

1 Q Can you spell that for me?
 2 A C-O-R-A-M-I-C. We began to use engineered facing
 3 materials with different designations that were
 4 similar in appearance and nature to the asbestos
 5 containing facings.
 6 Q I'm sorry, I dropped part of your answer, similar in
 7 what?
 8 A Similar in general appearance to the asbestos
 9 containing gaskets.
 10 Q Let me visit with you-- Any others you can think of
 11 besides those two categories?
 12 A In the 1980s we would have begun to see some graphite
 13 material as well, I believe.
 14 Q Okay. Let's talk about each one of those categories
 15 if we can. First of all, the coramic style material,
 16 if you can explain to me what that is and what it has
 17 to do with gaskets in high heat applications.
 18 MR. CELBA: Object to form.
 19 THE WITNESS: When we discussed composition
 20 style gaskets, those were gasket materials or facing
 21 materials that were mounted to some sort of a steel
 22 core. Could have been a perforated steel core or
 23 what we called an upset steel core with an adhesive
 24 used to bond the facing to the core. The facing
 25 materials, as we moved away from asbestos, the

1 stuck, if there is such a term, to the head and block
 2 surfaces.
 3 BY MR. VALLAS:
 4 Q Do you know when the first year is that Dana Victor
 5 started using anti-stick coating on its high heat
 6 application gaskets?
 7 MR. CELBA: Object to form.
 8 THE WITNESS: We used a number of different
 9 coatings over the years from the time I started with
 10 the company.
 11 BY MR. VALLAS:
 12 Q Okay. Were any of those used in-- Were any of those
 13 used for exhaust manifold head gaskets or intake
 14 gaskets that were-- Strike the question. Were-- I
 15 guess in what application? Were those anti-stick
 16 coatings, were they used on every gasket product you
 17 all put out or during certain years or only some
 18 during certain years, or how did you all--
 19 A They were used on many different applications over
 20 the years.
 21 Q Were there exhaust manifold asbestos containing
 22 gaskets manufactured without the anti-stick coating
 23 between 1977 and 1987?
 24 A Once again, we'd have to look at individual
 25 applications. I can't tell you that every

1 asbestos content was removed and was replaced by
 2 other materials.
 3 BY MR. VALLAS:
 4 Q All right. Would the facing materials for high heat
 5 applications, would they be soft or hard, or what
 6 were the facing materials like?
 7 MR. CELBA: Object to form.
 8 THE WITNESS: They were basically a soft
 9 paper like facing that was combined with a steel
 10 core.
 11 BY MR. VALLAS:
 12 Q Okay. Would that be something that after use in a
 13 high heat application setting might need to be, in
 14 other words, scraped off or wire brushed off? In
 15 other words, when you were to take that gasket off,
 16 might there be some of it sticking to the face or
 17 whatever it had been applied to, and you'd have to
 18 kind of take it and clean it off, or would those come
 19 off intact?
 20 MR. CELBA: Object to form. Go ahead.
 21 THE WITNESS: Most gaskets have an
 22 anti-stick coating of one sort or another that's
 23 placed on them. Here again, we get back to the
 24 individual application as to whether it might be
 25 removed fairly easily or whether it would be more

1 application and every part number would have used a
 2 coating.
 3 Q So there were some without it, you just wouldn't be
 4 able to say yes or no without particular part
 5 numbers; is that right?
 6 MR. CELBA: I'm going to object to the
 7 form. Go ahead.
 8 BY MR. VALLAS:
 9 Q Or if you can tell me.
 10 A Without knowing the individual part numbers, I cannot
 11 be assured that it did or did not have an anti-stick
 12 coating.
 13 Q How was the decision made to put an anti-stick
 14 coating on this gasket over here and not on this
 15 gasket over here?
 16 A That would have been an application engineering
 17 decision.
 18 Q From your years in working with Dana Victor are there
 19 at least general guidelines that you can point me
 20 to? Like could I mention a particular application
 21 for any type of gasket in a high heat setting, and
 22 you can tell me, yes, it would have or no, it
 23 wouldn't have had some type of anti-stick coating on
 24 it, or it would have this year or wouldn't have this
 25 year, or are we absolutely at a place where we would