

Page 14 1 Exhibit 2. 2 Q Okay. I'm just trying to figure out if that label 3 has been marked as an exhibit with the 8-23 letter or 4 if I need to mark it as a separate exhibit. 5 MR. VALLAS: Ms. Court Reporter, was it 6 marked-- 7 BY MR. VALLAS: 8 Q I guess, Mr. Austin, is a part of the 8-23-85 letter, 9 is it an attachment or an accompaniment to that 10 letter, or do you know? 11 A No. It just appears at the bottom of the letter. 12 That is a Xerox copy. 13 MR. CELBA: Charles, you want it marked. 14 MR. VALLAS: I guess, yeah. I'm just 15 trying to figure out if I've marked it or if I 16 haven't marked it. If I haven't marked it, let's 17 mark it. 18 MR. CELBA: You haven't marked it. 19 MR. VALLAS: Okay. Let's mark it. Thanks. 20 (Exhibit No. 4 was marked.) 21 BY MR. VALLAS: 22 Q Mr. Austin, I think that letter that you just 23 mentioned, the 8-23-85 letter, on which you were 24 copied and that we marked as an exhibit, I think it 25 mentioned-- I think it used warning labels in the	Page 16 1 asbestos containing gaskets, correct? 2 A Yes, sir. 3 Q I'm just wondering, is that over all of the decades 4 that Dana Victor was making asbestos containing 5 gaskets, or do you know? 6 A No, I do not know. 7 Q Do you know-- The one label that you are familiar 8 with that we've marked here, do you know the first 9 year that it was used, the last year that it was 10 used? 11 A The label would have been used beginning in 12 approximately January of 1985. 13 Q Okay. 14 A And would have been used until we ceased the use of 15 asbestos in our product. 16 Q Okay. It's my understanding, correct me if I'm 17 wrong, from taking your deposition previously, that 18 initially Dana would only place those warning labels 19 on its asbestos containing gasket products at the 20 request of the customer; is that correct? 21 A Yes, that's correct. 22 Q Was there-- I don't remember if I've asked you this 23 question previously. Was there a point in time where 24 Dana started placing an asbestos warning label on 25 every one of its asbestos containing gasket products
Page 15 1 plural, if I'm not mistaken, did it? 2 A This is the last one we discussed? 3 Q Yes, sir, Bailey and Oliver. 4 A It refers to with our asbestos warning labels. 5 Q Okay. Let me explore that a little bit with you. 6 I'm wondering if you know whether or not as of August 7 of 1985 was there-- I guess what I'm wondering, if 8 you know, was there one-- Was Dana-- Did Dana have 9 available to put on its products one warning label, 10 or were there different versions of it, or do you 11 know? 12 A There was only one warning label that went on the 13 gaskets. 14 Q And that's the one that we have a copy of that it's 15 kind of illegible; is that right? 16 A Yes, sir, that's correct. 17 Q Okay. When you say there was only one warning label 18 that went on the gasket, is that at any time to your 19 knowledge that Dana Victor was making asbestos 20 containing gaskets? Is there only one that you're 21 aware of over those decades? 22 A I'm sorry, Mr. Vallas, I don't understand your 23 question. 24 Q Okay. It was a poor question, sorry. You mentioned 25 there was one asbestos warning label that went on the	Page 17 1 whether or not it was requested by the customer? 2 A Yes, that is correct. 3 Q And when was that date? 4 A It appeared to me that it was in early 19-- well, 5 late 1985, possibly early 1986. 6 Q And what is the-- How do you know that, or why do you 7 think that? 8 A I was involved in the manufacturing operation at the 9 time, and part of my responsibility would have been 10 to be certain that the labels were appropriately put 11 on the boxes. 12 Q Is that the only manner in which asbestos warning 13 labels accompanied Dana Victor's asbestos containing 14 gaskets, meaning on the boxes? Was there ever-- And 15 the question is was there any other type of package 16 insert or ever any other type of warning label on the 17 product itself that you're aware of on the boxes? 18 A Not that I am aware of. 19 Q Okay. What is the next item that you have with you? 20 A I have a copy of a testimony of a Dr. William 21 Longeau. 22 Q Okay. 23 A In a Verta Sutton and P.D. Sutton versus, I believe 24 it's Acands, A-C-A-N-D-S, Incorporated. 25 Q Okay. Have you read that deposition?