

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

MERLE BARGER AND) Cause No. 10-L-754
MICHAEL THERIAULT,) Cause No. 10-L-436
INDIVIDUALLY AND AS SPECIAL)
ADMINISTRATOR OF THE)
ESTATE OF ROBERT THERIAULT,)
DECEASED)

Plaintiff(s),)

vs.)

A.W. CHESTERTON, INC.,)

Defendant(s).)

DEPOSITION OF ROBERT PETKASH

Friday, August 5, 2011

Videotaped discovery deposition of ROBERT PETKASH, called by the Plaintiffs for examination under the Illinois Rules of Civil Procedure, taken before me, the undersigned, Cheryl L. Baker, RPR, a Notary Public in and for the State of Ohio, at the Hilton Garden Inn, 4900 Emerald Court S.W., Cleveland, Ohio, commencing at 9:06 a.m. the day and date above set forth.

1	EXHIBIT INDEX (CONTINUED)	
2	Plaintiff's MARKED	
3	15 Three-page letter dated October 5, 1976	71
4	to Marc Collins from E.J. Sydor	
5	16 Inter-office Correspondence dated	73
6	October 18, 1976	
7	17 Inter-Office correspondence dated	77
8	November 4, 1976	
9	18 Two-page letter dated October 22, 1976	80
10	from Mr. R.W. Rosenow to Mr. E.J. Sydor	
11	19 One-page letter to Mr. R.W. Rosenow from	87
12	E.J. Sydor, dated October 27, 1976	
13	20 Airflex Test Request dated July 15,	90
14	1983	
15	21 Inter-office correspondence dated April	93
16	26, 1983	
17	22 Inter-office correspondence dated April	97
18	26, 1983	
19	23 Letter dated June 23, 1983 to Eaton	103
20	Corporation from James F. McMullen	
21	24 Internal Correspondence dated	106
22	January 24, 1986, from Jim Fisher to	
23	R.J. McCloskey	
24	25 Internal Correspondence dated April 10,	110
25	1987, from Paul S. Showalter to All	
	Field Sales Offices and Distributors	
	26 Internal Correspondence dated	113
	May 13, 1986, from Jim Fisher to	
	All Field Sales Offices, Agents & Distributors	
	27 Asbestos Information Association AIA/NA	119
	Members Companies	
	28 One page list of companies	122
	29 A Presentation before the Asbestos	124

1	EXAMINATION INDEX	
2	Robert Petkash	
3	CROSS BY MR. KIWALA	9
4	EXHIBIT INDEX	
5	Plaintiff's MARKED	
6	1 Amended Notice to Take Videotaped	12
7	Discovery Deposition	
8	2 Excerpts from the deposition of Pat	24
9	Murphy	
10	3 Material Safety Data Sheet	36
11	4 Two-page letter to Eaton Air Flex from	40
12	Jack Dauch	
13	5 Industrial Hygiene Digest	43
14	6 Inter-Office Correspondence dated	47
15	September 2, 1975, with attachment	
16	7 Instructions for Maintenance &	49
17	Disassembly of the Fawick 32VC1000	
18	Clutch	
19	8 Eaton-Fawick VC Marine Clutch/Brake	52
20	Maintenance Instructions	
21	9 Installation Operation & Maintenance of	54
22	the Airflex E Element Assembly	
23	10 Installation, Operation and Maintenance	57
24	of Airflex CB Element Assemblies	
25	11 Five-page letter dated February 22, 1983	62
	12 Inter-Office Correspondence dated	65
	September 7, 1976	
	13 Fawick Corporation Annual Report 1964	68
	14 Fawick Corporation Notice of Special	69
	Meeting of Shareholders	

1	OBJECTION INDEX	
2	BY MR. LANG	19
3	BY MR. LANG	19
4	BY MR. LANG	22
5	BY MR. LANG	27
6	BY MR. LANG	28
7	BY MR. LANG	28
8	BY MR. LANG	29
9	BY MR. LANG	29
10	BY MR. LANG	30
11	BY MR. LANG	31
12	BY MR. LANG	34
13	BY MR. LANG	34
14	BY MR. LANG	37
15	BY MR. LANG	37
16	BY MR. LANG	46
17	BY MR. LANG	46
18	BY MR. LANG	46
19	BY MR. LANG	49
20	BY MR. LANG	49
21	BY MR. LANG	52
22	BY MR. LANG	53
23	BY MR. LANG	59
24	BY MR. LANG	63
25	BY MR. LANG	64
	BY MR. LANG	66
	BY MR. LANG	67
	BY MR. LANG	76
	BY MR. LANG	77
	BY MR. LANG	85
	BY MR. LANG	86
	BY MR. LANG	87
	BY MR. LANG	87
	BY MR. LANG	92
	BY MR. LANG	96
	BY MR. LANG	100
	BY MR. LANG	101
	BY MR. LANG	102
	BY MR. LANG	102
	BY MR. LANG	105
	BY MR. LANG	105
	BY MR. LANG	105
	BY MR. LANG	106
	BY MR. LANG	107
	BY MR. LANG	108

OBJECTION INDEX (CONTINUED)

BY MR. LANG 107
 BY MR. LANG 108
 BY MR. LANG 108
 BY MR. LANG 115
 BY MR. LANG 115
 BY MR. LANG 118
 BY MR. LANG 121
 BY MR. LANG 123
 BY MR. LANG 123
 BY MR. LANG 124
 BY MR. LANG 124
 BY MR. LANG 125
 BY MR. LANG 126
 BY MR. LANG 126
 BY MR. LANG 127
 BY MR. LANG 127
 BY MR. LANG 127
 BY MR. LANG 128
 BY MR. LANG 129
 BY MR. LANG 130
 BY MR. LANG 130
 BY MR. LANG 134

APPEARANCES: (CONTINUED)

On Behalf of Eaton Corporation:

Christopher J. Lang, Esq.
 Pitzer Snodgrass, P.C.
 100 South Fourth Street, Suite 400
 St. Louis, MO 63102
 314-421-5545
 lang@pspcplaw.com

On Behalf of Defendants Rousselle

Corporation, Aurora Pump, Gardner Denver
 Industries, Zurn Industries, Albany
 International Corporation and Clark
 Equipment Company:

Kathleen M. Newman, Esq.
 (appearing telephonically)
 Segal, McCambridge, Singer & Mahoney
 233 South Wacker Drive, Suite 5500
 Chicago, IL 60606
 312-645-7829
 kneuman@smsm.com

ALSO PRESENT:

Jim Kafantaris, Videographer

APPEARANCES:

On Behalf of the Plaintiffs:

Ryan Kiwala, Esq.
 Simmons, Browder, Gianaris,
 Angelides & Barnerd, LLC
 One Court Street
 Alton, IL 62002
 618-259-2222
 rkiwala@simmonsfirm.com

On Behalf Defendant Eaton Corporation:

Daniel Petticord, Esq.
 Brzytwa, Quick & McCrystal
 1660 West 2nd Street
 Suite 900
 Cleveland, OH 44113-1411
 216-664-6900
 petticord@bqmlaw.com

On Behalf of Defendants IMO Industries,
 Inc., and Dana Companies, LLC:

Matthew Morris, Esq.
 (appearing telephonically)
 Heyl, Royster, Voelker & Allen
 105 West Vandalia, Suite 100
 Edwardsville, IL 62025
 800-610-4646
 mmorris@heyloyroster.com

On Behalf of Defendants John Crane, Inc. and
 Sealing Equipment Company:

Mark I. Tivin, Esq.
 (appearing telephonically)
 O'Connell, Tivin, Miller & Burns, LLC
 135 South LaSalle Street, Suite 2300
 Chicago, IL 60603
 312-256-8800

PROCEEDINGS

VIDEOGRAPHER: We're on the
 record. This is the videotape
 deposition of Robert Petkash in the
 case of Merle Barger, having a Cause
 Number of 10-L-754, and Michael
 Theriault, Individually and as a
 Special Administrator of the Estate
 of Robert Theriault, Deceased, having
 a Cause Number of 10-L-436, versus
 A.W. Chesterton, Incorporated, et
 al. This case is in the Third -- I'm
 sorry -- in the Circuit Court, Third
 Judicial Circuit, Madison County,
 Illinois. Today's date is August 5,
 2011. The time is 9:06.

Would counsel please state their
 affiliations.

MR. KIWALA: This is Ryan
 Kiwala of the Simmons firm, on behalf
 of the Plaintiffs.

MR. LANG: This is Chris Lang
 from Pitzer, Snodgrass on behalf of
 Eaton Corporation.

MR. PETTICORD: This is Dan

1 Petticord on behalf of Eaton
2 Corporation.

3 THE NOTARY: The attorneys on
4 the phone, if you'd give us your
5 affiliation also.

6 MR. MORRIS: Matt Morris for
7 Dana Companies, LLC and IMO
8 Industries, Inc.

9 MS. NEWMAN: Kathleen Newman
10 for Rousselle Corporation, Aurora
11 Pump Company, Gardner Denver, Inc.,
12 Zurn Industries, LLC, Albany
13 International Corporation, and Clark
14 Equipment Company.

15 VIDEOGRAPHER: Okay. You may
16 swear the witness in at this time.

17 ROBERT PETKASH

18 A Witness herein, called by the Plaintiffs for
19 cross-examination under the Illinois Rules of Civil
20 Procedure, after having been first duly sworn, as
21 hereinafter certified, was examined and testified as
22 follows:

23 CROSS-EXAMINATION

24 MR. LANG: Just before we
25 start, I want to confirm what we

1 cover that topic.

2 And I will note that no
3 objection was made up until this
4 point in that regard.

5 MR. LANG: Actually, we did
6 file objections.

7 MR. KIWALA: Okay. I did not
8 see the objections.

9 MR. LANG: Well, we did file
10 objections to the deposition notice
11 on the 25th of July.

12 MR. KIWALA: All right.

13 BY MR. KIWALA:

14 Q Can you please state your full name for the
15 record.

16 A My name is Robert P. Petkash, P-e-t-k-a-s-h.

17 Q And Mr. Petkash, what is your date of birth?

18 A May 15th, 1940.

19 Q And do you understand that you're testifying in a
20 videotape deposition?

21 A Yes.

22 Q And do you understand that you're testifying
23 today as if you were in court?

24 A Yes.

25 Q Do you understand that you're testifying today on

1 talked about before the deposition
2 began. Mr. Petkash is being produced
3 on behalf of Eaton Corporation, and
4 more specifically their Airflex
5 Division with regard to the two cases
6 that have been noticed. I understand
7 that you may have some broader
8 questions about the corporation, the
9 corporate structure, and he'll answer
10 those to the best of his ability.

11 But I'm confirming with you on the
12 record that he's being produced in
13 these two cases specifically with
14 regard to Eaton's Airflex Division.

15 MR. KIWALA: Okay. And for
16 the record, I will state that my
17 questions today with regard to the
18 products will be limited to the
19 Airflex products. But the -- I will
20 be asking questions that will be
21 going company-wide with respect to
22 Eaton's knowledge of the hazards of
23 asbestos. And I believe that the
24 Notice of Deposition covers -- is
25 that broad so as to cover that --

1 behalf of Eaton Corporation?

2 A Yes.

3 Q And do you understand that you've been designated
4 by Eaton as a representative witness of the
5 corporation to testify on the subjects listed in
6 Plaintiff's Notice of Deposition?

7 A Yes.

8 Q Are you represented by counsel here today?

9 A Yes.

10 MR. KIWALA: Cheryl, can we
11 mark the first one in the stack.

12 -----

13 (Plaintiff's Exhibit 1 marked for
14 identification.)

15 -----

16 Q Mr. Petkash, have you seen this document before?

17 A Yes.

18 Q Do you understand that you've been designated by
19 Eaton to testify on its behalf with respect to the
20 topics listed in the Notice of Deposition?

21 A Yes, I am.

22 Q Okay. Did you review anything in preparation for
23 the deposition today?

24 A Yes.

25 Q Okay. Can you tell me what you reviewed?

1 **A Well, this document, first of all. And then most**
 2 **recently the -- a deposition that I gave in 2008 in**
 3 **the Gordon Scully case.**
 4 Q Did you review any other documents?
 5 **A Just some old catalog information and things.**
 6 **But no, not really.**
 7 Q And you did not review any answers to
 8 interrogatories?
 9 **A Most recently, no. When they were first produced**
 10 **a month or six weeks ago, I did review them. But not**
 11 **recently.**
 12 Q Okay. But not in specific --
 13 **A No.**
 14 Q Not specifically in preparation for today?
 15 **A In preparation for this, no.**
 16 Q The old catalogs that you reviewed in
 17 preparation, who's the custodian of those catalogs?
 18 **A The law firm.**
 19 Q And other than speaking with attorneys for Eaton,
 20 have you talked to anybody in preparation for your
 21 deposition today?
 22 **A No.**
 23 Q Sir, are you currently employed?
 24 **A No. I retired from Eaton Corporation at the end**
 25 **of 1998. And since that time, I've been working**

1 **part-time as a manufacturer's representative for**
 2 **another company.**
 3 Q I believe that other company was Dellner Brakes?
 4 **A That's correct.**
 5 Q Okay. And we'll try not to talk over -- I'll try
 6 not to step on your answers so not to give the court
 7 reporter a headache.
 8 And you said you also provide consulting to Eaton
 9 Corporation; is that correct?
 10 **A In this capacity, yes.**
 11 Q And that capacity being consulting for
 12 litigation?
 13 **A Yes.**
 14 Q And that would include giving deposition
 15 testimony?
 16 **A That's correct.**
 17 Q Other than the deposition that you gave in 2008,
 18 have you given any other depositions in an asbestos
 19 case?
 20 **A Yes.**
 21 Q When was that?
 22 **A I don't recall the date. It was --**
 23 Q If you can give me an estimate.
 24 **A 2009. It was a San Francisco case --**
 25 Q Do you recall the name of the case?

1 **A Actually, I don't.**
 2 MR. PETTICORD: Off the
 3 record for a second.
 4 MR. KIWALA: Sure.
 5 VIDEOGRAPHER: Off the
 6 record.
 7 (Discussion off the record.)
 8 VIDEOGRAPHER: We are back on
 9 the record. The time is now 9:14.
 10 Q Mr. Petkash, are you being compensated for your
 11 time testifying today?
 12 **A Yes.**
 13 Q Do you charge an hourly rate for your consulting
 14 services for Eaton?
 15 **A Yes.**
 16 Q How much is that?
 17 **A \$75 an hour.**
 18 Q Could you briefly provide a summary of your
 19 educational background?
 20 **A I attended Ohio University after graduating from**
 21 **high school, for two years, working towards a**
 22 **mechanical engineering degree. I left after two**
 23 **years. And then after working for 25 years, I went**
 24 **back to Baldwin-Wallace College, a local school, and**
 25 **was very close to getting a business degree. I was**

1 **unable to finish because of my work -- workload.**
 2 Q Okay. That was your workload at Eaton at the
 3 time?
 4 **A Yes.**
 5 Q Okay. And you started with Eaton in 1963; is
 6 that correct?
 7 **A Correct. May.**
 8 Q At that time, it was known as Fawick Corporation?
 9 **A Yes, that's correct.**
 10 Q Did you hold any jobs between leaving Ohio
 11 University and going to work for Fawick?
 12 **A Yes, I did.**
 13 Q What --
 14 **A I was a design draftsman at a company called Iron**
 15 **Fireman.**
 16 Q And when did you start at Iron Fireman?
 17 **A 1960, '61, and then worked until I started with**
 18 **Eaton in '63.**
 19 Q And I understand that you held various positions
 20 at Fawick and later on at Eaton both in sales and I
 21 believe also an engineering position at one point in
 22 time; is that correct?
 23 **A It was a -- the engineering was designated as**
 24 **application engineering. My job was to get customer**
 25 **information and then decide what was the most**

1 **appropriate clutch or brake to utilize on that**
 2 **application. It was part of the sales department. It**
 3 **wasn't part of engineering.**
 4 Q Okay.
 5 **A It was a function of the sales side of the**
 6 **business.**
 7 Q Okay. Would it be fair to say then that most of
 8 your time at Fawick and Eaton was spent focused on
 9 sales?
 10 **A Yes.**
 11 Q Do you know when the Fawick Corporation was
 12 founded?
 13 **A In the late '30s.**
 14 Q Do you know where it was incorporated?
 15 **A It was a Cleveland company. But no, I don't know**
 16 **actually where it was incorporated.**
 17 Q What about Eaton Corporation, do you know when
 18 that company was founded?
 19 **A I think it started in 1911, or something. Very**
 20 **early in the 20th century.**
 21 Q And do you know where Eaton was incorporated?
 22 **A No. Again, a Cleveland company.**
 23 Q But its headquarters is located here in
 24 Cleveland, correct?
 25 **A Correct.**

1 Q And Fawick Corporation was merged into the Eaton
 2 Corporation; is that right?
 3 **A Correct.**
 4 Q And do you recall when that merger happened?
 5 **A It was in 1968.**
 6 Q And so you were an employee of Fawick at the
 7 time?
 8 **A Yes.**
 9 Q After the merger, did Eaton continue to use the
 10 Fawick name in association with any products?
 11 **A For a short period of time they did. And then**
 12 **they began to incorporate the Eaton name as the**
 13 **overall trademark or copyright, whatever they**
 14 **utilized. They retained the Airflex portion of it.**
 15 Q Okay. So the Fawick name would have been
 16 continued to be used in association with the Airflex
 17 products at least for a short period of time?
 18 **A Yes.**
 19 Q Okay. Do you recall when they ceased using the
 20 Fawick name? In early '70s, late '60s?
 21 **A Yeah, early, mid-70s they started removing it**
 22 **from literature and substituted with the Eaton logo.**
 23 Q And would it be fair to say that Fawick was the
 24 originator of the I guess you call it the Airflex
 25 clutch design that was used in the clutches that are

1 at issue here?
 2 MR. LANG: I'm just going to
 3 object to the form, foundation. You
 4 can answer that if you know.
 5 **A Yes.**
 6 Q And just for everybody's benefit, could you
 7 explain how Airflex clutch works and what makes it
 8 different from other types of clutches?
 9 MR. LANG: I'll just object
 10 to that, to the form again,
 11 foundation. That's kind of a broad,
 12 sweeping question. Answer that if
 13 you can.
 14 **A The Fawick style of clutch is a drum style of**
 15 **unit, making it unique compared to most other clutch**
 16 **and brake devices, being plate-type units. So the**
 17 **Airflex unit is like a donut. And by introducing**
 18 **compressed air, the inner diameter squeezes down and**
 19 **contacts a metal drum as opposed to plates squeezing**
 20 **together and transmitting torque power.**
 21 Q And there were Airflex clutches where the
 22 friction surface expanded out, and there were also
 23 ones --
 24 **A Correct.**
 25 Q -- where the friction surface contracted in?

1 **A That's correct. But the basic operating**
 2 **principle was the same; one expanded, the others**
 3 **constricted. But the principle of using the rubber**
 4 **tube as the actuator was the same.**
 5 Q And just to -- I guess in other words, everything
 6 was based on air going into this rubber tube to either
 7 expand or constrict those plates?
 8 **A Correct.**
 9 Q And the various types of Airflex clutches were
 10 given different letter designations. Is that fair to
 11 say?
 12 **A Yes.**
 13 Q And can you tell me what letter designations
 14 would have applied to the Airflex clutches that were
 15 the expanding-type clutches?
 16 **A That was the E type, expanding, EB type. And**
 17 **those were the expanding type.**
 18 Q And what letter designations would have applied
 19 to the Airflex clutches that were the constricting
 20 type?
 21 **A The most common one was the CB, and then there**
 22 **was also a VC.**
 23 Q Any others?
 24 **A There was one that was designated as CM. I think**
 25 **that's all the constricting ones.**

1 Q Did Fawick or Eaton also sell replacement
2 friction material for the Airflex clutches?
3 **A Yes.**
4 Q Did the clutch assemblies themselves come in any
5 sort of package or were they just shipped with no
6 package?
7 **A In a -- well, depending on the size. But the**
8 **smaller ones would be shipped in cardboard cartons.**
9 **The bigger ones would just be strapped to a pallet.**
10 Q Would there always be an operation manual or an
11 instruction manual sent along with the clutch assembly
12 when it was shipped out?
13 **A Yes.**
14 Q What about the replacement friction material, how
15 would that have been packaged?
16 **A Similarly, in cardboard cartons. Again,**
17 **sometimes they were -- they're big and heavy, so it**
18 **would be in a wood closed wooden crate, something like**
19 **that.**
20 Q And those replacement friction materials,
21 friction blocks, would those be shipped out with any
22 kind of instructions or a manual?
23 **A Typically it would be the same manual that we'd**
24 **send out with the clutch itself.**
25 Q Whatever clutch that particular friction material

1 is to be used for?
2 **A Right.**
3 Q I think I already know the answer to this, but
4 have you read the deposition of Pat Murphy in the
5 Theriault case?
6 **A Yes, I did.**
7 Q Okay. So you did -- did you do that in
8 preparation for this deposition?
9 **A Not recently, no. It was, again, when it was**
10 **originally produced several weeks ago. But not in**
11 **preparation for today.**
12 Q So have you read his description of the Airflex
13 clutches that were present at Brown Paper?
14 **A Yes.**
15 Q Do you have any reason to believe that Fawick or
16 Eaton Airflex clutches were not present at Brown
17 Paper?
18 MR. LANG: I'm just going to
19 object to the form, foundation. Go
20 ahead.
21 **A He says they were there. I've not seen them. I**
22 **don't know that we've seen them. I'm going on what**
23 **was said in the deposition --**
24 Q Okay.
25 **A -- that they were there.**

1 Q Does Eaton possess records for the sale of
2 Airflex clutches?
3 **A Yes.**
4 Q Do you know how far back those sales records go?
5 **A No, I don't.**
6 Q Did you conduct any search of Eaton's sales
7 records to see if there was any sale made of Airflex
8 clutches to Brown Paper?
9 **A Not that I'm aware of.**
10 Q And you're not aware of anybody else at Eaton
11 conducting that search?
12 **A No.**
13 Q Based on what you read from Mr. Murphy's
14 description of the Airflex clutches, can you tell me
15 which of the various models of Airflex clutches would
16 most closely fit his description?
17 **A The CB type and the VC type.**
18 Q The CB and the VC were the constricting type?
19 **A That's correct.**
20 Q We'll have to mark this. It's from the
21 deposition of Pat Murphy.
22 MR. KIWALA: Can we go off
23 the record.
24 VIDEOGRAPHER: Off the
25 record at 9:27.

1 (Discussion off the record.)
2 -----
3 (Plaintiff's Exhibit 2 marked for
4 identification.)
5 -----
6 VIDEOGRAPHER: We're back on
7 the record at 9:28. You may proceed.
8 BY MR. KIWALA:
9 Q Okay. Mr. Petkash, you've been handed a portion
10 of Pat Murphy's deposition from the Theriault case.
11 Could you take a look at Page 227 from that
12 transcript.
13 **A I've got it here, yes.**
14 Q And there on Page 227, Mr. Murphy describes an
15 expanding type clutch; is that correct?
16 **A I haven't read it yet. (Witness reading.) It**
17 **doesn't say anything about expanding type clutch. He**
18 **just said he has all kinds of them.**
19 Q Do you see the portion where he's asked by
20 counsel whether it was expanding or constricting, and
21 he says, "expanding"?
22 **A I'll read it again. No.**
23 MR. KIWALA: Off the record.
24 VIDEOGRAPHER: We're going
25 off the record at 9:30.

1 (Discussion off the record.
 2 VIDEOGRAPHER: We're back on
 3 the record. The time is now 9:31.
 4 You may proceed.
 5 BY MR. KIWALA:
 6 Q Okay. Mr. Petkash, we're now looking at Page 231
 7 of Mr. Murphy's deposition. And do you see where
 8 Mr. Murphy describes an expanding-type clutch?
 9 **A Yes, I see that.**
 10 Q What Airflex clutch types would most closely fit
 11 that description?
 12 **A The E type, based on that description.**
 13 Q Have you reviewed any transcriptions of
 14 depositions for Merle Barger?
 15 **A Yes.**
 16 Q Did you conduct any search of Eaton sales records
 17 for evidence of sales of clutches or replacement
 18 friction materials to Lumax Industries or Stanley
 19 Electric in Altoona, Pennsylvania?
 20 **A No.**
 21 Q Did you conduct any search of Eaton sales records
 22 for evidence of sales of clutches to manufacturers of
 23 industrial presses, specifically in this case
 24 Cincinnati, Inc., *Ruzel or Verson Allsteel Press
 25 Company?

1 **A We had an old tabulation of clutches sold to**
 2 **various -- for use on various presses. But that was**
 3 **the extent of the search.**
 4 Q Okay. Do you know if any of those companies I
 5 mentioned just now, Cincinnati, Rusell or Verson, do
 6 you know if any of those companies were customers of
 7 Eaton Airflex?
 8 **A Directly there was virtually no sales to those**
 9 **companies. There's a record of one, what was it, in**
 10 **1947, something like that, of one sale to Verson. But**
 11 **that was all the records show.**
 12 Q Okay. And you said virtually no records of
 13 direct sales. Did Eaton Airflex sell its Airflex
 14 products through distributors?
 15 **A No.**
 16 Q All of its sales were direct sales?
 17 **A That's correct, at that time.**
 18 Q Okay. At any point did Eaton or Airflex sell
 19 Airflex clutches through distributors?
 20 **A Yes.**
 21 Q Okay. When would that have taken place?
 22 **A It would have been mid, late '80s when we started**
 23 **using distribution. Prior to that, it was all direct**
 24 **sales.**
 25 Q So Eaton Airflex did not sell any Airflex

1 clutches through distributors prior to the middle or
 2 late '80s?
 3 **A No.**
 4 Q No, I'm incorrect, or no, you agree with that
 5 statement?
 6 **A Restate, please.**
 7 Q Okay. Eaton did not sell Airflex clutches
 8 through distributors prior to the mid or late '80s?
 9 **A That's correct.**
 10 Q And just going back, do you know if Brown Paper
 11 Company was a customer of Eaton or Fawick for Airflex
 12 clutches?
 13 **A No, I don't know.**
 14 Q You have no recollection, independent of sales
 15 records --
 16 **A No.**
 17 Q -- of that taking place?
 18 **A No.**
 19 Q Fawick used asbestos-containing friction
 20 materials in its Airflex clutches; is that correct?
 21 **MR. LANG: I'll just object**
 22 **to the form, foundation. Go ahead.**
 23 Q Go ahead and answer.
 24 **A Yes.**
 25 Q Do you know when Fawick first began using

1 asbestos-containing friction material?
 2 **A When it first started making clutches in the**
 3 **late '30s.**
 4 Q And after Fawick merged with Eaton, Airflex
 5 clutches continued to contain asbestos-containing
 6 friction material; is that correct?
 7 **A That's correct.**
 8 Q When did Eaton cease using asbestos friction
 9 material in Airflex clutches?
 10 **MR. LANG: I'm just going to**
 11 **object to the form, foundation.**
 12 **Go ahead.**
 13 **A It was something that phased out over a period of**
 14 **time up through the late '80s, early '90s.**
 15 Q When did that phase-out begin?
 16 **A Late '70s.**
 17 Q And how did that phase-out take place? Was that
 18 -- did Eaton just start with certain products, find a
 19 non-asbestos replacement for those and move on to
 20 other products over time?
 21 **A Yes.**
 22 Q Prior to the late '70s, were all -- did all
 23 Airflex clutches contain asbestos friction material?
 24 **MR. LANG: Objection to form,**
 25 **foundation.**

1 **A No.**
 2 Q Okay. Which ones did not?
 3 **A There was a -- what was called a water-cooled**
 4 **brake. It was used for tension applications. And**
 5 **from its original design, even today, it does not,**
 6 **never did use asbestos friction material.**
 7 Q Okay. Any other products other than the
 8 water-cooled brake?
 9 **A There were some of the products that actually had**
 10 **rubber facings. That was the actual friction**
 11 **surface. And some that were cork friction material.**
 12 **But those were utilized on the CB and VC, and so on.**
 13 Q Could those, I guess, those rubber-facing
 14 clutches, could they have been used in a paper-making
 15 application?
 16 MR. LANG: I'll just object to
 17 the form, foundation. Go ahead.
 18 **A It would not be common in a paper mill.**
 19 Q Okay. Would those sorts of clutches at all be
 20 used in any sort of industrial presses?
 21 MR. LANG: Same objection.
 22 **A No.**
 23 Q Do you know how much asbestos was in the friction
 24 material that Air -- I'm sorry -- Eaton was using for
 25 Airflex clutches?

1 MR. LANG: I'll just object
 2 again to the form, foundation, scope.
 3 **A It varied. It could be 10 percent of the**
 4 **material. It could be up to 50 percent. It was a**
 5 **range depending upon the characteristics that we were**
 6 **trying to achieve.**
 7 Q Do you know what was the purpose of the asbestos
 8 in the friction material that was going into the
 9 Airflex clutches?
 10 **A Not specifically, no.**
 11 Q Do you know how hot the friction surfaces of the
 12 clutch were getting during their normal use?
 13 **A Yes.**
 14 Q Okay. How hot?
 15 **A It could get 900,000 degrees. It could get**
 16 **pretty warm.**
 17 MR. LANG: Just for purposes
 18 of clarity, you meant 900 to a
 19 thousand degrees, or did you mean
 20 900,000?
 21 THE WITNESS: No, no. 900 to
 22 1,000 degrees Fahrenheit. It would
 23 be like a volcano.
 24 Q Did Eaton Airflex ever do any kind of testing to
 25 see how hot those friction surfaces were getting?

1 **A Yes.**
 2 Q Have you seen any of the results of that testing?
 3 **A Yes, I did.**
 4 Q Did you see any results of this testing in
 5 documents that you looked at in preparation for today?
 6 **A No.**
 7 Q Do you recall who were the suppliers of asbestos
 8 friction material during your employment with the
 9 company?
 10 **A Raybestos --**
 11 MR. LANG: Hold on. Let me
 12 make sure I've got this clear. I'm
 13 going to object to the form,
 14 foundation and scope in that he's
 15 limited to testimony as to Airflex.
 16 Q I'm sorry. And I'll limit the scope of my
 17 question just to Airflex products.
 18 **A Okay. Raybestos Manhattan, Johns-Manville,**
 19 **National Friction Products, which is now Carlisle.,**
 20 **Those were the ones that I'm familiar with.**
 21 Q Did any one of those predominate in terms of the
 22 amount that they supplied?
 23 **A In the most recent past, it would have been**
 24 **National Friction, Carlisle.**
 25 Q You're saying, "most recent past." How far back

1 does that go?
 2 **A It goes back to the early '70s, my best**
 3 **recollection.**
 4 Q In terms of a percentage of the total amount of
 5 friction material used by Eaton Airflex, how much of
 6 that would have been supplied by National Friction
 7 during that time span?
 8 **A High 90s percentile.**
 9 Q High 90s?
 10 **A Yes, high 90s.**
 11 Q I think we established earlier there are
 12 operation maintenance manuals for the Airflex
 13 clutches; is that right?
 14 **A Correct.**
 15 Q Okay. Did any of those manuals ever contain a
 16 warning about the hazards of asbestos during the time
 17 that asbestos-containing friction material was used on
 18 Airflex clutches?
 19 **A I don't think so.**
 20 Q And during the time that Airflex clutches
 21 contained asbestos-containing friction material, did
 22 any of those manuals ever contain any instructions
 23 about how to safely handle the asbestos friction
 24 material contained in the clutches?
 25 MR. LANG: You're talking about

1 Airflex manuals, right?
 2 MR. KIWALA: Yes, Airflex
 3 clutches.
 4 **A In the mid to late '80s, we -- the manuals were**
 5 **being updated, and those kind of warnings were --**
 6 **began to appear and were added.**
 7 Q And that was in the late '80s?
 8 **A Yeah, mid, late '80s.**
 9 Q Was there any -- was there ever any warning that
 10 compressed air should not be used to clean Airflex
 11 clutches in the manuals?
 12 **A In the later ones as they were being revised.**
 13 Q And again, this would have been the mid to late
 14 '80s?
 15 **A Yes.**
 16 Q Did the clutches or the friction material
 17 themselves ever carry any kind of label or tag that
 18 would indicate that they contained asbestos friction
 19 material?
 20 **A Not that I'm aware of.**
 21 Q And I think you said earlier that Eaton Airflex
 22 first began offering a non-asbestos friction material
 23 on some of these clutches as early as the late '70s;
 24 is that right?
 25 **A That's my guess.**

1 Q When did Eaton first offer Airflex clutches of
 2 the type that Mr. Murphy described, with non-asbestos
 3 friction material?
 4 **A He said the expanding type, and we have to assume**
 5 **that was the E type. That would have been in the**
 6 **early, mid-80s.**
 7 Q Do you know when Eaton first became aware that
 8 asbestos was a hazardous material?
 9 MR. LANG: I just object to the
 10 form, foundation.
 11 Q Go ahead and answer it.
 12 **A No, I don't.**
 13 Q Do you know if Fawick Corporation before the
 14 merger was ever a member of any trade organizations?
 15 **A No. Again, not that I'm aware of.**
 16 Q Are you aware of any trade organizations that
 17 Eaton had membership in during your employment there?
 18 **A No.**
 19 Q Were you, yourself, a member of any trade
 20 organization while you were employed with either
 21 Fawick or Eaton?
 22 **A No.**
 23 Q Did Fawick or Eaton ever provide any kind of
 24 annual medical exams for its employees?
 25 MR. LANG: Let me just object

1 to the scope, the form, foundation.
 2 Go ahead and answer if you can.
 3 **A I was provided for a period of time with an**
 4 **annual physical. But how it applied to other people I**
 5 **really don't know.**
 6 Q Do you know if Fawick or Eaton ever employed an
 7 industrial hygienist to consult regarding asbestos?
 8 **A No, they didn't.**
 9 Q Do you know if Eaton has ever had any
 10 Workers' Compensation claims arising out of a claim of
 11 exposure to asbestos?
 12 **A I'm not aware of it.**
 13 Q Is that anything that you investigated in
 14 preparation for your deposition today?
 15 **A No.**
 16 Q Did Eaton Airflex ever create any MSDS, Material
 17 Safety Data Sheets, for its clutches or replacement
 18 friction material?
 19 **A Yes.**
 20 Q And do you recall when that first happened?
 21 **A Early '80s would be the best idea.**
 22 MR. KIWALA: Let's mark --
 23 it's No. 30 in the stack. It's a
 24 little bit out of order. And if I've
 25 got my order right, this will be

1 Exhibit No. 3.
 2 -----
 3 (Plaintiff's Exhibit 3 marked for
 4 identification.)
 5 -----
 6 Q Mr. Petkash, if you could take a look at Exhibit
 7 No. 3. And would you agree that it appears to be an
 8 MSDS created by Eaton Airflex for friction material?
 9 **A Yes.**
 10 Q And if you look at the bottom of the second page,
 11 I believe it's dated 1985?
 12 **A Yes.**
 13 Q And going back to the first page, this friction
 14 material has asbestos in it, correct, according to
 15 Section II?
 16 **A Line numbered 1 says, "Chrysotile Asbestos," yes.**
 17 Q And next to that line showing the asbestos
 18 content there's a double asterisk; is that correct?
 19 Do you see that?
 20 **A Yes.**
 21 Q And if we look further down the page, the
 22 asterisk is telling us to see Section VI, right?
 23 **A Yes.**
 24 Q And Section VI is on the second page at the top.
 25 And it is a section -- the print isn't very good, but

1 it's labeled, "Health Hazard Data," correct?
 2 **A Oh, up -- yes.**
 3 **Q** And a couple lines down under the section
 4 labeled, "Chronic Toxicity Effects," among other
 5 things it says that asbestos is a suspect carcinogen;
 6 is that correct?
 7 **A Yes.**
 8 **Q** Do you know was asbestos a suspect carcinogen in
 9 1985?
 10 MR. LANG: Once again, I'm
 11 going to just object to the form,
 12 foundation. Go ahead.
 13 **A That's what the form says.**
 14 **Q** Do you know if Eaton created any MSDS for
 15 asbestos-containing friction material earlier than the
 16 one we see here in 1985?
 17 MR. LANG: I'll just object to
 18 the extent of the scope, and it's
 19 beyond any potential Airflex
 20 testimony. Go ahead.
 21 **Q** This is with respect to -- I'm sorry -- Eaton
 22 Airflex, any Eaton Airflex friction material?
 23 MR. LANG: Could we just
 24 have an ongoing thing with that?
 25 When you reference Eaton, I don't

1 want to -- can we focus it in on
 2 Airflex, meaning you're using Eaton
 3 interchangeably with Airflex when
 4 you're asking him specific questions
 5 about the products?
 6 MR. KIWALA: Yes. When we're
 7 talking about questions about the
 8 products, I'll restrict that to just
 9 the Airflex products.
 10 MR. LANG: Because when you
 11 say, "Eaton," so we're going to be on
 12 the same page, we're assuming it's
 13 Airflex you're talking about.
 14 MR. KIWALA: Yes.
 15 MR. LANG: Okay. Great.
 16 MR. KIWALA: If it's
 17 otherwise, I'll say so.
 18 MR. LANG: That way I won't
 19 keep interrupting you. Thanks.
 20 **Q** I'm sorry. Going back to the question, again, do
 21 you know if Eaton had created any MSDS for
 22 asbestos-containing friction material for use on
 23 Airflex products earlier than this document here?
 24 **A I was not aware of them. I had never seen this**
 25 **before.**

1 **Q** Do you know if Eaton Airflex ever created an MSDS
 2 for asbestos-containing friction material that listed
 3 asbestos as a known carcinogen rather than a suspect
 4 carcinogen?
 5 **A No.**
 6 **Q** Did Eaton ever have a written respiratory program
 7 for its employees who were working in the Airflex
 8 plant?
 9 **A I don't know.**
 10 **Q** Were you ever in the manufacturing areas at the
 11 Eaton Airflex facility?
 12 **A Often. I didn't work there. I just -- walking**
 13 **through.**
 14 **Q** Walking through, did you ever see people wearing
 15 any sort of masks or respirators while working with
 16 friction material?
 17 **A I don't recall.**
 18 **Q** Do you know if the manufacturing facility ever
 19 had any sort of dust collection or ventilation system?
 20 **A There were dust collectors around some of the**
 21 **machines.**
 22 **Q** Okay. Which machines?
 23 **A There were some that -- and this, again, is in**
 24 **the '70s time period -- where they were doing some**
 25 **drilling of friction material.**

1 **Q** Was there any sort of dust collection system
 2 prior to the '70s?
 3 **A Not that I was aware of.**
 4 **Q** And you started there in 1963, correct?
 5 **A Correct.**
 6 **Q** Do you recall any sort of industrial hygiene
 7 testing being done at Eaton Airflex; anybody coming in
 8 to the plant to take dust samples?
 9 **A No. I'm sorry. I saw a document yesterday,**
 10 **actually, where they had done some testing in the R&D**
 11 **lab of Eaton Airflex. But not in the factory itself,**
 12 **but in the R&D lab. And they found that there was**
 13 **no -- the concentrations were very low, well below the**
 14 **standards, allowable standard.**
 15 **Q** Okay.
 16 MR. KIWALA: Cheryl, can we
 17 mark the last one in the stack, No.
 18 34.
 19 -----
 20 (Plaintiff's Exhibit 4 marked for
 21 identification.)
 22 -----
 23 **Q** Okay. Mr. Petkash, I want you to take a look at
 24 what's been marked as Exhibit No. 4. And it appears
 25 to be a letter dated November 19, 1975, correct?

1 **A Correct.**
 2 Q And unfortunately on the first page, the
 3 letterhead kind of cuts off there. But if you turn to
 4 the second page, the signature line, it indicates that
 5 the author is a Jack Dauch, I guess, D-a-u-c-h,
 6 Manager of Occupational Health Services, correct?
 7 **A Correct.**
 8 Q And at any rate, this letter, if you look at,
 9 again, top of the first page, purports to be enclosing
 10 the results of recent asbestos sampling performed at
 11 the Eaton Airflex plant. Would you agree?
 12 **A First line, yeah.**
 13 Q Yeah. And this letter is addressed to Eaton
 14 Airflex, attention to Mr. Steve Trukalo?
 15 **A Yes.**
 16 Q Do you know what Mr. Trukalo's position at Eaton
 17 Airflex would have been at that time?
 18 **A He was the factory manager.**
 19 Q And I take it you don't have any recollection of
 20 this testing?
 21 **A No.**
 22 Q Let's go back to the second page, top of Page 2.
 23 And it lists the asbestos concentration that was found
 24 in the samples that were taken. And in six of the
 25 seven samples, it shows the asbestos fiber

1 concentration from the samples being lower than one
 2 fiber per cubic centimeter, correct?
 3 **A Yes.**
 4 Q Okay. And the seventh one, however, shows a
 5 fibers per cc of more than 6, right?
 6 **A 6.6, yes.**
 7 Q Let's go back to the bottom paragraph on the
 8 first page. And about halfway through that paragraph,
 9 it says that sample No. 7 was a sample taken from
 10 "actual cutting and sanding operation," right?
 11 **A Yes.**
 12 Q And it says that the cutting and sanding was done
 13 outside of a vented area; is that right?
 14 **A Yes.**
 15 Q And let's go back to the second page. And the
 16 last line of that first paragraph under the sample
 17 results, the author suggests that any future grinding
 18 should be done in a vented area; is that right?
 19 **A Yes.**
 20 Q And you mentioned earlier that you recall seeing
 21 testing done in the R&D lab?
 22 **A Correct.**
 23 Q And that showed levels -- very low levels of
 24 asbestos?
 25 **A Correct.**

1 Q Was the R&D lab ventilated? Did it have any sort
 2 of ventilation?
 3 **A Yes, it did.**
 4 Q Okay.
 5 **A There were fans and dust collectors and things in**
 6 **that area.**
 7 Q In the testing that you saw, were the fans and
 8 dust collectors operating when the testing in the R&D
 9 lab was taking place?
 10 **A Yes.**
 11 Q I think we're done with this letter.
 12 MR. KIWALA: Cheryl, can you
 13 mark -- it's No. 7 in the stack.
 14 -----
 15 (Plaintiff's Exhibit 5 marked for
 16 identification.)
 17 -----
 18 MR. KIWALA: And, Chris, this
 19 is one that was not from the Eaton
 20 production, is not an Eaton document.
 21 MR. LANG: Before you ask any
 22 questions about this --
 23 MR. KIWALA: Oh, that's an
 24 extra page, and we don't need to
 25 include that as an Exhibit yet.

1 MR. LANG: Before you ask him
 2 questions about this, do you want him
 3 to review it?
 4 MR. KIWALA: Yes.
 5 MR. LANG: I want to go off
 6 the, give him a second to look it
 7 over.
 8 VIDEOGRAPHER: We're going
 9 off the record. Actually, let's
 10 change tape right now.
 11 This concludes Tape No. 1. The
 12 time is now 10:02. We're going off
 13 the record.
 14 (Brief recess taken.)
 15 VIDEOGRAPHER: We're back on
 16 the record. This is the beginning of
 17 Tape No. 2. The time is now 10:12.
 18 You may proceed.
 19 BY MR. KIWALA:
 20 Q Mr. Petkash, go ahead and take a look at the next
 21 Exhibit marked No. 5. Have you ever seen that before?
 22 **A I have not.**
 23 Q I'll represent to you that this is the September
 24 1952 issue of the Industrial Hygiene Digest, and it's
 25 published by the Industrial Hygiene Foundation. If you

1 please turn to the second page of the document, look
 2 under the heading, "New Additions to Foundation
 3 Membership." Does that indicate that Eaton
 4 Manufacturing Company had recently become a member of
 5 the Industrial Hygiene Foundation?
 6 **A Yes, it does.**
 7 Q Is Eaton Manufacturing Company a former name of
 8 Eaton Corporation?
 9 **A Yes.**
 10 Q And if you'll go to the next page of the
 11 document, which would be Page 29 of the actual issue
 12 of the Digest, it appears to show a series of article
 13 abstracts. And I'd like you to take a look at the
 14 last one on the page. Can you read aloud what the
 15 title is there?
 16 **A "Asbestosis Associated with Bronchogenic**
 17 **Carcinoma."**
 18 Q Okay. And could you read the last two sentences
 19 of that abstract there, starting with, "The opinion is
 20 suggested" --
 21 **A Can I read the first part of the paragraph first**
 22 **or --**
 23 Q Oh, absolutely.
 24 **A (Witness reading.) Okay.**
 25 Q And could you just please read aloud the last two

1 sentences of that paragraph, starting with, "The
 2 opinion is suggested" --
 3 MR. LANG: I'm going to
 4 object to the form of the question.
 5 But go ahead and read it if you want
 6 to.
 7 **A "The opinion is suggested that the silicate in**
 8 **asbestos must itself be directly carcinogenic. It**
 9 **establishes an additional reason for preventative**
 10 **measures in the use of asbestos."**
 11 Q Okay. Mr. Petkash, would you agree that in 1952,
 12 information that asbestos causes cancer was available
 13 to Eaton?
 14 MR. LANG: Let me just object
 15 to the form, foundation. Answer that
 16 if you can. It's beyond the scope.
 17 Go ahead.
 18 **A You want to say the question again?**
 19 Q Sure. Would you agree that in 1952, information
 20 that asbestos causes cancer was available to Eaton?
 21 MR. LANG: Same objections.
 22 **A Based on this documentation, I would say yes.**
 23 MR. KIWALA: Cheryl, could
 24 you mark No. 8 in the stack.
 25 -----

1 (Plaintiff's Exhibit 6 marked for
 2 identification.)
 3 -----
 4 Q Okay. Mr. Petkash, you've been handed what I
 5 believe has been marked as Exhibit No. 6?
 6 **A Yes.**
 7 Q And if you'll take a look at that Exhibit, would
 8 you agree that the first page here appears to be an
 9 internal memo from Eaton Airflex dated September 2,
 10 1975?
 11 **A That's correct.**
 12 Q Have you seen this document before?
 13 **A I'm shown as a copier -- copy receipt, so yes.**
 14 **But probably in 1975 was the last time I saw it.**
 15 Q And I'd like you to turn the page -- the memo
 16 here attaches a short article. I'd like you to turn
 17 the page and take a look at that article. Have you
 18 ever seen that before?
 19 **A No. Well --**
 20 Q It would have been attached to the memo you
 21 received in 1975.
 22 **A Then I would have seen it. I want to read the**
 23 **letter to see what they're talking about.**
 24 MR. KIWALA: We can go off the
 25 record so he can have a chance to

1 review it.
 2 VIDEOGRAPHER: We're going
 3 off the record at 10:18.
 4 **A (Witness reading.)**
 5 VIDEOGRAPHER: We're back on
 6 the record. The time is now 10:19.
 7 Q Okay. Mr. Petkash, you've had a chance to review
 8 the letter. And in here it says NIOSH is issuing a
 9 warning about Brake Lining Surface: Asbestos
 10 Exposure. Do you see that?
 11 **A Yes.**
 12 Q And if you look in the paragraph underneath, I'll
 13 just read it. It says, "Previous studies of asbestos
 14 emissions from automobile brake lining wear showed
 15 that only a small fraction of the original asbestos
 16 content was found in brake drum dust. However,
 17 present findings indicate that enough asbestos is
 18 preserved to produce significant exposures during
 19 certain brake servicing procedures." Do you see that?
 20 **A Yes.**
 21 Q And if we go a little bit further down under,
 22 "Recommended Interim Procedures, and the first
 23 paragraph under that heading, the last sentence, it
 24 says, "During manual clutch respirators should be worn
 25 during removal and cleaning of the clutch, pressure

1 plate and housing assembly and during installation of
2 the new clutch assembly." Do you see that?

3 **A Yes.**

4 Q And then the next paragraph down, last sentence,
5 "Under no circumstances should compressed air" -- I'm
6 sorry -- "compressed air or dry brushing be used for
7 cleaning." Do you see that?

8 **A Yes.**

9 Q Would you agree that as of September 1975, Eaton
10 Airflex was aware of information showing that
11 significant exposures of asbestos could occur from
12 performing maintenance on or replacing clutches?

13 MR. LANG: Objection to the
14 form, foundation.

15 **A Yes.**

16 Q And specifically using compressed air to clean
17 clutches could cause a significant exposure to
18 asbestos?

19 MR. LANG: Same objections.

20 **A Yes.**

21 MR. KIWALA: Cheryl, could
22 you mark No. 9.

23 -----

24 (Plaintiff's Exhibit 7 marked for
25 identification.)

1 -----

2 Q Mr. Petkash, you've been handed what's been
3 labeled as Exhibit 7.

4 **A Uh-huh.**

5 Q Would you agree this appears to be instructions
6 for maintenance and disassembly of a Fawick clutch for
7 use on a Coast Guard vessel?

8 **A Yes.**

9 Q Did Fawick and Eaton sell Airflex clutches to the
10 military?

11 **A Directly, no. It was through, in this case, a**
12 **gearbox manufacturer. I think these were Philadelphia**
13 **Gears.**

14 Q Is the document that we're looking at now,
15 Exhibit 7, a document that Fawick or Eaton would have
16 created?

17 **A Yes.**

18 Q Let's look at the maintenance section on the
19 first page. And that first paragraph there, a little
20 bit more than halfway down, it says, "The clutch must
21 be kept clean of any foreign material and should be
22 inspected at regular intervals for such foreign
23 material." Do you see that?

24 **A Yes.**

25 Q And let's look at the next page. It has a little

1 chart of malfunctions. And if you see under the
2 "Cause" column, the first letter B there, it says,
3 "Foreign material in friction surface." And next to
4 that there's a -- in the "Correction" column, under B
5 it says "Clean completely." Do you see that?

6 **A Yes.**

7 Q A little bit further down in the "Cause" column,
8 the last C on that column, it says, "Embedment" -- I
9 think that's supposed to be "of foreign material in
10 friction shoes." And next to that it says, for the
11 correction, "Cleaner replace," correct?

12 **A Yes.**

13 Q Would foreign material include dust?

14 **A Dust, grease, items like -- of that sort, yes.**

15 Q Anything that's foreign?

16 **A Yeah. Anything that's not supposed to be there.**
17 **Pieces of metal. Could be lot of different things.**

18 Q I'm going to let you take a look at this
19 document, but do these instructions provide any
20 information about how to go about cleaning the clutch?

21 **A It doesn't appear to, no. It just says, "Clean,**
22 **clean or replace."**

23 Q And the friction material on this type of clutch
24 in 1968 would have been asbestos-containing friction
25 material, right?

1 MR. LANG: Object to the form
2 and foundation. If you know.

3 **A In the maintenance paragraph it says, "High grade**
4 **asbestos friction blocks," first sentence.**

5 Q Right.

6 MR. KIWALA: Cheryl, can you
7 mark No. 10 in the stack. This would
8 be Exhibit No. 8. I'm sorry. This
9 is FAW 18565.

10 -----

11 (Plaintiff's Exhibit 8 marked for
12 identification.)

13 -----

14 Q Mr. Petkash, have you had a chance to review
15 Exhibit No. 8?

16 **A Yes, briefly.**

17 Q And would you agree that these are maintenance
18 instructions for an Airflex clutch, specifically a VC
19 marine clutch?

20 **A Correct.**

21 Q And this document does appear to be an Eaton
22 document, correct?

23 **A Yes. It contains the Eaton logo.**

24 Q And the maintenance instructions on this document
25 are similar to what we saw in Exhibit No. 7 as far as

1 cleaning the clutch, right?
 2 **A Yes.**
 3 Q It says the clutch needs to be kept clean.
 4 Agree?
 5 **A Yes. With the same --**
 6 Q And it instructs that foreign material should be
 7 kept -- should be cleaned out of the clutch?
 8 **A Right.**
 9 Q And it does not say how to go about cleaning the
 10 clutch; is that correct?
 11 **A It does not.**
 12 Q And there's no warning here against using
 13 compressed air; is that correct?
 14 **A No, there isn't.**
 15 Q And now, this document, if you turn to the second
 16 page, is dated July 1st, 1973, right?
 17 **A Yes.**
 18 Q And the time that this document was created, all
 19 of the VC marine clutches would have had
 20 asbestos-containing friction material on them; is that
 21 right?
 22 MR. LANG: Object to the
 23 form, foundation, scope. Go ahead.
 24 **A At that period, yes.**
 25 Q Did the Airflex expanding type clutch, the E

1 type, still use asbestos friction material in 1982?
 2 **A That was during the time of transition. Some**
 3 **sizes may have and some others still might have been.**
 4 Q So some may have, some may not?
 5 **A Yes.**
 6 MR. KIWALA: Cheryl, can you
 7 mark No. 11. And this is Bates No.
 8 13178.
 9 -----
 10 (Plaintiff's Exhibit 9 marked for
 11 identification.)
 12 -----
 13 Q Mr. Petkash, Exhibit No. 9 is a multi-page
 14 document that appears to be an installation and
 15 operation manual for the Airflex E element assembly.
 16 Would you agree?
 17 **A Yes.**
 18 Q Okay. For purposes of our discussion today, I
 19 really want you to just take a look at and review
 20 Page 5, the first page of the section labeled,
 21 "Maintenance." And can you take a look at paragraph
 22 A1a. Do you see it?
 23 **A Yes.**
 24 Q And do you see where it says, "If the friction
 25 linings are glazed, the condition can be corrected by

1 sanding the friction lining to remove the glaze?"
 2 **A Yes.**
 3 Q Is there any note there that says that sanding
 4 the lining could release asbestos?
 5 **A No.**
 6 Q And let's take a look over at the
 7 right-hand column there, at the top where it says,
 8 "Oil or grease on the friction surface."
 9 **A Yes, I see it.**
 10 Q Okay. And if you -- would you agree there that
 11 the instruction there says that if oil or grease gets
 12 on the friction surface, you should use gasoline or
 13 naphtha on a rag to clean the lining; is that correct?
 14 **A Yes.**
 15 Q And right below that instruction there is a
 16 caution. And the caution says that gasoline and
 17 naphtha are flammable, right?
 18 **A Yes.**
 19 Q Okay. Now, Eaton did not supply gasoline or
 20 naphtha to customers for cleaning Airflex clutch
 21 linings, right?
 22 **A No, they did not.**
 23 Q But here they're telling their users about the
 24 hazards of gasoline and naphtha as far as they might
 25 be used in the maintenance of the clutch friction

1 lining, right?
 2 **A Yes.**
 3 Q And again, there's no warning about the asbestos
 4 in the friction material that the user is being
 5 instructed to sand in the left-hand side column; is
 6 that correct?
 7 **A That's correct.**
 8 Q And if you look further down that
 9 right-hand column to subparagraph C under, "Friction
 10 shoes do not retract," it says that if a deposit forms
 11 on the clutch lining, it needs to be cleaned, right?
 12 **A Which paragraph? I'm sorry.**
 13 Q It's under Section 5, "Friction shoes do not
 14 retract," subparagraph C.
 15 **A C?**
 16 Q Yes.
 17 **A Okay.**
 18 Q Okay. Is there any instruction there about how
 19 to go about cleaning the clutch lining in that
 20 instance?
 21 **A It's not talking about the linings themselves.**
 22 **Just the shoe and the interface between the back of**
 23 **the shoe and the rubber tube, if that gets dust and**
 24 **dirt from the atmosphere, it would reduce -- it would**
 25 **move the shoe and cause it to drag on the drum --**

1 Q Okay.

2 **A -- if there was enough contamination.**

3 Q Could wear dust from the operation of the clutch
4 get in there?

5 **A Could be one of the components of that
6 contamination, yes.**

7 Q Okay. But at any rate, there's no instruction
8 here about how to go about cleaning that area?

9 **A No.**

10 Q Okay. And there's no instruction there not to
11 blow out that area, that shoe, with compressed air,
12 correct?

13 **A No.**

14 Q Okay.

15 MR. KIWALA: Cheryl, could
16 you mark No. 12 in the stack. And
17 this is going to be FAW 06916.

18 -----

19 (Plaintiff's Exhibit 10 marked for
20 identification.)

21 -----

22 Q Okay. And, Mr. Petkash, you've been handed a
23 multi-page document. And this one appears to be a
24 manual for a CB type clutch. And it's dated 19 --
25 June of 1990, correct, on the front?

1 **A Yes, yes.**

2 Q And CB is one of those constricting-type
3 clutches?

4 **A Right. That's what the illustration shows.**

5 Q And by 1990, those CB type clutches no longer had
6 asbestos-containing friction material in them,
7 correct?

8 **A That's correct.**

9 Q I'd like you to turn to Page 9 of that document.
10 And if you look towards the bottom of the left-hand
11 column there under "Maintenance," paragraph 4.1.1.3,
12 it's titled "Contamination of Shoes or Drum."

13 **A Yes, I see it.**

14 Q Okay. And if you look at the end of the
15 paragraph, it instructs the user that, "Any dust
16 accumulation may be vacuumed from between the friction
17 shoe assemblies," right?

18 **A Yes.**

19 Q Okay. Now, let's go up to the top of the
20 right-hand column. And there's a caution statement,
21 correct?

22 **A Yes.**

23 Q And this caution statement says, "Do not use
24 compressed air to blow dust accumulations out from
25 between the friction shoes. Although the friction

1 material does not contain asbestos, the dust created
2 as the friction material wears, along with the dust
3 from the operating environment, may irritate the
4 respiratory system. " Did I read that right?

5 **A Correct.**

6 Q Okay. Sir, would you agree that the first time
7 that Eaton put a warning against the use of compressed
8 air to clean Airflex clutches was after they no longer
9 contained asbestos?

10 MR. LANG: I'll just object to
11 the form, foundation. You can answer
12 that if you know the answer.

13 **A I don't. I don't know.**

14 Q Okay.

15 **A It could have occurred well before this.**

16 Q So far today we've looked at three separate sets
17 of instructions for various models of Airflex
18 clutches.

19 **A Uh-huh.**

20 Q One from 1968, one from 1973, and one from 1982.
21 And in none of those was there an instruction not to
22 use compressed air. Would you agree with that?

23 **A Yes.**

24 Q Okay. And here in this manual that we're looking
25 at from 1990, where there is no asbestos in the

1 friction material, there's an instruction not to use
2 compressed air. Would you agree with that statement?

3 **A Yes.**

4 Q Okay. Are you aware of any Airflex instruction
5 manuals prior to this one in 1990 where this
6 instruction is given?

7 **A No, I'm not aware of which others may have or may
8 not have had that instruction.**

9 Q Do you know when the decision was made to put
10 this instruction into Airflex clutch manuals?

11 **A Into this manual it would have been around the
12 time it was published. This appears to be the
13 original publication, because they contained a
14 revision number or date as part of this. And there's
15 no such thing. So that would have been that time.**

16 MR. LANG: Just so I'm clear, I
17 didn't necessarily understand that.
18 What you're saying is Exhibit 10
19 looks like the first manual they put
20 out with regard to that particular
21 thing --

22 THE WITNESS: No. It's the
23 first publication of this one.

24 MR. LANG: That one.

25 THE WITNESS: Of this CB --

1 MR. LANG: Of the CB 4000.
 2 THE WITNESS: -- 4000. There
 3 could very well have been others
 4 prior to that with a similar
 5 warning. I don't know.
 6 Q Okay. Do you know if any manuals for the E
 7 style, the expanding style of clutch, would have
 8 carried that warning prior to 1990?
 9 A No, I don't.
 10 Q Is that anything that you investigated as part of
 11 your preparation for today's deposition?
 12 A I'm sorry. I didn't catch the first part.
 13 Q Is that anything that you investigated as
 14 preparation for your deposition today, warnings Eaton
 15 Airflex would have put out with respect to its
 16 clutches over time?
 17 A The only thing I saw was a -- it was an
 18 engineering drawing showing a warning label. But I
 19 don't know the date of that, when that drawing was
 20 produced.
 21 Q Okay. Would the engineering drawing have gone
 22 out to customers?
 23 A No. It was a drawing to manufacture the label.
 24 Q Oh, okay. And you don't know the date of that
 25 drawing?

1 A No, I don't. I don't know that.
 2 Q Do you have that drawing available to you?
 3 A It was with the attorneys.
 4 MR. PETTICORD: It was in the
 5 production.
 6 MR. KIWALA: Cheryl, could
 7 you go ahead and mark No. 13 in the
 8 stack.
 9 THE witness: Running out of
 10 room.
 11 MR. KIWALA: We're done with
 12 those. You can set them aside.
 13 -----
 14 (Plaintiff's Exhibit 11 marked for
 15 identification.)
 16 -----
 17 MR. KIWALA: I'm sorry. This
 18 is FAW 13678.
 19 A (Witness reading.)
 20 Q We can go off the record if you need a chance to
 21 review that.
 22 VIDEOGRAPHER: We're going
 23 off the record at 10:43.
 24 (Brief recess taken.)
 25 VIDEOGRAPHER: We're back on

1 the record. The time's now 10:46.
 2 BY MR. KIWALA:
 3 Q Mr. Petkash, you're looking at what's been marked
 4 as Exhibit No. 11. Have you ever seen this document
 5 before?
 6 A No.
 7 Q Okay. Do you know if this is a document that
 8 would have been created by the sales department at
 9 Eaton Airflex?
 10 A It appears to be, but I don't really know.
 11 Q And this appears to be a letter directed to
 12 customers of Eaton Airflex in the paper-making
 13 industry, correct?
 14 A Correct.
 15 Q And it's dated 1993 February 22nd?
 16 A Correct.
 17 Q Is this a letter that Eaton Airflex would have
 18 been sending out to all of its customers in the paper-
 19 making industry in 1993?
 20 MR. LANG: Object to the form,
 21 foundation, scope. You can answer if
 22 you can.
 23 A It appears so, yes, but I don't know.
 24 Q Did Eaton regularly send out these types of mass
 25 letters to customers in various industries such as the

1 paper-making industry?
 2 MR. LANG: Same objections.
 3 Q You were in sales, right?
 4 A Yes.
 5 Q Did the sales department do that sort of thing?
 6 A No. It wasn't common.
 7 Q Let's take a look at Page 4. And the third sort
 8 of bullet point down underneath that "Periodic
 9 inspections" section, and in that bullet point, again,
 10 we have this instruction to clean the dust from the
 11 clutch along with a warning not to use compressed air,
 12 correct?
 13 A Correct.
 14 Q Okay. And again, in 1993, there was no asbestos
 15 in Airflex clutches sold by Eaton Airflex, right?
 16 A Correct.
 17 MR. KIWALA: Let's go ahead
 18 and mark No. 14 in the stack. This
 19 is FAW 17182 to 184.
 20 It's not there?
 21 THE NOTARY: No.
 22 MR. KIWALA: Well, we'll skip
 23 it. My mistake. Second one today.
 24 Can we mark No. 15 in the stack then?
 25 Please tell me that one's there. And

1 this is FAW 17098.

2 -----
3 (Plaintiff's Exhibit 12 marked for
4 identification.)
5 -----

6 Q Mr. Petkash, I want you to take a moment and
7 review what's been marked as No. 12, Exhibit No. 12.

8 MR. KIWALA: We can go off
9 the record while he reviews that.

10 VIDEOGRAPHER: We're going
11 off the record. The time is now
12 10:51.

13 (Brief recess taken.)

14 VIDEOGRAPHER: We're back on
15 the record. The time is now 10:53.

16 BY MR. KIWALA:

17 Q Okay. Mr. Petkash, you've had a chance to review
18 Exhibit No. 12. And this is an inter-office memo
19 dated September 7th, 1976, correct?

20 A Correct.

21 Q And it is from an R.W. Rosenow to Marc Collins,
22 right?

23 A Correct.

24 Q Okay. At the time that this was written, what
25 position did Mr. Rosenow hold at Eaton Airflex?

1 A He was service manager, field service manager.

2 Q So part of his job was to handle customer
3 inquiries?

4 A For repair issues, service issues, installation,
5 that type of thing.

6 Q And Mr. Collins, what position did he hold at
7 Eaton Airflex at the time?

8 A He was the engineering manager at that time.

9 Q And from this letter, it appears that there's an
10 inquiry from a customer about asbestos released during
11 the engagement of clutches, right?

12 A Yes.

13 Q And at this point, it appears that Eaton is not
14 sure if there's an exposure from this operation or
15 not. Would you agree with that?

16 A Yes.

17 Q And it appears that Mr. Rosenow thinks that NAFCO
18 should be contacted to help answer the question,
19 right?

20 MR. LANG: Let me just object
21 to the form, foundation to the extent
22 it misstates what's set forth in the
23 document or requests the witness's
24 information as to what someone was
25 thinking back in 1976. But subject

1 to that, go ahead.

2 Q Well, at any rate, Mr. Rosenow is writing, "NAFCO
3 may be able to help provide this information." That's
4 what the letter says, right?

5 A That's what the letter says.

6 Q And NAFCO is National Friction Company; isn't it?

7 A Correct.

8 Q And that is the major supplier of asbestos
9 friction material used in Airflex clutches at this
10 time, right?

11 A Yes.

12 Q Okay. Do you know if there was ever any
13 relationship with National Friction other than it
14 being a supplier?

15 MR. LANG: Object to the
16 form, foundation. Go ahead if you
17 know.

18 A Early in its formation, I think it -- Mr. Fawick
19 himself personally had a small ownership in the
20 company. But then it became a separate company and he
21 was out of it. But that was in its very early days.
22 There was no further relationship other than a
23 customer vendor.

24 MR. KIWALA: Cheryl, could
25 you mark No. 2 in the stack. This is

1 FAW 03053.

2 -----
3 (Plaintiff's Exhibit 13 marked for
4 identification.)
5 -----

6 Q Okay. Mr. Petkash, you have Exhibit No. 13 in
7 front of you. And I really just need you to turn to
8 the fourth page of the Exhibit. And again, this is a
9 1964 Annual Report for Fawick Corporation, right?

10 A Yes.

11 Q And on the fourth page, fifth paragraph down,
12 could you read -- just go ahead and read that for a
13 second.

14 A (Witness reading.) Okay.

15 Q And this says here in the annual report that
16 Fawick, in fact, established National Friction
17 Products Company in Logansport, Indiana in 1964,
18 right?

19 A Yes.

20 Q And at the time that this annual report was
21 created, Fawick Corporation had a controlling interest
22 in that company; is that right?

23 A That's what it -- I was not aware of that fact.

24 MR. KIWALA: And, Cheryl,
25 could you mark No. 3 in the stack,

1 just a two-page document there. FAW
2 03188.

3 -----
4 (Plaintiff's Exhibit 14 marked for
5 identification.)
6 -----

7 MR. KIWALA: And I've only
8 included FAW 03236. It was a long
9 document.

10 **A (Witness reading.)**

11 Q Mr. Petkash, Exhibit No. 14 is a Fawick
12 Corporation Notice of Special Meeting of Shareholders,
13 correct?

14 **A Yes.**

15 Q And this one is dated March 1, 1968, correct?

16 **A Yes.**

17 Q Okay. And this is the notice of the shareholder
18 meeting for Fawick shareholders to approve the merger
19 with Eaton, right?

20 **A Yes.**

21 Q All right. And the second page of Exhibit No.
22 14, under the consolidated statement of income here,
23 under subparagraph C notes that at least at the time
24 of the merger, Fawick still owns stock in National
25 Friction. Would you agree with that?

1 **A It says 43 percent at that point.**

2 Q Do you know did Eaton ever own stock in National
3 Friction after the merger with Fawick?

4 **A I don't know.**

5 Q Do you know if any of the directors or officers
6 of Fawick Corporation were directors or officers of
7 National Friction?

8 **A No, I don't know.**

9 Q Do you know if any directors or officers of Eaton
10 Corporation were ever directors or officers of
11 National Friction?

12 **A No, I don't know.**

13 Q Do you know of anybody within Eaton who would
14 have that information?

15 **A No, I don't, nobody that dates back that far.**

16 Q Okay. Let's get back to Exhibit No. 12. That
17 was that letter from Mr. Rosenow to Mr. Collins. And
18 if you look at that last paragraph, it says that they
19 expect future -- I'm sorry -- similar inquiries in the
20 future from other customers, right? Inquiries similar
21 to the inquiry that's being brought up in this letter?

22 **A Yes.**

23 Q Okay. And the reason for that is OSHA
24 regulations, right?

25 **A Yes.**

1 MR. KIWALA: Let's go ahead
2 and mark No. 16 in the stack. And
3 this is FAW 11855.

4 -----
5 (Plaintiff's Exhibit 15 marked for
6 identification.)
7 -----

8 MR. KIWALA: And we can go
9 off the record. This is probably one
10 he'll want to review.

11 VIDEOGRAPHER: We're going
12 off the record at 11:05.

13 (Brief recess taken.)

14 VIDEOGRAPHER: We are back on
15 the record. The time is now 11:16.

16 BY MR. KIWALA:

17 Q Mr. Petkash, you've had the opportunity now to
18 review what has been marked as Exhibit 15?

19 **A Yes.**

20 Q And that is a -- if you take a look at that
21 Exhibit, it appears to be a letter from an E.J. Sydor
22 to Mr. Collins, dated October 5th, 1976, correct?

23 **A Yes.**

24 Q Who is E.J. Sydor?

25 **A It's Ed Sydor I think was the way it was -- Sydor**

1 **was the way it was pronounced. He was the general
2 manager of National Friction Products.**

3 Q Okay. I'm saying Sydor because of Darryl Sydor,
4 hockey player.

5 **A Oh, okay.**

6 Q Okay. And from this letter, it appears that
7 Mr. Sydor's letter is in response to a letter from
8 Mr. Collins, right?

9 **A Yes.**

10 Q Okay. And this letter is talking about the
11 potential, if any, of asbestos exposure from working
12 with brakes or friction material, right?

13 **A If you're grinding it and changing it, there may
14 have been a hazard.**

15 Q If you look at the fourth paragraph down, he
16 mentions that NIOSH has put out a warning about
17 asbestos exposure from working with brakes, right?

18 **A Yes.**

19 Q Okay. But then the next paragraph there, the one
20 that carries over from the first to the second page,
21 that sentence that carries over says he disagrees with
22 the statement -- he disagrees with the statement that
23 using compressed air to blow out brakes can cause a
24 significant exposure; is that right?

25 **A He's disagreeing with that statement, yes.**

Q Okay. And if you look at the last page, third paragraph down, he says, "There is no measurable amount of airborne asbestos liberated during a clutch or brake engagement, and this should not be a cause for concern among people using your brakes and clutches"; is that right?

A That's correct.

MR. KIWALA: Could we mark No. 17 in the stack. And this is FAW 17152.

(Plaintiff's Exhibit 16 marked for identification.)

Q Okay. And if you look at No. 16, it's another Eaton inter-office memo, this time from Mr. Rosenow to R.L. Baltz, who I believe is the individual who brought up the inquiry that was addressed in that first letter that we saw dated September 7th; is that right?

A Correct, from Exhibit 12.

Q And this letter appears to be passing on the information that came from Mr. Sydor at National Friction, right?

A Yes. Paraphrased it, in fact.

Q Okay. And the second paragraph there says that the friction material in Airflex clutches is about 50 persons asbestos by weight, right?

A Yes.

Q Okay. And then that paragraph goes on to say that clutching and braking causes surface temperatures to get very high, which causes the asbestos to convert to something else, correct?

A Correct.

Q Okay. And you had mentioned earlier that the clutching and braking causes very high temperatures, right?

A Yes.

Q And when I asked you how hot, you said in the neighborhood of 900 to a thousand degrees, right?

A Yep.

Q And this goes on to say that the amount of asbestos that's left after that conversion from asbestos to something else, whatever asbestos is left is inconsequential in terms of being a health hazard, right?

A Yes.

Q And I don't think we talked about specifically when we were looking at Exhibit No. 15, but that is basically what Mr. Sydor said in his letter; isn't it?

A Yes.

Q Do you know if any anyone at Eaton Airflex did any testing or research to determine if this information that was provided by Mr. Sydor was accurate?

A No.

Q Okay. Do you know if anybody did any testing to see if this information applied to specifically the Eaton Airflex products?

A No.

Q Okay. And in this letter, Mr. Rosenow is instructing Mr. Baltz to forward this information that came from Mr. Sydor on to the customer, right?

A Yes.

Q Okay. And there's nothing in this letter about giving the customer the information that came from NIOSH in 1975 that indicated wear dust from brakes and clutches was dangerous. Do you agree with that?

A Yes. It just said pass on this information.

Q Just the information that came from Mr. Sydor, right?

A Right.

Q Okay. And that information from NIOSH is information that Eaton Airflex had had for about a year by the time this letter was written, right?

MR. LANG: I'll just object to the form, foundation. Go ahead.

A I don't know the timing.

Q Let's go back and take a look at that. This was Exhibit No. 6. Yeah. And that memo there in Exhibit No. 6 is dated September 2, 1975, right?

A Yes.

Q Okay. And if you turn the page, the article is stamped "Received" by the sales department on August 26th, 1975, right?

A Yes.

Q So Eaton Airflex had had this information for a year by the time that the letter from Mr. Rosenow to Mr. Baltz was written?

A Yes.

Q Let's take a look at the handwritten note at the top of the Exhibit there, Exhibit No. 16. Do you know whose handwriting that is?

A Robert Burks.

Q I'm sorry?

A Robert Burks, R.L. Burks.

Q R.L. Burks. And what was his position?

A He was a marketing manager.

Q Okay. And it appears from the note here that Mr. Burks is directing a general memo go out to the

1 field providing this same information, right?
 2 **A Yes.**
 3 Q Okay. And so basically, this is going to be
 4 information that anybody in the field is going to give
 5 to Eaton Airflex customers when they have questions
 6 about asbestos release, right?
 7 **A Correct.**
 8 Q And the purpose is so they can eliminate most of
 9 the customer inquiries that they assume that they will
 10 be getting in the futures because of the OSHA
 11 regulations, right?
 12 MR. LANG: I just object to
 13 the form, foundation. Go ahead.
 14 **A The statement handwritten, "A general memo should**
 15 **eliminate most of customer questions re free**
 16 **asbestos." Yes, that was the intent of sending out a**
 17 **general memo.**
 18 Q Okay.
 19 MR. KIWALA: Could we mark
 20 No. 18 in the stack.
 21 MR. LANG: What's the number?
 22 MR. KIWALA: Oh, I'm sorry.
 23 FAW 18330.
 24 -----
 25 (Plaintiff's Exhibit 17 marked for

1 identification.)
 2 -----
 3 Q You can briefly take a look at that.
 4 VIDEOGRAPHER: We'll go off
 5 the record now and change the tape.
 6 MR. KIWALA: Okay.
 7 VIDEOGRAPHER: This concludes
 8 Tape No. 2. The time is now 11:27.
 9 We're going off the record.
 10 (Brief recess taken.)
 11 VIDEOGRAPHER: Stand by.
 12 We're back on the record. This is
 13 the beginning of Tape No. 3. The
 14 time is now 11:30. You may proceed.
 15 BY MR. KIWALA:
 16 Q Mr. Petkash, you've been handed what's been
 17 marked as Exhibit No. 17. And this appears to be a
 18 memo dated November 24th, 1976. And it's labeled,
 19 "Sales Department Letter No. 76-46," right?
 20 **A Correct.**
 21 Q Okay. Would this be the memo that Mr. Burks was
 22 directing be made in the handwritten note on Exhibit
 23 No. 16?
 24 **A Yes.**
 25 Q Okay. And at the bottom of the first page there,

1 the memo mentions that there has been some concern
 2 about exposure to asbestos from the use of Airflex
 3 products, right?
 4 **A Yes.**
 5 Q Okay. And the purpose of this letter is to
 6 address those concerns, right?
 7 **A Clarify this matter, yeah.**
 8 Q And this is being given to all field sales
 9 offices?
 10 **A Yes.**
 11 Q Okay. And this is information that everybody in
 12 the field sales offices is supposed to provide to the
 13 customers if there's an inquiry about asbestos
 14 release, right?
 15 **A Correct.**
 16 Q Let's turn to the second page of Exhibit No. 17.
 17 And on the second page, second paragraph down, again
 18 we have this information that high temperatures during
 19 the engagement of a clutch or brake break down the
 20 asbestos and whatever is left isn't dangerous,
 21 correct?
 22 **A Yes.**
 23 Q Okay. And just above that, in the last sentence
 24 in the paragraph above it, it says the asbestos
 25 content in the friction materials varies from between

1 25 percent and 60 percent by weight, correct?
 2 **A Yes.**
 3 Q Okay. And earlier I think you had estimated it
 4 was somewhere between --
 5 **A 10.**
 6 Q -- 10, 50?
 7 **A Yeah, I thought.**
 8 Q And this information about the asbestos breaking
 9 down and whatever is left is not dangerous, that's the
 10 information, the same information that was received
 11 from Mr. Sydor at National Friction, right?
 12 **A Yes.**
 13 Q And this memo to all field sales offices does not
 14 include that information received from NIOSH in 1975
 15 that the wear dust was, in fact, hazardous, correct?
 16 **A No, it doesn't.**
 17 Q Okay.
 18 MR. KIWALA: Can we mark
 19 what's No. 19 in that stack. This is
 20 FAW 17108.
 21 -----
 22 (Plaintiff's Exhibit 18 marked for
 23 identification.)
 24 -----
 25 Q And while your counsel is reviewing that letter,

1 we talked about the temperatures that the friction
2 material gets up to. And you had said earlier during
3 the engagement of a clutch or brake, we're looking at
4 temperatures of between 900 and a thousand degrees,
5 correct?

6 **A That's what I said, yes.**

7 **Q Okay.**

8 **A (Witness reading.) okay.**

9 **Q Okay. And I believe we're at No. 18 now?**

10 **A Yes.**

11 **Q If you take a look at Exhibit No. 18, it appears**
12 **to be a letter from Mr. Rosenow to Mr. Sydor. And**
13 **this is dated October 22, 1976, right?**

14 **A There's no signature page. I can't say --**

15 **Q You don't have the second page?**

16 **A No.**

17 **MR. KIWALA:** Is it there or
18 **missing? That's the one. That's the**
19 **third strike.**

20 **THE WITNESS:** 17108.

21 **MR. KIWALA:** 17109?

22 **THE WITNESS:** 17108.

23 **THE NOTARY:** 17109.

24 **MR. KIWALA:** Okay. That
25 **would be it.**

1 **VIDEOGRAPHER:** We're still
2 **on.**

3 **Q Okay. So now you have the second page of that**
4 **letter, right?**

5 **A Yes. Same letter. It was written by Rosenow.**

6 **MR. LANG:** Wait for a question.

7 **Q Again, this is the letter from Mr. Rosenow to**
8 **Mr. Sydor at National Friction?**

9 **A Yes.**

10 **Q And this one is dated October 22, 1976, correct?**

11 **A Yes, that's right.**

12 **Q Okay. And that's four days after, if you look at**
13 **Exhibit No. 16, right, the letter, that went from**
14 **Mr. Rosenow to Mr. Baltz?**

15 **A Uh-huh.**

16 **Q That's four days after --**

17 **A Yes.**

18 **Q -- that letter that went out with the information**
19 **to tell the customer that came from Mr. Sydor, right?**

20 **A Yes.**

21 **Q Okay. Now, Exhibit No. 18, this letter from**
22 **Mr. Rosenow to Mr. Sydor, it's asking some questions**
23 **about the information that Mr. Sydor had given earlier**
24 **to Eaton Airflex, right?**

25 **A Yes.**

1 **Q And, in particular, if you look at the second**
2 **paragraph, he's talking about that information about**
3 **asbestos converting to harmless minerals at high**
4 **temperatures, right?**

5 **A Yes.**

6 **Q Okay. And it notes that in the materials that**
7 **Mr. Sydor sent with his letter, there was a reference**
8 **to this breakdown of asbestos into harmless minerals**
9 **occurring at 900 degrees. Do you see that in the**
10 **letter?**

11 **A Yes, I do.**

12 **Q Okay. And below that, Mr. Rosenow says for the**
13 **most part, Airflex clutches and brakes don't get that**
14 **hot, and he wants to know exactly what temperature**
15 **this conversion is taking place at, right?**

16 **A Yes.**

17 **Q Okay. So at least according to Mr. Rosenow,**
18 **Airflex clutches and Airflex brakes don't get as hot**
19 **as 900 degrees, correct?**

20 **A I've seen many applications where there was**
21 **flames coming out of them. So there's some**
22 **applications that were very severe to the point where**
23 **it probably exceeded, well exceeded the 900 degrees.**
24 **They get very warm.**

25 **Q Was it -- strike that.**

1 **A And when we talking about paper mill**
2 **applications, that would be one.**

3 **Q Okay. Now, let's go down to the next paragraph.**
4 **In that next paragraph, Mr. Rosenow is saying that if**
5 **the conversion isn't taking place from asbestos to**
6 **those harmless minerals --**

7 **A Due to heat, yeah.**

8 **Q -- due to heat, then isn't abrasion the cause of**
9 **the wear dust in the clutches, right?**

10 **A Yes.**

11 **Q Okay. And then he says if that's the case,**
12 **aren't we emitting more asbestos than what Mr. Sydor**
13 **had suggested?**

14 **A He's asking that question --**

15 **Q He's asking that question.**

16 **A -- whether it is or not.**

17 **Q Whether that's happening?**

18 **A Right. It's not a fact at that point.**

19 **Q And again, this is four days after Mr. Rosenow**
20 **told Mr. Baltz to forward the information that came**
21 **from Mr. Sydor, right?**

22 **A Right.**

23 **Q Okay. So would you agree that at this point,**
24 **four days after Mr. Rosenow instructed Mr. Baltz to**
25 **forward that information, Mr. Rosenow is now**

1 expressing some doubts to whether or not this
2 information about asbestos converting into something
3 harmless really applies to Airflex products?

4 MR. LANG: Again, I'm going
5 to object to the form, foundation,
6 calls for speculation. You can
7 answer if you know what he was
8 thinking.

9 Q Your answer?

10 **A Over the -- I think he is trying to make a**
11 **generalization here. It isn't across the board,**
12 **because there certainly are -- there were many**
13 **applications that were severe enough to exceed that**
14 **temperature. I witnessed many of them.**

15 Q The customer in this case that Mr. Baltz was
16 being instructed to give this information to was Great
17 Northern Paper Company?

18 **A I thought it was J.W. Penney that the information**
19 **came from.**

20 Q Let's go back to -- what is that, Exhibit No. 16,
21 the correspondence dated October 18th. Yeah, Exhibit
22 No. 16.

23 **A J.W. Penny and Great Northern Paper.**

24 Q Okay. But at any rate, some days after this
25 letter was written to Mr. Sydor, Exhibit 18, the field

1 memo went out to everybody in sales carrying the same
2 information that was given to Mr. Baltz, right?

3 **A Yes.**

4 Q Okay. And, again, the information that was given
5 to Mr. Baltz and the information that went into the
6 field memo was only the information that came from
7 Mr. Sydor, right?

8 **A I don't know that that was the only source.**

9 Q Well, let's put it a different way. In neither
10 one of those memos, neither the one specifically to
11 Mr. Baltz nor the one that went to the entire sales
12 force, was there any information or instruction to
13 give to the customers the information that Eaton
14 Airflex had received from NIOSH?

15 **A No.**

16 Q Would it have been possible for Eaton Airflex to
17 put in that field sales memo the information from
18 NIOSH alongside the information from Mr. Sydor?

19 MR. LANG: Object to the
20 form, foundation. Go ahead.

21 **A It certainly would be possible.**

22 Q Would it have been possible for Eaton to have
23 told its customers NIOSH takes a different view; we
24 disagree with that, but this is what they have to say
25 about it?

1 MR. LANG: Same objections.

2 **A Certainly it's possible. Anything is possible.**

3 Q And that way, people like Mr. Theriault and
4 Mr. Barger and their employers could have looked at
5 both sets of information and made their own decision
6 about what precautions they should be taking?

7 MR. LANG: Let me just object
8 again to the form, foundation, calls
9 for speculation.

10 **A I don't know what they would have done with it.**
11 **I have no idea what they would do.**

12 MR. KIWALA: Let's mark No.
13 20 in the stack. This is FAW 17068.
14 Oh, yes. This is, I believe, Exhibit
15 19. This is No. 20 in my tabs.

16 -----
17 (Plaintiff's Exhibit 19 marked for
18 identification.)
19 -----

20 **A (Witness reading.) Okay.**

21 Q Okay. And if you take a look at what's been
22 marked as Exhibit No. 19, would you agree that this
23 appears to be a response from Mr. Sydor to
24 Mr. Rosenow's letter that we just finished looking at
25 in the last Exhibit?

1 **A It would appear so, yes.**

2 Q Okay. And this one's dated -- this letter,
3 Exhibit 19, is dated October 27th, 1976?

4 **A Yes.**

5 Q And it mentions as attaching some reference
6 material about the transformation of asbestos to those
7 other minerals, correct?

8 **A Yes.**

9 Q Okay. And unfortunately, I don't have that
10 attachment here, but the letter does talk about it.
11 In the second paragraph, Mr. Sydor says that this
12 conversion from asbestos these other minerals starts
13 at around 700 degrees, and it is completed about a
14 thousand degrees, correct?

15 **A Yes.**

16 Q Okay. As Eaton Airflex made that conversion over
17 the late '70s and through the '80s and going into the
18 '90s from asbestos-containing friction materials over
19 to non-asbestos-containing friction materials, they
20 did some testing of those potential replacements,
21 right?

22 **A Yes.**

23 Q Okay. And that was all done in-house. Strike
24 that.

25 At least some of that was done in-house?

1 **A To evaluate the samples provided generally by**
 2 **National Friction, yes.**
 3 Q Okay. And part of the purpose of that -- really,
 4 the purpose of that testing would have been to make
 5 sure that these replacement materials were suitable,
 6 right?
 7 **A Yes.**
 8 Q Okay. That they would hold up under the same
 9 conditions that the asbestos-containing friction
 10 materials would be subjected to, right?
 11 **A Yes.**
 12 Q Okay. And that would be part of what Eaton
 13 Airflex was trying to accomplish; they wanted to make
 14 sure that the new replacement material wasn't going to
 15 fail under those conditions, right?
 16 **A Yes.**
 17 Q Okay. Would that testing in the conditions to be
 18 simulated, would that include the amount of heat, the
 19 temperature that these friction materials would be
 20 going through?
 21 **A Yes.**
 22 MR. KIWALA: Okay. Let's
 23 go ahead and mark No. 22. And this
 24 is a few pages long, but it's
 25 starting at FAW 09783.

1 -----
 2 (Plaintiff's Exhibit 20 marked for
 3 identification.)
 4 -----
 5 **A (Witness reading.)**
 6 Q And we are at Exhibit No. 20.
 7 Mr. Petkash, would you agree that this is an
 8 Eaton Airflex Test Report, dated November 9th, 1979?
 9 **A Yes.**
 10 Q Okay. And this is a report of testing that was
 11 done on some potential non-asbestos friction materials
 12 to investigate whether these materials would be
 13 suitable for use in Airflex products, right?
 14 **A Yes. But not the E-type products. It was for a**
 15 **specific -- a different --**
 16 Q Agree. This is for the --
 17 **A CS-CT.**
 18 Q CS-CT.
 19 **A Right.**
 20 Q What kind of product is that?
 21 **A They were spring set air release brakes.**
 22 Q These are brakes?
 23 **A Not clutches, but brakes.**
 24 Q And I think we agreed earlier that when Eaton was
 25 doing these tests for replacement for

1 asbestos-containing friction material, they would want
 2 to be simulating the conditions that the friction
 3 material on that product, whatever product that
 4 friction material was going into, the temperature --
 5 the -- I'm sorry -- the conditions that the friction
 6 material would encounter during normal use?
 7 **A Yes.**
 8 Q Sorry. That was kind of a bad question.
 9 But the reason Eaton wanted to do that was to be
 10 sure that they were making -- putting in a replacement
 11 material that would offer a comparable performance,
 12 correct?
 13 **A Yes.**
 14 Q And part of the conditions that they'd want to
 15 simulate would include the temperatures that that
 16 friction material would encounter during actual use on
 17 an Airflex product?
 18 **A Yes.**
 19 Q Okay. Looking at Page No. 3 of that test report,
 20 under Section 7.2. And that says that they got the
 21 drum temperature up to about 225 degrees. Agree?
 22 **A Yes.**
 23 Q And Section 7.3, they got that drum temperature
 24 up to about 225 degrees again, right?
 25 **A Yes. There's a difference, though, between the**

1 **drum temperature and the surface temperature.**
 2 Q Okay.
 3 **A The interface between the friction material and**
 4 **the drum is much hotter as the -- over time, the heat**
 5 **soaks through. And they're taking like an overall**
 6 **mass temperature. That's what that 225 is.**
 7 Q Okay. Would they really know how hot the
 8 friction material was getting here, as part of this
 9 testing?
 10 **A It's not being reported, but that would be --**
 11 Q Would that be important information to know?
 12 MR. LANG: Just object to the
 13 form, foundation.
 14 **A I don't know. I don't know. The product that**
 15 **this is going on, the CS and the CT brake, was used on**
 16 **an application that cycled frequently; it might go on**
 17 **and off 100 times a minute. And to properly size the**
 18 **unit, you would try to provide enough brake capacity**
 19 **so that the temperature during operation didn't get**
 20 **much hotter than that. If it did, then it would wear**
 21 **very rapidly and it wouldn't be suitable.**
 22 So they were testing that product based on the
 23 conditions it would normally operate in the field. So
 24 it would try to keep the temperature down as much as
 25 possible.

MR. KIWALA: Let's go ahead and mark what's No. 23 in the stack. And, Chris, in this Exhibit, the Bates numbers aren't in sequential order, so let me just give them to you. It's FAW 22672, 10285, 22673 and 22671.

(Plaintiff's Exhibit 21 marked for identification.)

Q Okay.

A Okay.

Q Mr. Petkash, we're looking at what's been marked as Exhibit No. 21. And these appear to be a series of test requests that were issued at various points in the 1980s, correct?

A '83, '84, yeah.

Q And all of these test requests are being made by a gentleman by the name of Jim Latsko?

A Yes.

Q And what position did he hold at this time?

A He was a -- I think his title was principal engineer. He was a design engineer.

Q And let's just look at the first page, in that

Section 1.0 in the preface. It says the purpose of the test that's being requested is basically -- well, I'll just read it. "Because of the potential health hazards associated with asbestos, including the possibility of additional government controls and/or regulations, it is desirable to eliminate the use of asbestos in our friction materials." Did I read that right?

A Yes.

Q Okay. So the purpose of this -- and it says -- would you agree it has similar language in those preface sections on each of the subsequent pages?

A It's identical.

Q Okay. So would you agree that these -- the purpose of these tests to be performed are to help Eaton Airflex find a replacement for asbestos materials that were being used at that time?

A Yes. That's what it says.

Q And if you look in the "Objective" section on each of these, they're testing material that will qualify for use in either VC or CV design clutch, correct?

A Yes.

Q Okay. And those are, again, the constricting type?

A Correct.

Q And let's look at the drum temperatures listed on the first page. And can you tell me, what's the highest temperature that the material at issue is to be tested at here, highest drum temperature, anyway?

A It says, "550 degrees Fahrenheit."

Q And on the second page, what's the highest temperature?

A 400.

Q On the third page?

A 700.

Q And the fourth page?

A 400.

Q Okay. Do you know if the expanding-type clutches would be operating at different drum temperatures than what we've seen here with the constricting-type clutches?

A The E type would be similar to the VC.

Q Okay.

A The EB type, expanding, would be similar to the CB tests.

Q Okay. And at any point on these pages do we see a procedure that's calling for subjecting the friction material to a drum temperature higher than 700 degrees?

A No.

Q And, again, your testimony is that the asbestos-containing friction material on Airflex clutches would get in the neighborhood of between 900 and a thousand degrees, correct?

A Yes. Many that I saw.

Q Okay. And what we saw from Mr. Rosenow, his letter says that the clutches do not run as hot as 900 degrees; is that right?

A Yes.

Q Okay. And I understand you say there's a difference between the drum temperature and the temperature on the friction material. But we don't see drum temperatures in any of these testing documents getting higher than 700 degrees, right?

A That's correct.

Q And that 700 degrees only happens one time, right?

MR. LANG: Let me just object to the form and foundation. Subject to what you're reviewing, you can answer.

A It appears in one of the test requests, yes.

Q Okay.

A In an application it could happen often.

Page 97 1 Q I know you say you've seen many instances where 2 asbestos friction material on an Airflex clutch is 3 getting in the neighborhood of 900 to a thousand 4 degrees. Can you direct me to any document that would 5 show that happening? 6 A No, I don't -- no, I don't know of any documents 7 that show that. 8 Q Okay. And again, the sales memo that we saw 9 earlier that went out to the whole sales force said to 10 tell customers who are asking that normal operating 11 conditions on the clutch get the friction surfaces so 12 hot that the asbestos is converted to a harmless 13 material, right? 14 A Yes. 15 MR. KIWALA: Let's go ahead 16 and mark No. 24. This will be 17 Exhibit No. 22. We are a little bit 18 after noon. Let's take a break. 19 Could we go off the record. 20 ----- 21 (Plaintiff's Exhibit 22 marked for 22 identification.) 23 ----- 24 VIDEOGRAPHER: We're going 25 off the record. The time is now	Page 99 1 AFTERNOON SESSION 2 (1:00 p.m.) 3 VIDEOGRAPHER: We're back on 4 the record. The time is now 12:58. 5 You may proceed. 6 BY MR. KIWALA: 7 Q Okay. Mr. Petkash, we're back from lunch. And 8 you have in front of you what's been marked as Exhibit 9 No. 22. And just to make sure, this was Bates No. FAW 10 24173? 11 A Yes, I have it. 12 Q And that appears to be a letter from you to 13 Marc Collins, dated April 26th, 1983, right? 14 A That's correct. 15 Q Okay. And in the first sentence there of that 16 letter, it says -- you say, "The need for non-asbestos 17 friction material is reaching a crisis stage," right? 18 A Yes. 19 Q Can you explain to me what you meant by that, 20 "crisis stage"? 21 A Well, it's further mentioned that customers are 22 insisting that we supply them with clutches and brakes 23 that had non-asbestos material. And if we didn't, we 24 weren't going to sell it. So that, from a sales 25 perspective, is a crisis in that we're not going to be
Page 98 1 12:05. 2 (Luncheon recess taken.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 100 1 able to sell something, so we'd better do something to 2 satisfy those customer requirements. 3 Q Didn't -- Eaton Airflex was developing and 4 introducing using non-asbestos friction material on at 5 least some of its clutches as early as the late '70s, 6 you testified earlier, right? 7 A Correct. 8 Q Okay. In 1983, how many products still offered 9 only asbestos-containing friction material out of the 10 line -- out of the line of Eaton Airflex products? 11 MR. LANG: Just object to the 12 form, foundation. 13 A It's hard to quantify. The progression took 14 several years. And this was actually rather early in 15 the overall progression. 16 Q Okay. So at this point, there weren't that many 17 products that had -- 18 A Again, I'm -- no, there weren't that many 19 products. 20 Q Okay. And just to be clear, there weren't that 21 many products in 1983 that had a non-asbestos friction 22 material available for them? 23 A No. 24 Q And I guess that non-availability of a 25 non-asbestos friction material was what was causing

1 this crisis?
 2 **A It was threatening our business, yes.**
 3 Q And a little bit further down, you say that you
 4 keep telling the customers that the friction material
 5 residue is not harmful, but you say they don't believe
 6 you. And I know it says, "us" and "we" in the
 7 letter. I guess would that be the Eaton Airflex sales
 8 force is giving this message to the customers?
 9 **A Yes.**
 10 Q Okay. And the customers are not --
 11 **A And then utilizing that sales department letter**
 12 **that Bob Rosenow had written several years prior.**
 13 Q Okay. Was that sales department letter from
 14 1976, was that given directly to customers; would they
 15 see that actual development?
 16 MR. LANG: Object to the
 17 form, foundation.
 18 **A Most likely, yes.**
 19 Q Do you recall getting any feedback from the
 20 customers about why they didn't believe this message
 21 that they are getting?
 22 **A No, I don't remember anything specific.**
 23 Q And at the close of your letter, you say, "We
 24 must increase our efforts in this direction," meaning
 25 working towards non-asbestos replacements, correct?

1 **A Yes.**
 2 Q "We must increase our efforts in this direction
 3 before we start losing orders as a result." Were you,
 4 in fact, losing orders because of the asbestos issue
 5 at this point, when you wrote this letter?
 6 MR. LANG: Object to the
 7 form, foundation.
 8 **A Oftentimes you don't know that; you just lose**
 9 **it. And it's just -- you may not hear from the**
 10 **customer that they've gone elsewhere. It's just that**
 11 **you don't get the business.**
 12 Q Do you recall Eaton Airflex losing customers at
 13 this point in time?
 14 **A Not a specific name, no.**
 15 Q And just as a general matter, do you recall that
 16 around 1983, when this was -- when you wrote this
 17 letter, were you seeing a drop-off in the number of
 18 customers Eaton Airflex had for its products?
 19 MR. LANG: I'll just object
 20 to the form, foundation, asked and
 21 answered. Go ahead.
 22 **A No. It's hard to quantify. It could just be a**
 23 **different business atmosphere. You don't know.**
 24 MR. KIWALA: Let's go ahead
 25 and mark what's No. 25 in the stack

1 there.
 2 -----
 3 (Plaintiff's Exhibit 23 marked for
 4 identification.)
 5 -----
 6 MR. KIWALA: This is No. 23,
 7 and the Bates number is FAW 24219.
 8 Q Mr. Petkash, if you'll take a look at what's been
 9 marked as Exhibit 23. It appears to be a letter from
 10 the Ecusta Paper and Film Group of Olin Corporation.
 11 And the letter is dated June 23rd, 1983?
 12 **A Yes.**
 13 Q And Ecusta Paper and Film Group, this sounds like
 14 it might have been a paper mill customer of Eaton
 15 Airflex?
 16 **A Yes.**
 17 Q Was the paper-making industry, just in a general
 18 sense, a big customer for Airflex Products?
 19 **A Yes, it was.**
 20 Q Okay. And do you know if the -- in the address
 21 here it just states Eaton Corporation. It doesn't
 22 specifically mention the Airflex Division.
 23 Do you know if this Ecusta Paper and Film Group
 24 was a customer for Airflex products specifically?
 25 **A No, no, I don't know that specifically.**

1 Q Okay. In the letter, Ecusta is mentioning that
 2 they're purchasing products from Eaton that may
 3 contain asbestos, and it might be being used by
 4 employees who are not aware that there is asbestos
 5 present in the product, right? Do you see that?
 6 **A Yes.**
 7 Q And they're asking Eaton to put a label or a tag
 8 on the asbestos-containing components that will stay
 9 there with the component till the point of use, right?
 10 **A Yes.**
 11 Q Do you know if Airflex ever put that kind of
 12 label or tag on its asbestos-containing products or
 13 components? In 1983, were they doing that?
 14 **A In 1983, I don't know. But we did at some time.**
 15 Q At some point you did?
 16 **A Yeah. But I don't know that specific time**
 17 **period.**
 18 Q Do you have a sense -- would you be able to give
 19 me an estimate in terms of years when that practice
 20 may have started?
 21 **A It would have been in the mid-80s, something**
 22 **around that time. But I don't know, you know, if on**
 23 **June 24th we started putting labels on. I don't know.**
 24 Q Would you agree that without a label or a tag of
 25 the kind that Ecusta is asking for here, a worker who

1 encounters an asbestos product that is in service
 2 wouldn't necessarily be able to tell that the product,
 3 in fact, contains asbestos?
 4 MR. LANG: I just object to
 5 the form, foundation, speculation.
 6 Q If it was an Airflex product in service, a worker
 7 encountering an Airflex product in service, would they
 8 be able to tell whether or not that Airflex product
 9 had an asbestos component to it?
 10 MR. LANG: Same objections.
 11 Let him finish.
 12 Q Well, I'm finished. You can go ahead with your
 13 answer.
 14 **A No, they wouldn't, they wouldn't be able not to**
 15 **tell.**
 16 Q Would you agree that if the worker doesn't know
 17 that the Airflex product contains asbestos, they can't
 18 know what precautions they should be taking for
 19 working with the asbestos-containing components of
 20 that product?
 21 MR. LANG: Same objections.
 22 **A Yeah, I guess they wouldn't.**
 23 Q If they don't know there's asbestos there,
 24 they're not going to know that they need to take
 25 precautions, right?

1 **A Right.**
 2 MR. LANG: Same objections.
 3 MR. KIWALA: Can we move on,
 4 and let's mark what's No. 26 in this
 5 stack. And this is Bates No. FAW
 6 24333. It's a two-page document.
 7 -----
 8 (Plaintiff's Exhibit 24 marked for
 9 identification.)
 10 -----
 11 **A Okay.**
 12 Q Mr. Petkash, have you had an opportunity to
 13 review Exhibit No. 24?
 14 **A Yes.**
 15 Q And this is an Eaton memo dated January 24th,
 16 1986, right?
 17 **A Yes.**
 18 Q And it appears at the time, according to the
 19 first paragraph in that memo, the EPA was proposing a
 20 ban on asbestos in all products, right?
 21 **A Yes.**
 22 Q And based on that proposed ban, if you'll look at
 23 the bottom of the page, last paragraph, it appears
 24 that the decision has been made to substitute asbestos
 25 friction materials with non-asbestos replacements in a

1 number of products. Would you agree?
 2 **A Yes.**
 3 Q Okay. And specifically it mentions the VC, E,
 4 VE, DBA, and caliper products, right?
 5 **A Yes.**
 6 Q And the E and VE are expanding clutches, right?
 7 **A Yes.**
 8 Q And the VC is a constricting clutch?
 9 **A Yes.**
 10 Q All right. And it says that the decision was
 11 made that for these products, the asbestos material
 12 would be replaced with a non-asbestos material.
 13 Does this mean that prior to January 24th, 1986,
 14 these products had asbestos-containing friction
 15 material in their products -- I'm sorry. Strike
 16 that.
 17 Does that mean that prior to January 24th, 1986,
 18 these products had a non -- I'm sorry -- an
 19 asbestos-containing friction material?
 20 **A Yes.**
 21 Q Would that be true for all products falling under
 22 these categories?
 23 MR. LANG: I'll just object
 24 to the form, foundation. Go ahead.
 25 Q For instance, would that be true for all VC, E,

1 VE, DBA, and caliper products?
 2 MR. LANG: Objection.
 3 **A Yes.**
 4 Q And if you look further down in the paragraph, it
 5 looks like they're still working on finding a
 6 replacement for the friction material for CS, CT, and
 7 CB/EB products; is that correct?
 8 **A Yes.**
 9 Q Okay. And the CS/CT and the CB/EB, again, those
 10 are clutches, either constricting or expanding?
 11 **A The CS/CT were a spring set air release brake, a**
 12 **drum brake. The CB is the constricting unit. The EB**
 13 **is the expanding unit.**
 14 Q Okay. So does this mean that at this point in
 15 time, in January 1986, for the CB/EB products,
 16 asbestos-containing friction material is being used?
 17 MR. LANG: Same objections.
 18 **A That's what it would imply, yes.**
 19 Q Do you know if at any point Eaton Airflex was
 20 offering Airflex products with both an
 21 asbestos-containing version and an asbestos-free
 22 version? For instance, with a style E clutch, was
 23 there ever a time when the style E clutch, you could
 24 either get one that contained asbestos-containing
 25 friction material or one that had asbestos-free

1 friction material, where the customer had that option?
 2 **A There were -- the change was phased in based on**
 3 **size. And the volume -- the higher volume units would**
 4 **have been changed first and then the other. So there**
 5 **was some overlap as far as supplying them both at the**
 6 **same time.**

7 Q Would it be fair to say that depending on the
 8 size of the clutch and the style of the clutch, when
 9 that changeover occurred would vary in terms of when
 10 exactly that changeover occurred, but for each one of
 11 those styles, there would be at least some brief
 12 period where there was both an asbestos-containing
 13 version and an asbestos-free version available?

14 **A Actually, when we finally got production of a**
 15 **particular non-asbestos friction material, the --**
 16 **whatever was in inventory was scrapped.**

17 Q Was scrapped?

18 **A Yeah. They scrapped it. They didn't continue to**
 19 **sell them once we had a product that we could use on**
 20 **that particular size.**

21 Q Okay. Do you know if there's any document that I
 22 could find at Eaton that there's like a -- that would
 23 serve as a guide for when specifically each style
 24 would have changed over from an asbestos-containing to
 25 an asbestos-free version? Because as you said, it

1 depended on which specific product. It could have
 2 been as early as the late 1970s until as late as the
 3 early 1990s, right?

4 **A Yeah. No, as far as I'm aware, there's no such**
 5 **document.**

6 Q There's no record of that?

7 **A No.**

8 Q And if you look at the second page of that
 9 letter, the last sentence says that the -- if the
 10 testing that's being described in this letter is
 11 successful, the hope is that they can eliminate most
 12 of the asbestos products that Eaton Airflex has during
 13 1986, right?

14 **A Uh-huh.**

15 MR. LANG: Is that a yes?

16 **A Yes. I'm sorry.**

17 MR. KIWALA: Thank you.
 18 Could we mark No. 28 in the
 19 stack. This is FAW 17190. Yeah, 25.

20 -----

21 (Plaintiff's Exhibit 25 marked for
 22 identification.)

23 -----

24 VIDEOGRAPHER: Let's go off
 25 the record while I change tapes.

1 This concludes Tape No. 3. The time
 2 is now 1:19.

3 (Brief recess taken.)

4 VIDEOGRAPHER: We're back on
 5 record. This is the beginning of
 6 Tape No. 4. The time is now 1:20.

7 **A (Witness reading.) Okay.**

8 Q Okay. Mr. Petkash, you've had time to review
 9 what's been marked as Exhibit No. 25, correct?

10 **A Yes.**

11 Q And that is a letter titled, "Sales Department
 12 Letter No. 87-7," right?

13 **A Yes.**

14 Q And that's dated April 10th, 1987?

15 **A Yes.**

16 Q Okay. And this is another one of those memos
 17 that goes out to all of the salespeople for Eaton
 18 Airflex, right?

19 **A Correct.**

20 Q And is this conveying information that's supposed
 21 to be shared with the customers?

22 **A Yes.**

23 Q Okay. And let's take a look at the fifth
 24 paragraph down. And it's the second sentence. I'll
 25 just go ahead and read it. "The likelihood of

1 creating airborne fiber concentrations approaching the
 2 new action level appears to be significant only if the
 3 customer grinds, sands, or otherwise machines the
 4 blocks or if inappropriate methods, such as sweeping
 5 or blowing with compressed air instead of vacuuming,
 6 are used to clean up any friction residue that may be
 7 created by the unit." Did I read that correctly?

8 **A Yes.**

9 Q Okay. So here is in 1987 the sales department
 10 letter saying that blowing out a clutch with
 11 compressed air is a bad idea, correct?

12 **A Yes.**

13 Q Do you know if prior to April 10th, 1987 Eaton
 14 Airflex had never sent that type of information out to
 15 its sales force?

16 **A Which type of information?**

17 Q The sentence I just read there, that -- the
 18 instruction that -- the caution that blowing out
 19 clutches with compressed air is an inappropriate
 20 method.

21 **A Well, he refers to a sales department letter**
 22 **86-04, which I don't know what that contained. But**
 23 **this may have been a restatement of that. I don't**
 24 **know.**

25 MR. KIWALA: Let's go ahead

1 and mark No. 27 in the stack then.
2 This is No. FAW 17188.

3 -----
4 (Plaintiff's Exhibit 26 marked for
5 identification.)
6 -----

7 **A (Witness reading.) Okay.**

8 Q Mr. Petkash, you've had a chance to review
9 Exhibit No. 26, which appears to be the Sales
10 Department Letter No. 86-04?

11 **A Yes.**

12 Q Okay. And this is that sales department letter
13 that's being referred to in Exhibit 25, right?

14 **A Right.**

15 Q Okay. Do you see anywhere in that sales
16 department letter 86-04 any instruction saying not to
17 use compressed air to blow out a clutch?

18 **A No, it doesn't say that.**

19 Q Okay. So again, do you know of any prior to
20 April 10th, 1987, any field memo or instruction to the
21 sales staff that said instruct the customers that
22 using compressed air to blow out a clutch is an
23 inappropriate method?

24 **A No, I don't know of a document.**

25 Q Okay. Let's move on to the next paragraph --

1 back to Exhibit No. 25, the April 10th, 1987 memo.
2 And I'm going to read to you from that paragraph a
3 couple sentences in. It says, "However, any orders
4 received after April 1st, 1987 for our CB, VC, E, EB,
5 VE, DBA, DP and HD product lines for use in non-slip
6 applications will be shipped with non-asbestos
7 friction only."

8 So it was correct that after April 1st of '87,
9 those products that were listed just there would no
10 longer have asbestos-containing friction material?

11 **A Yes, that's what it says.**

12 Q Okay. Now, let's look at the sentence prior to
13 that. It says, "Over the past few months we have been
14 depleting our inventory of asbestos friction materials
15 by using it to fill orders where the customer has not
16 explicitly asked for non-asbestos materials." Did I
17 read that correctly?

18 **A Yes.**

19 Q Okay. Does that mean that in the -- I guess
20 between January 24th, 1986 and April 10th, 1987, there
21 was a period where at least on several of these
22 products there was both an asbestos-containing version
23 of the product and an asbestos-free, right?

24 **A Yes. That was the overlap that I was talking
25 about.**

1 Q Okay. And what this letter indicates here is
2 that during that period, unless the customer
3 specifically asked for the non-asbestos version of the
4 product, they got the asbestos-containing version,
5 correct?

6 MR. LANG: I'll just object
7 to form and foundation based on the
8 content of the letter. Go ahead.

9 **A That's what this sentence says, yes.**

10 Q Do you know why Eaton Airflex would do that?

11 MR. LANG: Object to the
12 form, foundation. Go ahead.

13 **A Because they hadn't yet received the replacement
14 material. It didn't happen overnight.**

15 Q This says that, does it not, if the customer
16 specifically asks for an asbestos-free product, they
17 could get it up -- you know, prior to April 1st of
18 1987, right?

19 **A That doesn't necessarily mean that it would have
20 been available at the time they wanted it. If they
21 said okay, we want non-asbestos material, well, we
22 haven't made it yet. So it's going to be a month or
23 two months before we're able to supply it.**

24 Q Let's go back to Exhibit No. 24, that January
25 24th memo of 1986, and look at the bottom paragraph on

1 the first page, second sentence. Actually, first two
2 sentences. Does that indicate that as of January
3 24th, 1986, there's a non-asbestos replacement
4 material available and ready to go for VC, E, VE, DBA
5 and caliper products?

6 **A Yes.**

7 Q Okay. And VE would be the expanding clutches,
8 right?

9 **A Yes.**

10 Q Okay. So between January 24th, 1986 and
11 April 1st, 1987, if an Airflex customer came to
12 Airflex with the request for an E style expanding
13 clutch with non-asbestos friction material, that was
14 available to them, right?

15 **A Not necessarily. It says, "We agreed to
16 replace." That doesn't mean that on the 25th of
17 January we had a pallet's load of non-asbestos
18 material in the house. It took months for that to
19 happen. It was a -- it's a long process. There's --
20 well, there's a variety of different sizes. They're
21 used in different quantities. So it just doesn't
22 happen overnight. It takes a long time before that
23 pipeline could be filled. And during that time, the
24 asbestos would continue to be used.**

25 **And if the customer explicitly asked to get**

1 **non-asbestos material, he may have had to wait for**
 2 **months before he would get the product.**
 3 Q Okay. Let's go back to that sales department
 4 letter, 87-7, back to that paragraph.
 5 **A Okay.**
 6 Q And let's read it together. And it says, "Over
 7 the past few months we have been depleting our
 8 inventory of asbestos friction materials by using it
 9 to fill orders where the customer has not explicitly
 10 asked for non-asbestos materials."
 11 **A Right.**
 12 Q Okay. So they're able -- they're filling
 13 orders -- they're filling the orders for the
 14 asbestos-containing materials. But if the customer is
 15 asking for a non-asbestos version, they're going to
 16 have to wait?
 17 **A It's very possible, yes.**
 18 Q Okay. You don't know that for sure?
 19 **A Well, I worked at Airflex for a long time. I**
 20 **knew how long it took to deliver stuff. And when**
 21 **we're making a change from one thing to another, it --**
 22 **regardless of how well it was planned, there always**
 23 **seemed to be a gap. You would plan to have it on**
 24 **August 5th, but the supplier, NAFCO, well, we couldn't**
 25 **make that material right now. It's not going to be**

1 **till September 5th. It happens all the time.**
 2 Q How long would it usually take for NAFCO to fill
 3 an order?
 4 **A Months.**
 5 Q Would it take a year?
 6 **A Not a year, no.**
 7 Q Okay. And in January of '86 --
 8 **A But the change could have very well taken a year**
 9 **or more. It just doesn't -- it's not black and**
 10 **white. It's not today we do, tomorrow we don't. It's**
 11 **a long transition.**
 12 Q Okay.
 13 **A And like I said, there's many parts. There's**
 14 **probably -- I don't know the number, but there's**
 15 **several hundred different part numbers and types. So**
 16 **it doesn't take -- it doesn't happen that quickly.**
 17 Q Okay. Well, based on what's in the memo here, is
 18 it true that if the -- up until April 1st, if an
 19 Airflex customer didn't specifically request a
 20 non-asbestos product, what they would get was an
 21 asbestos-containing product?
 22 MR. LANG: Let me just object
 23 to the form and foundation of that
 24 question.
 25 **A It very well could have been that prior to that,**

1 **as these materials became available, that they were**
 2 **getting non-asbestos before. It isn't necessarily**
 3 **okay, as of this date, everything happens.**
 4 Q Sir, have you ever heard of the Asbestos
 5 Information Association?
 6 **A No.**
 7 Q You don't know anything about that organization?
 8 **A I mean, let me think about that.**
 9 Q Let me ask you -- go ahead.
 10 **A I seem to recall seeing some publications. I**
 11 **think they were published in Canada, actually. And**
 12 **I'm not sure if that was the name of the organization**
 13 **that published them, but there were some documents**
 14 **that I saw at a --**
 15 Q Okay.
 16 **A -- at a trade show once.**
 17 Q Do you know if Eaton was ever a member of the
 18 Asbestos Information Association?
 19 **A As far as I'm aware, they were not.**
 20 MR. KIWALA: Okay. Let's go
 21 ahead and mark Exhibit -- I'm sorry.
 22 It's No. 31 in the stack. It would
 23 be No. 27.
 24 -----
 25 (Plaintiff's Exhibit 27 marked for

1 identification.)
 2 -----
 3 VIDEOGRAPHER: We're going
 4 off the record at 1:39.
 5 (Brief recess taken.)
 6 VIDEOGRAPHER: We're back on
 7 the record. The time is now 1:47.
 8 BY MR. KIWALA:
 9 Q Okay. Mr. Petkash, I want you to take a look at
 10 what's been marked as Exhibit 27.
 11 **A Yes, I did.**
 12 Q And does it appear from the first page there that
 13 this is a list of Asbestos Information Association
 14 members dated December 1978?
 15 **A Yes.**
 16 Q Okay. Let's turn to the back page of that
 17 document. This is, I believe, Page 6. And do you see
 18 at the bottom of this page where it lists Eaton
 19 Corporation as a member?
 20 **A Yes.**
 21 Q Okay. Do you know Richard Poirier?
 22 **A I did not.**
 23 Q Okay.
 24 **A It's a corporate person. That's the headquarters**
 25 **address. It wasn't Airflex.**

1 Q Where did Airflex have its plant?
 2 **A On Clinton Road on the west side of Cleveland.**
 3 **It's a suburb, Brooklyn.**
 4 Q And this gentleman, Mr. Poirier, appears to be at
 5 100 Erieview Plaza in Cleveland, Ohio?
 6 **A Yes.**
 7 Q Okay. Is that like the headquarters address?
 8 **A That's the headquarters, although I think it's a**
 9 **different address now.**
 10 MR. PETTICORD: Yeah.
 11 Q So would you agree that Eaton Corporation was a
 12 member of the AIA in 1978?
 13 MR. LANG: I'll just object to
 14 the form, foundation.
 15 **A That's what the list says. I don't know. I**
 16 **didn't know the individual. I wasn't aware that we**
 17 **were a member.**
 18 Q When you were preparing for deposition today, did
 19 you do any type of investigation about what
 20 memberships Eaton Corporation may have had?
 21 **A I did not.**
 22 Q Did anybody ask you to?
 23 **A No.**
 24 MR. KIWALA: Let's go ahead.
 25 Can we mark what is No. 32 in the

1 stack. And Chris and Dave, for your
 2 reference, it's the 1976 -- it's a
 3 two-page document.
 4 -----
 5 (Plaintiff's Exhibit 28 marked for
 6 identification.)
 7 -----
 8 **A (Witness reading.) Okay.**
 9 Q And this is Exhibit No. 28. Have you had a
 10 chance to review that document?
 11 **A Yes.**
 12 Q And this would appear to be a letter enclosing a
 13 submission to the Department of Labor regarding
 14 asbestos regulation, correct?
 15 **A Yes.**
 16 Q And that's from the Asbestos Information
 17 Association, and dated April 8th, 1976, right?
 18 **A Yes. April 8th.**
 19 Q April 8th. And the second page of that Exhibit
 20 contains a list of companies. And at the top of the
 21 page it says, "The following companies and trade
 22 associations have endorsed this statement." And do
 23 you see Eaton Corporation on that list?
 24 **A Yes.**
 25 Q So this would indicate that Eaton was endorsing

1 what the AIA had to say in its submission in 1976?
 2 MR. LANG: I'll just object
 3 to the form, foundation.
 4 **A Yes.**
 5 Q Would this suggest to you that Eaton had
 6 involvement with the Asbestos Information Association
 7 at least as early as 1986?
 8 MR. LANG: Same objections
 9 and scope.
 10 **A I have no idea.**
 11 Q And, sir, I asked you earlier if you were a
 12 member of any trade organizations, and I believe you
 13 said no; is that right?
 14 **A That's correct.**
 15 Q Okay. In your lifetime, have you had a chance to
 16 join maybe not trade organizations, but maybe other
 17 types of organizations?
 18 **A No. I'm not a joiner.**
 19 Q Not a member?
 20 **A No. Health club.**
 21 Q Okay. All right. No volunteer organization
 22 or --
 23 **A No.**
 24 Q Well, let me ask you this: If you were joining
 25 an organization, would you want to know something

1 about that organization before you joined?
 2 MR. LANG: I'll just object
 3 to the form of that question,
 4 foundation. Go ahead.
 5 Q More specifically, would you want to know what
 6 the goals and aims of the organization were before you
 7 joined?
 8 MR. LANG: Same objection and
 9 scope.
 10 **A Certainly. But your -- that's a lot of**
 11 **speculation. And since I don't intend to join, I'm**
 12 **not interested in evaluating different organizations.**
 13 MR. KIWALA: Let's go ahead
 14 and take a look and mark No. 33 in
 15 the stack.
 16 -----
 17 (Plaintiff's Exhibit 29 marked for
 18 identification.)
 19 -----
 20 Q I'll just have you look at the first page of that
 21 right now.
 22 **A Okay. (Witness reading.)**
 23 Q And Exhibit No. 29, do you agree that it appears
 24 to be a transcript of a presentation given by a
 25 Matthew Swetonic, Executive secretary of the AIA?

1 MR. LANG: I'll just object
2 to the form, foundation.

3 **A That's what the document says.**

4 Q And it's -- it says that the presentation was
5 given on June 7th, 1973?

6 **A That's the date on the document, yes.**

7 Q Okay. And the title of the document is, "Why
8 Asbestos"?

9 **A Yes.**

10 Q Okay. If you look at the first paragraph on the
11 transcript, would you agree it's asking the rhetorical
12 question why asbestos is being singled out as a target
13 in various groups, right?

14 **A Yes.**

15 Q If you look a little bit further down in the
16 paragraph that starts with the word "First" --

17 **A I see it.**

18 Q Okay. Would you agree that the presenter, again,
19 Mr. Swetonic, says in that paragraph that part of the
20 reason is because asbestos -- part of the reason that
21 asbestos is being singled out is because asbestos does
22 cause disease, right?

23 MR. LANG: I'll just object
24 to the form, foundation.

25 **A The key word in that sentence is "substantial".**

1 Q But it does say it does cause disease, right?

2 **A Substantial amounts.**

3 MR. LANG: Let me make an
4 objection. Object to the form,
5 foundation. And I'll state the
6 document speaks for itself.
7 Go ahead.

8 Q And it mentions two forms of cancer?

9 **A That's what it says.**

10 Q And he goes on to say that in his office, he has
11 a file of more than 2000 medical papers dealing with
12 the health risks of asbestos; is that right?

13 MR. LANG: Same objections.

14 **A Yes.**

15 Q Let's move on to the eighth page of the
16 transcript. It should be labeled Page 8 at the top.

17 **A Okay.**

18 Q And look at the fourth paragraph down. And that
19 says, "And the good news is that despite all the
20 negative articles on asbestos-health that have
21 appeared in the press over the past half-dozen years,
22 very few people have been paying attention."

23 So the presenter here is saying that yes,
24 asbestos does cause disease and does cause cancer and
25 kills people, but the good news is that despite all of

1 the negatives press about that, no one is paying
2 attention; is that right?

3 MR. LANG: I'll just object
4 again to the form, foundation, your
5 knowledge as to what someone else may
6 have been thinking or implying.
7 Go ahead.

8 **A You're adding to the negativity by saying it was
9 killing people.**

10 Q Does cancer not kill?

11 MR. LANG: Hold on. Object
12 to the form, foundation, beyond the
13 scope.

14 **A It wasn't saying it here. That's not what it
15 said. It said it was dangerous, but in substantial
16 quantities.**

17 Q And this was a statement made in 1973, right?

18 **A Yes.**

19 Q Okay. And we've seen a document showing Eaton
20 being a member at least in 1978?

21 **A Yes.**

22 Q Okay. So by that time, they would have been
23 aware that this statement had been made by somebody on
24 behalf of the AIA?

25 MR. LANG: Hold on. Wait.

1 Let me just object to the form. That
2 lacks foundation. There's no way
3 that connection could be made based
4 on what we've seen thus far, so I'm
5 going to object to the form and
6 foundation.

7 Q Go ahead and answer if you can.

8 THE WITNESS: Should I
9 respond?

10 MR. PETTICORD: If you can.

11 MR. LANG: If you can.

12 **A Well, in this document itself he says he's got
13 2000 articles and more being written every year.
14 Would anyone be able to read all of that and absorb
15 all that information? Unlikely.**

16 Q I'm sorry. I'm not asking about the articles.
17 I'm asking about the statement made by Mr. Swetonic.
18 By the time that Eaton was a member, would they --
19 they would have had access to and been aware that this
20 statement had been made by somebody representing the
21 Asbestos Information Association?

22 MR. LANG: Again, same
23 objection as before. We're talking
24 about a statement that was made in
25 '73, and then Eaton's knowledge

1 that -- and you're implying they got
2 the '73 article when they became a
3 member in '78. I'm going to object
4 to the form, lacks foundation, calls
5 for speculation. You can answer if
6 you can.

7 **A The likelihood that the Eaton representative,**
8 **whoever that may have been, was aware of this article**
9 **is pretty remote.**

10 Q Sir, you were an employee of Eaton for a long
11 period of time, right?

12 **A Yes.**

13 Q You made it fairly far up the ranks, at least
14 within the Airflex Division, correct?

15 **A Mid-level manager I guess you could say.**

16 Q And over that time, you gained some sense of the
17 corporate culture there in Eaton; did you not?

18 **A Of Eaton Corporation itself? No. I had very**
19 **little -- very little contact or involvement with the**
20 **corporate people. My involvement was simply with**
21 **Airflex.**

22 Q Do you have any idea why Eaton would associate
23 itself with a group that made statements such as the
24 statements made by Mr. Swetonic?

25 MR. LANG: Again, let me just

1 object to the form, foundation, calls
2 for speculation. It's beyond the
3 scope.

4 MR. PETTICORD: Argumentative.

5 MR. LANG: That's part of the
6 form. There's no possible way he can
7 answer that question. Really? Come
8 on.

9 Q Personally, as an employee of Eaton, would you
10 want the company to be associating itself with an
11 organization that made those kinds of statements?

12 MR. LANG: Let me just object
13 again, form, foundation. This is
14 argumentative. You've got to stop
15 that. Come on. He's here for the
16 Airflex Division. You know your
17 questions are improper. This is an
18 improper line of questioning
19 altogether.

20 MR. PETTICORD: Finish the
21 objection.

22 MR. LANG: I'm going to make
23 my objection to form, foundation,
24 argumentative, beyond the scope,
25 speculation. You can try and answer

1 that. If you forgot the question,
2 you can have it read back.

3 **A I don't think I can answer the question,**
4 **honestly.**

5 MR. PETTICORD: If you're
6 finished, we'll take a break.

7 VIDEOGRAPHER: We're going
8 off the record. The time is now
9 2:03.

10 (Brief recess taken.)

11 VIDEOGRAPHER: We're back on
12 record. The time is now 2:08.

13 BY MR. KIWALA:

14 Q Mr. Petkash, I just want to go back to an issue
15 we talked about in a couple points earlier today. You
16 testified earlier that it's your understanding that
17 the friction material on Airflex clutches during their
18 normal engagement gets to somewhere between 900 and a
19 thousand degrees, correct?

20 **A That's what I said, yes.**

21 Q And we saw earlier a letter from Mr. Rosenow that
22 indicated that the friction material did not get that
23 hot, correct?

24 **A Yes.**

25 Q Okay. And you're unable to recall a specific

1 document that says that the friction material on
2 Airflex clutches is getting up to 900 to a thousand
3 degrees, correct?

4 **A Documents, no. But I've seen -- I've witnessed**
5 **clutch engagements that obviously were at those**
6 **temperature levels. Maybe even higher.**

7 Q Okay. And that's what I wanted to find out.
8 Obviously you have something that you're basing that
9 statement on. Can you tell me -- you said you've seen
10 clutches in service that you believe are getting that
11 hot?

12 **A Yes, I did.**

13 Q Okay. And I think earlier you said that some of
14 them had fire coming off them. Is that part of the
15 normal engagement or operation of a clutch or brake?

16 **A Normal, no. Something wasn't going right.**

17 Q Okay. So that wasn't supposed to happen?

18 **A No.**

19 Q So if you saw flames coming off the clutch,
20 that's not normal operation of the clutch, right?

21 **A Correct.**

22 Q Okay. Do you have anything else other than
23 visual observations of a clutch in service that you
24 take as a basis for your statement that the friction
25 material is getting up to between 900 and a thousand

1 degrees?
 2 **A I don't have any documentation that shows that,**
 3 **but I know there were. But I don't have documentation**
 4 **to verify it.**
 5 Q Do you know who would have that type of
 6 documentation?
 7 **A No.**
 8 Q Do you know who would have conducted that type of
 9 testing?
 10 **A It wasn't necessarily testing. It was**
 11 **operation within a factory.**
 12 Q Okay. Can you tell me who other than yourself
 13 within Eaton might have more knowledge about that
 14 topic?
 15 **A Someone who's currently in engineering now, but I**
 16 **don't know --**
 17 Q Let's see. Mr. Collins was in engineering,
 18 right?
 19 **A He was an engineering manager at one time, yes.**
 20 Q Okay. And he was an engineer at the time that
 21 asbestos was being used in friction material for
 22 Airflex clutches, right?
 23 **A Yes. He was -- there was communication between**
 24 **he and National Friction, yes.**
 25 Q And we saw that today?

1 **A Yes.**
 2 Q Do you know if Mr. Collins is still alive?
 3 **A I think so, but I don't know that for a fact.**
 4 Q Okay. We also talked about the gentleman,
 5 Jim Latsko, who was in the, I guess, in the testing
 6 department?
 7 **A He was a design engineer.**
 8 Q Design engineer.
 9 **A Principal engineer, I think, was his title.**
 10 Q Okay. Do you know if Mr. Latsko is still alive?
 11 **A I think so.**
 12 Q Okay. Do you know where he lives?
 13 **A I think he lives in Parma, Parma, Ohio.**
 14 Q Do you know if he's still employed by Eaton?
 15 **A He is not.**
 16 Q Retired?
 17 **A Retired, yeah. He and I are about the same age.**
 18 Q Do you think he might have more knowledge about
 19 this topic about the temperatures that friction
 20 material gets up to?
 21 MR. LANG: I'll just object
 22 to the form, foundation, calls for
 23 speculation.
 24 **A I don't know if he has knowledge on it. He was**
 25 **the tester engineer.**

1 Q Fair enough. What about Mr. Rosenow, is he still
 2 alive?
 3 **A No.**
 4 MR. KIWALA: Okay.
 5 Mr. Petkash, we've been at this for
 6 quite some time. This has been a
 7 little bit tedious, I'm sure, for
 8 you. I appreciate your patience. I
 9 don't have any further questions.
 10 Thank you for your time.
 11 MR. LANG: Anybody on the
 12 phone? Going once, twice. Okay.
 13 We'll read.
 14 VIDEOGRAPHER: This concludes
 15 the deposition. The time is
 16 currently 2:13. This deposition
 17 contains a total of 4 videotapes.
 18 We're going off the record.
 19 (Signature not waived.)
 20 (Deposition concluded at 2:13 p.m.)
 21

Robert Petkash

1 The State of Ohio,)
 2) SS: CERTIFICATE
 3 County of Cuyahoga.)
 4 I, Cheryl L. Baker, Notary Public within and for the
 5 State of Ohio, duly commissioned and qualified, do
 6 hereby certify that the within-named ROBERT PETKASH,
 7 was by me first duly sworn to testify the truth, the
 8 whole truth, and nothing but the truth in the cause
 9 aforesaid; that the testimony then given by him/her
 10 was by me reduced to stenotypy in the presence of said
 11 witness, afterwards transcribed on a computer, and
 12 that the foregoing is a true and correct transcript of
 13 the testimony so given by him/her as aforesaid.
 14 I do further certify that this deposition was taken at
 15 the time and place in the foregoing caption specified
 16 and was completed without adjournment.
 17 I do further certify that I am not a relative,
 18 employee of, or attorney for any of the parties in the
 19 above-captioned action; I am not a relative or
 20 employee of an attorney for any of the parties in the
 21 above-captioned action; I am not financially
 22 interested in the action; I am not, nor is the court
 23 reporting firm with which I am affiliated, under a
 24 contract as defined in Civil Rule 28(D); nor am I
 25 otherwise interested in the event of this action.
 IN WITNESS WHEREOF I have hereunto set my hand and
 affixed my seal of office at Cleveland, Ohio on this
 15th day of August, 2011.
 Cheryl L. Baker, Notary Public
 in and for the State of Ohio.
 My commission expires 10/10/15

A				
ala 54:22	136:10	86:20 89:23	33:1,2,10	133:22
ability 10:10	administrator	93:1 97:15	33:21 34:1	al 8:12
able 67:3	1:7 8:8	102:21,24	35:16 36:8	albany 7:9
100:1	affiliated	105:12	37:19,22,22	9:12
104:18	136:14	107:24	38:2,3,9,13	alive 134:2
105:2,8,14	affiliation	111:25	38:23 39:1	134:10
115:23	9:5	112:25	39:7,11	135:2
117:12	affiliations	115:8,12	40:7,11	allen 6:17
128:14	8:18	119:9,21	41:11,14,17	allowable
abovecapti...	affixed	121:24	47:9 49:10	40:14
136:12,13	136:17	124:4,13	50:9 52:18	allsteel
abrasion 84:8	aforesaid	126:7 127:7	53:25 54:15	25:24
absolutely	136:6,8	128:7	55:20 59:8	alongside
45:23	afternoon	aia 3:22	59:17 60:4	86:18
absorb 128:14	99:1	121:12	60:10 61:15	aloud 45:14
abstract	age 134:17	123:1	63:9,12,17	45:25
45:19	agents 3:21	124:25	64:15,15	altogether
abstracts	ago 13:10	127:24	65:25 66:7	130:19
45:13	22:10	aims 124:6	67:9 74:2	alton 6:5
access 128:19	agree 27:4	air 2:10	75:2,9,24	altoona 25:19
accomplish	36:7 41:11	19:18 20:6	76:12 77:5	amended 2:6
89:13	46:11,19	29:24 33:10	79:2 82:24	amount 31:22
accumulation	47:8 49:9	49:5,6,16	83:13,18,18	32:4 73:3
58:16	50:5 52:17	53:13 57:11	85:3 86:14	74:17 89:18
accumulations	53:4 54:16	58:24 59:8	86:16 88:16	amounts 126:2
58:24	55:10 59:6	59:22 60:2	89:13 90:8	angelides 6:4
accurate 75:5	59:22 60:2	64:11 72:23	90:13 91:17	annual 2:23
achieve 30:6	66:15 69:25	90:21	94:16 96:3	34:24 35:4
action 112:2	75:18 84:23	108:11	97:2 100:3	68:9,15,20
136:12,13	87:22 90:7	112:5,11,19	100:10	answer 10:9
136:14,15	90:16 91:21	113:17,22	101:7	19:4,12
actual 29:10	94:11,14	airborne 73:3	102:12,18	22:3 27:23
42:10 45:11	104:24	112:1	103:15,18	34:11 35:2
91:16	105:16	airflex 2:18	103:22,24	46:15 59:11
101:15	107:1	2:19 3:10	104:11	59:12 63:21
actuator 20:4	121:11	10:4,14,19	105:6,7,8	66:18 85:7
added 33:6	124:23	18:14,16,24	105:17	85:9 96:22
adding 127:8	125:11,18	19:7,17,21	108:19,20	105:13
additional	agreed 90:24	20:9,14,19	110:12	128:7 129:5
46:9 94:5	116:15	21:2 22:12	111:18	130:7,25
additions	ahead 22:20	22:16 23:2	112:14	131:3
45:2	27:22,23	23:7,14,15	115:10	answered
address 79:6	28:12 29:17	25:10 26:7	116:11,12	102:21
103:20	34:11 35:2	26:13,13,18	117:19	answers 13:7
120:25	37:12,20	26:19,25,25	118:19	14:6
121:7,9	44:20 46:5	27:7,11,20	120:25	anybody 13:20
addressed	46:17 53:23	28:4,9,23	121:1	23:10 40:7
41:13 73:18	62:7 64:17	29:25 30:9	129:14,21	70:13 75:7
adjournment	67:1,16	30:24 31:15	130:16	77:4 121:22
	68:12 71:1	31:17 32:5	131:17	135:11
	76:2 77:13	32:12,18,20	132:2	anyway 95:5

appear 33:6 51:21 52:21 88:1 93:15 120:12 122:12	113:20 114:1,4,8 114:20 115:17 116:11 118:18 122:17,18 122:19	83:3,8 84:5 84:12 85:2 88:6,12 94:4,7,16 97:2,12 102:4 104:3 104:4 105:1 105:3,9,17 105:23 106:20,24 107:11 110:12 114:14 116:24 117:8 119:4 119:18 120:13 122:14,16 123:6 125:8 125:12,20 125:21,21 126:12,24 128:21 133:21	45:16 aside 62:12 asked 24:19 74:14 102:20 114:16 115:3 116:25 117:10 123:11 asking 10:20 38:4 82:22 84:14,15 97:10 104:7 104:25 117:15 125:11 128:16,17 asks 115:16 assemblies 2:19 21:4 58:17 assembly 2:18 21:11 49:1 49:2 54:15 associate 129:22 associated 45:16 94:4 associating 130:10 association 3:22 18:10 18:16 119:5 119:18 120:13 122:17 123:6 128:21 associations 122:22 assume 34:4 77:9 assuming 38:12 asterisk 36:18,22 atmosphere 56:24 102:23 attached	47:20 attaches 47:16 attaching 88:5 attachment 2:13 88:10 attended 15:20 attention 41:14 126:22 127:2 attorney 136:12,13 attorneys 9:3 13:19 62:3 august 1:16 8:15 76:9 117:24 136:17 aurora 7:9 9:10 author 41:5 42:17 automobile 48:14 available 46:12,20 62:2 100:22 109:13 115:20 116:4,14 119:1 aware 23:9,10 33:20 34:7 34:15,16 35:12 38:24 40:3 49:10 60:4,7 68:23 104:4 110:4 119:19 121:16 127:23 128:19 129:8
appearances 6:1 7:1	area 42:13,18 43:6 57:8 57:11			
appeared 126:21	areas 39:10			
appearing 6:16,23 7:12	arent 84:12 93:4			
appears 36:7 40:24 45:12 47:8 50:5 54:14 57:23 60:12 63:10 63:11,23 66:9,13,17 71:21 72:6 73:22 76:24 78:17 81:11 87:23 96:23 99:12 103:9 106:18,23 112:2 113:9 121:4 124:23	argumentative 130:4,14,24 arising 35:10 article 45:12 47:16,17 76:8 129:2 129:8	asbestos 3:22 3:25 10:23 14:18 28:8 28:23 29:6 29:23 30:7 31:7 32:16 32:23 33:18 34:8 35:7 35:11 36:14 36:16,17 37:5,8 39:3 41:10,23,25 42:24 46:8 46:10,12,20 48:9,13,15 48:17 49:11 49:18 52:4 54:1 55:4 56:3 59:1,9 59:25 64:14 66:10 67:8 72:11,17 73:3 74:3,7 74:18,19,19 77:6,16 79:2,13,20 79:24 80:8	asbestosco... 27:19 28:1 28:5 32:17 32:21 37:15 38:22 39:2 51:24 53:20 58:6 88:18 89:9 91:1 96:3 100:9 104:8,12 105:19 107:14,19 108:16,21 108:24 109:12,24 114:10,22 115:4 117:14 118:21 asbestosfree 108:21,25 109:13,25 114:23 115:16 asbestoshe... 126:20 asbestosis	attaches 47:16 attaching 88:5 attachment 2:13 88:10 attended 15:20 attention 41:14 126:22 127:2 attorney 136:12,13 attorneys 9:3 13:19 62:3 august 1:16 8:15 76:9 117:24 136:17 aurora 7:9 9:10 author 41:5 42:17 automobile 48:14 available 46:12,20 62:2 100:22 109:13 115:20 116:4,14 119:1 aware 23:9,10 33:20 34:7 34:15,16 35:12 38:24 40:3 49:10 60:4,7 68:23 104:4 110:4 119:19 121:16 127:23 128:19 129:8
application 16:24 17:2 29:15 92:16 96:25	articles 126:20 128:13,16			
applications 29:4 83:20 83:22 84:2 85:13 114:6	asbestos 3:22 3:25 10:23 14:18 28:8 28:23 29:6 29:23 30:7 31:7 32:16 32:23 33:18 34:8 35:7 35:11 36:14 36:16,17 37:5,8 39:3 41:10,23,25 42:24 46:8 46:10,12,20 48:9,13,15 48:17 49:11 49:18 52:4 54:1 55:4 56:3 59:1,9 59:25 64:14 66:10 67:8 72:11,17 73:3 74:3,7 74:18,19,19 77:6,16 79:2,13,20 79:24 80:8	asbestosco... 27:19 28:1 28:5 32:17 32:21 37:15 38:22 39:2 51:24 53:20 58:6 88:18 89:9 91:1 96:3 100:9 104:8,12 105:19 107:14,19 108:16,21 108:24 109:12,24 114:10,22 115:4 117:14 118:21 asbestosfree 108:21,25 109:13,25 114:23 115:16 asbestoshe... 126:20 asbestosis	asking 10:20 38:4 82:22 84:14,15 97:10 104:7 104:25 117:15 125:11 128:16,17 asks 115:16 assemblies 2:19 21:4 58:17 assembly 2:18 21:11 49:1 49:2 54:15 associate 129:22 associated 45:16 94:4 associating 130:10 association 3:22 18:10 18:16 119:5 119:18 120:13 122:17 123:6 128:21 associations 122:22 assume 34:4 77:9 assuming 38:12 asterisk 36:18,22 atmosphere 56:24 102:23 attached	attaches 47:16 attaching 88:5 attachment 2:13 88:10 attended 15:20 attention 41:14 126:22 127:2 attorney 136:12,13 attorneys 9:3 13:19 62:3 august 1:16 8:15 76:9 117:24 136:17 aurora 7:9 9:10 author 41:5 42:17 automobile 48:14 available 46:12,20 62:2 100:22 109:13 115:20 116:4,14 119:1 aware 23:9,10 33:20 34:7 34:15,16 35:12 38:24 40:3 49:10 60:4,7 68:23 104:4 110:4 119:19 121:16 127:23 128:19 129:8
applied 20:14 20:18 35:4 75:8				
applies 85:3				
appreciate 135:8				
approaching 112:1				
appropriate 17:1				
approve 69:18				
april 3:12,13 3:18 99:13 111:14 112:13				
				B
				back 15:8,24 23:4 24:6

25:2 27:10	began 10:2	78:25	burks 76:19	case 8:5, 12
31:25 32:2	18:12 27:25	106:23	76:21, 21, 22	13:3 14:19
36:13 38:20	33:6, 22	115:25	76:25 78:21	14:24, 25
41:22 42:7	beginning	120:18	burns 6:23	22:5 24:10
42:15 44:15	44:16 78:13	bqmlaw 6:12	business	25:23 50:11
48:5 56:22	111:5	brake 2:16	15:25 17:6	84:11 85:15
62:25 65:14	behalf 6:2, 8	17:1 19:16	101:2	cases 10:5, 13
66:25 70:15	6:14, 21 7:3	29:4, 8 48:9	102:11, 23	catalog 13:5
70:16 71:14	7:8 8:20, 23	48:14, 16, 19		catalogs
76:4 78:12	9:1 10:3	73:4 79:19	C	13:16, 17
85:20 99:3	12:1, 19	81:3 92:15	caliper 107:4	catch 61:12
99:7 111:4	127:24	92:18	108:1 116:5	categories
114:1	believe 10:23	108:11, 12	call 18:24	107:22
115:24	14:3 16:21	132:15	called 1:18	cause 1:4, 5
117:3, 4	22:15 36:11	brakes 14:3	9:18 16:14	8:5, 10
120:6, 16	47:5 73:17	72:12, 17, 23	29:3	49:17 51:2
131:2, 11, 14	81:9 87:14	73:5 75:17	calling 95:23	51:7 56:25
background	101:5, 20	83:13, 18	calls 85:6	72:23 73:4
15:19	120:17	90:21, 22, 23	87:8 129:4	84:8 125:22
bad 91:8	123:12	99:22	130:1	126:1, 24, 24
112:11	132:10	braking 74:6	134:22	136:6
baker 1:21	benefit 19:6	74:11	canada 119:11	causes 46:12
136:4, 21	best 10:10	break 79:19	cancer 46:12	46:20 74:6
baldwinwal...	32:2 35:21	97:18 131:6	46:20 126:8	74:7, 11
15:24	better 100:1	breakdown	126:24	causing
baltz 73:17	beyond 37:19	83:8	127:10	100:25
75:12 76:14	46:16	breaking 80:8	cant 81:14	caution 55:16
82:14 84:20	127:12	brief 44:14	105:17	55:16 58:20
84:24 85:15	130:2, 24	62:24 65:13	capacity	58:23
86:2, 5, 11	big 21:17	71:13 78:10	14:10, 11	112:18
ban 106:20, 22	103:18	109:11	92:18	cb 2:19 20:21
barger 1:4	bigger 21:9	111:3 120:5	caption	23:17, 18
8:5 25:14	birth 11:17	131:10	136:10	29:12 57:24
87:4	bit 35:24	briefly 15:18	carcinogen	58:2, 5
barnerd 6:4	48:21 50:20	52:16 78:3	37:5, 8 39:3	60:25 61:1
based 20:6	51:7 97:17	broad 10:25	39:4	95:21 108:7
23:13 25:12	101:3	19:11	carcinogenic	108:9, 12, 15
46:22 92:22	125:15	broader 10:7	46:8	114:4
106:22	135:7	bronchogenic	carcinoma	cc 42:5
109:2 115:7	black 118:9	45:16	45:17	cease 28:8
118:17	blocks 21:21	brooklyn	cardboard	ceased 18:19
128:3	52:4 112:4	121:3	21:8, 16	centimeter
basic 20:1	blow 57:11	brought 70:21	carlisle	42:2
basically	58:24 72:23	73:18	31:19, 24	century 17:20
74:25 77:3	113:17, 22	browder 6:4	carried 61:8	certain 28:18
94:2	blowing 112:5	brown 22:13	carries 72:20	48:19
basing 132:8	112:10, 18	22:16 23:8	72:21	certainly
basis 132:24	board 85:11	27:10	carry 33:17	85:12 86:21
bates 54:7	bob 101:12	brushing 49:6	carrying 86:1	87:2 124:10
93:4 99:9	bottom 36:10	brzytwa 6:10	cartons 21:8	certificate
103:7 106:5	42:7 58:10	bullet 64:8, 9	21:16	136:1

certified 9:21	civil 1:20 9:19 136:15	53:25 55:20 55:25 56:11	132:2,10 133:22	67:6,20,20 68:17,22
certify 136:5 136:9,11	claim 35:10	56:19 57:3	clutching 74:6,11	85:17 130:10
chance 47:25 48:7 52:14 62:20 65:17 113:8 122:10 123:15	claims 35:10 clarify 79:7 clarity 30:18 clark 7:10 9:13	57:24 60:10 61:7 64:11 73:3 79:19 81:3 94:21 97:2,11 107:8	cm 20:24 coast 50:7 collection 39:19 40:1	companywide 10:21 comparable 91:11
change 44:10 78:5 109:2 110:25 117:21 118:8	clean 33:10 49:16 50:21 51:5,21,22 53:3 55:13 59:8 64:10 112:6	108:22,23 109:8,8 112:10 113:17,22 116:13	collectors 39:20 43:5 43:8	compared 19:15
changed 109:4 109:24	cleaned 53:7 56:11	132:5,15,19 132:20,23	college 15:24 collins 3:3 65:21 66:6 70:17 71:22 72:8 99:13 133:17 134:2	compensated 15:10 compensation 35:10
changeover 109:9,10	cleaner 51:11	clutches 18:25 19:8 19:21 20:9 20:14,15,19 21:2 22:13 22:16 23:2 23:8,14,15 25:17,22 26:1,19 27:1,7,12 27:20 28:2 28:5,9,23 29:14,19,25 30:9 32:13 32:18,20,24 33:3,11,16 33:23 34:1 35:17 49:12 49:17 50:9 53:19 58:3 58:5 59:8 59:18 61:16 64:15 66:11 67:9 73:6 74:2 75:18 83:13,18 84:9 90:23 95:14,17 96:4,8 99:22 100:5 107:6 108:10 112:19 116:7 131:17	column 51:2,4 51:7,8 55:7 56:5,9 58:11,20 com 6:6,12,19 7:6,15 come 21:4 130:7,15 coming 40:7 83:21 132:14,19	completed 88:13 136:10 completely 51:5 component 104:9 105:9 components 57:5 104:8 104:13 105:19
changing 72:13	clear 31:12 60:16 100:20		commencing 1:23 commission 136:23 commissioned 136:4 common 20:21 29:18 64:6 communication 133:23 companies 3:23,24 6:15 9:7 26:4,6,9 122:20,21 company 6:21 7:10 9:11 9:14 14:2,3 16:14 17:15 17:18,22 25:25 27:11 31:9 45:4,7	compressed 19:18 33:10 49:5,6,16 53:13 57:11 58:24 59:7 59:22 60:2 64:11 72:23 112:5,11,19 113:17,22 computer 136:7 concentration 41:23 42:1 concentrat... 40:13 112:1 concern 73:5 79:1 concerns 79:6 concluded 135:20 concludes 44:11 78:7 111:1 135:14 condition 54:25
characteri... 30:5	cleveland 1:23 6:11 17:15,22,24 121:2,5 136:17			
charge 15:13	clinton 121:2			
chart 51:1	close 15:25 101:23			
cheryl 1:21 12:10 40:16 43:12 46:23 49:21 52:6 54:6 57:15 62:6 67:24 68:24 136:4 136:21	closed 21:18 closely 23:16 25:10			
chesterton 1:12 8:11	club 123:20			
chicago 6:24 7:14	clutch 2:15 2:16 17:1 18:25 19:7 19:14,15 21:4,11,24 21:25 24:15 24:17 25:8 25:10 30:12 48:24,25 49:2 50:6 50:20 51:20 51:23 52:18 52:19 53:1 53:3,7,10			
chris 8:22 43:18 93:3 122:1				
christopher 7:4				
chronic 37:4				
chrysotile 36:16				
cincinnati 25:24 26:5				
circuit 1:1,2 8:13,14				
circumstances 49:5				

conditions 89:9,15,17 91:2,5,14 92:23 97:11	122:20 135:17	45:8 68:9 68:21 69:12 70:6,10 103:10,21 120:19 121:11,20 122:23 129:18	114:8 115:5 122:14 123:14 129:14 131:19,23 132:3,21 136:8	crossexami... 9:19,23 cs 92:15 108:6,9,11 csct 90:17,18 ct 92:15 108:6,9,11
conduct 23:6 25:16,21	contamination 57:2,6 58:12	content 36:18 48:16 79:25 115:8	corrected 54:25	cubic 42:2
conducted 133:8	continue 18:9 109:18 116:24	correct 14:4 14:9,16 16:6,7,9,22 17:24,25 18:3 19:24 20:1,8 23:19 24:15 26:17 27:9 27:20 28:6 28:7 32:14 36:14,18 37:1,6 40:4 40:5,25 41:1,6,7 42:2,22,25 47:11 51:11 52:20,22 53:10,13 55:13 56:6 56:7 57:12 57:25 58:7 58:8,21 59:5 63:13 63:14,16 64:12,13,16 65:19,20,23 67:7 69:13 69:15 71:22 73:7,21 74:8,9 77:7 78:20 79:15 79:21 80:1 80:15 81:5 82:10 83:19 88:7,14 91:12 93:17 94:22 95:1 96:5,16 99:14 100:7 101:25 108:7 111:9 111:19 112:11	correction 51:4,11 correctly 112:7 114:17	culture 129:17 currently 13:23 133:15 135:16
conducting 23:11	continued 3:1 5:1 7:1 18:16 28:5	contract 136:15	correspond... 2:12,21 3:4 3:6,12,13 3:16,18,20 85:21	custodian 13:17
confirm 9:25	contracted 19:25	controlling 68:21	couldnt 117:24	customer 16:24 27:11 66:2,10 67:23 75:13 75:16 77:9 77:15 82:19 85:15 100:2 102:10 103:14,18 103:24 109:1 112:3 114:15 115:2,15 116:11,25 117:9,14 118:19
confirming 10:11	controls 94:5	conversion 74:18 83:15 84:5 88:12 88:16	counsel 8:17 12:8 24:20 80:25	customers 26:6 55:20 61:22 63:12 63:18,25 70:20 77:5 79:13 86:13 86:23 97:10 99:21 101:4 101:8,10,14 101:20 102:12,18 111:21 113:21
connection 128:3	converted 97:12	convert 74:7	county 1:3 8:14 136:2	cuts 41:3
consolidated 69:22	converting 83:3 85:2	conveying 111:20	couple 37:3 114:3 131:15	cutting 42:10 42:12
constrict 20:7	copier 47:13	copier 47:13	court 1:1,23 6:5 8:13 11:23 14:6 136:14	cuyahoga 136:2
constricted 20:3	copy 47:13	copyright 18:13	cover 10:25 11:1	cv 94:21
constricting 20:19,25 23:18 24:20 94:24 107:8 108:10,12	converting 83:3 85:2	converting 83:3 85:2	covers 10:24	
constricti... 58:2 95:16	conveying 111:20	conveying 111:20	crane 6:21	
consult 35:7	copier 47:13	copier 47:13	crate 21:18	
consulting 14:8,11 15:13	copy 47:13	copy 47:13	create 35:16	
contact 129:19	copyright 18:13	copyright 18:13	created 36:8 37:14 38:21 39:1 50:16 53:18 59:1 63:8 68:21 112:7	
contacted 66:18	cork 29:11	cork 29:11	creating 112:1	
contacts 19:19	corporate 10:9 120:24 129:17,20	corporate 10:9 120:24 129:17,20	crisis 99:17 99:20,25 101:1	
contain 28:5 28:23 32:15 32:22 59:1 104:3	corporation 2:23,24 3:15 6:8 7:3,9,10 8:24 9:2,10 9:13 10:3,8 12:1,5 13:24 14:9 16:8 17:11 17:17 18:1 18:2 34:13	corporation 2:23,24 3:15 6:8 7:3,9,10 8:24 9:2,10 9:13 10:3,8 12:1,5 13:24 14:9 16:8 17:11 17:17 18:1 18:2 34:13	cross 2:3	
contained 32:21,24 33:18 59:9 60:13 108:24 112:22				
contains 52:23 105:3 105:17				

cycled 92:16**D****dan** 8:25**dana** 6:15 9:7**dangerous**

75:18 79:20

80:9 127:15

daniel 6:9**darryl** 72:3**data** 2:9

35:17 37:1

date 1:24

8:15 11:17

14:22 60:14

61:19,24

119:3 125:6

dated 2:12,20

2:21 3:3,4

3:6,7,9,10

3:12,13,15

3:16,18,20

36:11 40:25

47:9 53:16

57:24 63:15

65:19 69:15

71:22 73:19

76:6 78:18

81:13 82:10

85:21 88:2

88:3 90:8

99:13

103:11

106:15

111:14

120:14

122:17

dates 70:15**dauch** 2:10

41:5,5

dave 122:1**day** 1:24

136:17

days 67:21

82:12,16

84:19,24

85:24

dba 107:4

108:1 114:5

116:4

dealing

126:11

deceased 1:9

8:9

december

120:14

decide 16:25**decision** 60:9

87:5 106:24

107:10

defendant

1:13 6:8

defendants

6:14,21 7:8

defined

136:15

degree 15:22

15:25

degrees 30:15

30:19,22

74:15 81:4

83:9,19,23

88:13,14

91:21,24

95:6,25

96:5,9,15

96:17 97:4

131:19

132:3 133:1

deliver

117:20

dellner 14:3**denver** 7:9

9:11

department

17:2 63:8

64:5 76:9

78:19

101:11,13

111:11

112:9,21

113:10,12

113:16

117:3

122:13

134:6

depended

110:1

depending

21:7 30:5

109:7

depleting

114:14

117:7

deposit 56:10**deposition**

1:15,18 2:6

2:7 8:4

10:1,24

11:10,20

12:6,20,23

13:2,21

14:14,17

22:4,8,23

23:21 24:10

25:7 35:14

61:11,14

121:18

135:15,16

135:20

136:9

depositions

14:18 25:14

described

34:2 110:10

describes

24:14 25:8

description

22:12 23:14

23:16 25:11

25:12

design 16:14

18:25 29:5

93:24 94:21

134:7,8

designated

12:3,18

16:23 20:24

designations

20:10,13,18

desirable

94:6

despite

126:19,25

determine

75:3

developing

100:3

development

101:15

devices 19:16**diameter**

19:18

didnt 35:8

39:12 60:17

61:12 92:19

99:23 100:3

101:20

109:18

115:14

118:19

121:16

difference

91:25 96:12

different

19:8 20:10

51:17 86:9

86:23 90:15

95:15

102:23

116:20,21

118:15

121:9

124:12

digest 2:11

44:24 45:12

direct 26:13

26:16,23

97:4

directed

63:11

directing

76:25 78:22

direction

101:24

102:2

directly 26:8

46:8 50:11

101:14

directors

70:5,6,9,10

dirt 56:24**disagree**

86:24

disagreeing

72:25

disagrees

72:21,22

disassembly

2:14 50:6

discovery

1:18 2:6

discussion

15:7 24:1

25:1 54:18

disease

125:22

126:1,24

distribution

26:23

distributors

3:19,21

26:14,19

27:1,8

division 10:5

10:14

103:22

129:14

130:16

document

12:16 13:1

38:23 40:9

43:20 45:1

45:11 47:12

50:14,15

51:19 52:21

52:22,24

53:15,18

54:14 57:23

58:9 63:4,7

66:23 69:1

69:9 97:4

106:6

109:21

110:5

113:24

120:17

122:3,10

125:3,6,7

126:6

127:19

128:12

132:1

documentation

46:22 133:2

133:3,6

documents

13:4 31:5

96:15 97:6

119:13

132:4

doesnt 24:17

51:21 80:16

103:21

105:16

113:18	drawing 61:18	eaton 2:10	101:7	2:19 54:15
115:19	61:19,21,23	3:15 6:8	102:12,18	eliminate
116:16,21	61:25 62:2	7:3 8:24	103:14,21	77:8,15
118:9,16,16	drilling	9:1 10:3	104:2,7	94:6 110:11
doing 39:24	39:25	12:1,4,19	106:15	embedment
90:25	drive 7:13	13:19,24	108:19	51:8
104:13	dropoff	14:8 15:14	109:22	emerald 1:22
dont 14:22	102:17	16:2,5,18	110:12	emissions
15:1 17:15	drum 19:14,19	16:20 17:8	111:17	48:14
22:22 23:5	48:16 56:25	17:17,21	112:13	emitting
27:13 32:19	58:12 91:21	18:1,9,12	115:10	84:12
34:12 35:5	91:23 92:1	18:22 21:1	119:17	employed
37:25 39:9	92:4 95:2,5	22:16 23:1	120:18	13:23 34:20
39:17 41:19	95:15,24	23:10 25:16	121:11,20	35:6 134:14
43:24 59:13	96:12,14	25:21 26:7	122:23,25	employee 18:6
59:13 61:5	108:12	26:13,18,25	123:5	129:10
61:9,19,24	dry 49:6	27:7,11	127:19	130:9
62:1,1	due 84:7,8	28:4,8,18	128:18	136:12,13
63:10,23	duly 9:20	29:24 30:24	129:7,10,17	employees
70:4,8,12	136:4,5	32:5 33:21	129:18,22	34:24 39:7
70:15 74:23	dust 39:19,20	34:1,7,17	130:9	104:4
76:3 81:15	40:1,8 43:5	34:21,23	133:13	employers
83:13,18	43:8 48:16	35:6,9,16	134:14	87:4
86:8 87:10	51:13,14	36:8 37:14	eatonfawick	employment
88:9 92:14	56:23 57:3	37:21,22,25	2:16	31:8 34:17
92:14 96:13	58:15,24	38:2,11,21	eatons 10:14	enclosing
97:6,6	59:1,2	39:1,6,11	10:22 23:6	41:9 122:12
101:5,22	64:10 75:17	40:7,11	128:25	encounter
102:8,11,23	80:15 84:9	41:11,13,16	eb 20:16	91:6,16
103:25		43:19,20	95:20 108:7	encountering
104:14,16	E	45:3,7,8	108:9,12,15	105:7
104:22,23	earlier 32:11	46:13,20	114:4	encounters
105:23	33:21 37:15	47:9 49:9	ecusta 103:10	105:1
112:22,23	38:23 42:20	50:9,15	103:13,23	endorsed
113:24	74:10 80:3	52:21,23	104:1,25	122:22
117:18	81:2 82:23	55:19 59:7	ed 71:25	endorsing
118:10,14	90:24 97:9	61:14 63:9	educational	122:25
119:7	100:6	63:12,17,24	15:19	engagement
121:15	123:11	64:15 65:25	edwardsville	66:11 73:4
124:11	131:15,16	66:7,13	6:18	79:19 81:3
131:3 133:2	131:21	69:19 70:2	effects 37:4	131:18
133:3,16	132:13	70:9,13	efforts	132:15
134:3,24	early 17:20	73:16 75:2	101:24	engagements
135:9	18:20,21	75:9,24	102:2	132:5
donut 19:17	28:14 32:2	76:12 77:5	eighth 126:15	engineer
double 36:18	33:23 34:6	82:24 86:13	either 20:6	93:24,24
doubts 85:1	35:21 67:18	86:16,22	34:20 94:21	133:20
dp 114:5	67:21 100:5	88:16 89:12	108:10,24	134:7,8,9
draftsman	100:14	90:8,24	electric	134:25
16:14	110:2,3	91:9 94:16	25:19	engineering
drag 56:25	123:7	100:3,10	element 2:18	15:22 16:21

16:23,24	exhibit 2:4	95:20 107:6	far 23:4	file 11:6,9
17:3 61:18	3:1 12:13	108:10,13	31:25 52:25	126:11
61:21 66:8	24:3 36:1,3	116:7,12	55:24 59:16	fill 114:15
133:15,17	36:6 40:20	expanding type	70:15 109:5	117:9 118:2
133:19	40:24 43:15	20:15 25:8	110:4	filled 116:23
entire 86:11	43:25 44:21	95:14	119:19	filling
environment	47:1,5,7	expect 70:19	128:4	117:12,13
59:3	49:24 50:3	expires	129:13	film 103:10
epa 106:19	50:15 52:8	136:23	faw 52:9	103:13,23
equipment	52:11,15,25	explain 19:7	57:17 62:18	finally
6:21 7:10	54:10,13	99:19	64:19 65:1	109:14
9:14	57:19 60:18	explicitly	68:1 69:1,8	financially
erie view	62:14 63:4	114:16	71:3 73:9	136:13
121:5	65:3,7,18	116:25	77:23 80:20	find 28:18
esq 6:3,9,16	68:3,6,8	117:9	87:13 89:25	94:16
6:22 7:4,12	69:4,11,21	exposure	93:6 99:9	109:22
established	70:16 71:5	35:11 48:10	103:7 106:5	132:7
32:11 68:16	71:18,21	49:17 66:14	110:19	finding 108:5
establishes	73:12,21	72:11,17,24	113:2	findings
46:9	74:24 76:5	79:2	fawick 2:14	48:17
estate 1:8	76:5,17,17	exposures	2:23,24	finish 16:1
8:8	77:25 78:17	48:18 49:11	16:8,11,20	105:11
estimate	78:22 79:16	expressing	17:8,11	130:20
14:23	80:22 81:11	85:1	18:1,6,10	finished
104:19	82:13,21	extent 26:3	18:15,20,23	87:24
estimated	85:20,21,25	37:18 66:21	19:14 21:1	105:12
80:3	87:14,17,22	extra 43:24	22:15 27:11	131:6
et 8:11	87:25 88:3		27:19,25	fire 132:14
etype 90:14	90:2,6 93:3	F	28:4 34:13	fireman 16:15
evaluate 89:1	93:9,15	facility	34:21,23	16:16
evaluating	97:17,21	39:11,18	35:6 50:6,9	firm 8:20
124:12	99:8 103:3	facings 29:10	50:15 67:18	13:18
event 136:15	103:9 106:8	fact 68:16,23	68:9,16,21	136:14
everybody	106:13	73:25 80:15	69:11,18,24	first 9:20
79:11 86:1	110:21	84:18 102:4	70:3,6	12:11 13:1
everybodys	111:9 113:4	105:3 134:3	february 2:20	13:9 27:25
19:6	113:9,13	factory 40:11	63:15	28:2 33:22
evidence	114:1	41:18	feedback	34:1,7
25:17,22	115:24	133:11	101:19	35:20 36:13
exactly 83:14	119:21,25	fahrenheit	fiber 41:25	41:2,9,12
109:10	120:10	30:22 95:6	42:2 112:1	42:8,16
examination	122:5,9,19	fail 89:15	fibers 42:5	45:21,21
1:19 2:1	124:17,23	fair 17:7	field 3:19,21	47:8 48:22
examined 9:21	expand 20:7	18:23 20:10	66:1 77:1,4	50:19,19
exams 34:24	expanded	109:7 135:1	79:8,12	51:2 52:4
exceed 85:13	19:22 20:2	fairly 129:13	80:13 85:25	54:20 59:6
exceeded	expanding	falling	86:6,17	60:19,23
83:23,23	20:16,17	107:21	92:23	61:12 72:20
excerpts 2:7	24:15,17,20	familiar	113:20	73:19 78:25
executive	24:21 34:4	31:20	fifth 68:11	93:25 95:3
124:25	53:25 61:7	fans 43:5,7	111:23	99:15

106:19	107:24	128:2,6	79:25 80:11	gearbox 50:12
109:4 116:1	115:7,12	129:4 130:1	81:1 82:8	gears 50:13
116:1	118:23	130:13,23	88:18,19	general 72:1
120:12	121:14	134:22	89:2,9,19	76:25 77:14
124:20	123:3 124:3	founded 17:12	90:11 91:1	77:17
125:10,16	125:2,24	17:18	91:2,4,5,16	102:15
136:5	126:4 127:4	four 82:12,16	92:3,8 94:7	103:17
fisher 3:17	127:12	84:19,24	95:23 96:3	generaliza...
3:21	128:1,5	fourth 7:5	96:13 97:2	85:11
fit 23:16	129:4 130:1	68:8,11	97:11 99:17	generally
25:10	130:6,13,23	72:15 95:12	100:4,9,21	89:1
fivepage 2:20	134:22	126:18	100:25	gentleman
flames 83:21	formation	fraction	101:4	93:20 121:4
132:19	67:18	48:15	106:25	134:4
flammable	former 45:7	francisco	107:14,19	getting 15:25
55:17	forms 56:10	14:24	108:6,16,25	30:12,25
flex 2:10	126:8	free 77:15	109:1,15	77:10 92:8
focus 38:1	forth 1:24	frequently	112:6 114:7	96:15 97:3
focused 17:8	66:22	92:16	114:10,14	101:19,21
following	forward 75:12	friction	116:13	119:2 132:2
122:21	84:20,25	19:22,25	117:8	132:10,25
follows 9:22	found 40:12	21:2,14,20	131:17,22	gianaris 6:4
force 86:12	41:23 48:16	21:21,25	132:1,24	give 9:4 14:6
97:9 101:8	foundation	25:18 27:19	133:21,24	14:23 44:6
112:15	19:3,11	28:1,6,8,23	134:19	77:4 85:16
foregoing	22:19 27:22	29:6,10,11	friday 1:16	86:13 93:5
136:8,10	28:11,25	29:23 30:8	front 57:25	104:18
foreign 50:21	29:17 30:2	30:11,25	68:7 99:8	given 14:18
50:22 51:3	31:14 34:10	31:8,19,24	full 11:14	20:10 60:6
51:9,13,15	35:1 37:12	32:5,6,17	function 17:5	79:8 82:23
53:6	44:25 45:2	32:21,23	further 36:21	86:2,4
forgot 131:1	45:5 46:15	33:16,18,22	48:21 51:7	101:14
form 19:3,10	49:14 52:2	34:3 35:18	56:8 67:22	124:24
22:19 27:22	53:23 59:11	36:8,13	99:21 101:3	125:5 136:6
28:11,24	63:21 66:21	37:15,22	108:4	136:8
29:17 30:2	67:16 76:2	38:22 39:2	125:15	giving 14:14
31:13 34:10	77:13 85:5	39:16,25	135:9 136:9	75:16 101:8
35:1 37:11	86:20 87:8	51:3,10,23	136:11	glaze 55:1
37:13 46:4	92:13 96:20	51:24 52:4	future 42:17	glazed 54:25
46:15 49:14	100:12	53:20 54:1	70:19,20	go 22:19 23:4
52:1 53:23	101:17	54:24 55:1	futures 77:10	23:22 27:22
59:11 63:20	102:7,20	55:8,12,25		27:23 28:12
66:21 67:16	105:5	56:4,9,13	G	29:17 32:1
76:2 77:13	107:24	58:6,16,25	gained 129:16	34:11 35:2
85:5 86:20	115:7,12	58:25 59:2	gap 117:23	37:12,20
87:8 92:13	118:23	60:1 67:6,9	garden 1:22	41:22 42:7
96:20	121:14	67:13 68:16	gardner 7:9	42:15 44:5
100:12	123:3 124:4	69:25 70:3	9:11	44:20 45:10
101:17	125:2,24	70:7,11	gasoline	46:5,17
102:7,20	126:5 127:4	72:2,12	55:12,16,19	47:24 48:21
105:5	127:12	73:24 74:2	55:24	51:20 53:9

53:23 56:19
 57:8 58:19
 62:7,20
 64:17 65:8
 67:1,16
 68:12 71:1
 71:8 76:2,4
 76:25 77:13
 78:4 84:3
 85:20 86:20
 89:23 92:16
 93:1 97:15
 97:19
 102:21,24
 105:12
 107:24
 110:24
 111:25
 112:25
 115:8,12,24
 116:4 117:3
 119:9,20
 121:24
 124:4,13
 126:7 127:7
 128:7
 131:14
goals 124:6
goes 32:2
 74:5,17
 111:17
 126:10
going 10:21
 16:11 19:2
 20:6 22:18
 22:22 24:24
 27:10 28:10
 30:8 31:13
 36:13 37:11
 38:11,20
 44:8,12
 46:3 48:2
 51:18 57:17
 62:22 65:10
 71:11 77:3
 77:4 78:9
 85:4 88:17
 89:14,20
 91:4 92:15
 97:24 99:24
 99:25

105:24
 114:2
 115:22
 117:15,25
 120:3 128:5
 129:3
 130:22
 131:7
 132:16
 135:12,18
good 36:25
 126:19,25
gordon 13:3
government
 94:5
grade 52:3
graduating
 15:20
grease 51:14
 55:8,11
great 38:15
 85:16,23
grinding
 42:17 72:13
grinds 112:3
group 103:10
 103:13,23
 129:23
groups 125:13
guard 50:7
guess 18:24
 20:5 29:13
 33:25 41:5
 100:24
 101:7
 105:22
 114:19
 129:15
 134:5
guide 109:23

H

hadnt 115:13
halfdozen
 126:21
halfway 42:8
 50:20
hand 136:16
handed 24:9
 47:4 50:2
 57:22 78:16

handle 32:23
 66:2
handwriting
 76:18
handwritten
 76:16 77:14
 78:22
happen 96:25
 115:14
 116:19,22
 118:16
 132:17
happened 18:4
 35:20
happening
 84:17 97:5
happens 96:17
 118:1 119:3
hard 100:13
 102:22
harmful 101:5
harmless 83:3
 83:8 84:6
 85:3 97:12
havent 24:16
 115:22
hazard 37:1
 72:14 74:20
hazardous
 34:8 80:15
hazards 10:22
 32:16 55:24
 94:4
hd 114:5
headache 14:7
heading 45:2
 48:23
headquarters
 17:23
 120:24
 121:7,8
health 37:1
 41:6 74:20
 94:3 123:20
 126:12
hear 102:9
heard 119:4
heat 84:7,8
 89:18 92:4
heavy 21:17
held 16:19

hell 10:9
 71:10
help 66:18
 67:3 94:15
hereinafter
 9:21
hereunto
 136:16
hes 10:12
 24:19 31:14
 72:25 83:2
 84:14,15
 128:12
 130:15
 134:14
hey! 6:17
hey!royster
 6:19
high 15:21
 32:8,9,10
 52:3 74:7
 74:11 79:18
 83:3
higher 95:24
 96:15 109:3
 132:6
highest 95:4
 95:5,7
hilton 1:22
hockey 72:4
hold 16:10
 31:11 65:25
 66:6 89:8
 93:22
 127:11,25
honestly
 131:4
hope 110:11
hot 30:11,14
 30:25 74:14
 83:14,18
 92:7 96:8
 97:12
 131:23
 132:11
hotter 92:4
 92:20
hour 15:17
hourly 15:13
house 116:18
housing 49:1

hundred
 118:15
hygiene 2:11
 40:6 44:24
 44:25 45:5
hygienist
 35:7

I

id 45:13
 47:15,16
 58:9
idea 35:21
 87:11
 112:11
 123:10
 129:22
identical
 94:13
identifica...
 12:14 24:4
 36:4 40:21
 43:16 47:2
 49:25 52:12
 54:11 57:20
 62:15 65:4
 68:4 69:5
 71:6 73:13
 78:1 80:23
 87:18 90:3
 93:10 97:22
 103:4 106:9
 110:22
 113:5 120:1
 122:6
 124:18
ii 36:15
il 6:5,18,24
 7:14
ill 14:5 19:9
 24:22 27:21
 29:16 30:1
 31:16 37:17
 38:8,17
 44:23 48:12
 59:10 76:1
 94:3 102:19
 107:23
 111:24
 115:6
 121:13

123:2 124:2	113:23	64:1 103:17	107:25	interrupting
124:20	include 14:14	information	108:22	38:19
125:1,23	43:25 51:13	3:22 13:5	instances	intervals
126:5 127:3	80:14 89:18	16:25 46:12	97:1	50:22
134:21	91:15	46:19 49:10	instruct	introducing
illinois 1:3	included 69:8	51:20 66:24	113:21	19:17 100:4
1:19 8:15	including	67:3 70:14	instructed	inventory
9:19	94:4	73:23 75:4	56:5 84:24	109:16
illustration	income 69:22	75:8,12,16	85:16	114:14
58:4	inconseque...	75:19,20,23	instructing	117:8
im 8:12 10:11	74:20	75:24 76:12	75:12	investigate
19:2 22:18	incorporate	77:1,4	instruction	90:12
22:22 23:9	18:12	79:11,18	21:11 55:11	investigated
27:4 28:10	incorporated	80:8,10,10	55:15 56:18	35:13 61:10
29:24 31:12	8:11 17:14	80:14 82:18	57:7,10	61:13
31:16,20	17:16,21	82:23 83:2	59:21 60:1	investigation
33:20 34:15	incorrect	84:20,25	60:4,6,8,10	121:19
35:12 37:10	27:4	85:2,16,18	64:10 86:12	involvement
37:21 38:20	increase	86:2,4,5,6	112:18	123:6
40:9 46:3	101:24	86:12,13,17	113:16,20	129:19,20
47:13 49:5	102:2	86:18 87:5	instructions	iron 16:14,16
51:18 52:8	independent	92:11	2:14,16	irritate 59:3
56:12 60:7	27:14	111:20	21:22 32:22	isnt 36:25
60:16 61:12	index 2:1,4	112:14,16	50:5 51:19	53:14 67:6
62:17 70:19	3:1 4:1 5:1	119:5,18	52:18,24	74:25 79:20
72:3 76:20	indiana 68:17	120:13	59:17	84:5,8
77:22 85:4	indicate	122:16	instructs	85:11 119:2
91:5 100:18	33:18 45:3	123:6	53:6 58:15	issue 19:1
105:12	48:17 116:2	128:15,21	intend 124:11	44:24 45:11
107:15,18	122:25	inhouse 88:23	intent 77:16	95:4 102:4
110:4,16	indicated	88:25	interchang...	131:14
114:2	75:17	inn 1:22	38:3	issued 93:16
119:12,19	131:22	inner 19:18	interest	issues 66:4,4
119:21	indicates	inquiries	68:21	issuing 48:8
123:18	41:4 115:1	66:3 70:19	interested	items 51:14
124:11	individual	70:20 77:9	124:12	ive 13:25
128:4,16,16	73:17	inquiry 66:10	136:14,15	22:21 24:13
128:17	121:16	70:21 73:18	interface	31:12 35:24
129:3	individually	79:13	56:22 92:3	69:7 83:20
130:22	1:6 8:7	insisting	interim 48:22	132:4,4
135:7	industrial	99:22	internal 3:16	
imo 6:14 9:7	2:11 25:23	inspected	3:18,20	J
imply 108:18	29:20 35:7	50:22	47:9	jack 2:10
implying	40:6 44:24	inspections	international	41:5
127:6 129:1	44:25 45:5	64:9	7:10 9:13	james 3:15
important	industries	installation	interoffice	january 3:17
92:11	6:14 7:9,9	2:17,19	2:12,21 3:4	106:15
improper	9:8,12	49:1 54:14	3:6,12,13	107:13,17
130:17,18	25:18 63:25	66:4	65:18 73:16	108:15
inappropriate	industry	instance	interrogat...	114:20
112:4,19	63:13,19	56:20	13:8	115:24

20:10,13,18	limited 10:18	129:10	lunch 99:7	45:4,7
40:25 41:8	31:15	longer 58:5	luncheon 98:2	marc 3:3
41:13 43:11	line 36:16,17	59:8 114:10		65:21 99:13
47:23 48:8	41:4,12	look 24:11	M	march 69:15
51:2 63:11	42:16	36:6,10,21	machines	marine 2:16
63:17 66:9	100:10,10	40:23 41:8	39:21,22	52:19 53:19
67:4,5	130:18	44:6,20	112:3	mark 6:22
70:17,21	lines 37:3	45:1,13	madison 1:3	12:11 23:20
71:21 72:6	114:5	47:7,17	8:14	35:22 40:17
72:7,7,10	lining 48:9	48:12 50:18	mahoney 7:13	43:13 46:24
73:19,22	48:14 55:1	50:25 51:18	maintenance	49:22 52:7
74:25 75:11	55:4,13	54:19,21	2:14,16,17	54:7 57:16
75:15,25	56:1,11,19	55:6 56:8	2:19 32:12	62:7 64:18
76:13 78:19	linings 54:25	58:10,14	49:12 50:6	64:24 67:25
79:5 80:25	55:21 56:21	64:7 70:18	50:18 52:3	68:25 71:2
81:12 82:4	list 3:24	71:20 72:15	52:17,24	73:8 77:19
82:5,7,13	120:13	73:1,15	54:21 55:25	80:18 87:12
82:18,21	121:15	76:4,16	58:11	89:23 93:2
83:7,10	122:20,23	78:3 81:11	major 67:8	97:16
85:25 87:24	listed 12:5	82:12 83:1	making 19:15	102:25
88:2,10	12:20 39:2	87:21 93:25	28:2 63:19	106:4
96:8 99:12	95:2 114:9	94:19 95:2	91:10	110:18
99:16 101:7	lists 41:23	103:8	117:21	113:1
101:11,13	120:18	106:22	malfunctions	119:21
101:23	literature	108:4 110:8	51:1	121:25
102:5,17	18:22	111:23	manager 41:6	124:14
103:9,11	litigation	114:12	41:18 66:1	marked 2:5
104:1 110:9	14:12	115:25	66:1,8 72:2	3:2 12:13
110:10	little 35:24	120:9	76:23	24:3 36:3
111:11,12	48:21 50:19	124:14,20	129:15	40:20,24
112:10,21	50:25 51:7	125:10,15	133:19	43:15 44:21
113:10,12	97:17 101:3	126:18	manhattan	47:1,5
113:16	125:15	looked 31:5	31:18	49:24 52:11
115:1,8	129:19,19	59:16 87:4	manual 21:10	54:10 57:19
117:4	135:7	looking 25:6	21:11,22,23	62:14 63:3
122:12	lives 134:12	50:14 59:24	48:24 54:15	65:3,7 68:3
131:21	134:13	63:3 74:24	57:24 59:24	69:4 71:5
letterhead	llc 6:4,15,23	81:3 87:24	60:11,19	71:18 73:12
41:3	9:7,12	91:19 93:14	manuals 32:12	77:25 78:17
letters 63:25	load 116:17	looks 60:19	32:15,22	80:22 87:17
level 112:2	local 15:24	108:5	33:1,4,11	87:22 90:2
levels 42:23	located 17:23	lose 102:8	60:5,10	93:9,14
42:23 132:6	logansport	102:4,12	61:6	97:21 99:8
liberated	68:17	losing 102:3	manufacture	103:3,9
73:3	logo 18:22	lot 51:17	61:23	106:8
lifetime	52:23	124:10	manufacturer	110:21
123:15	long 69:8	louis 7:5	50:12	111:9 113:4
likelihood	89:24	low 40:13	manufacturers	119:25
111:25	116:19,22	42:23	14:1 25:22	120:10
129:7	117:19,20	lower 42:1	manufacturing	122:5
limit 31:16	118:2,11	lumax 25:18	39:10,18	124:17

marketing	materials	127:20	8:6	24:10 25:7
76:23	21:20 25:18	128:18	mid 26:22	
masks 39:15	27:20 79:25	129:3	27:8 33:4,8	N
mass 63:24	83:6 88:18	members 3:23	33:13	nafco 66:17
92:6	88:19 89:5	120:14	mid70s 18:21	67:2,6
material 2:9	89:10,19	membership	mid80s 34:6	117:24
21:2,14,25	90:11,12	34:17 45:3	104:21	118:2
28:1,6,9,23	94:7,17	memberships	middle 27:1	name 11:14,16
29:6,11,24	106:25	121:20	midlevel	14:25 18:10
30:4,8 31:8	114:14,16	memo 47:9,15	129:15	18:12,15,20
32:5,17,21	117:8,10,14	47:20 65:18	military	45:7 93:20
32:24 33:16	119:1	73:16 76:5	50:10	102:14
33:19,22	matt 9:6	76:25 77:14	mill 29:18	119:12
34:3,8	matter 79:7	77:17 78:18	84:1 103:14	naphtha 55:13
35:16,18	102:15	78:21 79:1	millers 6:23	55:17,20,24
36:8,14	matthew 6:16	80:13 86:1	minerals 83:3	national
37:15,22	124:25	86:6,17	83:8 84:6	31:19,24
38:22 39:2	mccambridge	97:8 106:15	88:7,12	32:6 67:6
39:16,25	7:13	106:19	minute 92:17	67:13 68:16
50:21,23	mccloskey	113:20	missing 81:18	69:24 70:2
51:3,9,13	3:17	114:1	misstates	70:7,11
51:23,25	mccrystal	115:25	66:22	72:2 73:23
53:6,20	6:10	118:17	mistake 64:23	80:11 82:8
54:1 56:4	mcmullen 3:15	memos 86:10	mmorris 6:19	89:2 133:24
58:6 59:1,2	mean 30:19	111:16	mo 7:5	necessarily
60:1 67:9	107:13,17	mention	models 23:15	60:17 105:2
72:12 74:2	108:14	103:22	59:17	115:19
81:2 88:6	114:19	mentioned	moment 65:6	116:15
89:14 91:1	115:19	26:5 42:20	month 13:10	119:2
91:3,4,6,11	116:16	74:10 99:21	115:22	133:10
91:16 92:3	119:8	mentioning	months 114:13	need 43:24
92:8 94:20	meaning 38:2	104:1	115:23	62:20 68:7
95:4,24	101:24	mentions	116:18	99:16
96:3,13	meant 30:18	72:16 79:1	117:2,7	105:24
97:2,13	99:19	88:5 107:3	118:4	needs 53:3
99:17,23	measurable	126:8	morris 6:16	56:11
100:4,9,22	73:2	merged 18:1	9:6,6	negative
100:25	measures	28:4	move 28:19	126:20
101:4	46:10	merger 18:4,9	56:25 106:3	negatives
107:11,12	mechanical	34:14 69:18	113:25	127:1
107:15,19	15:22	69:24 70:3	126:15	negativity
108:6,16,25	medical 34:24	merle 1:4 8:5	msds 35:16	127:8
109:1,15	126:11	25:14	36:8 37:14	neighborhood
114:10	meeting 2:24	message 101:8	38:21 39:1	74:15 96:4
115:14,21	69:12,18	101:20	multipage	97:3
116:4,13,18	member 34:14	metal 19:19	54:13 57:23	neither 86:9
117:1,25	34:19 45:4	51:17	murphy 2:8	86:10
131:17,22	119:17	method 112:20	22:4 23:21	never 29:6
132:1,25	120:19	113:23	24:14 25:8	38:24
133:21	121:12,17	methods 112:4	34:2	112:14
134:20	123:12,19	michael 1:5	murphys 23:13	new 45:2 49:2

89:14 112:2	12:6,20	124:8 126:4	15:20 16:10	83:6,12,17
newman 7:12	69:12,17	128:23	121:5	84:3,11,23
9:9,9	noticed 10:6	130:21,23	134:13	85:24 86:4
news 126:19	november 3:6	objections	136:1,4,17	87:20,21
126:25	40:25 78:18	11:6,8,10	136:22	88:2,9,16
niosh 48:8	90:8	46:21 49:19	oil 55:8,11	88:23 89:3
72:16 75:17	number 8:6,10	64:2 87:1	okay 9:15	89:8,12,17
75:23 80:14	60:14 77:21	105:10,21	10:15 11:7	89:22 90:10
86:14,18,23	102:17	106:2	12:22,25	91:19 92:2
non 107:18	103:7 107:1	108:17	13:12 14:5	92:7 93:12
nonasbestos	118:14	123:8	16:2,5 17:4	93:13 94:10
28:19 33:22	numbered	126:13	17:7 18:15	94:14,24
34:2 90:11	36:16	objective	18:19 22:7	95:14,19,22
99:16,23	numbers 93:4	94:19	22:24 24:9	96:7,11,24
100:4,21,25	118:15	observations	25:6 26:4	97:8 99:7
101:25		132:23	26:12,18,21	99:15 100:8
106:25	O	obviously	27:7 29:2,7	100:16,20
107:12	object 19:3,9	132:5,8	29:19 30:14	101:10,13
109:15	22:19 27:21	occupational	31:18 32:15	103:20
114:6,16	28:11 29:16	41:6	38:15 39:22	104:1
115:3,21	30:1 31:13	occur 49:11	40:15,23	106:11
116:3,13,17	34:9,25	occurred	42:4 43:4	107:3 108:9
117:1,10,15	37:11,17	59:15 109:9	45:18,24	108:14
118:20	46:4,14	109:10	46:11 47:4	109:21
119:2	52:1 53:22	occurring	48:7 54:18	111:7,8,16
nonasbesto...	59:10 63:20	83:9	55:10,19	111:23
88:19	66:20 67:15	oconnell 6:23	56:17,18	112:9 113:7
nonavailab...	76:1 77:12	october 3:3,5	57:1,7,10	113:12,15
100:24	85:5 86:19	3:7,9 71:22	57:14,22	113:19,25
nonslip 114:5	87:7 92:12	81:13 82:10	58:14,19	114:12,19
noon 97:18	96:19	85:21 88:3	59:6,14,24	115:1,21
normal 30:12	100:11	offer 34:1	60:4 61:6	116:7,10
91:6 97:10	101:16	91:11	61:21,24	117:3,5,12
131:18	102:6,19	offered 100:8	63:7 64:14	117:18
132:15,16	105:4	offering	65:17,24	118:7,12,17
132:20	107:23	33:22	67:12 68:6	119:3,15,20
normally	115:6,11	108:20	68:14 69:17	120:9,16,21
92:23	118:22	office 126:10	70:16,23	120:23
northern	121:13	136:17	72:3,5,6,10	121:7 122:8
85:17,23	123:2 124:2	officers 70:5	72:19 73:1	123:15,21
notary 1:21	125:1,23	70:6,9,10	73:15 74:1	124:22
9:3 64:21	126:4 127:3	offices 3:19	74:5,10	125:7,10,18
81:23 136:4	127:11	3:21 79:9	75:7,11,15	126:17
136:21	128:1,5	79:12 80:13	75:23 76:8	127:19,22
note 11:2	129:3 130:1	oftentimes	76:24 77:3	131:25
55:3 76:16	130:12	102:8	77:18 78:6	132:7,13,17
76:24 78:22	134:21	oh 6:11 37:2	78:21,25	132:22
notes 69:23	objection 4:1	43:23 45:23	79:5,11,23	133:12,20
83:6	5:1 11:3	61:24 72:5	80:3,17	134:4,10,12
notice 2:6,24	28:24 29:21	77:22 87:14	81:7,8,9,24	135:4,12
10:24 11:10	49:13 108:2	ohio 1:22,23	82:3,12,21	old 13:5,16

26:1	original 29:5	120:17,18	66:2 83:13	104:17
olin 103:10	48:15 60:13	122:19,21	89:3,12	109:12
once 37:10	originally	124:20	91:14 92:8	114:21
109:19	22:10	126:15,16	118:15	115:2
119:16	originator	pages 89:24	125:19,20	129:11
135:12	18:24	94:12 95:22	130:5	periodic 64:8
onepage 3:9	osha 70:23	pallet 21:9	132:14	person 120:24
ones 19:23	77:10	pallets	particular	personally
20:25 21:8	outside 42:13	116:17	21:25 60:20	67:19 130:9
21:9 29:2	overall 18:13	paper 22:13	83:1 109:15	persons 74:3
31:20 33:12	92:5 100:15	22:17 23:8	109:20	perspective
64:25 88:2	overlap 109:5	27:10 29:18	parties	99:25
ongoing 37:24	114:24	63:18 84:1	136:12,13	petkash 1:15
operate 92:23	overnight	85:17,23	parts 118:13	1:18 2:2
operating	115:14	103:10,13	parttime 14:1	8:4 9:17
20:1 43:8	116:22	103:14,23	pass 75:19	10:2 11:16
59:3 95:15	ownership	papermaking	passing 73:22	11:16,17
97:10	67:19	29:14 63:12	pat 2:7 22:4	12:16 15:10
operation	owns 69:24	64:1 103:17	23:21 24:10	24:9 25:6
2:17,19		papers 126:11	patience	36:6 40:23
21:10 32:12	P	paragraph	135:8	44:20 46:11
42:10 54:15	package 21:5	42:7,8,16	paul 3:19	47:4 48:7
57:3 66:14	21:6	45:21 46:1	paying 126:22	50:2 52:14
92:19	packaged	48:12,23	127:1	54:13 57:22
132:15,20	21:15	49:4 50:19	penney 85:18	63:3 65:6
133:11	page 3:24	52:3 54:21	pennsylvania	65:17 68:6
opinion 45:19	24:11,14	56:12 58:11	25:19	69:11 71:17
46:2,7	25:6 36:10	58:15 68:11	penny 85:23	78:16 90:7
opportunity	36:13,21,24	70:18 72:15	people 35:4	93:14 99:7
71:17	38:12 41:2	72:19 73:2	39:14 73:5	103:8
106:12	41:4,9,22	74:1,5	87:3 126:22	106:12
opposed 19:19	41:22 42:8	79:17,24	126:25	111:8 113:8
option 109:1	42:15 43:24	83:2 84:3,4	127:9	120:9
order 35:24	45:1,10,11	88:11	129:20	131:14
35:25 93:5	45:14 47:8	106:19,23	percent 30:3	135:5,22
118:3	47:15,17	108:4	30:4 70:1	136:5
orders 102:3	50:19,25	111:24	80:1,1	petticord 6:9
102:4 114:3	53:16 54:20	113:25	percentage	6:12 8:25
114:15	54:20 58:9	114:2	32:4	9:1 15:2
117:9,13,13	64:7 68:8	115:25	percentile	62:4 121:10
organization	68:11 69:21	117:4	32:8	128:10
34:20 119:7	72:20 73:1	125:10,16	performance	130:4,20
119:12	76:8 78:25	125:19	91:11	131:5
123:21,25	79:16,17	126:18	performed	phased 28:13
124:1,6	81:14,15	paraphrased	41:10 94:15	109:2
130:11	82:3 91:19	73:25	performing	phaseout
organizations	93:25 95:3	parma 134:13	49:12	28:15,17
34:14,16	95:7,10,12	134:13	period 18:11	philadelphia
123:12,16	106:23	part 17:2,3	18:17 28:13	50:12
123:17	110:8 116:1	45:21 60:14	35:3 39:24	phone 9:4
124:12	120:12,16	61:10,12	53:24	135:12

physical 35:4	point 11:4	61:11, 14	95:23	108:20
pieces 51:17	16:21 26:18	preparing	procedures	110:12
pipeline	64:8, 9	121:18	48:19, 22	114:9, 22
116:23	66:13 70:1	presence	proceed 24:7	116:5
pitzer 7:4	83:22 84:18	136:7	25:4 44:18	program 39:6
8:23	84:23 95:22	present 7:17	78:14 99:5	progression
place 26:21	100:16	22:13, 16	proceedings	100:13, 15
27:17 28:17	102:5, 13	48:17 104:5	8:1	pronounced
43:9 83:15	104:9, 15	presentation	process	72:1
84:5 136:10	108:14, 19	3:25 124:24	116:19	properly
plaintiff	points 93:16	125:4	produce 48:18	92:17
1:10	131:15	presenter	produced 10:2	proposed
plaintiffs	poirier	125:18	10:12 13:9	106:22
1:19 2:5	120:21	126:23	22:10 61:20	proposing
3:2 6:2	121:4	preserved	product 90:20	106:19
8:21 9:18	portion 18:14	48:18	91:3, 3, 17	provide 14:8
12:6, 13	24:9, 19	press 25:24	92:14, 22	15:18 34:23
24:3 36:3	position	126:21	104:5 105:1	51:19 67:3
40:20 43:15	16:21 41:16	127:1	105:2, 6, 7, 8	79:12 92:18
47:1 49:24	65:25 66:6	presses 25:23	105:17, 20	provided 35:3
52:11 54:10	76:22 93:22	26:2 29:20	109:19	75:4 89:1
57:19 62:14	positions	pressure	110:1 114:5	providing
65:3 68:3	16:19	48:25	114:23	77:1
69:4 71:5	possess 23:1	pretty 30:16	115:4, 16	pspclaw 7:6
73:12 77:25	possibility	129:9	117:2	public 1:21
80:22 87:17	94:5	preventative	118:20, 21	136:4, 21
90:2 93:9	possible	46:9	production	publication
97:21 103:3	86:16, 21, 22	previous	43:20 62:5	60:13, 23
106:8	87:2, 2	48:13	109:14	publications
110:21	92:25	principal	products	119:10
113:4	117:17	93:23 134:9	10:18, 19	published
119:25	130:6	principle	18:10, 17	44:25 60:12
122:5	potential	20:2, 3	26:14 28:18	119:11, 13
124:17	37:19 72:11	print 36:25	28:20 29:7	pump 7:9 9:11
plan 117:23	88:20 90:11	prior 26:23	29:9 31:17	purchasing
planned	94:3	27:1, 8	31:19 38:5	104:2
117:22	power 19:20	28:22 40:2	38:8, 9, 23	purports 41:9
plant 39:8	practice	60:5 61:4, 8	68:17 72:2	purpose 30:7
40:8 41:11	104:19	101:12	75:9 79:3	77:8 79:5
121:1	precautions	107:13, 17	85:3 90:13	89:3, 4 94:1
plate 49:1	87:6 105:18	112:13	90:14 100:8	94:10, 15
plates 19:19	105:25	113:19	100:10, 17	purposes
20:7	predominate	114:12	100:19, 21	30:17 54:18
platetype	31:21	115:17	102:18	put 59:7 60:9
19:16	preface 94:1	118:25	103:18, 24	60:19 61:15
player 72:4	94:12	probably	104:2, 12	72:16 86:9
plaza 121:5	preparation	47:14 71:9	106:20	86:17 104:7
please 8:17	12:22 13:14	83:23	107:1, 4, 11	104:11
11:14 27:6	13:15, 17, 20	118:14	107:14, 15	putting 91:10
45:1, 25	22:8, 11	procedure	107:18, 21	104:23
64:25	31:5 35:14	1:20 9:20	108:1, 7, 15	

Q				
qualified	24:22 45:14	recollection	regulation	136:14
136:4	45:18,21,25	27:14 32:3	122:14	represent
qualify 94:21	46:5 47:22	41:19	regulations	44:23
quantify	48:13 59:4	recommended	70:24 77:11	representa...
100:13	68:12,12	48:22	94:6	12:4 14:1
102:22	94:3,7	record 8:3	relationship	129:7
quantities	111:25	10:12,16	67:13,22	represented
116:21	112:7,17	11:15 15:3	relative	12:8
127:16	114:2,17	15:6,7,9	136:11,12	representing
question	117:6	23:23,25	release 55:4	128:20
19:12 31:17	128:14	24:1,7,23	77:6 79:14	request 3:10
38:20 46:4	131:2	24:25 25:1	90:21	116:12
46:18 66:18	135:13	25:3 26:9	108:11	118:19
82:6 84:14	reading 24:16	44:9,13,16	released	requested
84:15 91:8	45:24 48:4	47:25 48:3	66:10	94:2
118:24	62:19 68:14	48:6 62:20	remember	requests
124:3	69:10 81:8	62:23 63:1	101:22	66:23 93:16
125:12	87:20 90:5	65:9,11,15	remote 129:9	93:19 96:23
130:7 131:1	111:7 113:7	71:9,12,15	removal 48:25	requirements
131:3	122:8	78:5,9,12	remove 55:1	100:2
questioning	124:22	97:19,25	removing	research 75:3
130:18	ready 116:4	99:4 110:6	18:21	residue 101:5
questions	really 13:6	110:25	repair 66:4	112:6
10:8,17,20	35:5 54:19	111:5 120:4	replace 51:11	respect 10:21
38:4,7	63:10 68:7	120:7 131:8	51:22	12:19 37:21
43:22 44:2	85:3 89:3	131:12	116:16	61:15
77:5,15	92:7 130:7	135:18	replaced	respirators
82:22	reason 22:15	records 23:1	107:12	39:15 48:24
130:17	46:9 70:23	23:4,7	replacement	respiratory
135:9	91:9 125:20	25:16,21	21:1,14,20	39:6 59:4
quick 6:10	125:20	26:11,12	25:17 28:19	respond 128:9
quickly	recall 14:22	27:15	35:17 89:5	response 72:7
118:16	14:25 18:4	reduce 56:24	89:14 90:25	87:23
quite 135:6	18:19 31:7	reduced 136:7	91:10 94:16	restate 27:6
	35:20 39:17	reference	108:6	restatement
	40:6 42:20	37:25 83:7	115:13	112:23
R	101:19	88:5 122:2	116:3	restrict 38:8
rag 55:13	102:12,15	referred	replacements	result 102:3
range 30:5	119:10	113:13	88:20	results 31:2
ranks 129:13	131:25	refers 112:21	101:25	31:4 41:10
rapidly 92:21	receipt 47:13	regard 10:5	106:25	42:17
rate 15:13	received	10:14,17	replacing	retained
41:8 57:7	47:21 76:9	11:4 60:20	49:12	18:14
67:2 85:24	80:10,14	regarding	report 2:23	retired 13:24
raybestos	86:14 114:4	35:7 122:13	68:9,15,20	134:16,17
31:10,18	115:13	regardless	90:8,10	retract 56:10
reaching	recess 44:14	117:22	91:19	56:14
99:17	62:24 65:13	regular 50:22	reported	review 12:22
read 22:4,12	71:13 78:10	regularly	92:10	13:4,7,10
23:13 24:16	98:2 111:3	63:24	reporter 14:7	44:3 48:1,7
	120:5		reporting	52:14 54:19

62:21 65:7	83:4,15	83:12,17	salespeople	107:10
65:17 71:10	84:9,18,21	84:4,19,24	111:17	110:9 114:3
71:18	84:22 86:2	84:25 96:7	sample 42:9,9	114:11,13
106:13	86:7 88:21	101:12	42:16	115:9,15
111:8 113:8	89:6,10,15	131:21	samples 40:8	116:15
122:10	90:13,19	135:1	41:24,25	117:6
reviewed	91:24 94:8	rosenows	42:1 89:1	121:15
12:25 13:16	96:9,15,18	87:24	sampling	122:21
25:13	97:13 99:13	rouselle 7:8	41:10	125:3,4,19
reviewing	99:17 100:6	9:10	san 14:24	126:9,19
80:25 96:21	104:5,9	royster 6:17	sand 56:5	128:12
reviews 65:9	105:25	rpr 1:21	sanding 42:10	132:1
revised 33:12	106:1,16,20	rubber 20:3,6	42:12 55:1	school 15:21
revision	107:4,6,10	29:10 56:23	55:3	15:24
60:14	110:3,13	rubberfacing	sands 112:3	scope 30:2
rhetorical	111:12,18	29:13	satisfy 100:2	31:14,16
125:11	113:13,14	rule 136:15	saw 40:9 43:7	35:1 37:18
richard	114:23	rules 1:19	47:14 52:25	46:16 53:23
120:21	115:18	9:19	61:17 73:19	63:21 123:9
right 11:12	116:8,14	run 96:8	96:6,7 97:8	124:9
18:2 22:2	117:11,25	running 62:9	119:14	127:13
32:13 33:1	122:17	rusell 26:5	131:21	130:3,24
33:24 35:25	123:13,21	ruzel 25:24	132:19	scrapped
36:22 42:5	124:21	ryan 6:3 8:19	133:25	109:16,17
42:10,13,18	125:13,22		saying 31:25	109:18
44:10 51:25	126:1,12	S	60:18 72:3	scully 13:3
52:5 53:1,8	127:2,17	safely 32:23	84:4 112:10	seal 136:17
53:16,21	129:11	safety 2:9	113:16	sealing 6:21
55:15,17,21	132:16,20	35:17	126:23	search 23:6
56:1,11	133:18,22	sale 23:1,7	127:8,14	23:11 25:16
58:4,17	righthand	26:10	says 22:21	25:21 26:3
59:4 64:3	55:7 56:9	sales 3:19,21	24:21 36:16	second 15:3
64:15 65:22	58:20	16:20 17:2	37:5,13	36:10,24
66:11,19	risks 126:12	17:5,9 23:4	42:9,12	41:4,22
67:4,10	rkiwala 6:6	23:6 25:16	48:8,13,24	42:15 44:6
68:9,18,22	road 121:2	25:17,21,22	50:20 51:2	45:1 53:15
69:19,21	robert 1:8,15	26:8,13,16	51:5,8,10	64:23 68:13
70:20,24	1:18 2:2	26:16,24	51:21 52:3	69:21 72:20
72:8,12,17	8:4,9 9:17	27:14 63:8	53:3 54:24	74:1 79:16
72:24 73:6	11:16 76:19	64:3,5 76:9	55:3,7,11	79:17,17
73:20,24	76:21	78:19 79:8	55:16 56:10	81:15 82:3
74:3,12,15	135:22	79:12 80:13	58:23 67:4	83:1 88:11
74:21 75:13	136:5	86:1,11,17	67:5 68:15	95:7 110:8
75:21,22,25	room 62:10	97:8,9	70:1,18	111:24
76:6,10	rosenow 3:8,9	99:24 101:7	72:21 73:2	116:1
77:1,6,11	65:21,25	101:11,13	74:1 79:24	122:19
78:19 79:3	66:17 67:2	111:11	83:12 84:11	secretary
79:6,14	70:17 73:16	112:9,15,21	88:11 91:20	124:25
80:11 81:13	75:11 76:13	113:9,12,15	94:1,10,18	section 36:15
82:4,11,13	81:12 82:5	113:21	95:6 96:8	36:22,24,25
82:19,24	82:7,14,22	117:3	99:16 101:6	37:3 50:18

54:20 56:13	104:18	shareholder	6:6	40:6 43:1
64:9 91:20	129:16	69:17	simply 129:20	51:14 64:5
91:23 94:1	sent 21:11	shareholders	simulate	64:7
94:19	83:7 112:14	2:24 69:12	91:15	sorts 29:19
sections	sentence	69:18	simulated	sounds 103:13
94:12	48:23 49:4	sheet 2:9	89:18	source 86:8
see 11:8 23:7	52:4 72:21	sheets 35:17	simulating	south 6:24
24:19 25:7	79:23 99:15	shipped 21:5	91:2	7:5,13
25:9 30:25	110:9	21:8,12,21	singer 7:13	span 32:7
31:4 36:19	111:24	114:6	singled	speaking
36:22 37:16	112:17	shoe 56:22,23	125:12,21	13:19
39:14 47:23	114:12	56:25 57:11	sir 13:23	speaks 126:6
48:10,19	115:9 116:1	58:17	59:6 119:4	special 1:6
49:2,7	125:25	shoes 51:10	123:11	2:24 8:8
50:23 51:1	sentences	56:10,13	129:10	69:12
51:5 54:22	45:18 46:1	58:12,25	six 13:10	specific
54:24 55:9	114:3 116:2	short 18:11	41:24	13:12 38:4
58:13 75:8	separate	18:17 47:16	size 21:7	90:15
83:9 95:22	59:16 67:20	show 26:11	92:17 109:3	101:22
96:14	september	45:12 97:5	109:8,20	102:14
101:15	2:13,22	97:7 119:16	sizes 54:3	104:16
104:5	44:23 47:9	showalter	116:20	110:1
113:15	49:9 65:19	3:19	skip 64:22	131:25
120:17	73:19 76:6	showed 42:23	small 48:15	specifically
122:23	118:1	48:14	67:19	10:4,13
125:17	sequential	showing 36:17	smaller 21:8	13:14 25:23
133:17	93:4	49:10 61:18	smsm 7:15	30:10 49:16
seeing 42:20	series 45:12	127:19	snodgrass 7:4	52:18 74:23
102:17	93:15	shown 47:13	8:23	75:8 86:10
119:10	serve 109:23	shows 41:25	soaks 92:5	103:22,24
seen 12:16	service 66:1	42:4 58:4	sold 26:1	103:25
22:21,22	66:1,4	133:2	64:15	107:3
31:2 38:24	105:1,6,7	side 17:5	somebody	109:23
44:21 47:12	132:10,23	56:5 121:2	127:23	115:3,16
47:18,22	services	signature	128:20	118:19
63:4 83:20	15:14 41:6	41:4 81:14	sorry 8:13	124:5
95:16 97:1	servicing	135:19	29:24 31:16	specified
127:19	48:19	significant	37:21 38:20	136:10
128:4 132:4	session 99:1	48:18 49:11	40:9 49:6	speculation
132:9	set 1:24	49:17 72:24	52:8 56:12	85:6 87:9
segal 7:13	62:12 66:22	112:2	61:12 62:17	105:5
sell 21:1	90:21	silicate 46:7	70:19 76:20	124:11
26:13,18,25	108:11	similar 52:25	77:22 91:5	129:5 130:2
27:7 50:9	136:16	61:4 70:19	91:8 107:15	130:25
99:24 100:1	sets 59:16	70:20 94:11	107:18	134:23
109:19	87:5	95:18,20	110:16	spent 17:8
send 21:24	seven 41:25	similarly	119:21	spring 90:21
63:24	seventh 42:4	21:16	128:16	108:11
sending 63:18	severe 83:22	simmons 6:4	sort 21:5	squeezes
77:16	85:13	8:20	29:20 39:15	19:18
sense 103:18	shared 111:21	simmonsfirm	39:19 40:1	squeezing

19:19	77:14	125:25	97:11	118:2, 5, 16
ss 136:1	122:22	126:2	suspect 37:5	120:9
st 7:5	127:17, 23	127:15	37:8 39:3	124:14
stack 12:11	128:17, 20	substitute	swear 9:16	131:6
35:23 40:17	128:24	106:24	sweeping	132:24
43:13 46:24	132:9, 24	substituted	19:12 112:4	taken 1:20
52:7 57:16	statements	18:22	swetonic	26:21 41:24
62:8 64:18	129:23, 24	suburb 121:3	124:25	42:9 44:14
64:24 67:25	130:11	successful	125:19	62:24 65:13
68:25 71:2	states 103:21	110:11	128:17	71:13 78:10
73:9 77:20	stay 104:8	suggest 123:5	129:24	98:2 111:3
80:19 87:13	stenotypy	suggested	sworn 9:20	118:8 120:5
93:2 102:25	136:7	45:20 46:2	136:5	131:10
106:5	step 14:6	46:7 84:13	sydor 3:3, 8, 9	136:9
110:19	steve 41:14	suggests	71:21, 24, 25	takes 86:23
113:1	stock 69:24	42:17	71:25 72:3	116:22
119:22	70:2	suitable 89:5	72:3 73:23	talk 14:5
122:1	stop 130:14	90:13 92:21	74:25 75:4	88:10
124:15	strapped 21:9	suite 6:11, 17	75:13, 20	talked 10:1
staff 113:21	street 6:5, 10	6:24 7:5, 13	80:11 81:12	13:20 74:23
stage 99:17	6:24 7:5	summary 15:18	82:8, 19, 22	81:1 131:15
99:20	strike 81:19	supplied	82:23 83:7	134:4
stamped 76:9	83:25 88:23	31:22 32:6	84:12, 21	talking 32:25
stand 78:11	107:15	supplier 67:8	85:25 86:7	38:7, 13
standard	structure	67:14	86:18 87:23	47:23 56:21
40:14	10:9	117:24	88:11	72:10 83:2
standards	studies 48:13	suppliers	sydors 72:7	84:1 114:24
40:14	stuff 117:20	31:7	system 39:19	128:23
stanley 25:18	style 19:14	supply 55:19	40:1 59:4	tape 44:10, 11
start 9:25	19:14 61:7	99:22		44:17 78:5
16:16 28:18	61:7 108:22	115:23	T	78:8, 13
102:3	108:23	supplying	tabs 87:15	111:1, 6
started 16:5	109:8, 23	109:5	tabulation	tapes 110:25
16:17 17:19	116:12	supposed 51:9	26:1	target 125:12
18:21 26:22	styles 109:11	51:16 79:12	tag 33:17	tedious 135:7
28:2 40:4	subject 66:25	111:20	104:7, 12, 24	telephonic...
104:20, 23	96:20	132:17	take 2:6	6:16, 23
starting	subjected	sure 15:4	24:11 28:17	7:12
45:19 46:1	89:10	31:12 46:19	36:6 40:8	tell 12:25
89:25	subjecting	66:14 89:5	40:23 41:19	20:13 23:14
starts 88:12	95:23	89:14 91:10	44:20 45:13	64:25 82:19
125:16	subjects 12:5	99:9 117:18	47:7, 17	95:3 97:10
state 1:22	submission	119:12	51:18 54:19	105:2, 8, 15
8:17 10:16	122:13	135:7	54:21 55:6	132:9
11:14 126:5	123:1	surface 19:22	64:7 65:6	133:12
136:1, 4, 22	subparagraph	19:25 29:11	71:20 76:4	telling 36:22
statement	56:9, 14	48:9 51:3	76:16 78:3	55:23 101:4
27:5 58:20	69:23	55:8, 12	81:11 87:21	temperature
58:23 60:2	subsequent	74:6 92:1	97:18 103:8	83:14 85:14
69:22 72:22	94:12	surfaces	105:24	89:19 91:4
72:22, 25	substantial	30:11, 25	111:23	91:21, 23

92:1,1,6,19	thanks 38:19	118:13,13	96:5 97:3	136:10
92:24 95:4	thats 14:4,16	118:14	131:19	times 63:1
95:5,8,24	16:9 19:11	128:2 130:6	132:2,25	92:17
96:12,13	20:1,25	theriault 1:5	threatening	timing 76:3
132:6	23:19 26:17	1:8 8:7,9	101:2	title 45:15
temperatures	27:9 28:7	22:5 24:10	three 59:16	93:23 125:7
74:6,11	33:25 37:13	87:3	threepage 3:3	134:9
79:18 81:1	43:23 47:11	theyre 21:17	till 104:9	titled 58:12
81:4 83:4	51:9,15,16	47:23 55:23	118:1	111:11
91:15 95:2	56:7 58:4,8	92:5 94:20	time 8:16	tivin 6:22,23
95:15 96:14	67:3,5	104:2,7	9:16 13:25	today 10:17
134:19	68:23 70:21	105:24	15:9,11	11:23,25
tension 29:4	73:7 74:18	108:5	16:3,8,22	12:8,23
terms 31:21	80:9 81:6	116:20	17:8 18:7	13:14,21
32:4 74:20	81:18,18	117:12,12	18:11,17	15:11 22:11
104:19	82:11,12,16	117:13,15	25:3 26:17	29:5 31:5
109:9	84:11,17	theyve 102:10	28:14,20	35:14 54:18
test 3:10	92:6 94:2	thing 37:24	32:7,16,20	59:16 61:14
90:8 91:19	94:18 95:23	60:15,21	35:3 39:24	64:23
93:16,19	96:16 99:14	61:17 64:5	41:17 44:12	118:10
94:2 96:23	108:18	66:5 117:21	44:17 47:14	121:18
tested 95:5	110:10	things 13:5	48:6 53:18	131:15
tester 134:25	111:14,20	37:5 43:5	54:2 59:6	133:25
testified	113:13	51:17	60:12,15	today's 8:15
9:21 100:6	114:11	think 17:19	61:16 65:11	61:11
131:16	115:9	20:24 22:3	65:15,24	told 84:20
testify 12:5	120:24	32:11,19	66:7,8	86:23
12:19 136:5	121:8,15	33:21 43:11	67:10 68:20	tomorrow
testifying	122:16	50:12 51:9	69:23 71:15	118:10
11:19,22,25	123:14	67:18 71:25	73:16 75:25	top 36:24
15:11	124:10	74:23 80:3	76:13 78:8	41:9,22
testimony	125:3,6	85:10 90:24	78:14 92:4	55:7 58:19
14:15 31:15	126:9	93:23 119:8	93:22 94:17	76:17
37:20 96:2	127:14	119:11	96:17 97:25	122:20
136:6,8	130:5	121:8 131:3	99:4 102:13	126:16
testing 30:24	131:20	132:13	104:14,16	topic 11:1
31:2,4 40:7	132:7,20	134:3,9,11	104:22	133:14
40:10 41:20	theres 26:9	134:13,18	106:18	134:19
42:21 43:7	36:18 51:4	thinking	108:15,23	topics 12:20
43:8 75:3,7	53:12 56:3	66:25 85:8	109:6 111:1	torque 19:20
88:20 89:4	57:7,10	127:6	111:6,8	total 32:4
89:17 90:10	58:20 60:1	thinks 66:17	115:20	135:17
92:9,22	60:14 66:9	third 1:2	116:22,23	toxicity 37:4
94:20 96:14	66:14 75:15	8:12,13	117:19	trade 34:14
110:10	79:13 81:14	64:7 73:1	118:1 120:7	34:16,19
133:9,10	83:21 91:25	81:19 95:10	127:22	119:16
134:5	96:11	thought 80:7	128:18	122:21
tests 90:25	105:23	85:18	129:11,16	123:12,16
94:15 95:21	109:21,22	thousand	131:8,12	trademark
thank 110:17	110:4,6	30:19 74:15	133:19,20	18:13
135:10	116:3,19,20	81:4 88:14	135:6,10,15	transcribed

136:7	34:4,5	55:12 58:23	verify 133:4	117:1,16
transcript	51:23 53:25	59:7,22	version	127:25
24:12	54:1 57:24	60:1 64:11	108:21,22	waived 135:19
124:24	58:5 66:5	79:2 90:13	109:13,13	walking 39:12
125:11	94:25 95:18	91:6,16	109:25	39:14
126:16	95:20	94:6,21	114:22	want 9:25
136:8	112:14,16	104:9	115:3,4	38:1 40:23
transcript...	121:19	109:19	117:15	44:2,5 46:5
25:13	133:5,8	113:17	version 25:24	46:18 47:22
transforma...	types 19:8	114:5	26:5,10	54:19 65:6
88:6	20:9 25:10	user 56:4	versus 8:10	71:10 91:1
transition	63:24	58:15	vessel 50:7	91:14
54:2 118:11	118:15	users 55:23	vi 36:22,24	115:21
transmitting	123:17	usually 118:2	videographer	120:9
19:20	typically	utilize 17:1	7:18 8:2	123:25
true 107:21	21:23	utilized	9:15 15:5,8	124:5
107:25		18:14 29:12	23:24 24:6	130:10
118:18	U	utilizing	24:24 25:2	131:14
136:8	uhhuh 50:4	101:11	44:8,15	wanted 89:13
trukalo 41:14	59:19 82:15		48:2,5	91:9 115:20
trukalos	110:14	V	62:22,25	132:7
41:16	unable 16:1	vacuumed	65:10,14	wants 83:14
truth 136:5,6	131:25	58:16	71:11,14	warm 30:16
136:6	underneath	vacuuming	78:4,7,11	83:24
try 14:5,5	48:12 64:8	112:5	82:1 97:24	warning 32:16
92:18,24	undersigned	vandalia 6:17	99:3 110:24	33:9 48:9
130:25	1:20	varied 30:3	111:4 120:3	53:12 56:3
trying 30:6	understand	varies 79:25	120:6 131:7	59:7 61:5,8
85:10 89:13	10:6 11:19	variety	131:11	61:18 64:11
tube 20:4,6	11:22,25	116:20	135:14	72:16
56:23	12:3,18	various 16:19	videotape 8:3	warnings 33:5
turn 41:3	16:19 60:17	20:9 23:15	11:20	61:14
45:1 47:15	96:11	26:2,2	videotaped	wasnt 17:3
47:16 53:15	understanding	59:17 63:25	1:18 2:6	64:6 89:14
58:9 68:7	131:16	93:16	videotapes	120:25
76:8 79:16	unfortunately	125:13	135:17	121:16
120:16	41:2 88:9	vary 109:9	view 86:23	127:14
twice 135:12	unique 19:15	vc 2:16 20:22	virtually	132:16,17
two 10:5,13	unit 19:15,17	23:17,18	26:8,12	133:10
15:21,22	92:18	29:12 52:18	visual 132:23	watercooled
45:18,25	108:12,13	53:19 94:21	voelker 6:17	29:3,8
115:23	112:7	95:18 107:3	volcano 30:23	way 38:18
116:1 126:8	units 19:16	107:8,25	volume 109:3	71:25 72:1
twopage 2:10	109:3	114:4 116:4	109:3	86:9 87:3
3:7 69:1	university	vendor 67:23	volunteer	128:2 130:6
106:6 122:3	15:20 16:11	vented 42:13	123:21	wear 48:14
type 20:16,16	updated 33:5	42:18	vs 1:11	57:3 75:17
20:17,20	use 18:9 26:2	ventilated		80:15 84:9
23:17,17,18	29:6 30:12	43:1	W	92:20
24:15,17	38:22 46:10	ventilation	wacker 7:13	wearing 39:14
25:12 34:2	50:7 54:1	39:19 43:2	wait 82:6	wears 59:2

100:1
weeks 13:10
 22:10
weight 74:3
 80:1
went 15:23
 82:13,18
 86:1,5,11
 97:9
west 6:10,17
 121:2
weve 22:22
 59:16 95:16
 127:19
 128:4 135:5
whats 40:24
 50:2 63:3
 65:7 66:22
 77:21 78:16
 80:19 87:21
 93:2,14
 95:3,7 99:8
 102:25
 103:8 106:4
 111:9
 118:17
 120:10
whereof
 136:16
white 118:10
whos 13:17
 133:15
withinnamed
 136:5
witness 9:16
 9:18 12:4
 24:16 30:21
 45:24 48:4
 60:22,25
 61:2 62:9
 62:19 68:14
 69:10 81:8
 81:20,22
 87:20 90:5
 111:7 113:7
 122:8
 124:22
 128:8 136:7
 136:16
witnessed
 85:14 132:4

witnesss
 66:23
wont 38:18
wood 21:18
wooden 21:18
word 125:16
 125:25
words 20:5
work 16:1,11
 39:12
worked 16:17
 117:19
worker 104:25
 105:6,16
workers 35:10
working 13:25
 15:21,23
 39:7,15
 72:11,17
 101:25
 105:19
 108:5
workload 16:1
 16:2
works 19:7
worn 48:24
wouldnt 92:21
 105:2,14,14
 105:22
writing 67:2
written 39:6
 65:24 75:25
 76:14 82:5
 85:25
 101:12
 128:13
wrote 102:5
 102:16

X

Y

yeah 18:21
 33:8 41:12
 41:13 51:16
 76:5 79:7
 80:7 84:7
 85:21 93:18
 104:16
 105:22
 109:18

110:4,19
 121:10
 134:17
year 75:25
 76:13 118:5
 118:6,8
 128:13
years 15:21
 15:23,23
 100:14
 101:12
 104:19
 126:21
yep 74:16
yesterday
 40:9
youd 9:4
youll 45:10
 47:7 103:8
 106:22
youre 11:19
 11:22,25
 23:10 31:25
 32:25 38:2
 38:4,13
 60:18 63:3
 72:13 96:21
 127:8 129:1
 131:5,25
 132:8
youve 12:3,18
 24:9 47:4
 48:7 50:2
 57:22 65:17
 71:17 78:16
 97:1 111:8
 113:8
 130:14
 132:9

Z

zurn 7:9 9:12

O

O 94:1
00 99:2
000 30:15,20
 30:22
02 44:12
03 131:9
03053 68:1

03188 69:2
03236 69:8
05 71:12 98:1
06 1:23 8:16
06916 57:17
08 131:12
09783 89:25

1

1 2:6 12:13
 30:22 36:16
 44:11 58:11
 58:11 69:15
 94:1 99:2
 111:2,6
 120:4,7
10 2:19 3:18
 30:3 44:12
 44:17 48:3
 48:6 52:7
 57:19 60:18
 62:23 63:1
 65:12,15
 80:5,6
 136:23,23
100 4:19 6:17
 7:5 92:17
 121:5
101 4:19
102 4:20,20
10285 93:6
103 3:15
105 4:21,21
 4:22 6:17
106 3:16 4:22
107 4:23 5:2
108 4:23 5:2
 5:3
101436 1:5
 8:10
101754 1:4
 8:6
10th 111:14
 112:13
 113:20
 114:1,20
11 2:20 54:7
 62:14 63:4
 71:12,15
 78:8,14
110 3:18

113 3:20
115 5:3,4
118 5:4
11855 71:3
119 3:22
12 2:6,21
 44:17 57:16
 65:3,7,7,18
 70:16 73:21
 98:1 99:4
121 5:5
122 3:24
123 5:5,6
124 3:25 5:6
 5:7
125 5:7
126 5:8,8
127 5:9,9,10
128 5:10
129 5:11
13 2:23 3:21
 62:7 68:3,6
 135:16,20
130 5:11,12
13178 54:8
134 5:12
135 6:24
13678 62:18
14 2:24 15:9
 64:18 69:4
 69:11,22
15 3:3,10
 64:24 71:5
 71:18 74:24
 136:23
15th 11:18
 136:17
16 3:4 71:2
 71:15 73:12
 73:15 76:17
 78:23 82:13
 85:20,22
1660 6:10
17 3:6 73:9
 77:25 78:17
 79:16
17068 87:13
17098 65:1
17108 80:20
 81:20,22
17109 81:21

81:23
17152 73:10
17182 64:19
17188 113:2
17190 110:19
183 5, 7 48:3
77:20 80:22
81:9, 11
82:21 85:25
18330 77:23
184 64:19
18565 52:9
18th 85:21
193 9 4:2, 2
40:25 48:6
57:24 80:19
87:15, 17, 22
88:3 111:2
1911 17:19
1940 11:18
1947 26:10
1952 44:24
46:11, 19
1960 16:17
1963 16:5
40:4
1964 2:23
68:9, 17
1968 18:5
51:24 59:20
69:15
1970s 110:2
1973 53:16
59:20 125:5
127:17
1975 2:13
40:25 47:10
47:14, 21
49:9 75:17
76:6, 10
80:14
1976 2:22 3:3
3:5, 6, 7, 9
65:19 66:25
71:22 78:18
81:13 82:10
88:3 101:14
122:2, 17
123:1
1978 120:14
121:12

127:20
1979 90:8
1980s 93:17
1982 54:1
59:20
1983 2:20
3:11, 12, 14
3:15 99:13
100:8, 21
102:16
103:11
104:13, 14
1985 36:11
37:9, 16
1986 3:17, 21
106:16
107:13, 17
108:15
110:13
114:20
115:25
116:3, 10
123:7
1987 3:19
111:14
112:9, 13
113:20
114:1, 4, 20
115:18
116:11
1990 57:25
58:5 59:25
60:5 61:8
1990s 110:3
1993 63:15, 19
64:14
1998 13:25
1st 53:16
114:4, 8
115:17
116:11
118:18

2

22 2:7, 13 24:3
41:22 44:17
47:9 67:25
76:6 78:8
91:20 131:9
131:12
135:16, 20

203 10 87:13
87:15 90:2
90:6 111:6
2000 126:11
128:13
2008 13:2
14:17
2009 14:24
2011 1:16
8:16 136:17
20th 17:20
213 12 93:9
93:15
216646900
6:12
222 20 3:7
3:13 4:3
81:13 82:10
89:23 97:17
97:21 99:9
225 91:21, 24
92:6
22671 93:7
22672 93:6
22673 93:6
227 24:11, 14
22nd 63:15
233 15, 15
93:2 103:3
103:6, 9
2300 6:24
231 25:6
233 7:13
23rd 103:11
242 7 3:16
3:17 97:16
106:8, 13
115:24
24173 99:10
24219 103:7
24333 106:6
24th 78:18
104:23
106:15
107:13, 17
114:20
115:25
116:3, 10
253 18 15:23
80:1 102:25
110:19, 21

111:9
113:13
114:1
25th 11:11
116:16
263 12, 14, 20
106:4 113:4
113:9
26th 76:10
99:13
273 9, 22 4:3
23:25 78:8
113:1
119:23, 25
120:10
27th 88:3
283 24 4:4, 4
24:7 110:18
122:5, 9
136:15
293 25 4:5, 5
45:11
124:17, 23
2nd 6:10

3

32 9 36:1, 3
36:7 58:11
68:25 78:13
91:19, 23
111:1
304 6 24:25
35:23 78:14
30s 17:13
314 6 25:3
119:22
3122568800
6:25
3126457829
7:14
3144215545
7:6
32 121:25
32vc1000 2:14
33 124:14
344 7, 7
40:18
362 9
374 8, 8
39 120:4

4

42 10 3:6
40:20, 24
58:11 64:7
111:6
135:17
402 10
4007 5 95:9
95:13
4000 61:1, 2
432 11 62:23
70:1
441131411
6:11
464 9, 9, 10
63:1
472 12 120:7
492 14 4:10
4:11
4900 1:22

5

51 16 2:11
3:3 8:15
43:15 44:21
54:20 56:13
5030 4 74:2
80:6
5165 12
522 16 4:11
534 12 65:15
542 17
550 95:6
5500 7:13
572 19
5899 4
594 12
5th 71:22
117:24
118:1

6

62 12 42:5, 6
42:6 47:1, 5
76:5, 6
120:17
6080 1
60603 6:24
60606 7:14
60s 18:20

61 16:17
6182592222
 6:6
62 2:20
62002 6:5
62025 6:18
63 4:13 16:18
63102 7:5
64 4:13
65 2:21
66 4:14
67 4:14
68 2:23
69 2:24

7

7 2:14, 22
 42:9 43:13
 49:24 50:3
 50:15 52:25
 91:20, 23
700 88:13
 95:11, 24
 96:15, 17
70s 18:20
 28:16, 22
 32:2 33:23
 39:24 40:2
 88:17 100:5
71 3:3
73 3:4 128:25
 129:2
75 15:17
76 4:15
7646 78:19
77 3:6 4:15
78 129:3
7th 65:19
 73:19 125:5

8

8 2:16 46:24
 52:8, 11, 15
 126:16
80 3:7
8006104646
 6:18
80s 26:22
 27:2, 8
 28:14 33:4
 33:7, 8, 14

35:21 88:17
83 93:18
84 93:18
85 4:16
86 4:16 118:7
8604 112:22
 113:10, 16
87 3:9 4:17
 4:17 114:8
877 111:12
 117:4
8th 122:17, 18
 122:19

9

9 1:23 2:3, 17
 8:16 15:9
 23:25 24:7
 24:25 25:3
 49:22 54:10
 54:13 58:9
90 3:10
900 6:11
 30:15, 18, 20
 30:21 74:15
 81:4 83:9
 83:19, 23
 96:4, 8 97:3
 131:18
 132:2, 25
90s 28:14
 32:8, 9, 10
 88:18
92 4:18
93 3:12
96 4:18
97 3:13
9th 90:8