all factory stuff. 4 Q All right. 5 A They hung by the tail end of each 6 machine in like a -- clear envelope where you can 7 see your daily -- like any time any one of the 8 managers or any one of the -- in production come up 9 and see where I was at, on how many I made or if I 10 was changing to a different size and everything was 11 dated, and if they want to reflect back on a number, 12 because sometimes when a number rolled through the 13 rollers and we got like messy, so they came in to 14 get the number and my number had to coincide with 15 that roll. So they would come and grab that number 16 just to write it down on the roll again if it got 17 messed up. So my numbers always matched that size. 18 Q And did you ever have an occasion 19 where, in fact, you'd have to go pull a production 20 card, was there an incident with the tugboat once? 21 A Well, that happened -- yeah, there 22 was -- back the early '80s we had a piece of 23 finished brake lining come back and there was a 24 barge incident, accident, that they said our brake 25 lining had failed. And it was a half-inch --
Page 31 1 out the yarn instead of throwing it all away. And 2 that was command from the office on when we had to 3 change over. And initially finish out that we're 4 not going to do asbestos anymore. 5 Q Okay. As of say 1983, was the company 6 still making asbestos woven lining? 7 A Absolutely, yes. Yes. 8 Q Okay. How about 1984? 9 A Yes. 10 Q Okay. For the quarter-inch, the 11 thinner widths, okay? 12 A Yes. 13 Q Was the company still making asbestos 14 woven lining in 1985? 15 A Yes. 16 Q In the thinner widths as well? 17 A Yes. 18 Q Okay. What about in 1986? 19 A Yes. 20 Q Okay. And that would be noted on the 21 production cards? 22 A Yes. 23 Q Did you ever throw those away? 24 A No. 25 Q Did you keep them?	Page 33 1 half-inch or 5/8ths piece. 2 And Vincent Lacarrubba was the R & D 3 and I just happened to be there and he showed me. 4 He goes, do you see anything wrong with this lining? 5 So I said, no, what happened? He goes, it failed. 6 Well, low and behold, they sent a coffee cup with 7 grounds in it saying that the brake pad had failed 8 on the operation of the barge. When they tested the 9 grinds it was more metal fragments than asbestos 10 fragments and other particles from the brake lining. 11 It ended up the lining didn't fail; 12 their band had disintegrated which the lining had 13 nothing to grab on to. So, the barge went sailing, 14 had the accident, but they tried to claim that it 15 was our fault the brake lining failed and it wasn't. 16 Because we ended up seeing when, I guess, I don't 17 know what lawyer went out and saw the barge and saw 18 their equipment and it was like antiquated beyond 19 repair and that was their fault. The winch failed. 20 Q Let me show you a sales document. 21 (Whereupon, Lecki Exhibit 4 was 22 received and marked for Identification.) 23 (Whereupon, Lecki Exhibit 5 was 24 received and marked for Identification.) 25 (Whereupon, Lecki Exhibit 6 was

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Page 34 1 received and marked for Identification.) 2 BY MR. HUGHES: 3 Q Okay. The first exhibit you have 4 there, the sales record, is it number 4? 5 A Yes. 6 Q Have you ever seen documents like that 7 before? 8 A I've seen these -- not so often but in 9 shipping, this is big in shipping, but I do know 10 what this is because it's, throughout the factory 11 you see these hanging through the different 12 departments, which was the finishing or shipping and 13 receiving. Because, like I said, it's not a big 14 factory. I know what these are, these are order 15 forms. 16 Q Okay. And what's the date on that 17 one? Is that one 1984? 18 A 1-17-84. 19 Q Okay. Can you tell what kind of 20 products are being listed on there? 21 A 5/16, 3/8ths, 3/16ths, and 22 quarter-inch. Heavy-duty woven asbestos lining. 23 Q Okay. Was the company making and 24 selling heavy-duty woven asbestos lining in 1984? 25 A Yes.	Page 36 1 before? 2 A Woven, yes. 3 Q Does that appear to be Reddaway 4 shipping record? 5 A Yes. 6 Q What's the date on that? 7 A 8-21-86. 8 Q Okay. Can you tell what kind of 9 products are listed on there? 10 A Quarter-inch, quarter-inch -- all 11 quarter-inch. 12 Q Okay. 13 A There's quarter-inch ebony and then 14 regular heavy-duty woven, which it's all asbestos. 15 Q Was the company still making and 16 selling asbestos heavy-duty woven in 1986? 17 A Yes. 18 Q How do you know that? 19 A The date, and plus whatever was still 20 left in stock was still in the factory, finished 21 stock. 22 Q Okay. Explain for me the process 23 of -- when did the -- was there a time when you 24 first heard about the company thinking about making 25 non-asbestos?
Page 35 1 Q How do you know that? 2 A Because "HD" is heavy-duty woven. If 3 it was anything else it would state it on the 4 billing, if anything was changed. 5 Q Okay. And then the next document, the 6 Exhibit 5 I think, have you seen documents like that 7 before? 8 A Yes, this is shipping and receiving 9 which goes out with any finished product. 10 Q Okay. 11 A The bales, boxes or cartons. 12 Q Is that one also dated '84? It's kind 13 of hard to read. 14 A Yes, 3-23-84 to be exact. 15 Q Okay. And does it indicate that the 16 product -- whether the product was asbestos? 17 A It says right on here "6 bales 18 asbestos brake lining nonflex." 19 Q Okay. And what does that mean when it 20 talks about "bales of brake lining"; do you know? 21 A It's what they get wrapped in to be 22 shipped out, to be covered. So, basically for 23 shipping purposes. 24 Q Okay. And then the next document 25 after that, have you seen documents like that	Page 37 1 A Yes. In and around 1985. 2 Q Okay. What do you remember? 3 A There was a letter or a document sent 4 from OSHA to Ed Eggert. He was the general manager 5 then. Eggert, E-g-g-a-r-t. I'm winging it. Not 6 good with names. He was the general manager and 7 also head of sales. 8 Q Okay. 9 A He would come out and give us reports 10 on up and coming things at the factory, as well as 11 sales. Anything to do with the NWPA laws, which was 12 an OSHA law. We had put a humidification system in, 13 which cost a lot of money, figures I don't recall, 14 but I knew it was close to probably a million 15 dollars to keep the dust levels down for OSHA, 16 because asbestos, you know, they were cracking down 17 on it. And the more OSHA stepped in, the more the 18 dust levels went down, meaning they wanted almost 19 zero tolerances of dust. 20 So Ed Eggert told -- said -- he showed 21 us this document which was the thing from OSHA 22 saying it's going to be hard making asbestos for the 23 future, think about another alternative. 24 So at the point there was -- they 25 started to look into different types of yarns and

Page 38 1 blends and getting into a different product. And 2 that was in and around 1985. 3 Q Okay. And Ed Eggert, do you remember 4 when he -- was he at the company when you got there 5 or... 6 A No. 7 Q Okay. Do you remember roughly when he 8 came to the company? 9 A Well, it had to be after Fred Grassel 10 passed away. And that was pretty -- let me see. 11 Had to be after '85 that Grassel passed away and 12 then Ed Eggert arrived. He was brought in for a 13 general manager and sales, because that's what 14 Grassel's position was. He was pretty much plant 15 operations general manager. He was part owner. 16 Q Okay. And how long was Ed Eggert 17 there? 18 A Till, I'm going to say 1989 or 1990, 19 winter, winter of. He was fired. 20 Q Okay. Tell me about that. What 21 happened? 22 A Between the changeover and the lack of 23 sales, and also Todd Walker started working in the 24 factory as one of the head salesmen, and he started 25 in, you know, getting more involved in the factory,	Page 40 1 A In times. At the beginning very 2 rarely saw him. He was pretty much on the road, 3 sales. He did a lot with the oil fields. He had a 4 lot of good friends and that was pretty much one of 5 our main productions was the oil fields. So he 6 pretty much stayed Texas, out that way with some of 7 his, you know, close, I guess, business friends that 8 bought -- put a lot of orders in. 9 Q And some of the oil field companies 10 would buy the thicker sizes? 11 A The inch and inch and an eighth. 12 Q And that could actually be submerged 13 in oil or used in a clutch, that sort of thing? 14 A It's for drilling. 15 Q Okay. 16 A It's for slowing down the drill head, 17 the drill shaft. 18 Q Okay. And so you met Mr. Barton, Jr.? 19 A Couple of times at the beginning, not 20 too much. 21 Q Did he take some folks out on the -- 22 out on a boat at one point? 23 A Later on, later in the late '80s. He 24 brought the boat up because he wanted to get back in 25 touch with the factory and he wanted to see what was
Page 39 1 and saw that Ed Eggert wasn't doing his job, 2 basically. 3 So, eventually he just said he's not 4 going to, you know, deal with Ed Eggert anymore and 5 he fired Ed Eggert. He -- because he wasn't 6 bringing in the sales, lack of, you know, 7 production. Things were really falling apart. And 8 the non-asbestos changeover wasn't going well, 9 meaning sales were still lacking. 10 Q Okay. Let me ask you about some of 11 these names. William Barton, Sr. and Junior? 12 A He was the president and owner of, 13 part owner of the factory. 14 Q Bill -- so Bill Barton, Jr.? 15 A Bill Barton, Jr. 16 Q Okay. Was he the president when you 17 got there? 18 A Yes. 19 Q Okay. Did you ever meet him? 20 A Yes. 21 Q Okay. Where did he live? 22 A In Stuart, Florida. 23 Q So, he lived away from the factory? 24 A Yes. 25 Q Would he come up to visit?	Page 41 1 going on. Because, like I said, the factory was in 2 a big change. 3 Q Yup. 4 A Sales was down, trying to pick up 5 sales, trying to pick up emotions. So he brought 6 the boat up a couple times and he took us out on the 7 boat for fishing. 8 Q What was the boat called? 9 A It was the Miss Redco. 10 Q And Redco was another name for 11 Reddaway? 12 A Right. It was like our nickname if 13 you want to call it. 14 Q And then Mr. Barton, he had a spouse 15 named Pam; is that right? 16 A Yes. 17 Q Okay. And then Todd Walker, is he in 18 the room? 19 A Yes. 20 Q Okay. Who was Todd Walker? 21 A He was the son of Pam. 22 Q So he was the stepson of Mr. Barton? 23 A Yes. 24 Q When did Todd Walker start working at 25 Reddaway?

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Page 42 1 A Took over or actually in sales? 2 Q Well, when did he first show up at the 3 company? 4 A In and around 1985. 5 Q Okay. And what kinds of things did he 6 do when he first started at Reddaway? 7 A He was one of, I would say head 8 salesmen involved in going out to the -- we got into 9 some foreign business, Germany. I don't recall 10 anything other than Germany, maybe some other 11 factories abroad. But he went out to all our, 12 pretty much all our distributors, all our customers, 13 met with them, tried to get -- raise more orders and 14 more business. 15 Q Okay. Could his start date have been 16 1987? 17 A That could be more general manager. 18 Q Okay. What happened? Did he move up 19 or what happened? 20 A Well, when he fired Ed Eggert, then he 21 took over general manager of the factory, as well as 22 now head salesmen. So he was involved in 23 everything. 24 Q Okay. Okay. Did he become president 25 of the company at some point?	Page 44 1 I was declined a raise. So, in turn, Mr. Walker 2 brought in one of his friends to take over and help 3 him. He was, I think, plant operations, and he took 4 over making a higher salary than me and I was to 5 train him. His name was Joey Dipadavao. I'm going 6 to wing this. Dipadavao, D-i-p-a-d-a-v-o-a. 7 Q Okay. So, in 1983 Todd Walker wasn't 8 at the company? 9 A No. 10 Q Is that correct? 11 A If he did it was for a visit, but he 12 had no -- 13 Q He wasn't working there? 14 A He wasn't -- no, he wasn't involved 15 with the factory as, per se, to make an order, 16 change something, say that there's a special client 17 or anything like that. He wasn't involved. 18 Q Okay. I want to show you a couple 19 excerpts from Mr. Walker's deposition from 20 April 13th, 2012. First one is on page 15 in which 21 I asked "When was the date that Reddaway switched to 22 non-asbestos." And the answer was "Basically they 23 switched in 1983." Is that correct? 24 A No, that's incorrect. 25 Q Why is that incorrect?
Page 43 1 A Probably now. I don't know. He 2 wasn't in charge -- or he was in charge then but I 3 don't know if you want to call it president. 4 Q From your perspective in the '70s and 5 '80s, who was the person at the very top of 6 Reddaway? 7 A Bill Barton, Jr. 8 Q Okay. All right. And how long did 9 you work for Reddaway? When did you leave? 10 A August of 1995. 11 Q Okay. And were you fired? Did you 12 retire? 13 A Retired. 14 Q Okay. And at the time you retired 15 what was your job position? 16 A I was head foreman of the weaving 17 shed. 18 Q Why did you retire? 19 A There was a little controversy on 20 salaries, pay scales, and what I wanted to continue 21 making staying there being the, you know, one of the 22 lead persons of the factory, because there was 23 downsizing and, you know, plus I said business was 24 declining. So, in order to keep the factory 25 running, I put my -- my word in for a raise. Well,	Page 45 1 A We only were making samples then for 2 testing of the material to change over from asbestos 3 to non-asbestos. 4 Q Tell me how you would make samples. 5 A We -- when we were switching out and 6 downsizing the asbestos, meaning moving the yarns to 7 the other sizes to finish out, the quarter-inch, the 8 second quarter-inch was the newer of the looms we 9 had set up for a sample machine. So, they brought 10 in different types of sample of the non-asbestos. 11 There was a synthetic, it was more fiberglass, it 12 was a white texture which was very hairy, itchy. We 13 ran samples of that. Testing went accordingly, 14 which I found out it wasn't good because of the 15 resins or the type of change that they needed 16 because it was a different product. Asbestos, it 17 was one patent, one type of dipping process and it 18 was all patent by Bill Barton, Jr., and that worked 19 well for asbestos. 20 With the non-asbestos, we needed 21 change. It wasn't drying properly, it wasn't 22 setting up right, and that meant a lot in the 23 stopping of the new brake lining which was what we 24 were trying to change into. So there was many 25 changes or samples that was run until we finally

Page 46 1 went to Norfab, which now they switched from Ametex 2 to their name Norfab, to find the right blend. 3 Q Okay. Now -- and were there occasions 4 where you would run part of a roll with non-asbestos 5 and part with asbestos? 6 A That was also on some machines. I ran 7 like a two or 3-inch piece on the edge trim with 8 asbestos, and we ran a full roll that was dipped and 9 cut out separately because it was tighter and it 10 held in so they can get a sample. That ended up not 11 working well because it was a mixture and they 12 weren't sure if that was the right type of blend, 13 and that's when we went to the quarter-inch to get a 14 precise right blend of a product and start with a 15 smaller size instead of a thicker size. Things 16 weren't working out. And as well as the compounds 17 wasn't working properly. 18 Q Okay. 19 (Whereupon, Lecki Exhibit 7 was 20 received and marked for Identification.) 21 BY MR. HUGHES: 22 Q You mentioned running samples, looking 23 at Exhibit 7, can you tell what that is? 24 A This is one of the sample orders of 25 the non-asbestos quarter-inch which came off that	Page 48 1 the dipping was the different type of resin that had 2 to be formulated so it would set up and bake 3 properly. 4 Q Okay. 5 A So that was a long trial basis. So 6 this was like the early workings of how the thinner 7 size to see what it did and then go from there with 8 the thicker sizes, which took time. 9 Q But once you ran a sample of the 10 non-asbestos on a loom, could you then still run 11 asbestos on the loom? 12 A If I was told to set back up, yes. 13 Q How would you do that? 14 A You would strip out all the ends out 15 of the whole machine and then have a whole setup of 16 asbestos to put back in the machine. 17 Q Okay. Do you recall which loom was 18 the first loom that was used to run any 19 non-asbestos? 20 A The newer quarter-inch. 21 Q Okay. And so in Mr. Walker's 22 deposition he testified that there was only one loom 23 that ran a quarter-inch; is that correct? 24 A No, there was two. 25 Q Okay. And --
Page 47 1 new quarter-inch loom, which was sent out for 2 samples to East Patterson Machine, which I'm almost 3 positive in my memory it was a punch press operation 4 in Clifton. This is one of the ones I think Vincent 5 Lacarrubba knew. 6 Q Do you remember them as a customer? 7 A Offhand, yes and no. There were so 8 many. I just knew because this was a sample that 9 was going out for testing in the first -- 10 Q Okay. 11 A -- one of the first products that we 12 were trying to make and see how it worked on a 13 smaller machine, not big, heavy duty. Quarter-inch 14 is very thin size, light duty. 15 Q Now, to run a sample on a machine, 16 wouldn't you have to change over the way the machine 17 works in order to run non-asbestos? 18 A The workings of the machines, it ran, 19 it depended on the variable of thickness. The 20 non-asbestos would run thinner. We had a hard time 21 getting tolerances. And then when I finished my 22 tolerance it had like -- elasticity, it like it 23 would make it, it'd be thinner and all of a sudden 24 when it relaxed it got thicker. And that's also the 25 problems we had in rolling and in dipping. And then	Page 49 1 A It also ran 5/16ths. 2 Q So, the loom that ran a 3 quarter-inch -- first of all, there were two looms 4 that could run quarter-inch? 5 A Yes. 6 Q And the second loom came in in the 7 '80s for the quarter-inch? 8 A Yes. 9 Q And each loom that ran a quarter-inch 10 could also run 5/16ths? 11 A Yes. 12 Q Okay. And it was the new loom for the 13 quarter-inch that was used for non-asbestos? 14 A Yes, in samples. 15 Q Okay. Was the new loom for the 16 quarter-inch ever used for asbestos or just for 17 non-asbestos? 18 A I'm not sure if we set it up to run 19 some asbestos. It could be, yes, we did, but not 20 for a long period of time. It was almost to run out 21 the product. 22 Q Okay. When you worked there and 23 Mr. Walker was also working there, how much time did 24 he spend in the weaving shed? 25 A Not much. Just periodically walk

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Page 50 1 through either for, how's everything going, orders, 2 see how the operations, if I needed anything in 3 inventory. 4 Q How much time would you spend in the 5 weaving shed in your normal days? 6 A Eight to 10 hours a day. 7 Q Okay. 8 A Five or six days. 9 Q Did the non-asbestos yarn have a 10 different color? 11 A Nonasbestos was like a yellowish 12 orange. 13 Q Was it Kevlar? 14 A It changed colors when it went in the 15 drying process. 16 Q Okay. And I interrupted you. 17 Was it Kevlar? 18 A Kevlar was one of the main products of 19 the blend. 20 MR. HUGHES: Okay. Let me show you 21 something else. 22 (Whereupon, Lecki Exhibit 8 was 23 received and marked for Identification.) 24 BY MR. HUGHES: 25 Q All right. Let me hand you Exhibit 8,	Page 52 1 A Yes. 2 Q What was happening there? 3 A We were trying to finish out and keep 4 up with business in the asbestos, which we still had 5 in the factory, but at a minimum, meaning we weren't 6 ordering much more asbestos yarn, which was almost 7 at a nil, meaning nothing, and just by liquidating 8 our stock -- 9 (Telephone interruption.) 10 BY MR. HUGHES: 11 Q And we can take a break if you need to 12 answer the phone. 13 A No. 14 Q So, in '86 what was happening with the 15 asbestos and non-asbestos? 16 A We were liquidating our stock in yarn, 17 meaning the raw material, to finish out until we 18 couldn't use any more on the looms on finishing out 19 roll good product. Meaning, before it went to 20 process in my department before we ended up 21 liquidating and throwing it all away. 22 So we didn't want to waste the yarn 23 where we could finish it in roll good, put it into 24 production, because OSHA in the laws really weren't 25 getting on us yet, meaning it was in the works, but
Page 51 1 and ask you what's the date on that one? Is that 2 1986? 3 A August of 1986, yes. 4 Q Does it have Mr. Eggert's name at the 5 bottom? 6 A Yes, it does. 7 Q Okay. The part I highlighted towards 8 the bottom, can you tell me what that's talking 9 about? 10 A "As of today, August 18th, 1986, we 11 have 13 working weeks to process our remaining 12 asbestos yarn and roll goods inventory. 13 Consequently, we must push on production as if we 14 were up to our eyeballs in business. Our goal is to 15 have all looms cleaned of asbestos yarns by 16 November 18th," I guess, of 1986, "and to have 17 completed all grinding and slitting by that date 18 also. This is a tall order since, we will also by 19 trying to keep up with production of the RNAW," 20 which is the non-asbestos. 21 Q Okay. Were you around in 1986 at the 22 company? 23 A Yes. 24 Q Okay. Do you remember what he's 25 talking about there?	Page 53 1 it wasn't really serious yet. 2 Q Okay. So am I understanding you 3 correctly that in 1986 the company was still 4 manufacturing woven lining with asbestos? 5 A Yes, at a smaller scale, meaning we 6 were downsizing on the asbestos. 7 Q Okay. And the company, in that memo 8 Mr. Eggert's talking about using up the rest of the 9 asbestos raw material. That would be the yarn? 10 A Yes. 11 Q Okay. And then was there -- once all 12 the looms were converted over, was there still 13 asbestos woven lining that was in the finished 14 product inventory? 15 A Yes. 16 Q Okay. Did OSHA ever come by the 17 plant? 18 A Yes, on certain occasions they 19 announced that they were going to do air sampling. 20 In the early, beginning in the '70s or the early 21 '80s we were tested a couple times by OSHA. They 22 came in with their own equipment and each one of us 23 wore an apparatus for taking air samples and we had 24 the humidification system in place and which was 25 working. Evidently we passed and we went on. But

Page 54 1 randomly they would come in just to check, make sure 2 the system was on or working properly. 3 Q Did the company know in advance that 4 OSHA was going to come for an inspection? 5 A On certain occasions, yes, because the 6 testing had to be set up. On any other like 7 surprise visits, it was very rarely. 8 Q Okay. When the company knew in 9 advance would they do anything to get ready for the 10 inspection? 11 A We do a massive cleanup. We'd make 12 sure, like soup to nuts, it was clean like you can 13 walk through there and dine. Because there was a 14 lot of dust, a lot of cardboard, empty boxes, you 15 know, production garbage, meaning it had to be clean 16 garbage cans, clean everything, bag it and tag it. 17 All those cautioning tags were on everything when it 18 went to the garbage area. We'd do a massive cleanup 19 to make everything less dusty really. Like when 20 they come in it was like, wow, this place is really 21 nice. So we'd pass. Make it easier on everybody. 22 Q Would people wear new or clean 23 uniforms for the visit? 24 A Yes. 25 Q Okay. Would they normally wear new or	Page 56 1 Q For the inspection? 2 A Yes. 3 Q But when OSHA wasn't there, it wasn't 4 mandatory? 5 A No. That was laxed. 6 Q Okay. 7 A The only thing that was enforced was 8 eye protection. 9 Q Okay. And when the company knew OSHA 10 was coming, they would sweep up and clean that 11 plant? 12 A Yes. 13 Q And clean up all the dust? 14 A Yes. 15 Q Okay. Was there asbestos dust? 16 A Yes. 17 Q They would clean that up? 18 A Yes. 19 Q Okay. But when OSHA wasn't there the 20 plant wasn't necessarily that clean? 21 A Through the production week we would 22 clean up either late Friday, at the end of 23 production, we would like take more -- slow down 24 machinery and end work a little early to clean up 25 the whole mess of the week. Normally if it was a
Page 55 1 clean uniforms every day? 2 A Yes, we didn't have pigs. They 3 changed -- we had seven or eight or 10 uniforms per 4 worker. 5 Q Okay. Would the workers wear dust 6 masks or respirators when OSHA showed up? 7 A Yes, and eye protection. 8 Q Okay. Did the workers normally wear 9 dust masks or respirators when OSHA wasn't there? 10 A No, that was your option, but eye 11 protection was the major thing. 12 Q Okay. 13 A We had a couple of injuries so we 14 enforced the eye protection more than the mask. The 15 mask were -- was up to your discretion. At times we 16 would enforce it more, but when we got in to the 17 non-asbestos sampling, we felt it was less because 18 it was a non-asbestos, it wasn't asbestos. So we 19 took away, you know, the authority on saying you 20 didn't have to wear a respirator. 21 Q But when the company knew OSHA was 22 coming, they would have everyone wearing a mask? 23 A That was mandatory. 24 Q When OSHA showed up? 25 A Yes.	Page 57 1 heavy week we'd end earlier, clean up, get the shop 2 ready for next week, or if we worked Saturdays, that 3 was our cleanup. Pretty much nothing ran in my shop 4 on a Saturday but all cleanup. 5 Q Okay. I'm going to -- this is an 6 exhibit from the deposition of Mr. Walker, it's 7 Exhibit 34. It's the letter from Ralph Lanz, at the 8 end of it, it has some pages of measurements of 9 asbestos that lists employees. It's my only copy 10 but I want to hand it to you and see if you can 11 recognize any of these names and what they did, 12 okay? 13 A Yes. 14 Q So, I won't mark this for this one, 15 but it's Exhibit 34 from the April deposition of 16 Mr. Walker. 17 Actually on the first page I marked 18 where it talked about dry and wet. Do you see that? 19 A Yes. 20 Q Do you know what that's talking about? 21 A Each asbestos roll came off soaking 22 wet because of the high friction levels of asbestos. 23 Q Okay. 24 A So each loom -- you know, the jumbo 25 loom really got saturated because you're going to a

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1 big thickness of inch, inch and an eighth to get it
2 to work properly. It had to be pretty much
3 saturated, which also meant a lot of mess, cleanup,
4 which involved, you know, more cleanup on a wetter
5 production day or every production day, but each
6 roll no matter which loom it ran off of was wet --
7 Q Okay.
8 A -- asbestos.
9 Q If you turn a couple of pages in
10 you'll see -- go in one more page, okay, that page.
11 Do you see where I highlighted an
12 employee name?
13 A Yes, Gladys.
14 Q Do you remember Gladys?
15 A Yes, Gladys ran the bobbin machine.
16 She ran the things that ran in the shuttle to bind
17 the materials on the machines, which ran -- it was
18 called the filler.
19 Q Okay. And does it say -- I think it
20 says something about bobbins on there?
21 A Yes, she ran the bobbin machine.
22 Q Okay. So was she one of the people
23 that worked in the weaving department?
24 A She worked with me, yes.
25 Q Was she one of the people that you

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1 oversaw?
2 A Well, I oversaw at the beginning when
3 I was apprentice, I worked with her to learn her
4 machine, which I learned all the machines, and hers
5 pretty much I used to always give her help because
6 we were always low on bobbins because production was
7 very heavy. And in changing different sizes, each
8 thickness that she ran on that had to be changed
9 quite frequently, so she was always behind.
10 So, in my apprentice I used to always
11 go over and give her a hand to make more bobbins
12 because the machines couldn't run without them.
13 Q Okay.
14 A Either in the back in the creel or up
15 in front, you needed both, but this mainly ran the
16 front.
17 Q Okay. Who's the name on the next
18 page?
19 A Helen Ott.
20 Q Do you remember her?
21 A She ran the 3/8ths loom only. She
22 knew all the looms but her main priority was the
23 3/8ths loom which was different from all the others;
24 it was an electric loom. Ran very fast. So, she
25 was trained on that and pretty much she stayed on,

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1 that was her prime loom, which was loom number 7.
2 Q Okay. Who's the next person?
3 A Roy Cleveland. He worked in the
4 finishing department. He did drill press, he worked
5 with Andy Alday -- he worked down in the finishing
6 department. He didn't work with me at all, but I
7 knew who he was.
8 Q Okay. And then who's on the next
9 page?
10 A John SanRoman, good man, passed away,
11 buried him. He was one of the -- he was in the
12 finishing department. He cut and slitted the
13 finished product on some specialty roll good orders.
14 He was the main guy. He was pretty much partners
15 with Andy all day on a lot of the finished material
16 that went out for orders, big orders.
17 Q Okay. Is there another page after
18 that?
19 A Yes.
20 Q Who's the next one?
21 A Felicetta Barbieri. She ran the
22 3/16ths loom. She ran the thinnest loom with all
23 the thinner sizes. Had numerous changeovers because
24 that loom also ran ebony and it had a lot of massive
25 changes, meaning a lot of ends had to come out and

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1 be restrung, which I learned how to do that because
2 I used to work with her. I worked with all these
3 women.
4 Q Okay. Who's next?
5 A Florence Kowal, she ran the half-inch
6 loom as well as the same loom ran 5/8ths. She
7 worked in the weaving shed with me.
8 Q Okay. Is there another one?
9 A That's it.
10 Q Okay. What about, was there somebody
11 named Vince Lacarruba, L-a-c-a-r-r-u-b-a?
12 A He was -- he was head in charge of
13 custom cutting, meaning custom orders. He did all
14 custom fancy brake pads, anything weird, I would
15 say. Any special type. He was also involved in
16 R&D. He tested the linings, meaning anything that
17 came back that they said failed or any of the new
18 stuff like the non-asbestos that we were starting to
19 get into, he tested on a little brake machine.
20 Q Okay. Did he end up getting lung
21 cancer?
22 A From what I understand from his
23 daughter, he died, yes, of cancer.
24 Q Did his wife bring a claim of some
25 sort against Reddaway?

Page 62 1 A Through the daughter, only from what I 2 recall, yes. And numerous other companies, I think 3 she ended up suing, which I don't recall who. But 4 through -- to the daughter, who I met through, she 5 works as an x-ray technician in Brick and I had to 6 go to a bone doctor then, and low and behold, that's 7 how I met her. Because she was the x-ray technician 8 there and I just started talking to her about her 9 father and stuff and she told me he passed away. 10 And I said, oh, and I says -- she 11 goes, yes, and my mother sued numerous customers or 12 what went on with Vince, and pretty much that's all 13 she said. And I said, well, it's sad, you know, 14 that things -- I hope everything goes along. 15 Q When was that? When did you talk to 16 her? 17 A Oh, that had to be about ten years 18 ago. 19 Q About ten years ago? 20 A Yeah, 2000. 21 Q And the daughter's name is Ann Marie? 22 A Ann Marie Lacarruba. She's married 23 now. I don't recall her marriage name. 24 Q Does she live around here? 25 A Yes, she still lives in Brick.	Page 64 1 received and marked for Identification.) 2 BY MR. HUGHES: 3 Q Mr. Lecki, you brought a page of notes 4 with you today? 5 A Some I jot down from memory. 6 Q Okay. Can you walk us through what's 7 in your notes and how it relates to what you 8 remember? 9 A From start to finish I was at the age 10 of 21 when I started at Reddaway in July of 1975 11 until August of 1995. It was a non-union factory. 12 Fred Grassel was one of the part owners, Warren 13 Conway, part owner, and Bill Barton, Jr., he was the 14 head owner. Pam, his wife, that I knew later on 15 when he -- you know, I found out the whole 16 information of the factory. Then I found out Todd, 17 there was a -- her son was, you know, involved with, 18 you know, the family member. 19 We did woven asbestos til around 1987, 20 still had finished product in shipping and receiving 21 until '88 or after. Fred Davies was the foreman of 22 the weaving shed, worked with him until he retired 23 and I took over as head foreman of the weaving shed. 24 Frank Davies, Fred Davies' nephew, still works at 25 Reddaway. He worked with asbestos during the years.
Page 63 1 Q Okay. 2 A Or down the shore. I know she's still 3 closes by. If she's not in Brick it could be Toms 4 River. 5 Q Okay. Did Mr. Lacarruba, do you 6 remember how long he worked there? 7 A He was there before me in '75, so it 8 has to be a couple of years before '75, and when I 9 left in '95 he was still there. 10 Q Okay. Did he end up leaving the 11 company? 12 A I guess. I don't know. I'm pretty 13 sure. 14 MR. HUGHES: We've been going for 15 about an hour, let's go off and take a 16 five-minute break and then go a little bit 17 more. 18 THE WITNESS: Absolutely. 19 THE VIDEOGRAPHER: It is now 11:20. 20 We are at the end of tape number 1. 21 (Whereupon, a short break was taken.) 22 THE VIDEOGRAPHER: It is now 11:37 on 23 May 17, 2012. We will continue with tape 2 of 24 the videotaped deposition of Raymond Lecki. 25 (Whereupon, Lecki Exhibits 9-15 were	Page 65 1 He works part time now at Reddaway. Todd was not at 2 the Reddaway in any title in 1984. Fred Grassel was 3 still alive and in charge of plant operations until 4 '86 when he died. Warren Conway was in charge of 5 finance of the whole factory until he retired in '88 6 or around then. 7 Ed Eggert was hired by Bill Barton, 8 Jr. to take over sales and plant operations 1986. 9 Mike Alape took over for Warren -- Alape, A-l-a-p-e, 10 took over for Warren Conway when he retired, 1989 11 with finance and sales. 12 Todd started at the factory late '87, 13 '89 as head salesperson. After a year or two, Todd 14 did not go out of the factory on the road for sales. 15 He convinced Bill and Pam the factory needed change 16 in the office. Or -- at or around '89 or '90 he 17 fired Ed Eggert in the winter and fired Mike Alape a 18 week before Christmas. 19 In 1991 went to Germany with Todd and 20 Joey Dipadava, which also he hired in the factory 21 as plant superintendent or plant operations manager. 22 I met my wife April 21st, 1985, 23 married October 4th, 1986, and my daughter was born 24 August 3rd, '87 to bring some memory back on dates; 25 that's how I recalled most of the stuff because

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Page 66 1 that's how when I came home my wife when I was still 2 working with asbestos, she said it was a bad smell, 3 the non-asbestos smelled cleaner. 4 Q Okay. 5 A And that's all I have written. 6 Q Okay. Did she go to the plant 7 sometime in the mid-'80s? 8 A A couple times she stopped by for 9 lunch. 10 Q Okay. Have you talked to her about 11 your testimony today? 12 A Yes. 13 Q What can she recall about the use of 14 asbestos, if anything? 15 A The smell was bad because it was 16 musty, wet, and normally the minute I come home, she 17 said take a shower, don't go near the kids, because 18 I worked with asbestos. It's either was in my hair 19 or pretty much on my skin. From washup you couldn't 20 really -- you know, even though you changed 21 uniforms, left your work shoes there, it was still, 22 you know, you got home, you washed up real good. 23 Q Okay. You mentioned a trip to 24 Germany, what was that about? 25 A We had -- it was one of our big	Page 68 1 During the regular workweek it wasn't mandatory. 2 Q Okay. 3 A Again, the only mandatory thing was 4 eye protection throughout the factory. 5 Q Okay. Let me show you Exhibit 10. 6 Have you seen a document like that before? 7 A Material data sheets. 8 Q Yeah. An MSDS sheet, have you ever 9 seen one of those? 10 A Yes, they came in on either the drums, 11 the linseed oils to tell you what was in the 12 product, you know, they covered, you know, when it 13 was shipped. 14 Q Okay. Now, that MSDS sheet, does it 15 appear to be for the Reddaway woven lining? 16 A Yes, 50 percent asbestos. 17 Q Okay. Is that correct, from your 18 experience, was the product about 50 percent 19 asbestos? 20 A It was all asbestos, weaving through 21 the dipping process, when you dipped the rolls, 22 total asbestos. 23 Q So, the woven stuff was asbestos? 24 A Yes. 25 Q But was there also some wire in it?
Page 67 1 customers. They bought asbestos lining at the 2 beginning and then when we changed over to 3 non-asbestos, they were putting in big orders which 4 helped us out with the non-asbestos. 5 We went over there because they were 6 closing down one -- a part of their factory so we 7 went over and bought the remaining old looms, which 8 looked like ours, to get us extra parts, and we 9 bought it for scrap metal, meaning it was a deal you 10 couldn't pass up on. The type of machinery it 11 almost coincided what we had. Because the German 12 and English, it looked the same. For future, you 13 know, breakdowns and big, major, if anything really 14 broke down we had extra stuff. 15 Q Okay. I'm going to show you a few 16 more documents. That's Exhibit 9, and at the top it 17 talks about OSHA and talks about, I think, 18 respirators. Do you see that? 19 A Yes. 20 Q Okay. Do you know if the company ever 21 got a citation from OSHA; you may or may not know, 22 I'm just asking? 23 A Not -- no, that would be more office 24 because only when they arrived like for testing we 25 more -- we wore the -- we wore the respirators.	Page 69 1 A Brass and zinc. 2 Q Okay. Was the brace and zinc -- first 3 of all, why was there brass and zinc? 4 A Brass held for strength; zinc was for 5 lubrication throughout the wearing process as the 6 lining was applied to the brake pad or the brake 7 drum. 8 Q And for the heavy-duty woven lining, 9 how much brass or zinc would be in it, if you know? 10 A Per bobbin, some had two strands of 11 brass and two strands of zinc. Some had a single 12 strand of brass, single strand of zinc. Some were 13 plain, nothing in them. So, some numbers were like 14 630-0, then it was 6302B, 6302BZ. The six was the 15 type of strand; the three was the 3-wrap, 3-wraps of 16 yarn; and the two meant two wires, two wires of 17 brass, two wires of zinc. 18 Q Okay. 19 A Or one brass, one zinc. 20 Q So, when the woven heavy-duty lining 21 was coming off of the looms, okay, say in 1984, 22 okay? 23 A Yes. 24 Q What would be in that product before 25 it went to the resin and the dip, what would be in

Page 70 1 the product besides the asbestos yarn? Would it be 2 the brass or zinc? 3 A It'd be both. 4 Q Brass and zinc? 5 A Brass and zinc, yes. 6 Q Anything else? 7 A Oh, on the edge so that -- for cutting 8 would be jute, a trim on the edge which would be the 9 rope type fiber, just so -- because the trim always 10 got thrown away. 11 Q Okay. And the jute was j-u-t-e? 12 A J-u-t-e, yes. 13 Q So, it was -- you'd have some strands 14 of the brass or wire or brass or zinc, some of the 15 jute on the sides? 16 A On the side for cutting purposes, 17 because it was wasted, it was thrown away. 18 Q But the over -- is it fair to say the 19 overwhelming majority of the stuff that would come 20 off the loom would be the asbestos yarn? 21 A Yes. With the -- 22 MR. SMITH: Objection to form. 23 THE WITNESS: -- with the brass and 24 zinc. 25	Page 72 1 didn't have asbestos in it, right? 2 A No. 3 Q Okay. So, when it came out of there 4 presumably now it has some of the resin in it too, 5 to go with what came off the loom? 6 A Yes, that percentage I don't know. 7 That was in the dipping process. 8 Q Okay. Let me show you another one. 9 That's number 11. That's another -- can you tell me 10 what that is? 11 A These are order forms, filled order 12 forms for unbranded non-asbestos woven, dated 13 1-27-88 and the other one is dated 2-16-88. 14 Q Okay. And what thicknesses is it 15 showing for that? 16 A From the thin size 3/16ths, 17 quarter-inch and 5/16ths. 18 Q Okay. And is it your recollection 19 that as of 1988 the company was able to make 20 non-asbestos woven brake lining in those sizes? 21 A Yes. 22 Q Okay. Let me show you Exhibit 12. 23 Can you tell what that is? 24 A Another order dated 1-27-88 for 25 5/16ths non-asbestos woven.
Page 71 1 BY MR. HUGHES: 2 Q Okay. 3 A And in the filler. It ran in the 4 shuttle too; that's what made the thickness on the 5 sizes throughout the woven process to weave it 6 together. There was also brass and zinc in there to 7 bind it and each -- each loom that ran always had a 8 brass or a zinc wire in it for that thickness. 9 There was never a yarn without a wire in it, and 10 especially in the weaving up in front. 11 Q Okay. The yarn, when the company was 12 making the asbestos heavy-duty woven lining, was the 13 yarn, to your understanding, have anything in it 14 besides asbestos? 15 A No, it was just asbestos. 16 Q Okay. All right. So, when the 17 product would come off the loom, would it be more 18 than 50 percent asbestos? 19 A Yes. 20 Q Okay. But then the product would go 21 to the dip, right? 22 A Yes. 23 Q And it would be soaked in that resin? 24 A Yes. 25 Q Okay. So, presumably -- and the resin	Page 73 1 Q Okay. And is it your recollection 2 that the company was able to make non-asbestos in 3 that size in 1988? 4 A Yes. 5 Q Okay. I think you testified earlier 6 that when the company was selling the non-asbestos 7 product, the sales documents would say 8 "non-asbestos" on them; is that correct? 9 A Yes. 10 Q And do those seem to say 11 "non-asbestos" on them? 12 A Yes. 13 Q Okay. Let me show you Exhibit 13. 14 Can you tell what that is? 15 A -- dated -- this is a -- one of the 16 shipping orders, shipping release orders, what's 17 going out of shipping and receiving, dated 8-23-85, 18 three bales of asbestos brake lining. 19 Q And as of 1985, is it correct the 20 company was still making and/or selling asbestos 21 brake lining? 22 A Yes, this is a finished product. 23 Q Okay. And would that be woven rolls 24 there? 25 A Yes.

Page 74 1 Q Okay. How do you know that? 2 A It's three bales, and in the bales, 3 all bales had woven, centrifugal brake lining which 4 was the bales. 5 Q And that would be -- would that be the 6 burlap bags? 7 A Depending on the size -- burlap bag, 8 yes, roll -- roll good as it was called. 9 Q All right. Let me show you one more, 10 it's 14. Can you tell me what that is? 11 A Dated 8-16-85, this is an order form 12 for the variable sizes from 5/16ths, 3/8ths, 13 3/16ths, a quarter-inch, HD-woven lining; that's 14 asbestos. 15 Q How do you know? 16 A It just says "HD"; it doesn't say 17 "non-asbestos." If it was non-asbestos it would 18 specify non-asbestos. 19 Q Okay. Did you also see the 20 abbreviation RNAW for non-asbestos? 21 A Yes, that was another little logo or 22 abbreviation. 23 Q Would that stand for "Reddaway 24 non-asbestos woven"? 25 A Yes.	Page 76 1 A On the outside of the finished 2 product. 3 Q Okay. Let me show you -- 4 A On the roll part. 5 Q This is -- we don't need to bother to 6 mark this, this is Exhibit 9 from Mr. Walker's 7 deposition. It's a -- it's like a Reddaway 8 promotional brochure, but let me hand it to you, 9 okay? You just mentioned, a logo -- what did you 10 say, a logo on the outside? 11 A It was an ink pad type with a stencil 12 and they logo-ed it on the outside if the customer 13 wanted Redco, which that's what it looked like right 14 there in the picture, and that was branded on the 15 outside as well as maybe on the inside. If they 16 didn't, they didn't get the logo. They just got a 17 size and that was tagged on it to show what size the 18 roll was finished. Whatever size it was. 19 Q Can you hold that up and show the jury 20 where the logo would be stamped on there when it was 21 branded? 22 A It's -- two brands would be on the 23 outside perimeter and on the inside diameter. 24 Q So, it'd be put on the outside and the 25 inside of the roll?
Page 75 1 Q Okay. But that one, the document 2 you're looking at says -- what does it say "heavy 3 duty"? 4 A Just "heavy-duty woven lining." I 5 would say this is asbestos. 6 Q Okay. And then here's the last one. 7 I think that's 15. Can you tell me what that is? 8 A This is another order form, sizes 9 3/16ths, quarter-inch, date 8-25-80 -- 8-28-85, 10 sorry. 11 Q Okay. 12 A Unbranded heavy-duty woven brake 13 lining. That's asbestos. 14 Q Where it says -- so that would be 15 asbestos; right? 16 A Yes. 17 Q Okay. And where it says "unbranded," 18 do you know what that would mean? 19 A There's not our logo on it. It just 20 goes out plain. The company that it gets shipped 21 to, they either put their logo or nothing on it. 22 Q Okay. Did you ever see the roll 23 lining when it would have the Reddaway logo? 24 A Yes, it would say "Redco." 25 Q Where would it say that?	Page 77 1 A Yes. 2 Q Okay. And if you page through that 3 document, do you see pictures of the heavy-duty 4 woven rolls the way that they used to look? 5 A Yes, this is another one, this is a 6 thicker size. 7 Q Okay. And would that -- if it was 8 branded Redco, would it have had Redco stamped on 9 the outside and inside? 10 A As well as same, same as the thinner 11 sizes. Any type of roll good in this form would 12 either get the logo here on the outside as well as 13 the inside, and a tag stating the size of the -- of 14 each roll. 15 Q How would the logo be stamped on 16 there, if you know? 17 A With an ink stencil. They had 18 stencils and an ink pad, regular ink pad, and they 19 just inked them on. 20 Q Okay. So, it was possible then to 21 stencil graphics or words on the surface of the 22 rolls of lining? 23 A Yes. 24 Q Okay. Did you ever see where Reddaway 25 stenciled or put on the surface of the linings any

Page 78 1 warning about asbestos? 2 A No, not on the linings, only on the 3 burlap bags when it was shipped out. 4 Q Okay. Did Reddaway, while you were 5 working there, ever tell you that there was any risk 6 that asbestos could cause cancer or mesothelioma? 7 A No, just at -- just the warning labels 8 that you worked with asbestos. 9 Q Okay. But you never saw any warning 10 that was actually physically stenciled or put on the 11 rolls themselves? 12 A Not to my knowledge, no. 13 Q Okay. Did you have any understanding 14 of what the rolls would end up being used for out in 15 the market? 16 A Yes. 17 Q What kind of things would they be used 18 for? 19 A It was for all heavy-duty equipment. 20 So it went on heavy-duty machinery. Like I said, 21 the oil field was a big product. 22 Q Cranes? 23 A It went on cranes, barges. Then it 24 went -- the thinner sizes went to light-duty holding 25 brakes, parking brakes, you know, light-duty	Page 80 1 to? 2 A In the big oil field blocks they used 3 to sell packet kits of brass bolts and nuts, lock 4 washers and washers which is in that picture there. 5 Q Okay. 6 A That went in almost every box of the 7 oil field wells. Or the thicker sizes depending on 8 what the customer wanted or needed. 9 Q Did you have any understanding of 10 other ways that the lining could be attached to 11 brake bands; for example, could it be riveted? 12 A It could be riveted or also epoxy, and 13 I think the epoxy went on lighter-duty clutches or 14 brake applications. 15 Q Okay. 16 A We also sold the epoxy. 17 Q Did you ever actually see the roll 18 lining when it would be taken by an end user off the 19 roll and put on a brake? Did you ever, ever see an 20 end user or just hear about it or how do you know 21 about that? 22 A I would hear through, you know, some 23 operations on what the other companies did. I 24 sometimes never saw how they applied, just through 25 like when we used to counter -- countersink holes,
Page 79 1 equipment. So, your thinner sizes went on lighter 2 duty, as well as you went up in sizes it went for 3 heavier duty or different applications. Then it 4 went into custom cutting on different sizes. 5 Q What about elevators, could they be 6 used on elevators? 7 A Elevators we tried getting into that 8 but it wasn't our field. They were looking at the 9 other variables. 10 Q Okay. Did you ever hear the phrase 11 "brake bands." 12 A Yes. 13 Q B-a-n-d-s. 14 What are brake bands? 15 A Brake bands is what the lining gets 16 attached to. 17 Q Okay. 18 A So, that's a surface that it gets 19 attached to as well as when it goes to on the -- it 20 would be on the other brake surface. So, there's 21 two surfaces; one that it gets applied to, and one 22 that gets put onto in the process of whatever 23 equipment to hold or stop the equipment. 24 Q Did Reddaway sell products that would 25 help you to put the lining on the band if you wanted	Page 81 1 that was, I guess, riveted. The other company did 2 that. 3 Q Okay. 4 A What we used to ship to. 5 Q So, you understood that the lesser 6 widths, like quarter-inch, could be used for brake 7 bands for industrial use? 8 A Yes. 9 MR. SMITH: Objection to form. 10 BY MR. HUGHES: 11 Q Okay. Is that something that was 12 generally known around the company as far as you 13 could tell? 14 MR. SMITH: Objection as to form. 15 THE WITNESS: Repeat that again. 16 BY MR. HUGHES: 17 Q Well, would other people at Reddaway 18 have known that as far as you could tell? 19 MR. SMITH: Objection as to form. 20 Speculation. 21 THE WITNESS: As to? 22 BY MR. HUGHES: 23 Q What the brake lining would be used 24 for out in the market? 25 A It was always for heavy-duty

Page 82 1 equipment. 2 Q Okay. Was it marketed for that use? 3 A Yes. 4 Q Okay. And would executives from 5 Reddaway go, to your knowledge, out in the field and 6 meet with potential accounts or existing accounts? 7 A Oh, yes, for promoting more sales or 8 trying to see if they were going to get any new 9 equipment. Or buy new equipment or see if we can 10 put the pads on the new equipment. Or we had a 11 change a design or different cutting, which was 12 custom cutting. 13 Q Okay. 14 A And see if we got any orders. 15 Q When the company was making the change 16 from asbestos to non-asbestos, did there come a time 17 when the company was having problems in terms of 18 revenues and being able to make payroll? 19 A Sure. There was one time Warren came 20 out and he got us all together down in shipping and 21 receiving and he was a little taken aback that he 22 had to tell us that one week we probably -- we used 23 to get paid every Wednesday, that they might not 24 meet payroll because of a customer late on payment 25 or not coming through with a payment because of, you	Page 84 1 raw material to make our yarns. And that was the 2 non-asbestos. 3 So, he wanted to know how much -- how 4 good our production was, what was the outlook on 5 production sales, and how much, you know, we're 6 going to order in the future. 7 Q Do you remember -- 8 A To gear up. 9 Q Okay. Roughly when was that meeting, 10 if you know? 11 A That had to be '87, '88. 12 Q Okay. What about any meetings of the 13 company people at Reddaway to talk about trying to 14 change to non-asbestos? 15 A Ed Eggert was telling us, you know, 16 periodically when we were changing over, that we 17 started samples and this is going to be the new 18 product, and when we find a good product, because we 19 tried many samples. And then when the Kevlar and 20 the different blend came we said, all right, we're 21 going to nail this down. This is what we pretty 22 much started ordering and started getting done. But 23 the problem started lacking in the dipping. The 24 resin that was for asbestos didn't go with the 25 non-asbestos. It had to be changed. So that took
Page 83 1 know, our lack of -- not lack of production, it was 2 lack of sales. 3 And we were struggling to get out of 4 one, which was the asbestos, get into non-asbestos, 5 and sales was dipping at the moment. And things, 6 you know, we were spending -- trying to change over, 7 which non-asbestos was three times the amount of 8 asbestos. 9 Q When you say "the amount" you mean the 10 price? 11 A Price-wise, yes. 12 Q Okay. Were there ever any meetings 13 that you were involved in where people at Reddaway 14 would talk about this changeover? 15 A Well, I visited with Norfab. I went 16 to visit down in Pennsylvania, Norristown, 17 Pennsylvania. 18 Q Tell me about that, who went? 19 A Me, Ed Eggert, Mike Alape, Todd -- no, 20 it wasn't Todd, it was Bill Barton, and we all went 21 down for a big meeting on the pricing or getting 22 some more non-asbestos yarn when we finally figured 23 out this is the blend we want and make some type of 24 business arrangement with John, and he wanted to 25 know how much that he had to buy because he gets the	Page 85 1 some time. 2 So the dipping process started to 3 change because now we're getting out of asbestos, it 4 wasn't the same. The non-asbestos wouldn't set up. 5 So Bill Barton, Jr. had to get a chemist in one time 6 and help him, and they started trying to figure out 7 what chemical or what process to now start with the 8 non-asbestos to get that geared up so we can start 9 selling or make a product that would work out in the 10 field. 11 Q Okay. When the company had the 12 problem with payroll, was that in the '80s, do you 13 remember? 14 A Yes. 15 Q Okay. Now, you said you got married 16 in 1986; is that right? 17 A '87. 18 Q '87, okay. 19 A Oh, no '86, I'm sorry. 20 Q '86? 21 A October 4th, '86. 22 Q 86, okay. 23 As of that time was your recollection 24 that the company was still making or selling the 25 asbestos heavy-duty woven?

Page 86 1 A In finished product -- yes, it still 2 had a lot of finished product. To the amount, I -- 3 offhand I don't know how much was in finished. But 4 my end was -- we were finishing out of the woven all 5 the raw material, because eventually you couldn't 6 weave anymore because we weren't buying any more. 7 So what was ever in the shop was just being 8 liquidated through the machines. 9 Q Did you have any understanding of why 10 the company was switching to non-asbestos? 11 A The laws, the laws have changed. 12 Eventually everything came down that we had to get 13 out and we had to get into different competition 14 with the non-asbestos. 15 Q Okay. In term -- did you have any 16 sense of what was more popular with customers in the 17 mid-'80s, in terms of asbestos or non-asbestos? 18 A The asbestos always ran the best. I 19 mean, the customers always wanted that, as well as, 20 you know, they looked, if we didn't sell it or we 21 were changing, there was other avenues that they 22 could buy it, which that's where sales dropped 23 because Korea and Canada were selling asbestos brake 24 pads or brake lining. 25 So customers went through them to get	Page 88 1 A No. 2 Q End quote; is that correct? 3 A No, we were only into samples. 4 Q Okay. How do you know that? 5 A I ran it. 6 Q Okay. Did anybody know what ran on 7 those machines better than you did during the time 8 you worked there? 9 A Yes. 10 Q Who knew better than you? 11 A Nobody. 12 Q So you were the one that knew the 13 best? 14 A Pretty much it came down to when they 15 want a change of size, they came to me on the sizes, 16 the product and the yarn, what ran in the machine. 17 And pretty much they said, this is what we want to 18 go with, a thin size first. 19 Q Okay. Were there ever times where you 20 would put spools of asbestos yarn on a machine for 21 one job or run, then you'd go back to non-asbestos 22 yarn and then go back to asbestos yarn? 23 A That was a sample. We'd run a sample 24 on the edge of the asbestos and that would get cut 25 in finishing.
Page 87 1 orders that we couldn't fill because we were 2 changing over then. So, they were still getting 3 finished product that we couldn't sell or we didn't 4 sell anymore where we were changing over, and then 5 now that's where sales dipped also. 6 Q Was the company using the sales of the 7 asbestos products to fund the change to the 8 non-asbestos? 9 MR. SMITH: Objection to the form. 10 THE WITNESS: Yes. 11 BY MR. HUGHES: 12 Q Okay. How do you know that? 13 A Well, because we had a lot of finished 14 product; you had to finish out. We just didn't 15 throw it all away, which was tons of, you know, 16 finished product, until we finally -- the customers 17 didn't buy it anymore or they were afraid to buy it 18 or they were buying it other routes, sales dropped. 19 Q Okay. 20 A And then they were -- the customers 21 were changing over to non-asbestos or starting to 22 gear up. 23 Q Okay. In Mr. Walker's deposition on 24 page 21 he said "in early 1983 we were in full 25 production of the non-asbestos"?	Page 89 1 Q So, were there time -- so is it 2 correct that there were times where you would switch 3 over to non-asbestos yarn but then you would switch 4 back to asbestos yarn on a given machine? 5 A Yes. 6 Q Okay. In Mr. Walker's deposition on 7 page 25 he said "you couldn't just go back and forth 8 with the asbestos and non-asbestos; it would be 9 impossible. Once they were changed over that was 10 it." Is that correct? 11 A No. 12 Q Why not? 13 A When you run a sample and you put it 14 in the bobbins on the edge of the material, which 15 ran a three-inch strip with the rest of the loom 16 asbestos, up in front when everything got tied in, 17 you would run a non-asbestos fiber yarn through the 18 shuttle so that this product, the sample gets the 19 non-asbestos, the rest of the asbestos gets the 20 non-asbestos, which is a filler. 21 Then when it goes down, and I 22 designated where the product was to be trimmed for 23 the finishing when it got dipped and the process of 24 rolled and finished and grinded, they cut that, then 25 it goes to sampling, which Vince would get it in

Page 90 1 testing, and then the rest of the lining would put 2 to the side. Whether they used it or not in 3 finished good, that was up to finishing. But it was 4 all blended. 5 But the edge was just the 6 non-asbestos, meaning the yarn that came in from the 7 creel, as well as the yarn that ran just the front 8 for a sample. Now, that ran either a 50-foot length 9 or 25-foot length and only ran for a specific length 10 for a sample. 11 Q Okay. 12 A When we were starting sampling. 13 Q At page 40 of Mr. Walker's deposition 14 I asked "And they would have one loom for the 15 quarter-inch. 16 Answer: Yes. 17 Question: There would be one 18 particular loom that would make it? 19 Answer: Yes. 20 Question: And not two looms? 21 Answer: One loom." 22 Is that correct that there was only 23 one loom for the quarter-inch? 24 A No, there was two looms. 25 Q How do you know that?	Page 92 1 Q Okay. All right. I've asked you 2 today about how the looms worked and I've asked you 3 generally about the resin. 4 Have I asked you anything that you 5 would think would be a trade secret that other 6 companies shouldn't know about if Reddaway is trying 7 to protect its secrets? 8 MR. HAMILTON: Objection to the form. 9 THE WITNESS: When we've changed over 10 the dipping room, we changed over, we situated 11 different departments and made it more 12 streamline. 13 When they changed the dipping room, 14 the dipping tank used to be in the ground. So 15 when they were going to fill that in and finish 16 off that area and use it for a different 17 department, they had -- before the contractor 18 came in and cemented the hole, which was a tank 19 which was left in ground, we dumped in extra 20 barrels or old barrels of resin and other parts 21 of stuff or brake lining that was never going 22 to be used, or damaged, in the hole to take up 23 room. So less cement and then that was 24 finished. And that's what's in the ground 25 there now.
Page 91 1 A Because I built the new one with Ed 2 Pagano and Fred Davies. This is before Fred Davies 3 retired. 4 Q Okay. And was Mr. Walker working at 5 the plant when you all built the second loom? 6 A No. 7 Q Okay. Did Mr. Walker ever sit down 8 with you, during the time that you worked together, 9 to ask you all about how the looms worked, how the 10 yarn worked, all the details? 11 A At times, yes. 12 Q Okay. 13 A Not much. He was involved more sales 14 and then plant operations. 15 Q Okay. Did he -- did Mr. Walker ever 16 contact you, say in the last year, to ask any 17 questions about how these things worked? 18 A Recently? 19 Q Yeah. 20 A No. 21 Q Okay. When was the last time you ever 22 spoke to Mr. Walker? 23 A August of 1995. 24 Q And that was when you resigned? 25 A Yes, retired.	Page 93 1 BY MR. HUGHES: 2 Q Are you saying they put asbestos in 3 there? 4 A Yes, there should be some asbestos or 5 resin dumped in that ground there, that corner. 6 Q Okay. 7 A That was the old dipping department, 8 the old dipping. 9 Q Did the company get any approval from 10 any regulators before they -- are you saying they 11 put asbestos brake lining in the ground? 12 A Yes. 13 Q Okay. Did they -- do you know if that 14 was approved by any regulators? 15 A Not to my knowledge. 16 Q Okay. Is that something that the 17 company hasn't publicly revealed? 18 A Yes. 19 Q Okay. Is there anything about the 20 general resin process I have asked you that you 21 would consider a trade secret, besides what you've 22 just said about putting things in the ground? 23 MR. HAMILTON: Objection to the form. 24 THE WITNESS: The resins was a patent. 25

Page 94 1 BY MR. HUGHES: 2 Q Okay. 3 A And whatever -- I don't recall what 4 company made the resins, but the blend and 5 everything was a special percentage blend that was 6 patent. 7 Q Okay. But I haven't asked you what 8 the ingredients were in the resin? 9 A No, no. 10 Q Except that it wasn't asbestos? 11 A Yes. 12 Q Do you know what the exact ingredients 13 were in the resins? 14 A Linseed oils. 15 Q Okay. Was that a secret? 16 A Depending on what type or how it was 17 made, yes. 18 Q Okay. But I haven't asked you what 19 type of linseed oil, right? 20 A No. 21 Q And I haven't asked you how it was 22 made? 23 A No. 24 Q Okay. Do you know what process the 25 company uses nowadays to manufacture its lining?	Page 96 1 corporation, company, manufacturing. 2 Q Okay. Have you ever heard of someone 3 named Sylvester White? 4 A He worked with Vincent Lacarruba in 5 the finishing department, custom cutting. 6 Q Okay. Is he still alive? 7 A To my knowledge, I really don't know. 8 Q Okay. Josephine Restano? 9 A Deceased. She worked with me at the 10 beginning before she retired. 11 MR. HUGHES: Okay. I think those are 12 all my questions. I'm going to look through my 13 notes, but I'm going to turn it over to the 14 other lawyers here to see if they have any 15 questions for you. 16 MR. SMITH: Go off the record. 17 THE VIDEOGRAPHER: It is now 12:11. 18 We're going off the video record. 19 (Whereupon, a short break was taken.) 20 THE VIDEOGRAPHER: It is now 12:22. 21 We'll go back on the video record. 22 EXAMINATION BY 23 MR. HAMILTON: 24 Q Hi, Mr. Lecki, my name is Dexter 25 Hamilton, I'm an attorney for Reddaway. I just have
Page 95 1 A No. 2 Q Okay. Mr. Walker gave a deposition in 3 1993 where he was asked if Mr. Eggert resigned or 4 was fired and he said he resigned; does that match 5 your understanding? 6 A No. 7 Q What's your understanding? 8 A Ed Eggert when he came out, he said he 9 was just fired. He said goodbye to everybody. Todd 10 had took his car away, which was a Volkswagen Jetta. 11 And that was the last I saw of him. Then shortly 12 after, Mike Alape was fired a week before Christmas. 13 Q How close was he to his retirement? 14 A Oh, I don't know how many years he was 15 going to put in or do. 16 Q At page 27 of his 1993 deposition, 17 Mr. Walker said, he was asked "Why did Ed Eggert 18 resign from the company," and he said "I don't 19 really have that knowledge, to move out of New 20 Jersey because he didn't like it anymore basically." 21 Is that your understanding? 22 A No. 23 Q What's your understanding? 24 A He was just fired and he -- from what 25 I recall he went back to Raybestos company,	Page 97 1 a few questions for you. 2 A Okay. 3 Q You were shown a number of invoices 4 today where Reddaway's products were shipped to 5 various customers. Do you remember seeing those 6 invoices? 7 A Not all the time. I didn't work in 8 shipping and receiving, but I saw them in passing 9 because I used to go down to shipping and receiving 10 or in the areas, saw them. 11 Q Well, I'm asking do you remember 12 seeing those invoices today? 13 A Yes, yes. 14 Q That you were shown? 15 A Yes. 16 Q Was your responsibility to prepare 17 those invoices? 18 A Through my department I only received 19 orders to make the roll good. 20 Q So you didn't -- it wasn't your 21 responsibility or anyone who reported to you, it 22 wasn't their responsibility to actually type those 23 forms of what was being requested and what was being 24 sent to the customer? 25 A No.

ERIK ROSS PHILLIPS, ET AL. vs. ALBANY INTERNATIONAL, ET AL.
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1 Q You were asked some questions about 2 the content of the yarn, the asbestos-containing 3 yarn. How did you know what materials comprised the 4 asbestos containing yarn when the factory was using 5 asbestos containing yard? 6 A I was taught all that through Fred 7 Davies. 8 Q Okay. 9 A He taught me all the yarns plus the 10 women. Every woman that I was with on each machine, 11 how I learned each machine, they taught me what was 12 in the machine, how it worked, and I worked them as 13 well as repair them. 14 Q But the various shipments of asbestos 15 containing yarn, when the factory was using the 16 asbestos containing yarn, would you necessarily see 17 the packaging of the yarn and know specifically what 18 was in each batch or each shipment? 19 A I unloaded it. 20 Q Okay. So there would be paperwork 21 that would come with it? 22 A Yes. 23 Q And what other department -- describe 24 all of the departments that were at the factory 25 during the time period that you were there?	1 outside was the tanks on certain other chemicals 2 that were put into the batch of the dip. 3 Q Now, when the lining came off of the 4 looms, and I think you said went into ovens 5 initially? 6 A Drying ovens. 7 Q Drying ovens. 8 A My department, to get the water out of 9 it. 10 Q So, the drying ovens that would be in 11 your department also? 12 A One. I had one. 13 Q One. 14 And then would it go into a dipping 15 department, correct? 16 A Well, there was a couple other 17 process, but yes, exactly, finished. To make the 18 roll hard and get into a finished product it had to 19 be dipped. 20 Q But you weren't in charge of that 21 department? 22 A No, sir. 23 Q And after the dipping department did 24 it go to another different department? I know it 25 went through other processes, but I'm just trying to
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1 A You had a full working machine shop, 2 had lathes, had cutting materials, it had also -- 3 you know -- you know, drill presses and the normal 4 pretty good sized machine shop to fix all repairs of 5 the factory. Ed Pagano ran that. Then you had the 6 stock room which partly was pretty much mine, which 7 kept the inventory of asbestos at the time and as 8 well as the non-asbestos because that was the 9 shipping area -- delivery area where I brought in 10 the yarns. 11 The next area was Vincent Lacarruba, 12 which was custom cutting. And he did all of the 13 different custom work on, I'm going to say the 14 thinner sizes or up to a certain size. 15 Then in the middle, which was the 16 biggest department, which was mine, the weaving 17 shed, which had all of the looms and a drying oven 18 which, you know, was ran off of the boiler at the 19 time until we had a problem. The material caught on 20 fire, but it switched to gas. So we put a new gas 21 drying oven in there. Then it went to shipping and 22 receiving and finish, meaning everything -- big 23 cutting of the rolls, bigger material, all the rest 24 of the material went there, as well as the dipping 25 department at the end of the factory. And then	1 figure out what different stations? 2 A After it came out dipping, it got like 3 vacuumed so it would squeeze out all the juice of 4 the compound, they would weigh it, because they went 5 by weight, to see if the compound set up properly. 6 Then it was taken to a drying rack, second level, 7 which was an upper level, second floor, on an 8 elevator. They brought it up. No man ever ran on 9 it, it was just for material. They pulled the 10 chain -- it was an old belt driven elevator and it 11 went upstairs and they dried it on the rack. 12 Q Was that a different dep? 13 A Well, it was pretty much involved, the 14 finishing department. It was all involved with 15 finishing. 16 Q And then after that there was the 17 shipping department? 18 A That was pretty much in the whole 19 finishing area, that section of the end of the 20 company. 21 Q Okay. And that's where the label 22 were -- the warning labels and other labels were 23 placed? 24 A Yes. 25 Q And you were never in charge of that

Page 102 1 department, correct? 2 A No. 3 MR. HAMILTON: That's all I have. 4 EXAMINATION BY 5 MR. SMITH: 6 Q Mr. Lecki, my name is Patrick Smith, I 7 have a few questions for you. 8 In addition to the departments that 9 you just spoke about, there was -- was there also a 10 sales department? 11 A Yes, that was in the office. 12 Q Did you ever have any responsibilities 13 in the sales department? 14 A No. 15 Q Okay. Other than the trip to Germany 16 and the trip to Norfab in Norristown, Pennsylvania, 17 were you ever responsible for making sales calls on 18 any of the Reddaway customers? 19 A No. 20 Q Were you ever responsible, in any of 21 the years you spent at Reddaway, to take orders from 22 any of those customers? 23 A No. 24 Q In the 1980s, and let's say -- let's 25 take from like 1983 to 1988, would it be correct	Page 104 1 told ten rolls, then ten rolls possibly went out in 2 shipping. That I wasn't involved in. All I got was 3 the initial orders to make the rolls. I'm guessing 4 that was finished product that had to be replaced. 5 Q And once the weaving shed made the 6 rolls and they went over to the finishing 7 department, you have no information as to where they 8 were sent, what quantities they were sent to or what 9 customers they were sent to, correct? 10 A No, only if it went out in raw good, 11 meaning roll good, meaning out of my department, 12 which a couple times I had a couple orders that I 13 had to gather up dry rolls for an order but they 14 went out just like that, white dry rolls. 15 If it was asbestos or when we changed 16 over to non-asbestos, they went out of my department 17 roll good, finished, meaning just off the loom. 18 Q But generally once the production was 19 done in your department, it went over to finishing 20 and it went over to shipping and receiving, and you 21 had no further responsibility for determining who 22 got those rolls, correct? 23 A Yes. 24 Q Okay. Now, you've told us that when 25 the company started to switch over to -- from
Page 103 1 that one of the largest customers of Reddaway would 2 have been oil fields, in that time period? 3 A Yes. 4 Q Okay. And in terms of the oil field 5 customers, the products that they were buying from 6 Reddaway tended to be the larger size woven brake 7 linings, correct? 8 A Yes. 9 Q Okay. And when I say "larger size" 10 why don't you tell us what those larger size were? 11 A Inch, inch and an 1/8, inch and a 12 quarter. 13 Q Okay. 14 A Three quarters. If it went on any 15 type of smaller oil field, I wasn't -- I'm not sure 16 about that, but three quarters is just right under 17 and 7/8ths under the inch product, but mainly the 18 big jumbo product which was inch, inch and a half, 19 inch and a quarter. 20 Q In the time period, and let's just 21 talk about '83 to '88, what percentage of the 22 production of Reddaway was designed to go to the oil 23 field in those sizes? 24 A It varied. It all depended on what I 25 received to make the raw material product. If I was	Page 105 1 asbestos containing yarn to a non-asbestos 2 containing yarn, that it started first as samples? 3 A Yes. 4 Q Okay. To your memory, did there come 5 a time where the production switched from samples to 6 the regular production of non-asbestos woven brake 7 linings? 8 A Yes. 9 Q And when do you recall that? 10 A It had to be late '86 to '87. 11 Q Okay. Do you recall any time in 1983 12 being informed by any member of the company, either 13 folks you work with or folks in the front office, 14 that Reddaway was advising its customers that it was 15 regular -- it was engaged to do regular production 16 of non-asbestos containing woven brake linings? 17 A Yes. 18 Q You were told that? 19 A Yes. 20 Q Okay. And who were you told that 21 from? 22 A Fred Grassel, at the time he was still 23 alive, saying that we're going to be changing, we're 24 going to be doing some samples while we were still 25 into asbestos, but they were getting scared because

Page 106 1 of the laws changing and we were going to get out of 2 it. 3 So, at the time we were still in 4 production, but making samples and trying different 5 variables of the non-asbestos. 6 Q Okay. I guess my -- I guess my 7 question's a little bit different. Do you -- to 8 your memory, do you recall when the weaving shed 9 went from simply making samples of the non-asbestos 10 woven brake lining to actually the regular 11 production of that product? 12 A Late '86 into '87, fall into '87, full 13 bore. Full bore, meaning full production. 14 Q But other than full production, do you 15 recall a time in 1983 where there would have been 16 available to the Reddaway customer non-asbestos 17 woven brake linings in various sizes, such as a 18 quarter-inch, 5/16ths, 3/8ths or one half-inch? 19 A Only in samples. 20 MR. SMITH: Okay. Let me -- what's 21 our next exhibit? 22 (Whereupon, Lecki Exhibit 16 was 23 received and marked for Identification.) 24 BY MR. SMITH: 25 Q Mr. Lecki, we've handed you what we	Page 108 1 number 16, the product information sheet, would have 2 been to inform the Reddaway customers of the 3 availability of the Reddaway non-asbestos woven 4 brake linings? 5 A Yes. 6 Q Okay. And what is the date you see on 7 this memo? 8 A April 1st, 1983. 9 Q Okay. And for the material use, 10 Exhibit 16 indicates that this Reddaway non-asbestos 11 woven brake lining was designed for use in band 12 brakes and band clutch service, correct? 13 A Yes. 14 Q Okay. And these were the same band 15 brakes that you were describing before for us? 16 A Yes. 17 Q Okay. And if you look there, sir, for 18 sizes available, it indicates that as of April 1st 19 of 1983, Reddaway was making available to its 20 customers the non-asbestos woven brake linings in 21 widths to 20-inches wide ground. Now, what does 22 that mean? Does that mean the width of to 23 20-inches? 24 A Yes. 25 Q Okay.
Page 107 1 marked as Exhibit number 16 which, is an 2 April 1st, 1983 memo of the Reddaway company. Have 3 you ever -- first of all, let me give you a chance 4 to read that. 5 A Uh-huh. 6 Q Do you recognize the document as one 7 that you've ever seen before? 8 A Not offhand, no. 9 Q Okay. Why don't you just take a 10 second and just take a look at it. 11 Have you ever seen that document 12 before? 13 A No. 14 Q Okay. What is a product information 15 sheet, Mr. Lecki? 16 A This is telling me about the 17 non-asbestos woven brake lining which is made in my 18 department. 19 Q Right. 20 A All about it. 21 Q And would this have been a product 22 information sheet that would have been provided by 23 Reddaway to its customers? 24 A Yes. 25 Q Okay. And the purpose of this Exhibit	Page 109 1 A Well -- 2 Q So, you would have made it from 1-inch 3 to 20-inches? 4 A On a sample size, yes, up to 20-inches 5 wide, yes. 6 Q Okay. Now, the sizes available 7 doesn't say anything about samples, correct? 8 A No, no. 9 Q Okay. And in terms of, again, under 10 sizes available under thicknesses, it indicates as 11 of April 1st of 1983 Reddaway's making available to 12 its customers the non-asbestos woven brake linings 13 in thicknesses of a quarter-inch, 5/16ths inch, 14 3/8ths of an inch and one half of an inch, correct? 15 A Yes. 16 Q Now, those particular thicknesses 17 would have been what would have been gone to the 18 industrial customers other than the oil fields, 19 correct? 20 A Yes. 21 Q Okay. Oil fields, as we discussed, 22 one of the bigger ones, right? 23 A Thicker sizes. 24 Q Okay. So, as of April 1st, 1983, a 25 customer could have ordered from Reddaway a

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Page 110 1 quarter-inch, 5/16-inch, or 3/8-inch non-asbestos 2 woven brake lining, correct? 3 A Yes. 4 Q Okay. And if that order had come in, 5 Reddaway would have produced it as of April 1st, 6 1983, correct? 7 A Yes. 8 Q Okay. And if you'll see on page 2 of 9 that exhibit, there's actually a price list for 10 those various brake linings, correct? 11 A Yes. 12 Q Okay. Before Reddaway would sell to a 13 customer, would Reddaway create an inventory of a 14 particular product before sales or announcements of 15 the availability of product being available to the 16 customer? 17 A Yes. 18 Q So, as of April 1st, 1983 would it be 19 correct that Reddaway would have had in inventory 20 nonwoven -- non-asbestos woven brake linings in 21 thicknesses one quarter inch, 5/16ths-inch, 22 3/8ths-inch, one half-inch? 23 A Yes. 24 MR. SMITH: Okay. Sir, that's all the 25 questions I have, thank you.	Page 111 1 MS. DRAYTON: I have no questions, 2 thank you. 3 MR. HUGHES: A couple cleanup 4 questions, sir. 5 EXAMINATION BY 6 MR. HUGHES: 7 Q It is it correct there were five looms 8 run off a belt drive pully system? 9 A Yes. 10 Q And then two that were electric? 11 A Yes. 12 Q Okay. When you worked at Reddaway, 13 this was a full-time job? 14 A Yes. 15 Q Eight or nine hours a shift? 16 A Yes. 17 Q When were the shifts? 18 A Day shift only. 19 Q Okay. Were there actually signs in 20 the plant that said "asbestos" on them back when the 21 company was using asbestos? 22 A Yes. 23 Q What were those signs? Where were 24 they? 25 A It said "Caution." They were up on	Page 112 1 poles about maybe head height. 2 Q Right. 3 A That said "Caution, asbestos product 4 in use." 5 Q Okay. Did the signs ever come down? 6 A I'm not -- I don't recall. 7 Q Okay. Was there anyone there that had 8 a concern about carrying asbestos dust home with 9 them? 10 MR. HAMILTON: Objection to the form. 11 THE WITNESS: No, we changed uniforms. 12 We left our uniforms in the locker, which 13 that's what we were supposed to do because they 14 supplied uniform, shoe, work shoes, everything 15 stayed there. 16 BY MR. HUGHES: 17 Q Okay. Would Mr. Walker clean off the 18 bottom of his shoes before he would leave? 19 A Yes. 20 Q Okay. Theresa Speights, 21 S-p-e-i-g-h-t-s, do you know who she was? 22 A She worked in the weaving shed. She 23 ran the thinner machine, 3/16ths, but she knew how 24 to run all of them. She pretty much was an all 25 purpose. She knew a lot of the other looms.	Page 113 1 Q Okay. Daisy Gonzales? 2 A She works in the office, if she's 3 still there. 4 Q James Peero, P-e-e-r-o? 5 A He worked there in the finishing 6 department. He hit the lottery and retired. 7 Q Okay. When you were working with 8 Mr. Walker, did he spend a good deal of time in 9 Florida or Texas, to your understanding? 10 A At the beginning when he did sales he 11 was on the road a lot, and then, yeah, he stopped. 12 Q Okay. The Norfab facility, that used 13 to be Ametex? 14 A Yes. 15 Q Is that right? 16 A Yes. 17 Q And that was in Norristown, 18 Pennsylvania? 19 A Yes. 20 Q Was there a fellow named John 21 Weber, Jr.? 22 A He was one of the owners. 23 Q Of what? 24 A Of Norfab/Ametex. 25 Q Okay. And that's the place where you
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Page 114 1 went on the trip that you mentioned? 2 A Yes. 3 Q When you worked at Reddaway did you 4 know that Abex was a customer? 5 A I've heard of variable customers. I 6 wasn't really familiar of pretty much their 7 operation -- 8 Q Okay. 9 A -- but you hear about some big 10 customers or some of the ones that were ordering a 11 lot or were affiliated with the company in sales. 12 Q Okay. You were shown this exhibit, 13 the product information sheet for the non-asbestos? 14 A Uh-huh. 15 Q Okay. Is that a yes? 16 A Yes. 17 Q Do you know whether this was sent to 18 Abex or not? 19 A I don't know. That's part of sales or 20 office use only. 21 Q Okay. To your knowledge did Abex, 22 assuming that they got that information, did Abex 23 ever make a request to switch to get the 24 non-asbestos instead of the asbestos; do you know? 25 A Not -- not to my --	Page 116 1 EXAMINATION BY 2 MR. SMITH: 3 Q In that time period the major 4 customers for that were the oil fields? 5 A Not at the beginning. We couldn't 6 afford or we didn't supply the jumbo loom until 7 later. They were waiting to see how the compound 8 set up, because the big brake blocks, that machine, 9 like I said, ran 2000 ends, 2000 ends of the Kevlar, 10 the non-asbestos, was a lot of money. So to fill 11 that machine, I was pretty much the last one to get 12 involved in. 13 Q Right. So, the -- so, pretty much in 14 the -- that period of the '80s, '84, '85, '86, '87, 15 the asbestos containing brake -- woven brake linings 16 that were being made, a lot of those were going to 17 the oil fields because that was the last loom to be 18 replaced, correct? 19 A Yes. 20 MR. SMITH: Thank you. 21 MR. HAMILTON: Nothing for me. 22 THE VIDEOGRAPHER: It is now 12:44. 23 We are now done with the videotaped deposition 24 of Raymond J. Lecki. 25 (Whereupon, the deposition concluded at
Page 115 1 MR. SMITH: Objection to form 2 speculation, lack of basis, lack of foundation, 3 lack of knowledge. 4 THE WITNESS: Not to my knowledge. 5 BY MR. HUGHES: 6 Q Okay. Not withstanding this form, is 7 it still your testimony that Reddaway was making 8 and/or selling asbestos heavy-duty woven lining in 9 1984? 10 A Yes. 11 Q 1985? 12 A Yes. 13 Q 1986? 14 A Yes, getting out. 15 Q Okay. 1987? 16 A Finished. 17 Q Okay. And then in 1988 would it be 18 non-asbestos? 19 A Yes, totally. 20 Q And that's based on your personal 21 experience working in the weaving shed? 22 A Yes. 23 MR. HUGHES: Okay. Thank you, that's 24 all. 25 MR. SMITH: I just have one follow up.	Page 117 1 12:44 p.m.) 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

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C E R T I F I C A T E

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STATE OF _____:
COUNTY/CITY OF _____:

Before me, this day, personally appeared
RAYMOND LECKI, who, being duly sworn, states that
the foregoing transcript of his/her Deposition,
taken in the matter, on the date, and at the time
and place set out on the title page hereof,
constitutes a true and accurate transcript of said
deposition.

RAYMOND LECKI

SUBSCRIBED and SWORN to before me this ____
day of ____, 2012, in the
jurisdiction aforesaid.

My Commission Expires _____ Notary Public _____

C E R T I F I C A T E

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I, Jamie I. Moskowitz, a Shorthand
(Stenotype) Reporter and Notary Public of the State
of New Jersey, do hereby certify that the foregoing
Deposition, of the witness, RAYMOND LECKI, taken at
the time and place aforesaid, is a true and correct
transcription of my shorthand notes.

I further certify that I am neither
counsel for nor related to any party to said action,
nor in any way interested in the result or outcome
thereof.

IN WITNESS WHEREOF, I have hereunto set my
hand this 17th day of May 2012.

Jamie Ilyse Moskowitz
License No. XI01658

D E P O S I T I O N E R R A T A S H E E T

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RE:
FILE NO.
CASE CAPTION: ERIK ROSS PHILLIPS vs. ALBANY
DEPONENT: RAYMOND LECKI
DEPOSITION DATE: May 17, 2012

To the Reporter:
I have read the entire transcript of my Deposition
taken in the captioned matter or the same has been
read to me. I request for the following changes be
entered upon the record for the reasons indicated.
I have signed my name to the Errata Sheet and the
appropriate Certificate and authorize you to
attach both to the original transcript.

SIGNATURE: _____ DATE: _____

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