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A I have it.
Q Can you please identify that document for me?
A The subject is brake lining availability dated May 1, 1985. It is an internal Eaton correspondence. Do you want me to read it to you?
Q Not the whole thing. In summary fashion, if you can, describe the document to me.
A It was a communication from L.J. Valentine who was a sales coordinator to our field organization relating to lining availability at various OEMs.
Q My recollection is, and if I am wrong or your recollection is different, please tell me, when Mr. Bartels was asking you questions about this document, there was some discussion as to whether International was specifying that it be supplied with brakes that contained asbestos?
A Yes.
Q Do you recall that testimony?
A Yes.
Q And did International, to your knowledge, ever actually specify that it wanted to be supplied with brakes that contained asbestos?
A I don't know the answer to that. But according to the matrix that was attached to this memo, it indicates that International only was offering an asbestos material at this time.

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Q By offering, do you mean to its customers it was offering an asbestos-containing brake material at that time?
A Yes.
Q And do you know what types of trucks those brakes referred to in that document were going on?
A Primarily class eight.
Q Class eight being the heaviest?
A Yes.
Q Trucks that weighed the most?
A Yes.
Q Do you have any knowledge or information that International ever indicated in any way that if it was possible to provide it with nonasbestos-containing brake material that would still meet performance specifications that it did not want that type of brake material? If you don't understand that question, let me know.
A I think I know what you are saying. And no, I don't have – I don't have any recollection of that.
Q Am I correct that in the time frame we are talking about here that as far as heavy trucks were concerned, class eight trucks were concerned, there was not a nonasbestos-containing brake material available that would meet the Federal Motor Vehicle Safety standard performance specifications?
A I don't know that to be a fact. I think it didn't

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cover everything. But like we talked about before, the high friction applications which were more for the on-off road type real heavy applications, that may have been the case at this time. But for over-the-road highway type applications, there were nonasbestos that did meet the Federal Motor Vehicle safety specifications, I believe.
Q For a class eight, for instance?
A Yes.
Q When did that material first become available?
A Oh, boy, I know they were working on it in the early '80s.
Q I understand they were working on it in the early '80s. Do you know when it first went into production such that you were able to supply it to one of your customers?
A I think we sold brakes with nonasbestos lining approved to Mack Truck as early as '80 or '81.
Q What type of vehicles were those linings going into to your knowledge?
A I guess they were –
MR. QUICK: Don't guess.
A I can't specify. I don't know for sure.
Q Well, do you have any knowledge or information as to why Mack would be using nonasbestos-containing brakes in certain of its trucks as early as 1980 or 1981 and International would not have been doing the same thing?

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A No. I don't really know. It is probably a marketing decision. I don't know.
Q Is it also possible that it was because of the difference -- is it possible, Mr. Hobbie, that the reason Mack was able to use nonasbestos-containing brake material in certain of its vehicles was because those vehicles differed in design or weight classification or some other performance specification versus International vehicles?
A I would say it's possible. I don't know that for sure, but it is possible.
Q Give me one second. I'm just reviewing my notes. Okay?
A Sure.
Q I'm not going to be able to refer you to the specific exhibit, but I think it was actually more than one that referenced the stockpiling as you were calling it of asbestos-containing brake linings in the '87 time frame?
A Yes.
Q Do you recall being asked questions about that earlier?
A Oh, yes, yes.
Q And one of those documents referenced International making such a request?
A Yes.
Q Asking you to ensure that you were able to continue

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