FILE NAME: !ăōŜăűƨă /ŜϒŜyű tƛLJŜ l·yŘ {ĶŜŜű ó! / t{ú

DATE: нлмп hŎű y

DOC#: ! / t{мон

5OCUMENT DESCRIPTION: [ŜƎl·f π 5ŜLJƨăƛűƛƨy{ʣϒϒl·ℕὲ ƨŦ [Ŝøƛă !ℕϒăűℕƨyƎ

Summary of Lewis Armstrong Deposition of October 8, 2014

| | PAGE |
|---|---|
| 76 years old good health | 11 |
| Worked for JM Manufacturing from 1983 to 1987 | 13 |
| Worked in the shipping department | 13 |
| AC pipe is light grey in color | 14 |
| Worked from Johns Manville in the same plant before 1983 | 14 |
| May 1960 is when Armstrong started with JM and worked continuously for JM at the Denison plant until JMM took over in 1983 | 14-15 |
| Composition of water and sewer pipe is identical except that the sewer pipe is not pressure tested | 16 |
| Armstrong saw both Canadian fiber and Calavaras fiber and blue African fiber | 18 |
| Same asbestos fiber was used by JM and by JMM | 19 |
| Armstrong began in the shipping department at Denison in about 1980 and continued in the shipping department until he left in 1987 | 22-23 |
| Remembers change of management in 1983. But for the work he did, nothing changed after 1983. "Everything remained the same." | 23 |
| There was no labeling on a new piece of pipe that was made and was ready to ship | 24 |
| Never saw any kind of stencil or writing on the pipe re: asbestos cautions | 25 |
| Armstrong is shown what purports to be a Johns Manville caution label. Armstrong says he never saw any such label on Johns Manville pipe or on JMM pipe. Never saw the caution label until shown in the deposition. | 25-26 |
| Armstrong saw hundreds of 1000s of pieces of pipe at JM Manufacturing | 26 |
| When JM Manufacturing took over management of the Denison plant there was no change in the way the asbestos cement was manufactured. | 27 |
| There was pipe made by Johns Manville that was in inventory when JMM took over on Jan 1, 1983; Armstrong can't say that the inventory was ever all depleted. | |

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
COURT OF UNLIMITED JURISDICTION

ROBERT W. JONES, SR., and SHARON E. JONES,
Plaintiffs,
vs. ) Case No. BC541164
BORGWARNER MORSE TEC, INC., et al.,
Defendants.

VOLUME I
DEPOSITION OF LEWIS ARMSTRONG
Wednesday, October 8, 2014
Denison, Texas

REPORTED BY:
KEATON HOUGEN
CSR NO. 8754

JOB NO.
77876MAU



SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
COURT OF UNLIMITED JURISDICTION

ROBERT W. JONES, SR., and SHARON E. JONES,
Plaintiffs,
VS. NO. BC541164
BORGWARNER MORSE TEC, INC., et al.,
Defendants.

**********

ORAL AND VIDEOTAPED DEPOSITION OF
LEWIS ARMSTRONG
October 8, 2014

**********

ORAL AND VIDEOTAPED DEPOSITION OF LEWIS ARMSTRONG, produced as a witness at the instance of the Plaintiffs, and duly sworn, was taken in the above-styled and -numbered cause on the 8th day of October, 2014, from 9:05 a.m. to 2:55 p.m., live and via telephone, before Keaton Hougen, CSR in and for the State of Texas, reported by machine shorthand, at the Hampton Inn & Suites, 3415 Ansley Boulevard, Denison, Texas 75020.



A P P E A R A N C E S

FOR THE PLAINTIFFS:
Mr. Christian H. Hartley
MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC
300 West Coleman Boulevard, Suite 200
Mount Pleasant, South Carolina 29464
Phone: 843-388-1330
Fax: 803-753-9931
E-mail: chartley@mrhfmlaw.com

FOR THE DEFENDANT, J-M MANUFACTURING:
Mr. Anthony S. Miller
MANION GAYNOR & MANNING
201 Spear Street, 18th Floor
San Francisco, California 94105
Phone: 415-512-4381
Fax: 415-512-6791
E-mail: Amiller@mgmlaw.com

FOR THE DEFENDANT, CALAVERAS ASBESTOS LIMITED and MUELLER COMPANY:
Mr. John Loomis (Via Telephone)
FOLEY & MANSFIELD
300 South Grand Avenue, Suite 2800
Los Angeles, California 90071
Phone: 213-283-2100
E-mail: jloomis@foleymansfield.com

FOR THE DEFENDANT, CERTAINTEED CORPORATION:
Mr. Joe Greenslade (Via Telephone)
POLSINELLI LLP
2049 Century Park East, Suite 2300
Los Angeles, California 90067
Phone: 310-556-1801

FOR THE DEFENDANT, WESTERN AUTO SUPPLY CO.:
Mr. Howard Ruddell (Via Telephone)
POND NORTH, LLP
350 South Grand Avenue, Suite 3300
Los Angeles, California 90071
Phone: 213-617-6170

ALSO PRESENT:
Mr. Chase Huddleston, Videographer



INDEX

Appearances . . . . . 2
LEWIS ARMSTRONG
Examination by Mr. Hartley . . . . . 7
Examination by Mr. Miller. . . . . 40
Examination by Mr. Loomis. . . . . 135
Examination by Mr. Miller. . . . . 158
Examination by Mr. Hartley . . . . . 162
Examination by Mr. Miller. . . . . 167
Reporter's Certificate . . . . . 171

EXHIBITS

NO. DESCRIPTION PAGE
1 Notice of Deposition . . . . . 25
2 Caution Statement. . . . . 25
3 Photos of Pipe . . . . . 36
4 Declaration. . . . . 120