

Page 62 1 assemblies using asbestos linings by Navistar? 2 A Yes. 3 Q It looks like on the far left is the Eaton part 4 number used by International, correct? 5 A Yes. 6 Q Right next to it is the lining material column? 7 A Yes. 8 Q That tells you what lining is being used with that 9 particular part number? 10 A Yes. 11 Q Or that may be the part number. Then the brake size 12 is obviously the size of the brake? 13 A Yes. 14 Q Apparently, these are all of the asbestos brakes 15 used by Harvester in the relevant brake sizes listed? 16 ALL COUNSEL: Objection to the form. 17 A It looks like it. I don't know if that is actual 18 usage or if it's a forecast. It could be either one, I guess. 19 Q If you go back to the memo, it says, again I will 20 read it to make sure I'm not trying to put words in anyone's 21 mouth, based on the attached list, Navistar has requested all 22 current brake assemblies using asbestos linings to be provided 23 (via stockpiling, if necessary through 1987. Did I read that 24 correctly? 25 A Yes.	Page 64 1 distributed it to their dealers. 2 Q It says Eaton Axles and Brakes? 3 A Yes. 4 Q In the top right hand, it seems to be referring 5 specifically to single anchor pin brakes, 15-inch series, 6 16-and-a-half-inch series, correct? 7 A Yes, correct. 8 Q On the second page, there seems to be a chart? 9 A Yes. 10 Q Can you describe what that chart is? 11 A For the two different size brakes, it lists the 12 various lining materials that are available, the friction 13 codes, the ratings, medium, high friction. I think that is 14 the Eaton part number, kit. It shows a shoe only and then 15 shoe and lining assembly, return springs, spring kit. They 16 are calling it a minor kit and major kit which would include 17 other things like bushings and rollers, that type of stuff. 18 Q As I understand it then, someone could go to this 19 chart, an OEM, and find the lining mix industry number they 20 would need for their product and obtain it from Eaton? 21 A Yes. 22 Q This is what is being offered by Eaton, what is 23 displayed on this chart? 24 A I would say so. 25 (Exhibit 12, letter-7/31/87, was marked for
Page 63 1 Q You would agree it sounds like these are the current 2 brake assemblies using asbestos linings that they want 3 stockpiled through 1987? 4 A Yes. 5 (Exhibit 11, flyer, was marked for 6 identification.) 7 Q Let me show you what's been marked as Hobbie 11. 8 A Okay. 9 Q Do you recognize that exhibit, sir? 10 A Yes. 11 Q Describe what it is. 12 A I would say it's a quick reference sales flyer to be 13 used by OEMs and their dealers to -- as a quick reference of 14 different parts that were available for servicing the brakes. 15 Q Is there a date? 16 A I can't see one on here. 17 Q Pointing to the lower right-hand corner, does that 18 help? 19 A Oh, 1984, no month though. 20 Q You would categorize that as an advertising flyer or 21 something more than that? 22 A Partially advertising. It is an awareness flyer or 23 quick reference flyer. 24 Q Who would that go to? 25 A Probably go to the OEMs and they would have	Page 65 1 identification.) 2 A Okay. 3 Q Have you had a chance to look at that document? 4 A Yes. 5 Q Describe what that document is, please. 6 A It is a communication from division purchasing 7 manager to Mr. Robert VanWarmer who was -- I think he was 8 titled as, like, a brake sales manager at that time. And he's 9 asking that all of these OEMs listed on the attachment using 10 the current asbestos specifications and the size brakes and 11 part numbers, basically he is requesting a status update as to 12 how these could be converted over to nonasbestos. 13 Q The date of that letter is dated July 31, 1987, 14 correct? 15 A That is correct. 16 Q Reading the second paragraph, from the list of brake 17 assembly part numbers provided to me by John Lilly, I have 18 compiled a list by customer which shows asbestos applications, 19 correct? 20 A Correct. 21 Q The list that he is referring to is the list 22 attached to this piece of correspondence, correct? 23 A Yes. 24 Q If you would go to the list that is attached, it 25 appears that it is listed as appendix A, correct?

17 (Pages 62 to 65)