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1 of course, you've had your deposition taken before.
 2 If you don't understand any of my questions or you
 3 can't hear me for any reason today, just let me know.
 4 I'll try to fix the problem, okay?
 5 A Yes, sir.
 6 Q If you do answer my question, I'm going to assume
 7 that you heard the entire thing and that you
 8 understood it, okay?
 9 A I understand.
 10 Q Can you tell me, Mr. Austin, if you have reviewed any
 11 materials today in preparation for this deposition or
 12 if you have brought with you to the deposition today
 13 any materials?
 14 A I have brought with me some materials today.
 15 Q Okay. Have you had an opportunity to review those
 16 materials-- Did you have an opportunity to review
 17 those materials prior to the deposition today?
 18 A Yes, I did.
 19 Q Okay. I don't want to know what you all talked
 20 about, but did you also have the opportunity to visit
 21 with your lawyers prior to your deposition today?
 22 A Yes, I did.
 23 Q Okay. Let's talk a little bit about the materials
 24 that you had the opportunity to review that you have
 25 brought with you to the deposition today; and if you

1 information I present.
 2 Q And in your, I guess, opinion, how do you-- How does
 3 that letter-- What does that letter tell you about
 4 asbestos labeling? I guess why is it significant as
 5 far as you understand it?
 6 A This was the initial labeling, request for labeling
 7 from our customers, and it demonstrates a label that
 8 was used to-- on products that was produced for
 9 Caterpillar in the Detroit Allison division and the
 10 label that was used on materials by Roger Moss.
 11 Q Okay. I think you said this was the initial request
 12 for labeling from your customers; and if you can,
 13 just kind of explain exactly what that means. I
 14 guess what kind of label, what are your customers
 15 asking you, what kind of label are they asking for,
 16 etc., as far as you can tell from the letter?
 17 A Detroit Diesel and Caterpillar had requested that we
 18 identify product that might contain asbestos with a
 19 label on the outside of the package, and that is--
 20 That label is shown here in a reduced format.
 21 Q Okay. Is this letter of January 8, 1985 that you are
 22 looking at, is that the-- Prior to that date, did
 23 Dana label any of its asbestos containing products
 24 with some type of label or some type of other
 25 designation informing the customer or the user that

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1 can, just kind of start I guess at the top of your
 2 stack or however they're organized there in front of
 3 you. Start at the top and tell me what you have.
 4 A I have a letter regarding asbestos labeling for
 5 Caterpillar DDAD and Roger Moss dated January 8,
 6 1985.
 7 Q I'm sorry, a letter regarding Caterpillar, could you
 8 run that by me again?
 9 A The title is Asbestos Labels For Caterpillar, DDAD,
 10 and Roger Moss, dated January 8, 1985.
 11 MR. CELBA: Charles, if we can shortcut
 12 this, these are essentially the same documents that
 13 were presented and filed.
 14 BY MR. VALLAS:
 15 Q Okay. Roger Moss is the author of the letter or the
 16 recipient?
 17 A No. Roger Moss is part of the subject.
 18 Q Okay. What was the purpose of you reviewing that
 19 letter this morning or in preparation for this
 20 deposition, whether it was this morning?
 21 A The asbestos labeling seems to be a matter that is
 22 brought up in most of the depositions that I have
 23 given.
 24 Q Okay.
 25 A The documents are here to accurately depict the

1 the product contained in the package or however it
 2 was contained, might have asbestos in it?
 3 MR. CELBA: I'm going to object to the
 4 form.
 5 BY MR. VALLAS:
 6 Q Let me strike the question, it was probably-- It's a
 7 bad question. Prior to January 8, 1985 did Dana
 8 label any of its products with some indication, to
 9 give some indication that the product may contain
 10 asbestos?
 11 A To the best of my knowledge, in approximately January
 12 of 1985 was the first labeling that was done.
 13 Q Okay.
 14 MR. VALLAS: Let's go ahead if we can,
 15 Ms. Court Reporter, and mark the deposition notice or
 16 notices, I don't remember if it was one or two, for
 17 the cases. But even if it was two deposition
 18 notices, we can just mark them collectively as
 19 Exhibit No. 1. Let's go ahead and mark this letter
 20 as Deposition Exhibit No. 2.
 21 (Discussion off the record.)
 22 (Exhibit Nos. 1 and 2 were marked.)
 23 BY MR. VALLAS:
 24 Q Mr. Austin, what's the next item you have with you at
 25 your deposition?