

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

JANE GUDMUNDSON, Individually)
and as Special Administrator of)
the Estate of HARVEY G.)
GUDMUNDSON, Deceased,)
) No. 03-L-538
Plaintiff,)
)
vs.)
)
JOHN CRANE, INC., et al.,)
)
Defendants.)

VIDEOTAPED EVIDENCE DEPOSITION OF
ROLAND DOKTOR

Taken on behalf of Plaintiff
January 18, 2005

Certify Question:
Page 114, Line 13

Sarah L. Paszkiewicz, CSR/RMR/CCR
Certified Shorthand Reporter
License No. 084-004225
C.C.R. No. 801

INDEX OF EXHIBITS

	Page
Exhibit 15 -- Drawing	147
Exhibit 16 -- Order	152
Exhibit 17 -- Drawing	155
Exhibit 18 -- Naval Auxiliary Machinery	163

(The original exhibits were attached to the transcript that was sent to the Wise & Julian Law Firm.)

INDEX OF EXAMINATION

	Page
Examination by Mr. Iola	10

INDEX OF EXHIBITS

	Page
Exhibit 1 -- Notice of Deposition	8
Exhibit 2 -- Notice of Deposition	8
Exhibit 3 -- Letter	21
Exhibit 4 -- Military Specification	58
Exhibit 5 -- Order	69
Exhibit 6 -- Drawing	79
Exhibit 7 -- Order	80
Exhibit 8 -- Drawing	87
Exhibit 9 -- Drawing	96
Exhibit 10 -- Instructions for Operation and Maintenance	119
Exhibit 11 -- Order	125
Exhibit 12 -- Drawing	133
Exhibit 13 -- Drawing	136
Exhibit 14 -- Order	144

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vs.)
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JOHN CRANE, INC., et al.,)
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Defendants.)

VIDEOTAPED EVIDENCE DEPOSITION OF
ROLAND DOKTOR, produced, sworn, and examined on
behalf of Plaintiff, January 18, 2005, between
the hours of eight in the forenoon and five in
the afternoon of that day, at the Boston Logan
Airport Hilton, 85 Terminal Road, Boston,
Massachusetts, before Sarah L. Paszkiewicz,
Registered Merit Reporter, Certified Shorthand
Reporter and Notary Public.

A P P E A R A N C E S

The Plaintiff was represented by
Mr. Randall L. Iola, in association with the law
firm of Wise & Julian, P.C., 3555 College Avenue,
Alton, IL 62002.

APPEARING TELEPHONICALLY: The
Defendant, Ingersoll-Rand Company, was
represented by Mr. Carl McNulty, of the law firm
of Burroughs, Hepler, Broom, MacDonald, Hebrank &
True, 103 West Vandalia, Edwardsville, IL 62025.

Page 5 1 APPEARING TELEPHONICALLY: The 2 Defendant, ITT Industries, Inc., was represented 3 by Mr. James Kasper, of the law firm of Gunty & 4 McCarthy, 150 South Wacker, Suite 1025, Chicago, 5 IL 60606. 6 APPEARING TELEPHONICALLY: The 7 Defendant, Viacom, Inc., was represented by 8 Ms. Beth Gori, of the law firm of Herzog Crebs, 9 L.L.P., 515 North 6th Street, City Centre, 24th 10 Floor, St. Louis, MO 63101. 11 APPEARING TELEPHONICALLY: The 12 Defendants, CertainTeed Corporation, and Parker 13 Hannifin Company, were represented by Mr. Jeff 14 Bash, of the law firm of Heyl, Royster, Voelker & 15 Allen, 103 West Vandalia, Suite 100, Mark Twain 16 Plaza II, P.O. Box 467, Edwardsville, IL 62025. 17 The Defendant, Warren Pumps, LLC, was 18 represented by Ms. Lisa A. LaConte, of the law 19 firm of Heyl, Royster, Voelker & Allen, Bank One 20 Building, Suite 600, 124 S.W. Adams Street, 21 Peoria, IL 61602. 22 APPEARING TELEPHONICALLY: The 23 Defendant, IMO Industries, Inc., was represented 24 by Ms. Kristen M. Streepey, of the law firm of 25 Matushek, Nilles & Sinars, L.L.C., One North LaSalle Street, Suite 2100, Chicago, IL 60602. 26 APPEARING TELEPHONICALLY: The 27 Defendant, John Crane, was represented by 28 Mr. Daniel O'Connell, of the law firm of 29 O'Connell & Associates, P.C., 645 Tollgate Road, 30 Suite 220, Elgin, IL 60123.	Page 7 1 IT IS HEREBY STIPULATED AND AGREED by 2 and between Counsel for the Plaintiff and Counsel 3 for the Defendants, that this deposition may be 4 taken in shorthand by SARAH L. PASZKIEWICZ, a 5 Registered Professional Reporter, Certified 6 Shorthand Reporter and Notary Public, and 7 afterwards transcribed into typewriting, and the 8 signature of the witness is not waived by 9 agreement of counsel and the witness. 10 11 12 * * * * * 13 14 15 VIDEOGRAPHER: We're now recording 16 and on the record. My name is George Libbares. 17 I'm a certified legal video specialist. The 18 court reporter is Sarah Paszkiewicz. We are with 19 Pohlman Reporting Company. Our business address 20 is One Metropolitan Square, Suite 2950, 21 St. Louis, Missouri 63102. 22 Today is January 18, 2005 and the 23 time is 9:21 a.m. This is the deposition of 24 Roland R. Doktor, in the matter of Jane 25 Gudmundson, et al., Plaintiffs, versus John
Page 6 1 The Defendant, Warren Pumps, LLC, was 2 represented by Ms. Judith A. Perritano, of the 3 law firm of Pierce, Davis & Perritano, 10 4 Winthrop Square, Boston, MA 02110. 5 APPEARING TELEPHONICALLY: The 6 Defendant, Garlock, was represented by Ms. Alexis 7 Weed, of the law firm of Segal, McCambridge, 8 Singer & Mahoney, Ltd., One IBM Plaza, Suite 200, 9 Chicago, IL 60611. 10 Also Present: The Videographer, 11 Mr. George P. Libbares, in association with 12 Pohlman Reporting Company, One Metropolitan 13 Square, Suite 2040, St. Louis, MO 63102.	Page 8 1 Crane, Inc. et al, Defendants, in the Circuit 2 Court, Third Judicial Circuit, Madison County, 3 Illinois. Civil action 03-L-538. 4 This deposition is being taken at the 5 Airport Hilton in Boston, Massachusetts on behalf 6 of the plaintiffs. The court reporter will now 7 administer the oath. 8 9 * * * * * 10 11 ROLAND DOKTOR, 12 of lawful age, being produced, sworn and examined 13 on the part of the Plaintiff, and after 14 responding "I Do" to the oath administered by the 15 court reporter, deposes and says: 16 17 * * * * * 18 19 (Whereupon, Exhibits 1 and 2 were 20 marked.) 21 VIDEOGRAPHER: Counsel, will now 22 state their appearances. 23 MR. IOLA: Randall Iola on behalf of 24 the plaintiff, Jane Gudmundson. 25 MS. LACONTE: Lisa LaConte on behalf

Page 9 1 of Warren Pumps. 2 MS. PERRITANO: Judy Perritano on 3 behalf of Warren Pumps. 4 MR. IOLA: Folks on the phone. 5 MR. MCNULTY: Carl McNulty on behalf 6 of Ingersoll-Rand. 7 MR. BASH: Jeff Bash on behalf of 8 CertainTeed Corporation and Parker Hannifin. 9 MS. STREEPEY: Kristen Streepey on 10 behalf of IMO Industries, Inc. 11 MR. KASPER: James Kasper on behalf 12 of ITT Industries, Inc. 13 MS. WEED: Alexis Weed on behalf of 14 Garlock. 15 MR. O'CONNELL: Daniel O'Connell on 16 behalf of John Crane. 17 MS. GORI: Beth Gori on behalf of 18 Viacom. 19 MR. IOLA: Before we begin, I'd like 20 to attach as Deposition Exhibit Number 1, 21 Plaintiff's Notice of Videotaped Evidence 22 Deposition of the representative deponent of 23 Warren Pumps, Incorporated. In addition, I'd 24 like to attach as Deposition Exhibit Number 2, 25 the Notice of Videotaped Evidence Deposition of	Page 11 1 A. 82 Bridges Avenue. 2 Q. City? 3 A. Warren, Massachusetts. 4 Q. Zip? 5 A. 01083. 6 Q. What's your date of birth, please? 7 A. 11/16/56. 8 Q. Your residential address, please? 9 A. 141 Rice Corner Road, Brookfield, 10 Massachusetts. 11 Q. Zip? 12 A. 01506. 13 Q. Have you ever been deposed before? 14 A. Yes. 15 Q. On how many occasions? 16 A. Two. 17 Q. Do you recall when that was? 18 A. Not specifically. 19 Q. I know of one deposition you gave on 20 April 24, 2003 in a case in Washington state, 21 where the deposition took place here in Boston, 22 correct? 23 A. Yes. 24 Q. Was there another deposition, an 25 asbestos deposition, as well?
Page 10 1 Roland Doktor for this date and time. 2 MS. LACONTE: We will put on the 3 record, as well that there are currently pending 4 a motion to quash the individual notice of Roland 5 Doktor's deposition; as well as a motion for 6 Protective Order with respect to the corporate 7 representative deposition. Both of those motions 8 are scheduled for hearing today. By agreement of 9 counsel, we're going to proceed with the 10 deposition and go ahead and allow inquiry while 11 the hearing is held. And we'll take up further 12 matters, as we may need to after that hearing. 13 [EXAMINATION] 14 QUESTIONS BY MR. IOLA: 15 Q. Sir, will you please state your full 16 name for the record? 17 A. Roland Doktor. 18 Q. Do you have a middle name, please? 19 A. Rudolph. 20 Q. You are presently employed, correct? 21 A. Yes. 22 Q. Where are you employed? 23 A. Warren Pumps, LLC. 24 Q. What is the street address for Warren 25 Pumps, LLC where you are employed, sir?	Page 12 1 A. There was one in California. 2 Q. Okay. Do you recall if that was 3 before or after April 24, 2003? 4 A. It was after. 5 Q. Do you recall how far after? 6 A. It was -- I believe, it was late 7 summer, early fall of that same year. 8 Q. Do you recall who deposed you? 9 A. No, I do not. I don't remember the 10 gentleman's name. 11 Q. Do you recall the name of the case? 12 A. No, sir. 13 Q. Do you recall Mr. Bergman was the 14 individual that deposed you on April 24, 2003 15 here in Boston? 16 A. Yes, sir. 17 Q. The California case deposition, did 18 that take place here in Boston, as well? 19 A. No, it was in California. 20 Q. Do you know where in California you 21 went for that? 22 A. Let's see. It was San Francisco. It 23 was across the bay in Oakland. 24 Q. Was it with the McClain Law Firm? 25 A. Could be, I just -- I don't remember,

Page 13	Page 15
1 sir. 2 Q. Kazan, McClain ring a bell? 3 A. No, sir. 4 Q. The Hanley, Harley Law Firm ring a 5 bell? 6 A. No, sir. 7 Q. Do you have copies of both of those 8 transcripts in your possession at your office? 9 A. Yes. 10 Q. And have you had an opportunity to 11 read and review those transcripts before you came 12 in here today? 13 A. Yes, I did. 14 Q. In addition to those transcripts, 15 have you had an opportunity to look at any other 16 documents in preparation for your testimony here 17 today? 18 A. Yes. 19 Q. Tell me, please, sir, what documents 20 you've looked at in preparation for your 21 testimony here today? 22 A. I reviewed the documents that were 23 produced at the beginning of this case. I also 24 reviewed the drawings that were in question. I 25 also reviewed Mr. Forest's deposition.	1 night, as well, that was a supplement set to the 2 original set? 3 A. Yes, sir, I did. 4 Q. So the record is correct in 5 reflecting what you reviewed, sir, your testimony 6 is you reviewed the original Bates stamped 7 documents that Warren Pumps produced in the 8 Illinois Warren Pumps litigation, correct? 9 A. Yes. 10 Q. You reviewed the additional 11 supplemental documents that were produced last 12 night that consisted of approximately 56 pages, 13 plus or minus a few pages, correct? 14 A. Yes. 15 Q. And you reviewed the drawings that 16 Warren Pumps previously produced to me that were 17 Bates stamped Warren Pumps Illinois, specific to 18 the Bausell, correct? 19 A. Yes, sir. 20 Q. Are there any other documents that 21 you reviewed in preparation for your testimony 22 here today? 23 A. The interrogatories were also 24 reviewed. 25 Q. And when you say the interrogatories,
Page 14	Page 16
1 Q. And Mr. Forest you understand to be a 2 shipmate of Mr. Gudmundson's; is that correct? 3 A. Yes, sir. 4 Q. On what ship, sir? 5 A. The Bausell. 6 Q. And as you sit here today, you 7 understand that Mr. Gudmundson also served upon 8 the Bausell? 9 A. Yes, sir. 10 Q. When you reviewed those documents 11 that you said were produced earlier in this 12 litigation, were those Bates stamped numbered 13 documents? 14 A. Yes, sir. 15 Q. Do you recall what the Bates stamped 16 numbering was on them? In other words, how many 17 of them there were and what the Bates starting 18 number was and what the Bates concluding number 19 was? 20 A. No, I do not. 21 Q. Do you believe they were Bates 22 stamped WP-IL, meaning Warren Pumps-Illinois? 23 A. I do not recall. 24 Q. Okay. Did you also look at a set of 25 documents that was recently produced to me last	1 what do you mean? 2 A. The original questions that were 3 asked in the Illinois cases. 4 Q. And whose interrogatories did you 5 review? 6 A. I don't understand. 7 Q. Very well. If at any time today you 8 don't understand a question I ask, I would 9 appreciate it if you tell me you don't 10 understand, so that I can restate or rephrase the 11 question. Okay? 12 A. Thank you. 13 Q. If you answer a question that I ask, 14 I'm going to assume that you fully understood the 15 question and you're completely answering to the 16 best of your knowledge and ability; is that fair? 17 A. Yes, sir. 18 Q. Were they the interrogatory answers 19 that Warren Pumps answered? 20 A. Yes, sir. 21 Q. Okay. Did you also review 22 interrogatory answers that Mr. Gudmundson's 23 family answered? 24 A. Not that I'm aware of, sir. 25 Q. Okay. The interrogatory answers that

Warren Pumps answered in this case, you were the individual who verified those answers, correct?

A. Yes, sir.

Q. Okay. And you're aware that there are several sets of interrogatory answers that you have verified with respect to litigation filed by Wise & Julian in Madison County, Illinois, correct?

A. Yes, sir.

Q. You understand there's a master set of Warren Pumps' answers to interrogatories that had to be verified, correct?

A. Yes, sir.

Q. And you understand that there's a supplemental set, as well, correct?

A. Yes.

Q. And we will get into that later on in the deposition. But you reviewed all of that, as well, in preparation for your testimony here today, correct?

A. Yes, sir.

Q. When did you begin reviewing all this data for your deposition today?

A. I would say it was sometime ago. I mean, we had originally scheduled this deposition

produced?

A. Not that I'm aware of.

Q. Okay.

A. Just what we was -- Just what you were given yesterday.

Q. You understand, sir, that one of the notices that was issued for this deposition, was what we call a representative of Warren Pumps notice, correct?

A. Yes, sir.

Q. Have you had an opportunity to review what we've previously identified as Deposition Exhibit Number 1 in preparation for your deposition here today?

A. Yes.

Q. Have you had an opportunity to look through the deposition notice for the 57 matters or areas of inquiry that are listed on this notice?

A. I have gone through, yes.

Q. And have you had an opportunity to read and review each and every one of those areas?

A. I've gone through them, yes.

Q. And are there some of those areas

for, you know, last fall. So we -- I did look at some of it back at that time period and then some review yesterday, as well.

Q. Okay. Prior to yesterday, had you re-reviewed anything from last fall in preparation for your testimony here today?

A. No.

Q. Okay. And yesterday you had an opportunity to meet with your lawyers, correct?

A. Yes, sir.

Q. And yesterday you had an opportunity to review these additional documents again, correct?

A. Yes.

Q. And yesterday you met with the lawyers and reviewed these documents for approximately how long, sir?

A. Oh, six, seven hours.

Q. And upon your review, did you discover any additional documents that were relevant to this case?

MS. PERRITANO: Yesterday?

Q. (By Mr. Iola) Yesterday. That had not previously been produced and have now been produced as a supplement to what was originally

that you feel you are not here to testify as the corporate representative to bind the company, Warren Pumps, Incorporated, with your testimony?

A. I'd have to look through it again, just to be on the --

Q. Certainly. If you would kindly, sir, please look beginning at the top of Page 2 through the 57 areas and if you could just identify for me, if you like by marking an "X" on the number and counsel can assist you, I don't have any problem with that, on the areas that you are not being designated as the corporate representative to testify on behalf of Warren Pumps, Incorporated?

MS. PERRITANO: Randall, it might be easier, there's actually a letter that went from Lisa's office to -- just a second, Wise & Julian, that indicates the areas of which he's been designated to testify.

Q. (By Mr. Iola) Okay. Would you like to just read those numbers and we'll circle those numbers and those will be the only areas that we'll take him as or --

MS. LACONTE: Do you have a copy of the letter?

Page 21 1 MR. IOLA: I don't have a copy in 2 front of me. 3 MS. LACONTE: Why don't we mark a 4 copy of the letter then? 5 MS. PERRITANO: That's the first 6 issue. The second issue is -- 7 MR. IOLA: Let the record reflect 8 that we will mark as Deposition Exhibit Number 3, 9 the letter from Ms. LaConte to Mr. Barry Julian, 10 that's dated January 12, 2005. It consists of 11 six pages and it outlines areas within the notice 12 that Mr. Doktor will be designated as the 13 corporate representative of Warren Pumps, 14 Incorporated to testify; is that correct? 15 (Whereupon, Exhibit 3 was marked.) 16 MS. PERRITANO: That is correct. The 17 second issue is there is a motion for Protective 18 Order pending. So to the extent that the notice 19 seeks information beyond the scope of the 20 Gudmundson case, and more specifically, beyond 21 the time frame that we're dealing with in 22 Gudmundson, Mr. Doktor is not here to testify as 23 to those issues today. So to the extent that 24 we're going through the notice and he says, I'm 25 here to testify as to Category Number 1, it's	Page 23 1 that happens to be. 2 Q. (By Mr. Iola) Mr. Doktor, where -- 3 You understand what we're discussing is that you 4 are the designated representative on behalf of 5 the Warren Pumps, Incorporated to bind the 6 company with your testimony here today, with 7 respect to the pump products on board the USS 8 Bausell that Warren Pumps had, to the best of 9 your knowledge and ability, correct? 10 A. Yes, sir. 11 Q. And before we go there, I want to 12 cover a little bit of background with you. What 13 is your present position at Warren Pumps? 14 A. I'm the manager of new programs for 15 the Navy. 16 Q. And you've been in that position for 17 a time now, correct? 18 A. About three years. 19 Q. Roughly around 2001? 20 A. Yes, sir. 21 Q. To the present? 22 A. Yes, sir. 23 Q. In that position as manager of new 24 programs for the Navy, what are your duties and 25 responsibilities, please?
Page 22 1 Category Number 1 within the time frame for 2 purposes of today's deposition. And that is 3 actually spelled out also in the January 12th 4 letter, which has been marked as Exhibit 3. 5 MR. IOLA: That's fine. And if you 6 desire, we can come back to this after the 7 hearing is held in an hour or so and we can more 8 thoroughly flush out the areas then. 9 MS. PERRITANO: Well, it might -- it 10 might make sense for time purposes -- 11 MR. IOLA: Okay, let's do that. 12 MS. PERRITANO: -- to deal with the 13 drawings and the Bausell first, because I think 14 that might streamline things a little bit. 15 MR. IOLA: That's fine. We'll do it 16 that way. We'll come back to this area, sir, 17 after the Court has had an opportunity this 18 morning to hear arguments. 19 MS. PERRITANO: And I guess so we're 20 clear, whatever category in this notice deals 21 with -- with the issues of the drawings and the 22 pumps on the ship at issue, he has been 23 designated for that. 24 MR. IOLA: Okay. Very fine. 25 MS. PERRITANO: Whatever category	Page 24 1 A. Provide all information and sales and 2 marketing for new products to the United States 3 Navy -- 4 Q. When you say new products -- 5 A. -- from Warren Pumps. 6 Q. I'm sorry. 7 A. Complete pump units. 8 Q. When you say "new products", what do 9 you mean? 10 A. Those that would be fully 11 manufactured from scratch. 12 Q. As opposed to old products that are 13 not fully manufactured from scratch? 14 A. Well, as opposed to repairs or spare 15 parts. 16 Q. And that's somebody else's duty and 17 responsibility, correct? 18 A. Yes, sir. 19 Q. Who is that individual? 20 A. That would be Vince Ardizzone. 21 Q. Can you spell the last name please, 22 sir? 23 A. A-r-d-i-z-o-n-e, excuse me, 24 A-r-d-i-z-z-o-n-e. 25 Q. And Mr. Vince Ardizzone, what's his

Page 25 1 full title? 2 A. Aftermarket manager. 3 Q. Prior to 2001, what was your position 4 with the company, please? 5 A. Manager of composite components. 6 Q. In the position of manager of 7 composite components, when did you assume that 8 position? 9 A. 1999. 10 Q. In the position of manager of 11 composite components, what were your duties and 12 responsibilities? 13 A. Introduce and develop composites 14 within the United States Navy for Warren Pumps 15 and other products. 16 Q. And when you say composites, can you 17 define that for us, please? 18 A. It's -- It's a non-metal product. 19 Q. Prior to 1999, what was your position 20 at Warren Pumps? 21 A. Sales engineer. 22 Q. When did you first assume the 23 position of sales engineer at Warren Pumps? 24 A. That would have been -- Let's see. 25 1995, '94.	Page 27 1 A. Ensure that all documentation and all 2 terms and conditions for those contracts were 3 met. 4 Q. What was the position you held at 5 Warren Pumps, prior to manager of contract 6 administration in 1990 or '91? 7 A. Contract administrator. 8 Q. When did you first become a contract 9 administrator at Warren Pumps? 10 A. 1986. 11 Q. Did you work continuously from 1986 12 to 1990 or '91 as contract administrator at 13 Warren Pumps? 14 A. Yes, sir. 15 Q. What were your duties and 16 responsibilities as a contract administrator at 17 Warren Pumps from 1986 to 1990 or '91? 18 A. Primarily the same duties as when I 19 was manager. However, when I was manager, I had 20 other people reporting to me who carried out some 21 of the other functions that were required. 22 Q. As manager, how many other people did 23 you have reporting to you? 24 A. Three. 25 Q. What was your position at Warren
Page 26 1 Q. So continuously for 1994, '95 to 2 1999, you were sales engineer at Warren Pumps? 3 A. Yes, sir. 4 Q. What were your duties and 5 responsibilities as a sales engineer at Warren 6 Pumps from 1994, '95 through 1999? 7 A. Sales of pump units to major 8 shipyards in the U.S. Navy. 9 Q. Prior to 1994 or '95, what was the 10 position you held at Warren Pumps? 11 A. The contract -- Manager of contract 12 administration. 13 Q. How long did you hold the position of 14 manager of contract administration for Warren 15 Pumps? 16 A. Three years. 17 Q. So did you begin sometime in 1991? 18 A. '90 or '91, yes. 19 Q. As manager of contract administration 20 at Warren Pumps from 1990, '91 through 1994, what 21 were your duties and responsibilities? 22 A. Administer all contracts for both 23 commercial and Navy products. 24 Q. When you say administration of 25 contracts, what do you mean?	Page 28 1 Pumps, prior to contract administrator in 1986? 2 A. Sales engineer. 3 Q. When did you first become sales 4 engineer at Warren Pumps? 5 A. That would have been -- That would 6 have been 1984 through '86. 7 Q. As sales engineer from 1984 through 8 1986 at Warren Pumps, what were your duties and 9 responsibilities? 10 A. Provide sales and marketing for new 11 units for supply system depots. 12 Q. D-e-p-o-t-s, correct? 13 A. Yes. That's correct. 14 Q. Got to be careful with that term 15 around lawyers. 16 A. Depots, I guess, would probably be 17 the better pronunciation. Depends what part of 18 the country you're in. 19 Q. Prior to your employment at Warren 20 Pumps as a sales engineer in 1984, what was your 21 position? 22 A. Supervisor of research and 23 development. 24 Q. How long were you supervisor of 25 research and development for Warren Pumps?

Page 29 1 A. Two years. 2 Q. As supervisor of research and 3 development for Warren Pumps in 1982 through 4 1984, what were your duties and responsibilities? 5 A. Supervise union employees on the 6 testing of pumps for the design department. 7 Q. Prior to 1982, what was your position 8 at Warren Pumps? 9 A. Field service engineer. 10 Q. Do you have a resume? 11 A. Yes, sir. I don't have it with me, 12 but I do. 13 Q. Okay. As field service engineer, 14 when did you assume that position? 15 A. 1978. 16 Q. As field service engineer at Warren 17 Pumps from 1978 to 1982, what were your duties 18 and responsibilities? 19 A. Supervise, troubleshoot any pump 20 issues that customers may have. 21 Q. You arrived at Warren Pumps in 1978, 22 correct? 23 A. Yes, sir. 24 Q. Prior to Warren Pumps in 1978, where 25 were you employed?	Page 31 1 A. Massachusetts Maritime Academy. 2 Q. When did you arrive at Massachusetts 3 Maritime Academy? 4 A. Fall of 1974. 5 Q. How long did you remain at the 6 Massachusetts Maritime Academy beginning in the 7 fall of 1974? 8 A. Graduation in 1978. 9 Q. And immediately upon your graduation, 10 in fact, prior to your graduation, you worked in 11 some internship capacity at Warren Pumps in the 12 summer of 1977, correct? 13 A. Yes, sir. 14 Q. And then you were hired full-time at 15 Warren Pumps upon your graduation from the 16 Massachusetts Maritime Academy in 1978, correct? 17 A. Yes, sir. 18 Q. Is Warren Pumps the only real job, 19 since your graduation from college? 20 A. No, sir. 21 Q. Okay. What else have you done? 22 A. I worked as a sales engineer for 23 Hamilton Standard from April of 1985 to December 24 31st of 1986. 25 MS. PERRITANO: '86 or '85?
Page 30 1 A. The summer of 1977, I was employed by 2 Warren Pumps, as well. 3 Q. Okay. Did you have any other 4 employment, prior to the summer of 1977? 5 A. I did work part-time during the 6 summer of the year before for the school 7 department within the town of Warren. 8 Q. You graduated from high school, 9 correct? 10 A. Yes, sir. 11 Q. What year did you graduate high 12 school? 13 A. 1974. 14 Q. And where did you graduate high 15 school? 16 A. Quaboag Regional. 17 Q. Can you spell that? 18 A. Q-u-a-b-o-a-g. 19 Q. That's located where? 20 A. Warren, Massachusetts. 21 Q. Upon your graduation from Quaboag 22 High School in Warren, Massachusetts in 1974, did 23 you attend college? 24 A. Yes, sir. 25 Q. Where did you attend college?	Page 32 1 A. I'm sorry, '85. I'm sorry, '85. 2 Q. (By Mr. Iola) For a period of what 3 appears to be eight months, from April 1985 to 4 December of 1985? 5 A. Yes, sir. 6 Q. And what caused you to go to work for 7 Hamilton Standard during that period of time, 8 from April 1985 to December 1985? 9 A. Warren Pumps was going through a 10 leverage buyout and I just wasn't sure what my 11 status would be within the company, so I decided 12 to try something different. 13 Q. And then you came back to Warren 14 Pumps? 15 A. I was offered a position after a 16 short period of time to come back to Warren, yes. 17 Q. So when you left to go to Hamilton, 18 and that was sometime during the period of time 19 between 1984 and 1986, were you in the position 20 of sales engineer, correct? 21 A. Yes, sir. 22 Q. When you left to go to Hamilton, you 23 were a sales engineer at Warren Pumps, correct? 24 A. Yes, sir. 25 Q. When you came back on January 1,

Page 33 1 19 -- 2 A. '86. 3 Q. '86. You came back into the position 4 of sales engineer? 5 A. No, I came back as contract 6 administrator. 7 Q. And was that the only gap in your 8 continuous employment at Warren Pumps since 1978? 9 A. Yes, sir. 10 Q. Mr. Doktor, did you, personally, 11 search the records of Warren Pumps for the 12 documents that were produced in this litigation? 13 A. I did look for some records. We also 14 had some -- Most of the record search was 15 conducted by counsel. 16 Q. Okay. And when you say "counsel", 17 can you identify, by name, whose office you're 18 speaking of? 19 A. Pierce, Davis and Perritano. 20 Q. And when was that discovery location 21 done? When did they search? 22 MS. PERRITANO: He may not know. 23 Q. (By Mr. Iola) If you know. 24 A. I really don't know when it was 25 actually started, but...	Page 35 1 A. Yes, sir. 2 Q. Did he participate in any search of 3 any of these documents? 4 A. That, I do not know. 5 Q. Okay. What is Mr. Legault's 6 position? 7 A. He's chief engineer. 8 Q. And you're aware that Mr. Legault has 9 been active in the searching of documents in 10 other litigation regarding asbestos, correct? 11 A. That is my understanding, yes. 12 Q. For instance, in Mr. Bergman's case 13 out of Seattle, Washington, Mr. Legault was the 14 individual who procured the documents for the 15 document production, correct? 16 A. That's my understanding, yes. 17 Q. I want to switch gears here for a 18 moment, Mr. Doktor, and talk a little bit about 19 what you know about the corporate history of 20 Warren Pumps, Incorporated. Okay? 21 A. Yes, sir. 22 Q. Okay. And actually, I'm not even 23 using the right phrase anymore, because as of 24 2004, it's Warren Pumps, LLC, correct? 25 A. Yes, sir.
Page 34 1 Q. At any point in time today, 2 Mr. Doktor, if I ask you a question that you 3 simply don't know the answer to, if you would be 4 kind enough to simply state for the record that 5 you do not know, that will be fine with me. I 6 don't want you to answer something that you don't 7 know anything about. I only want you to answer 8 something that you have personal knowledge or you 9 have educated yourself to have knowledge about. 10 Okay? 11 A. Yes, sir. 12 Q. If you do tell me that you don't 13 know, please bear in mind that normally my 14 follow-up response will be, can you tell me who 15 would have that knowledge? And then I'll ask you 16 to identify who that individual is, if you know. 17 And if you don't know, again, you simply tell me 18 you don't know. Okay? 19 A. (Witness nods head.) 20 Q. Is there anybody else at Warren, that 21 is an employee of Warren, that was charged with 22 the assistance in locating any documents? 23 A. Not that I'm aware of. 24 Q. Okay. Mr. John Legault, are you 25 familiar with him?	Page 36 1 Q. Warren Pumps was founded as Warren 2 Steam Pump Company, correct? 3 A. Yes, sir. 4 MS. PERRITANO: Randall, before you 5 get any further, just so it's clear on the 6 record, he may not be the appropriate person to 7 give you a complete corporate history. You're 8 welcome to ask him questions about what he knows, 9 but I just wanted to make that clear for the 10 record. 11 Q. (By Mr. Iola) Okay. If we get to 12 any area here that you're not knowledgeable 13 about, you'll simply tell me that correct, 14 Mr. Doktor? 15 A. Yes. 16 Q. Warren Pumps was founded as Warren 17 Steam Pump Company and was incorporated in the 18 State of Massachusetts in 1897, correct? 19 A. Yes, sir. 20 Q. Warren Steam Pump Company started 21 using technology developed by Quimby Pump Company 22 around 1950, correct? 23 A. That's my understanding, yes, sir. 24 Q. And that's your understanding from 25 what?

Page 37 1 A. Just what I have read about corporate 2 history. 3 Q. And where have you read things about 4 corporate history? 5 A. Most of it's on our website. 6 Q. And do you know who is the so-called 7 corporate historian at Warren Pumps, if there is 8 such as a person? 9 A. I don't know. 10 MS. PERRITANO: Objection, if there 11 is a person. 12 A. Yeah, I don't know if there is a 13 person. 14 Q. (By Mr. Iola) Okay. Who's the most 15 senior individual still employed at Warren Pump 16 Company? 17 A. I don't know who that would be. 18 Q. Okay. Do you know anybody who's been 19 around longer than yourself at Warren? 20 A. Yes, sir. 21 Q. Who is that? 22 A. John Legault would be one. 23 Q. Do you know when Mr. Legault first 24 arrived at Warren Pump? 25 A. No, sir, I do not.	Page 39 1 Q. Warren Steam Pump Company changed its 2 name to Warren Pumps, Incorporated in 1957, 3 correct? 4 A. I know we have changed our name. I 5 don't know what the exact date was. 6 Q. Do you know anyone, other than 7 yourself, who would be better able to tell me the 8 exact date of that name change? 9 A. Not right off the top of my head, no. 10 Q. In 1972 Warren Pumps was purchased 11 and merged into Houdaille Industries, 12 Incorporated, H-o-u-d-a-i-l-l-e, correct? 13 A. Yes, sir. 14 Q. In 1985, certain Warren Pumps' 15 employees purchased Warren Pumps, Incorporated 16 from Houdaille and the company was incorporated 17 in the State of Delaware, correct? 18 A. Yes, sir. 19 Q. And that was the leverage buyout that 20 you spoke of earlier, when you left for a period 21 of time, because you didn't know what was going 22 to happen, correct? 23 A. Yes, sir. 24 Q. Do you know which certain Warren 25 Pumps' employees were involved in that purchase? Page 40 1 A. I don't know all that were involved, 2 no. 3 Q. Do you know any? 4 A. I do remember several of them, yes. 5 Q. What are their names? 6 A. I know Larry Holley. 7 Q. Spell his last name, please. 8 A. H-o-l-l-e-y. 9 Q. Anyone else? 10 A. Ed Baldagya, B-a-l-d-a-g-y-a. 11 Q. Anyone else? 12 A. George Landberg. 13 Q. Spell the last name, please. 14 A. L-a-n-d-b-e-r-g. 15 Q. Anyone else? 16 A. Pete Colthard, C-o-l-t-h-a-r-d. 17 Q. Anyone else? 18 A. Now I'm stretching. I can't think of 19 anybody else. 20 Q. Is Mr. Holley still employed at 21 Warren? 22 A. No. 23 Q. Do you know where he went? 24 A. He has -- He's deceased. 25 Q. Okay. Mr. Baldagya, is he still
Page 38 1 Q. Warren Steam Pump Company acquired 2 certain screw pump technology from HK Porter, 3 Incorporated in 1950, correct? 4 MS. PERRITANO: Objection, if you 5 know. 6 A. My understanding is that Quimby was 7 owned by HK Porter. 8 Q. (By Mr. Iola) So is the answer to my 9 question, yes, that is correct? 10 MS. PERRITANO: Objection. 11 A. Could you restate the question? 12 Q. (By Mr. Iola) Absolutely. Warren 13 Steam Pump Company acquired certain screw pump 14 technology from HK Porter, Incorporated, who 15 owned Quimby Pump Company and they acquired this 16 screw pump technology in 1950? 17 MS. PERRITANO: Objection, if you 18 know. 19 A. Like I said, from what I have read, 20 yes. 21 Q. (By Mr. Iola) Do you know any 22 individual who would be in a better position than 23 yourself, to give testimony on that issue? 24 A. Not that I can think of. It goes 25 back quite a ways.	

Page 41 1 employed? 2 A. No. 3 Q. Do you know where he is at? 4 A. He is also deceased. 5 Q. Mr. Landberg, is he still employed at 6 Warren? 7 A. No, I do not know where he is any 8 longer. 9 Q. When he left Warren, do you know 10 where he went? 11 A. No, sir, I don't. 12 Q. Mr. Colthard, is he still employed at 13 Warren? 14 A. No. 15 Q. Do you know where he is at? 16 A. He's, unfortunately, also deceased. 17 Q. Okay. 18 A. We had a bad -- a streak of bad luck, 19 I guess. 20 Q. In 1989, Warren Pumps was purchased 21 by IMO Industries, Incorporated, correct? 22 A. Yes, sir. 23 Q. Warren Pumps is currently owned by 24 IMO Industries, Incorporated, correct? 25 A. Yes, sir.	Page 43 1 correct, to the best of your knowledge and 2 ability, right? 3 MS. PERRITANO: Well, he didn't 4 create it, but if you -- 5 Q. (By Mr. Iola) You can answer. 6 A. I mean, I would assume that the 7 person who actually set up the website got his 8 information somewhere. 9 Q. Warren is now known as Warren Pumps, 10 LLC, correct? 11 A. Yes, sir. 12 Q. The transaction leading to Warren 13 Pumps, LLC took place in 2004, correct? 14 A. Yes, sir. 15 Q. And when did that transaction take 16 place? 17 A. That, I don't know. 18 Q. Do you know when, what quarter in 19 2004, Warren Pumps, Incorporated changed its name 20 to Warren Pumps, LLC? 21 A. No, I do not. 22 Q. Do you know what the purpose was of 23 Warren Pumps, Incorporated changing its corporate 24 structure to Warren Pumps, LLC? 25 A. No, sir.
Page 42 1 Q. Warren Pumps is currently a member of 2 The Colfax Pump Group, correct? 3 A. Yes, sir. 4 Q. The Colfax Pump Group is a worldwide 5 association of pump manufacturers with 6 headquarters located in Monroe, North Carolina, 7 correct? 8 MS. PERRITANO: Objection, if you 9 know. 10 A. My understanding is, yes, that's 11 correct. 12 Q. (By Mr. Iola) That's information 13 published on your website, correct? 14 A. Well, that's where it is. 15 Q. And you would expect all of the 16 information that's published on Warren website to 17 be factual and correct, right? 18 A. Well, I don't particularly surf our 19 own website all the time, so I really don't know 20 everything that's on it. 21 Q. But you would agree with me, 22 Mr. Doktor, that the purpose of the website is to 23 tell the world about Warren Pumps, correct? 24 A. It is a sales tool, yes. 25 Q. And it's designed to be factually	Page 44 1 Q. Were you involved in the change from 2 Warren Pumps, Incorporated to Warren Pumps, LLC? 3 A. No, sir. 4 Q. Do you know an individual at Warren 5 Pumps who was involved in that transaction? 6 A. No, I do not. 7 Q. As you sit here today, can you tell 8 me who the person most knowledgeable at Warren 9 Pumps is, that would have knowledge of that 10 transaction from Warren Pumps, Incorporated to 11 Warren Pumps, LLC in 2004? 12 MS. PERRITANO: Objection, if you 13 know. 14 A. I wouldn't -- wouldn't know if 15 anybody was involved. 16 Q. (By Mr. Iola) Who's the president of 17 Warren Pumps, LLC? 18 A. We don't have a president. We have a 19 general manager. 20 Q. Who is that individual? 21 A. Mario DiDomenico. 22 Q. Can you spell that, please? 23 A. D-i-D-o-m-e-n-i-c-o. 24 Q. How long has Mr. DiDomenico been with 25 Warren Pumps?

Page 45 1 A. I believe 1995 or 1996. 2 Q. Has he continuously served in the 3 position as general manager since then? 4 A. Yes, sir. 5 Q. Who serves underneath Mr. DiDomenico 6 at Warren Pumps? 7 A. He has several managers that report 8 to him. 9 Q. Who are those? 10 A. Mr. Legault is one, for engineering. 11 Q. John? 12 A. Legault. 13 Q. Legault. Anybody else? 14 A. Gary Young. 15 Q. Y-o-u-n-g? 16 A. Yes, sir. 17 Q. What's his title? 18 A. Controller. 19 Q. Anybody else? 20 A. We have Matt Korzec, K-o-r-z-e-c, 21 manufacturing manager. 22 Q. Anybody else? 23 A. Mr. Ardizzone. 24 MS. PERRITANO: Randall, I want to 25 object to something when he's done.	Page 47 1 asking Mr. Doktor about, but technically 2 speaking, it goes beyond, I think, the Gudmundson 3 case. So I just want to lodge a general 4 objection as to its relevance, with respect to 5 that case. I'm going to let you ask him, because 6 I think we need -- you know, we can move things 7 along a little bit that way, but I do want it 8 clear on the record that it is beyond the scope. 9 And if we were to play this tape in trial, what 10 was going on in the '80s and '90s in terms of the 11 corporate history, would be something that we 12 would not necessarily agree to being admissible. 13 But you can continue because I think you'll move 14 along. 15 Q. (By Mr. Iola) Mr. Doktor, just to 16 summarize the corporate history structure. 17 Warren Pumps was founded as Warren Steam Pump 18 Company in 19 -- in 1897, correct? 19 A. Yes, sir. 20 Q. Remained as that entity through 1957, 21 correct? 22 A. Yes. 23 Q. Sometime in 1957, it changed names to 24 Warren Pumps, Incorporated, correct? 25 A. Yes.
Page 46 1 Q. (By Mr. Iola) Okay. Go ahead, sir. 2 MS. PERRITANO: You can answer that. 3 Q. (By Mr. Iola) Mr. Ardizzone's title, 4 again, is aftermarket manager, correct? 5 A. Yes, sir. 6 Q. Anybody else? 7 A. Mark Korzec. 8 Q. M-a-r-k? 9 A. Yes, sir. 10 Q. K-o-r-z-e-c? 11 A. Yes, sir. 12 Q. What is his title? 13 A. Industrial sales manager. 14 Q. Is he related to Matt? 15 A. Yes, sir. 16 Q. Are they brothers? 17 A. Yes, sir. 18 Q. I have some familiarity with working 19 with brothers. Anybody else? 20 A. The last one that I can think of is 21 Robert Bliss. 22 Q. And his title? 23 A. Human resource manager. 24 MS. PERRITANO: My turn. This is, 25 you know, something I have no problem with you	Page 48 1 Q. It continued to operate continuously 2 from 1957 forward to 2004 as Warren Pumps, 3 Incorporated, correct? 4 A. Yes. 5 Q. Somewhere in 2004, it changed its 6 name to Warren Pumps, LLC, correct? 7 A. Yes. 8 Q. And from 2004 continuously to the 9 present date, it's operated as Warren Pumps, LLC, 10 correct? 11 A. Yes. 12 Q. Warren Pumps is still located in 13 Warren, Massachusetts, correct? 14 A. Yes. 15 Q. At any time have they had a facility 16 in another location, other than Warren, 17 Massachusetts? 18 MS. PERRITANO: And I'm just going to 19 object for the record, again, to the extent that 20 we're talking about facilities that may or may 21 not have been in existence during the Gudmundson 22 time frame. But you can feel free to ask some 23 questions on it, that's fine. I just want the 24 objection on the record. 25 Q. (By Mr. Iola) Any other location,

Page 49	Page 51
1 other than Warren, Massachusetts? 2 A. Yes. 3 Q. And that location is where, sir? 4 A. Peace Dale, Rhode Island. 5 Q. And what was in Peace Dale, Rhode 6 Island? 7 A. It was a small facility to make some 8 end suction pumps. 9 MS. PERRITANO: Randall, I'm assuming 10 I can just have a continuing objection? 11 MR. IOLA: That's fine. If you want 12 to mention it each time just briefly, that's 13 fine. 14 MS. PERRITANO: I really don't want 15 to. 16 MR. IOLA: It doesn't matter to me. 17 MS. PERRITANO: Unless you would like 18 me to break the flow, which maybe I should do. 19 Q. (By Mr. Iola) How many employees 20 approximately are there at Warren Pumps, 21 presently? 22 A. Around 100. 23 Q. Warren Pumps is unionized, correct? 24 A. Our shop facility is, yes. 25 Q. With the International Electrical	1 be either a screw or gear pump, correct? 2 MS. PERRITANO: Objection, relevance. 3 A. Yes. 4 Q. (By Mr. Iola) You are aware, 5 Mr. Doktor, that some of Warren's pumps, at 6 various times, may have incorporated gasket or 7 packing components containing asbestos? 8 MS. PERRITANO: Objection, relevance. 9 Q. (By Mr. Iola) Correct? 10 A. Yes. 11 Q. How did Warren obtain these gaskets 12 or packing components containing asbestos? 13 MS. PERRITANO: Objection. 14 Q. (By Mr. Iola) If you know? 15 MS. PERRITANO: I'll let him answer 16 this question, but then, I think, in terms of the 17 components for the particular pumps, until we get 18 a court ruling on the motion for Protective 19 Order, I'd like to deal with just the Bausell, if 20 I'm pronouncing that correctly, ship. You can 21 answer generally over my objection, and then 22 we're going to... 23 A. I wasn't part of the purchasing 24 department, so I don't really know how they went 25 about getting that type of materials.
Page 50	Page 52
1 Union, AFL-CIO? 2 A. Yes. 3 Q. Presently, Warren Pumps manufactures 4 only pumps, correct? 5 MS. PERRITANO: Objection, same, 6 relevance as to what's going on presently. 7 A. Yes. 8 Q. (By Mr. Iola) The last steam pump 9 was manufactured at Warren in approximately 1995, 10 correct? 11 MS. PERRITANO: Objection, relevance. 12 A. Yes. 13 Q. (By Mr. Iola) Up until 1995, Warren 14 Pumps manufactured reciprocating and centrifugal 15 pumps, which handled common material like fluids, 16 correct? 17 MS. PERRITANO: Objection, relevance. 18 A. Yes. 19 Q. (By Mr. Iola) With the introduction 20 of the Quimby technology, which dates back to 21 1950, Warren began to pump viscous fluids, oils, 22 fuels, correct? 23 MS. PERRITANO: Objection, relevance. 24 A. Yes. 25 Q. (By Mr. Iola) The Quimby pump would	1 Q. (By Mr. Iola) But in all fairness, 2 Mr. Doktor, you signed the Verification of 3 Interrogatory Answers in this case, correct? 4 MS. PERRITANO: Well, he signed the 5 Verification as a corporate representative, not 6 as somebody who necessarily knows the -- all of 7 the information contained therein with personal 8 knowledge. 9 Q. (By Mr. Iola) Let's ask the question 10 and get an answer first, then we'll move forward. 11 You signed the Verification of the 12 Warren Pumps, Incorporated Supplemental Answers 13 and Objections to Plaintiff's Standard 14 Interrogatories In Re: All Asbestos Litigation 15 Filed by Wise & Julian in Madison County, 16 Illinois. You signed those interrogatory answers 17 on the 3rd day of September 2004; is that 18 correct? 19 MS. PERRITANO: Can you show him the 20 signature, so he knows the date? 21 MR. IOLA: Sure. 22 MS. PERRITANO: Because I don't know 23 that he actually knows it was -- 24 Q. (By Mr. Iola) Sure, let me hand you 25 -- Without marking it as an exhibit at this point

Page 53 1 in time, sir, let me hand you the interrogatory 2 answers that are the supplemental answers filed 3 in Madison County, Wise & Julian litigation and 4 ask you to turn to the very last page of that 5 document. Do you see that, sir? 6 A. Yes. 7 Q. It's entitled "Verification", 8 correct? 9 A. Yes. 10 Q. It's Warren Pumps, Incorporated by 11 Roland Doktor, correct? 12 A. It's Warren Pumps, LLC. 13 MS. PERRITANO: In September. 14 A. September, okay. Yes. Okay. Yes. 15 Q. (By Mr. Iola) And at the bottom, is 16 a signature line for you, correct? 17 A. Yes. 18 Q. Do you recognize that as your 19 signature? 20 A. Yes. 21 Q. And you signed it in the presence of 22 a notary, correct? 23 A. Yes. 24 Q. Ms. Sylvia Cummings, correct? 25 A. Yes.	Page 55 1 A. That's what it says, yes. 2 Q. Okay. That's good for now until we 3 get the court's order on this other information. 4 MS. PERRITANO: Why don't we talk 5 about the drawings. 6 MR. IOLA: Yeah, we're getting there. 7 Q. (By Mr. Iola) Warren's largest 8 customer is the United States Navy, correct? 9 MS. PERRITANO: Objection to the 10 extent it seeks information beyond the Gudmundson 11 time period. Go ahead. 12 A. Yes. 13 Q. (By Mr. Iola) Part -- 14 A. Can I? 15 Q. Yes, sir. 16 A. Or agents of the government. 17 Q. Very well. Part of the process of 18 satisfying the government with respect to 19 products that are put on board naval vessels, is 20 something called the QPL, correct? 21 A. It depends on what time frame we're 22 talking about and what military specification you 23 are talking about. 24 Q. Let's talk about in the 1940s. 25 A. Okay.
Page 54 1 Q. Is she an employee there at Warren? 2 A. Yes, she is. 3 Q. Okay. And you dated it the 3rd day 4 of September 2004, correct? 5 A. Yes. 6 Q. And in your verification, you 7 identify that some of these answers, and 8 supplemental answers, may not be based on 9 personal knowledge and were prepared based on 10 documents and information located after a 11 reasonably diligent investigation, under the 12 circumstances, with the assistance and advice of 13 counsel and the answers and supplemental answers 14 set forth subject to inadvertent or undiscovered 15 errors, or therefore limited by records and 16 information still in existence presently 17 recollected, and thus far discovered in the 18 course of the preparation of these answers and 19 supplemental answers, correct? 20 A. Yes. 21 Q. And then at the very end, you say 22 that subject to the limitations set forth above, 23 the answers and supplemental answers are true and 24 correct to the best of your current information 25 and belief; is that correct, sir?	Page 56 1 Q. Was there such a thing in the 1940s, 2 as the QPL or qualified products list? 3 A. I have not seen any documentation for 4 that time period for QPL. 5 Q. When is your understanding that the 6 QPL was invented? 7 MS. PERRITANO: Objection to the 8 extent it's after the Gudmundson time frame. You 9 can answer. 10 A. My understanding is it was 11 commensurate with the introduction of military 12 specifications. 13 Q. (By Mr. Iola) Which was when? 14 A. Specifically that date, I don't know. 15 Q. Well, part of the documentation 16 that's been turned over in this case are some Mil 17 Specs, right? 18 A. Yes. 19 Q. Mil Specs dealing with pumps, 20 reciprocating, direct-acting and power-driven, 21 correct? 22 A. Yes. 23 Q. And those Mil Specs are dated in 24 1955, correct? 25 A. Yes.

Page 57	Page 59
1 MS. PERRITANO: Well, let me just 2 show him. 3 Q. (By Mr. Iola) And they supercede 4 some Mil Specs that were in effect as early as 5 1939, correct? 6 MS. PERRITANO: Objection. Wait. 7 Q. (By Mr. Iola) If you know. 8 MS. PERRITANO: Take a look at the 9 document. 10 Q. (By Mr. Iola) Before you look at the 11 document, I want to know what you know from your 12 memory. Do you know? 13 A. The document called a Mil Spec? 14 Q. No. 15 A. Identified as a Mil Spec? 16 Q. The document that I just referred to 17 that was produced in this litigation, is a Mil 18 Spec dated 1955 that supercedes a Mil Spec dated 19 1939; do you know that to be true? 20 A. I'd have to -- 21 Q. Okay. Very well. 22 A. First page. 23 MR. IOLA: Let's just give him the 24 entire document. We'll mark it. 25 MS. PERRITANO: Wait a minute. I	1 corner of that document, it lists that Mil Spec 2 as what number? 3 A. MIL-P-19158. 4 Q. And it says a date of that Mil Spec, 5 correct? 6 A. Yes. 7 Q. And what's the date, sir? 8 A. 29 December 1955. 9 Q. And then it says it supersedes a 10 prior version of the Mil Spec, correct, sir? 11 A. Well, the S47-1 is a specification. 12 I would not call that what we would know today as 13 a Mil Spec, because it doesn't have the MIL 14 designation. 15 Q. But it is a specification from the 16 United States Navy, correct? 17 A. It's a specification from the United 18 States Government, whether it was a naval spec or 19 a general spec, I don't know. 20 Q. Very well. A specification from the 21 U.S. Government dated when? 22 A. 1 March 1939. 23 Q. So at least as early as March 1, 1939 24 the U.S. Government issued some kind of spec with 25 respect to a portion of what became Military Spec
Page 58	Page 60
1 need to get the both-sided copy. 2 MR. IOLA: Well, here's mine. I 3 don't care. Is what you gave me this morning 4 both-sided? 5 MS. PERRITANO: I did, but I have 6 another one for him. 7 MR. IOLA: Okay. 8 MS. PERRITANO: Give me one second. 9 MR. IOLA: One sec, Mr. Doktor. 10 We're going to pull the correct form of the 11 document here with copying of both sides of the 12 page, so that you'll have a complete set. 13 THE WITNESS: Thank you. 14 MS. PERRITANO: Why don't you mark -- 15 MR. IOLA: Here, let me just mark 16 mine. When she finds it, I'll take hers. 17 (Whereupon Exhibit 4 was marked.) 18 Q. (By Mr. Iola) Let me hand you what's 19 been marked as Deposition Exhibit Doktor Number 20 4. 21 And ask you if that is the Mil Spec 22 that was produced to me this morning, in 23 reference to the Gudmundson case? 24 A. Yes. 25 Q. Okay. And at the very top, right	1 19158 dated December 29, 1955, correct? 2 A. Yes, sir. 3 Q. Can you tell the Members of the Jury, 4 Mr. Doktor, what a Military Specification is 5 designed to do or what it's designed to say and 6 to whom it speaks? 7 MS. PERRITANO: Objection to the 8 extent it's beyond the scope of the deposition. 9 Feel free to -- 10 A. I'm not sure what -- what you're 11 really asking. 12 Q. (By Mr. Iola) Okay. What I'm asking 13 is why is it relevant for Warren Pumps to have a 14 Military Specification? 15 A. We would -- 16 MS. PERRITANO: Objection, beyond the 17 scope. 18 A. We would be building pumps for the 19 government that would be required to be furnished 20 under this Military Specification. 21 Q. (By Mr. Iola) The government sets 22 the specification for which you build a pump to 23 furnish to them, correct? 24 A. Yes. 25 MS. PERRITANO: Objection, time

Page 61	Page 63
1 frame. 2 Q. (By Mr. Iola) They kind of outline 3 what they require the pump to have and be built 4 like; and then you put your heads together to 5 build the finest pump you can that meets that 6 outline, correct? 7 MS. PERRITANO: Objection, time 8 frame, relevance. 9 A. It is -- It is a document for which 10 we would use to design the pump and manufacture 11 the pump. 12 Q. (By Mr. Iola) What is your 13 understanding of why you produced this Mil Spec 14 that's dated December 29, 1955 in this case? 15 A. It's within the time frame that we 16 were asked to look at. 17 Q. And the time frame that you were 18 asked to look at, was what? 19 A. 1951 to 1955. 20 Q. And in 1951 to 1955 was the time 21 frame of what? 22 A. Mr. Gudmundson's service on the 23 Bausell. 24 Q. Okay. And Mr. Gudmundson's service 25 on the Bausell was while he was in the United	1 research, either at the naval archives or 2 elsewhere, to determine when the Bausell was 3 constructed and where it was constructed? 4 A. I don't know. 5 Q. Okay. As you sit here today, do you 6 have any knowledge about what shipyard 7 constructed the USS Bausell? 8 A. From the information that we provided 9 you today, it was Bath Iron Works. 10 Q. And Bath Iron Works is located where? 11 A. In Bath, Maine. 12 Q. So why would a military specification 13 from 1955 have anything to do with the equipment 14 that was supplied to the Bausell when it was 15 constructed in the time period of 1941 to 1945? 16 A. It wouldn't necessarily. 17 Q. Okay. Can you testify under oath 18 that Deposition Exhibit Number 4, which is the 19 Military Specification for pumps, reciprocating, 20 direct-acting and power-driven, which is 21 MIL-P-19158 (ships), 29 December, 1955 was a Mil 22 Spec that was previously in effect at the time 23 the Bausell was constructed between 1941 and 24 1945? 25 A. Not previously, no.
Page 62	Page 64
1 States Navy, correct? 2 A. Yes. 3 Q. But you're aware that the Bausell 4 wasn't built in 1951, correct? 5 A. That's correct. 6 Q. And pumps that would have been 7 installed on the Bausell, in its initial 8 construction, would have been supplied during the 9 construction of the Bausell, correct? 10 A. Yes. 11 Q. What is your understanding of when 12 the Bausell was constructed? 13 A. During the 2nd World War. 14 Q. What is your understanding, for the 15 Members of the Jury, exactly what years that was? 16 A. That would be 1941 to 1945. 17 MS. PERRITANO: The years of the 2nd 18 World War. 19 A. 2nd World War. 20 Q. (By Mr. Iola) Do you know, within 21 that window of 1941 to 1945, when the Bausell was 22 constructed? 23 A. Specifically, no. 24 Q. Have you done any research or are you 25 aware of anyone else at Warren Pumps who has done	1 Q. It's your understanding that this Mil 2 Spec came into effect on the date it's dated, 3 correct? 4 A. Yes, sir. 5 Q. Do you have any knowledge of 6 Specification 47-1, March 1, 1939? 7 A. No, I do not. 8 Q. Have you made any attempt to go and 9 locate that specification in this litigation? 10 A. Counsel has, yes. 11 Q. Okay. Do you know whether or not 12 counsel has discovered that specification? 13 A. Not to my knowledge, no. 14 Q. Okay. And one other warning I want 15 to give you, Mr. Doktor, throughout the 16 deposition today, I'm not interested in any 17 conversation that you have ever had with any of 18 your lawyers at any point in time. Okay? 19 A. Yes, sir. 20 Q. Those are privileged communications 21 and they are not to be disclosed to me or anyone 22 else. Okay? 23 A. Yes, sir. 24 Q. So if I ask you a question today, I'm 25 asking you the question to either identify who it

Page 65	Page 67
1 was or their name, but don't tell me about the 2 communication. Okay? That's privileged. All 3 right? 4 A. Yes, sir. 5 Q. Do you understand that? 6 A. Yes, sir. 7 Q. Okay. 8 MS. PERRITANO: He understands it. 9 THE WITNESS: Do you want this? 10 Q. (By Mr. Iola) From your review of 11 the documents, you're aware that certain sales of 12 pumps by Warren Pumps, Incorporated, actually it 13 would have been the Warren Steam Pump Company 14 during that period of time, in the 1941 to 1945 15 period, were sold for the installation on board 16 the USS Bausell, correct? 17 A. Yes. 18 Q. And you know that because of certain 19 records that you've determined, correct? 20 A. Yes. 21 Q. As well as certain drawings that you 22 have, correct? 23 A. Yes. 24 Q. And tell me, if you would, or if you 25 can, off the top of your head without looking at	1 Q. Okay. And when you say a whole group 2 of destroyers, you are referring to a group of 3 destroyers that were being constructed during the 4 same time period, correct? 5 A. For the 2nd World War effort, yes. 6 Q. And were all these destroyers being 7 built at Bath Iron Works? 8 MS. PERRITANO: If you know. 9 A. I do not. That, I don't know. 10 Q. (By Mr. Iola) Okay. And was there a 11 certain class of destroyers that these pumps were 12 being used on? 13 A. Might have been multiple classes. 14 Q. Okay. Were you aware these pumps 15 were used across the Gearing class, 16 G-e-h-r-i-n-g? 17 A. No, I -- 18 Q. G-e-a-r-i-n-g, I'm sorry. 19 A. No, I was not. 20 Q. Were you aware of where these pumps 21 were being installed? 22 MS. PERRITANO: If you know. 23 A. What do you mean by installed? 24 Q. (By Mr. Iola) Well, when they go to 25 the shipyard, are you aware of what destroyers,
Page 66	Page 68
1 any documents, what type of pumps were on board 2 the USS Bausell that Warren manufactured? 3 A. Do you want them by design or do you 4 want them by service? There's a couple of ways I 5 can do that. 6 Q. Yeah, just tell me the names of them. 7 A. One was the main circulating pump. 8 You have the fresh water pump, diesel generator 9 circulating pump, sea water circulating pump. 10 Q. Also known as salt water circulating 11 pump? 12 A. Yes, sir. The emergency feed pump, 13 and the fire and bilge pump. 14 Q. Now, what you have just given me is 15 the name of the various pumps that Warren Pumps 16 sold for installation on the USS Bausell, 17 correct? 18 A. Yes. 19 Q. And are you aware that the USS 20 Bausell is also known as DD-845? 21 A. Yes, sir. 22 Q. Okay. And some of these pumps were 23 sold in quantities of more than one, correct? 24 A. Yes, sir, they were for a whole group 25 of destroyers.	1 individually, these pumps were being installed 2 upon? 3 A. We would know that from the order 4 that the customer would have given us. 5 Q. Okay. And do you have paperwork 6 reflecting the order of the customer? 7 A. Yes, that was provided to you this 8 morning. 9 Q. Okay. And I want to be clear that 10 where you located some of these documents, that 11 were provided to me last night, were from the 12 customers' files that you keep at Warren Pumps, 13 correct? 14 A. They were from the sales file, yes. 15 Q. Which have not been destroyed, 16 correct? 17 MS. PERRITANO: You have what was in 18 the sales file. 19 Q. (By Mr. Iola) But I want to back up 20 to my question: Has the sales file been 21 destroyed? 22 MS. PERRITANO: Objection. 23 A. The only documents that we have, have 24 been provided to you. 25 Q. (By Mr. Iola) Okay. But those

Page 69	Page 71
1 documents were obtained from the sales file, 2 right? 3 A. What remains of the sales file, yes. 4 Q. That's my question. Are you aware 5 that there are certain portions of the sales file 6 that have been destroyed? 7 MS. PERRITANO: Objection. If you 8 know. 9 A. I'm only assuming. 10 Q. (By Mr. Iola) And what are you only 11 assuming? 12 MS. PERRITANO: Don't assume. 13 A. Okay. Then, I don't know. 14 MS. PERRITANO: If you know, tell 15 him. Otherwise, do not assume. 16 A. I do not know what else would have 17 been in the sales file. 18 (Whereupon Exhibit 5 was marked.) 19 Q. (By Mr. Iola) Let's start by handing 20 him a clean copy of WP-IL Page 1 through 3, I 21 believe, is the first one. Let me hand you, sir, 22 what I've marked as Deposition Exhibit Number 5, 23 which is dated May 17, 1943, order by Warren 24 Engineering Company, ship to Bath Iron Works. Do 25 you see that, sir?	1 Q. And the purpose of spare parts is you 2 can't just sell a unit to the United States 3 Government and/or the United States Navy, you 4 have to give them some spare parts in case 5 something breaks down, and they got to fix it, 6 right? 7 MS. PERRITANO: Objection, relevance. 8 A. In this -- In this case, that was 9 correct. 10 Q. (By Mr. Iola) I mean in every case 11 where you sold a pump, almost, you sold them 12 spares, correct? 13 MS. PERRITANO: Objection, relevance. 14 A. No. 15 Q. (By Mr. Iola) Okay. There were some 16 instances where you simply sold the pump, no 17 spares and that was the end of it, correct? 18 MS. PERRITANO: Objection, beyond the 19 scope, and relevance. 20 A. Yes. 21 Q. (By Mr. Iola) How about with respect 22 to the USS Bausell, was there ever a situation 23 where all you sold was the pump? 24 A. According to this information, no. 25 Q. You always sold spares, in addition,
Page 70	Page 72
1 A. Yes. 2 Q. Is there any other identifying number 3 or heading on this document that you would call 4 this document? 5 A. Just our order number that's at the 6 top, upper right-hand corner. 7 Q. Which is C-4647. 8 A. No, it's the A-17488. 9 Q. So this is order number A-17488, 10 correct? 11 A. Yes. 12 Q. And this is an order from a customer 13 to Warren Pumps, correct? 14 A. Yes. 15 Q. For what? 16 A. Well, this is not the order from the 17 customer. This is our order that we would have 18 put into our system or would have generated the 19 demand for the pumps. 20 Q. And what is this an order for? 21 A. This is for eight 25-inch main 22 condenser circulating pumps and spares. 23 Q. And spares is just spare parts; is 24 that correct, sir? 25 A. Yes.	1 correct? 2 MS. PERRITANO: To the Bausell? 3 Q. (By Mr. Iola) To the -- With respect 4 to what was sold by Warren Pumps to the 5 government for the Bausell, correct? 6 A. For this particular pump, yes. 7 Q. Okay. And right now, all we're 8 looking at is the main condenser circulating 9 pump, correct? 10 A. Yes. 11 Q. How many of these main condenser 12 circulating pumps were aboard the Bausell? 13 A. Two. 14 Q. How do you know that? 15 A. Under the special marks column, 16 left-hand column, these are for DD-805 to DD-808 17 and there's -- So there's four ships there and 18 there's eight pumps on the order, so that would 19 be two per ship. 20 Q. I thought we agreed that the Bausell 21 was DD-845, right? Is that correct? 22 A. Yes. 23 Q. So DD-845 is not even on this 24 document, right? 25 A. This particular one does not have the

Page 73 1 845 on it. 2 Q. Okay. So back up to my original 3 question: Do you believe there were two main 4 condensing circulating pumps installed, Warren 5 main condensing circulating pumps installed upon 6 the USS Bausell DD-845? 7 A. Yes, I believe the drawings will -- 8 Q. Okay. 9 A. -- provide that information. 10 Q. These two main condensing circulating 11 pumps were installed aboard the Bausell where? 12 A. Should be at Bath Iron Works. 13 Q. Okay. That was the shipyard where 14 the vessel was built, correct? 15 A. Yes. 16 Q. Where, on the Bausell, would a main 17 condensate circulating pump be installed? 18 A. I'm not familiar with that particular 19 ship, so I can't tell you exactly where it would 20 be. 21 Q. Where are they commonly installed, 22 meaning engine room, fire room, boiler room? 23 A. It would be the engine room. 24 Q. Would it be in the aft engine room, 25 as well as the forward engine room?	Page 75 1 Q. Okay. Let's look at the drawings and 2 if you would, please, sir, show me any drawings 3 that you have regarding the main condensate 4 circulating pumps; and that's what they are, 5 right? 6 A. Main condenser circulating pumps. 7 Q. Okay. 8 A. It's not -- It wasn't in that group 9 that you asked me to look at. 10 MR. IOLA: Okay. Why don't we take a 11 break for a moment and if you can look in any 12 other group that you brought with you of 13 documents, see if you can find any drawings on 14 the main condenser circulating pumps and we'll 15 pick up there after we come back on the record. 16 THE WITNESS: Thank you. 17 VIDEOGRAPHER: The time is 10:28. 18 We're off the record. 19 (Whereupon, a brief break was taken.) 20 VIDEOGRAPHER: The time is 10:41 a.m. 21 We're on the record. 22 Q. (By Mr. Iola) Sir, we're back on the 23 record and you understand you're still under 24 oath? 25 A. Yes.
Page 74 1 A. If there was an aft and a forward 2 engine room. 3 Q. There would be one in each, correct? 4 A. Yes. 5 Q. Do you know whether the Bausell had 6 an aft and a forward engine room? 7 A. Again, I don't -- I'm not familiar 8 with that particular ship. 9 Q. Are you familiar with the Gearing 10 class of destroyers, of which the Bausell is one? 11 A. Just by name. 12 Q. Are you familiar with whether the 13 Gearing class of destroyers had engine rooms both 14 in the aft and the forward? 15 A. No. 16 Q. Okay. Just so the record is clear, 17 sir, did you locate any document, like Deposition 18 Exhibit Number 5, which indicated on the 19 document -- not the drawing, which indicated on 20 the document that two main condensate circulating 21 pumps were installed and sold for installation 22 aboard the USS Bausell? 23 A. Can we just look through? 24 Q. Absolutely. 25 A. It's not in the pile, no.	Page 76 1 Q. You have located the main condenser 2 circulating pump drawings; is that correct, sir? 3 A. Yes. 4 Q. Can you identify them by Bates stamp 5 number for the record, please? 6 A. We have WP-IL 00244, WP-IL 00245 and 7 WP-IL 00245B, as in boy. 8 Q. Okay. And what are those exactly, 9 please, sir? 10 A. Do you want me to use the Bates 11 numbers to identify? 12 Q. That's fine. 13 A. Okay. Bates number WP-IL 00244 and 14 00245 is the outline and certification data for 15 that main condenser circulating pump. And Bates 16 number 00245B, as in boy, is the sectional 17 assembly and parts list for that pump. 18 Q. For the main condenser circulating 19 pumps, Drawings 244 and 245, is there anything on 20 those drawings that indicates any asbestos 21 insulating, insulation, parts, cement, anything 22 of the sort? 23 MS. PERRITANO: On the main circ 24 pump, is that what you're talking about? 25 Q. (By Mr. Iola) No, the main condenser

Page 77 1 circulating pump? 2 A. No. 3 Q. And on drawing 245B, which is the 4 sectional assembly and parts list, is there 5 anything that identifies any asbestos-containing 6 gaskets, asbestos-containing insulation, 7 asbestos-containing lagging, anything of the 8 sort? 9 MS. PERRITANO: Objection to the 10 extent it asks for more than one product at the 11 same time, so when you answer, just break it 12 down, please. 13 A. Okay, it -- Just let me find the 14 right piece number for you. 15 MS. LACONTE: Can whoever is typing, 16 mute their phone, please? 17 A. There is a -- No, it's not identified 18 on here. There is -- There is a gasket that is 19 unidentified by material, which is piece number 20 703. There is also gasket material -- packing 21 material, which is piece number 727, and is 22 identified as plastic metallic rod and by the 23 Navy department specification. 24 Q. (By Mr. Iola) And do you think that 25 gasket material contained asbestos?	Page 79 1 Deposition Exhibit 6 as a group, if you'd like. 2 MS. PERRITANO: Okay. Why don't we 3 do that just so -- 4 MR. IOLA: Sure. 5 MS. PERRITANO: -- it's clear later. 6 Do you care which of the three drawings -- 7 MR. IOLA: I would put it on 244. 8 MS. PERRITANO: Okay. 9 MR. IOLA: And for the record, we're 10 marking as Deposition Exhibit Number 6, drawings 11 WP-IL-00244, 00245 and 00245B together as a 12 group, as Exhibit Number 6. 13 (Whereupon, Exhibit 6 was marked.) 14 Q. (By Mr. Iola) Sir, the next item 15 that I believe you listed was the fresh water 16 pump, but I want to turn your attention instead 17 to the fire and bilge pump. And in the documents 18 that you located last night as supplemental 19 documents, did you locate any orders for fire and 20 bilge pumps? 21 A. That's what I'm looking for right now 22 for you. 23 Q. I believe, turn your attention to 24 WP-IL 00016 and the pages behind it. 25 A. Yes.
Page 78 1 MS. PERRITANO: Objection, if you 2 know. 3 A. I do not know, based on this 4 information. 5 Q. (By Mr. Iola) Do you think the 6 packing material contained asbestos? 7 MS. PERRITANO: Objection, if you 8 know. 9 A. From this information, it doesn't 10 give me enough. 11 Q. (By Mr. Iola) Okay. So from the 12 drawings we have on the main condenser 13 circulating pumps, including drawings 244, 245 14 and 245B, it's unclear whether or not the main 15 condenser circulating pumps had any 16 asbestos-containing parts or insulation, correct? 17 A. Correct. 18 Q. Okay. Let's move, if we would, 19 sir -- 20 MS. PERRITANO: Did you mark -- 21 actually mark those as an exhibit? 22 MR. IOLA: No, I don't need to. 23 MS. PERRITANO: You're just going to 24 refer to them as -- 25 MR. IOLA: We can mark them as	Page 80 1 Q. Let's mark as Deposition Exhibit 2 Number 7 what's Bates stamp numbered as WP-IL 3 00016 through WP-IL 00020; is that where you 4 stopped? 5 A. Yes. 6 (Whereupon, Exhibit 7 was marked.) 7 Q. (By Mr. Iola) Does this appear to be 8 the pages of the documents that deal with fire 9 and bilge pumps? 10 A. Yes. 11 Q. Okay. And what is this document that 12 we've just now marked as Deposition Exhibit 13 Number 7? 14 A. This is our sales order for the 15 pumps. 16 Q. Order number A-17909? 17 A. Yes. 18 Q. It's dated November 30, 1943? 19 A. Yes. 20 Q. And it's ordered by Warren 21 Engineering, correct? 22 A. Yes. 23 Q. For Gibbs and Cox, correct? 24 A. Yes. 25 Q. Who is Gibbs and Cox?

Page 81	Page 83
1 A. They were the naval architects. 2 Q. And it says ship to Bath Iron Works 3 Corp., Bath, Maine, correct? 4 A. Yes. 5 Q. And this is -- Under special marks 6 it's for the class of ships DD-829 through 7 DD-849, correct? 8 A. Yes. 9 Q. And that would include the USS 10 Bausell at DD-845, correct? 11 A. Yes. 12 Q. So this document tells us that some 13 fire and bilge pumps were ordered by the 14 engineering department at Warren for sale and 15 installation to Bath Iron Works aboard these 16 Naval ships, correct? 17 A. Yes. 18 Q. And how many fire and bilge pumps? 19 A. 84. 20 Q. 84 total for the whole variety of 21 different ships, correct? 22 A. Yes. 23 Q. And what exactly were they, these 84? 24 A. Could you rephrase? 25 Q. Yeah, were they 6-by-9-by-12 vertical	1 molded ring stuffing box packing, correct? 2 A. Yes. 3 Q. It suggests that there was steam 4 cylinders and valve chest to be suitably 5 insulated and lagged, correct? 6 A. Yes. 7 Q. And what does that tell you? 8 A. That tells me that there was some 9 form of insulation around the steam cylinder. 10 Q. And a steam cylinder is what, 11 Mr. Doktor? 12 A. That's the driving mechanism for the 13 pump. 14 Q. And steam is what? 15 A. Heated water. 16 Q. Okay. Super-heated water? 17 MS. PERRITANO: Objection, if you 18 know. 19 A. Could be. 20 Q. (By Mr. Iola) But at least, it's in 21 excess of 125 degrees to create steam, correct? 22 MS. PERRITANO: Objection. 23 A. 212 degrees. 24 Q. (By Mr. Iola) Even better. That's 25 correct?
Page 82	Page 84
1 single fire and bilge pumps with air chambers? 2 A. Yes, that's the description on 3 the order. 4 Q. And is there various types of fire 5 and bilge pumps or is that the fire and bilge 6 pump that Warren made? 7 A. For this particular ship, that was 8 the pump that we made. 9 Q. Okay. There's not a different 10 variety or version, correct? 11 A. Not for the ship. 12 MS. PERRITANO: Objection. 13 Q. (By Mr. Iola) Okay. This document 14 indicates that these 84 vertical single fire and 15 bilge pumps 6-by-9-by-12s were all identical, 16 correct? 17 A. Yes. 18 Q. And they were centrifugally cast, 19 correct? 20 A. The pump cylinder was. 21 Q. Okay. And there's a little 22 description about midway down the page that 23 describes that, correct? 24 A. Yes. 25 Q. It suggests that there was John Crane	1 A. Yes. 2 MS. PERRITANO: Objection. 3 Q. (By Mr. Iola) Steam requires 4 insulation, correct? 5 MS. PERRITANO: Objection, if you 6 know. Beyond the scope of this witness's 7 designation. 8 Q. (By Mr. Iola) You can answer. 9 A. It doesn't necessarily need to be. 10 Q. Okay. It doesn't necessarily need to 11 be to keep steam steam? 12 A. Correct. 13 Q. Okay. You've seen uninsulated steam 14 lines before? 15 MS. PERRITANO: Objection, relevance, 16 beyond the scope. 17 Q. (By Mr. Iola) You can answer. 18 A. Yes. 19 Q. These steam lines or this steam 20 cylinder was insulated, correct? 21 A. And lagged, yes. 22 Q. Okay. What is -- What do you mean by 23 the term "lagged"? 24 A. It's the metal covering that goes 25 over the insulation.

Page 85 1 Q. And the design of why there is metal 2 covering over the insulation is why? 3 A. Protection. 4 Q. Protection from what? 5 A. People -- 6 MS. PERRITANO: Objection, if you 7 know. 8 A. Again, I'm -- 9 MS. PERRITANO: Don't speculate. 10 Q. (By Mr. Iola) If you don't know -- 11 A. I don't know. 12 MS. PERRITANO: If it's beyond your 13 knowledge, do not speculate. 14 Q. (By Mr. Iola) The second page of 15 this document, WP-IL 00017, indicates on 16 September 12, 1945, DD-845 received four pumps, 17 correct? 18 A. Yes. 19 Q. And what does it say underneath that? 20 A. Well, I can't read the next line, but 21 the line after that is four air chambers. 22 Q. And where was a fire and bilge pump 23 installed, if you know? 24 A. I don't know. 25 MS. PERRITANO: On the ship?	Page 87 1 VIDEOGRAPHER: Hold on. Off the 2 record. I just lost power. 3 (Whereupon, an off-the-record 4 discussion was held.) 5 VIDEOGRAPHER: The time is 10:55 a.m. 6 We are now back on the record after a brief power 7 outage. 8 Q. (By Mr. Iola) Mr. Doktor, now in 9 front of you is -- are some drawings regarding 10 the assembly list of spares and materials 11 6-by-9-by-12 vertical single fire and bilge 12 pumps, correct? 13 A. Yes. 14 Q. They're labeled Bates number WP-IL 15 00240 and WP-IL 00241; is that correct, sir? 16 A. Yes. 17 MR. IOLA: We will mark those as a 18 group as Deposition Exhibit Number 8 and simply 19 put that at the bottom by the WP number. That 20 will be great. 21 (Whereupon Exhibit 8 was marked.) 22 Q. (By Mr. Iola) For the record, this 23 is really one drawing, is it not, Mr. Doktor, 24 that just happened to be copied on two pages, 25 because it's so long; is that correct?
Page 86 1 Q. (By Mr. Iola) Yes, sir. 2 A. In particular on the ship, I don't 3 know. 4 Q. Are they installed in pairs? 5 A. I do not know. 6 Q. But this indicates that four of them 7 were aboard the USS Bausell, correct? 8 A. Yes. 9 Q. Where aboard the USS Bausell, you 10 don't know, correct? 11 A. I do not know. 12 Q. Have you made any research at the 13 naval archives to determine where on the USS 14 Bausell the fire and bilge pumps were? 15 A. Not that I'm aware of, no. 16 Q. Have you made any research or 17 conducted any research at Bath Iron Works, or any 18 of their records to determine where the 19 installation of these fire and bilge pumps was? 20 A. No. 21 MS. PERRITANO: On the Bausell? 22 Q. (By Mr. Iola) Yes. 23 A. No, not that I'm aware of. 24 Q. Now, in front of you, you have some 25 drawings --	Page 88 1 A. That's correct. Yes. 2 Q. But this one drawing is a drawing of 3 the assembly list of spares and material for the 4 6-by-9-by-12 vertical single fire and bilge pump, 5 correct? 6 A. Yes. 7 Q. And this is the Warren Pumps 8 6-by-9-by-12 vertical single fire and bilge pump 9 that was manufactured by Warren Pumps for sale on 10 various ships, including DD-645, the USS Bausell, 11 correct? 12 A. The 845. 13 Q. 845, I'm sorry. 14 A. Yes. 15 Q. And as I understand these drawings, 16 we can look right to the left of the description 17 of what this drawing is and we see a listing of 18 various ships, correct? 19 A. Yes. 20 Q. And up there we see DD-829 to 849, 21 correct? 22 A. Yes. 23 Q. Which tells us that anything in the 24 numbers DD-829 through 849 is the ship that this 25 was installed upon, correct?

Page 89 1 A. Yes. 2 Q. And the next column says DD-809, what 3 does that mean? 4 A. This should be -- if you go down to 5 the bottom of that column, it says purchase -- 6 purchase order number. 7 Q. Okay. 8 A. So that was the customer's order for 9 those items. 10 Q. And then the next column says WSP 11 Company, Inc. order number, correct? 12 A. Yes. 13 Q. And that would correspond to the A 14 number we mentioned earlier, which is on 15 Deposition Exhibit Number 7, which in this case 16 is order A-17909, correct? 17 A. Yes. 18 Q. And that corresponds identically with 19 DD-829 through 849, correct? 20 A. Yes. 21 Q. On this document under the list of 22 material, we see as material part number 161, a 23 gasket, pump cylinder and heads; is that right? 24 A. Yes, sir. 25 Q. And it says number 2 and then it says	Page 91 1 A. Yes. 2 Q. And what is this a gasket for? 3 A. Can you give me a second to find 4 out -- 5 Q. Yes, sir. 6 A. -- exactly where that part number is. 7 It's a gasket that seals the lower head to the 8 pump cylinder and the upper head to the cylinder. 9 Q. Do you know what the purpose is of 10 using an asbestos gasket there? 11 MS. PERRITANO: Objection, if you 12 know. 13 A. The gasket seals any leakage between 14 those two parts. 15 Q. (By Mr. Iola) There's also part 16 number 162, correct? 17 A. Yes. 18 Q. What's 162? 19 A. Gasket pump cylinder and hand hold 20 plate, I believe, is what the description is. 21 Bifocals aren't what they used to be. 22 Q. And what is that? 23 A. That's another gasket. 24 Q. Another gasket that contained 25 asbestos?
Page 90 1 material asbestos and material specification 2 asbestos, correct? 3 A. Yes. 4 Q. Does that mean that's an 5 asbestos-containing gasket? 6 MS. PERRITANO: Objection. Go ahead. 7 Q. (By Mr. Iola) You can answer. 8 A. That's what the drawing says, yes. 9 Q. That's an asbestos-containing gasket 10 to be used on a single one fire and bilge pump, 11 correct? 12 A. Yes. 13 Q. And if we have four aboard the USS 14 Bausell, then wherever this part number 161 is, 15 we multiply it by four, because we have four such 16 pumps on the Bausell, correct? 17 MS. PERRITANO: Objection. 18 A. We have four pumps on the Bausell. 19 Q. (By Mr. Iola) Okay. Do you know how 20 many of these gaskets containing asbestos for 21 part number 161 are on the pump? 22 A. According to the drawing, let me see, 23 two. 24 Q. So two gaskets for part number 161 25 are on each pump, correct?	Page 92 1 A. According to this drawing, yes. 2 Q. Part number 163, what is that? 3 A. Pump gasket, pump cylinder and -- and 4 I can't read the rest of that. 5 Q. Another gasket? 6 A. Yes. 7 Q. Containing asbestos? 8 MS. PERRITANO: Objection. 9 A. According to the drawing, yes. 10 Q. (By Mr. Iola) According to the list 11 of material on the drawing, right? 12 A. Yes, sir. 13 Q. How many of those are there on each 14 pump? 15 A. One. 16 Q. Okay. How many part numbers 162 on 17 each pump? 18 A. One. 19 Q. Okay. Part number 164, what is that? 20 A. It's another gasket. 21 Q. Another gasket that's used where? 22 A. On this pump, between the pump 23 cylinder and another piece. 24 Q. How many of those on each pump? 25 A. One.

Page 93 1 Q. And is that an asbestos-containing 2 gasket? 3 MS. PERRITANO: Objection, if you 4 know. 5 A. The drawing indicates it has 6 asbestos. 7 Q. (By Mr. Iola) Well, the drawing is 8 what we go by, right? That's what tells us what 9 the part is, correct? 10 A. Yes. 11 Q. So you can look at the drawing and 12 know that that gasket contained asbestos, right? 13 MS. PERRITANO: From the drawing, 14 yes. 15 Q. (By Mr. Iola) You can answer. 16 A. Yes. 17 Q. Do you have any reason to disbelieve 18 the drawing is accurate? 19 A. No. 20 Q. Do you have any reason to disbelieve 21 that gasket did not contain asbestos? 22 MS. PERRITANO: Objection. 23 A. No. 24 Q. (By Mr. Iola) Are there any other 25 asbestos-containing gaskets that you're aware of	Page 95 1 correct? 2 A. That's correct. 3 Q. So, naturally, you would assume that 4 this is a pump that was manufactured at the 5 Warren manufacturing facility in Warren, 6 Massachusetts, correct? 7 A. Yes. 8 Q. Did Warren purchase these gaskets 9 precut? 10 A. I do not know. 11 Q. Did Warren purchase sheet gaskets? 12 MS. PERRITANO: For this particular 13 pump? 14 Q. (By Mr. Iola) Yes, sir. 15 A. I don't know. 16 Q. Do you know who was the supplier of 17 these asbestos gaskets for the fire and bilge 18 pump? 19 A. No. 20 Q. This fire and bilge pump drawing is 21 dated when? 22 MS. PERRITANO: There it is. 23 A. It was traced or drawn in 1940. 24 Q. (By Mr. Iola) And it was finally 25 approved by Warren Pumps on what date?
Page 94 1 on this drawing? 2 A. Can you give me a second just to look 3 real quick? 4 Q. Absolutely. 5 MS. PERRITANO: Take your time. 6 THE WITNESS: I need to take my 7 glasses off. 8 A. I did not see any. 9 Q. (By Mr. Iola) Okay. These gaskets 10 are installed during the initial construction of 11 the pump, correct? 12 A. Yes. 13 Q. The initial construction of this pump 14 takes place at the Warren Pumps or Warren Steam 15 Pump Company manufacturing facility, correct? 16 A. Yes. 17 Q. Was this pump, this fire and bilge 18 pump, manufactured at the Warren, Massachusetts 19 Warren Pump facility? 20 MS. PERRITANO: If you know. 21 A. It doesn't indicate on the drawing 22 whether -- whether it was or not. 23 Q. (By Mr. Iola) But it's not the type 24 of pump that you identified earlier was 25 manufactured at the Rhode Island facility,	Page 96 1 A. It doesn't -- doesn't have a Warren 2 Pumps approval, it has a Bureau of Ships 3 approval, supervisor of ship building approval. 4 Q. And the date of that is what? 5 A. March 20th, 1941. 6 Q. Is it your understanding that this is 7 the drawing that was in effect at the time the 8 fire and bilge pumps installed upon the USS 9 Bausell were constructed? 10 A. Yes. 11 Q. Next -- 12 MS. PERRITANO: Is that two pages? 13 Q. (By Mr. Iola) Yes. Next I want to 14 turn your attention to Bates stamped drawings 15 WP-IL-00238 and WP-IL-00239. Do you see those 16 documents, sir? 17 A. Yes. 18 MR. IOLA: If you would kindly, 19 please, mark WP-IL 00238 as Deposition Exhibit 20 Number 9. 21 (Whereupon, Exhibit 9 was marked.) 22 Q. (By Mr. Iola) And let me state for 23 the record and ask you to confirm that these two 24 drawings, 238 and 239, are the lagging outline 25 6-by-9-by-12 vertical single fire and bilge pump,

Page 97 1 correct? 2 A. Yes. 3 Q. And this is one drawing that, again, 4 is too big to fit on one page, correct? 5 A. Yes. 6 Q. So that's why we're only marking it 7 as Deposition Exhibit Number 9, even though it's 8 two Bates stamp numbers for the record. 9 This is a drawing of Warren Steam 10 Pump Company, Incorporated, correct? 11 A. Yes. 12 Q. Of the lagging outline for the 13 6-by-9-by-12 vertical single fire and bilge pump, 14 correct? 15 A. Lagging and outline, yes. 16 Q. And the lagging and outline for 17 6-by-9-by-12 vertical single fire and bilge pumps 18 installed upon the USS Bausell, correct? 19 A. Yes. 20 Q. Again, it shows the range of DD-829 21 to DD-849, correct? 22 A. Yes. 23 Q. And the purchase order number 24 A-17909, correct? 25 A. Yes.	Page 99 1 Pumps puts together, correct? 2 A. Yes. 3 Q. And this is intended show the 4 customer what the customer must do with this pump 5 to properly install it and for it to properly 6 operate, correct? 7 MS. PERRITANO: Objection. 8 A. In a manner of speaking, yes. 9 Q. (By Mr. Iola) In other words, if the 10 customer ignored this lagging and outline 11 drawing, would this pump work effectively? 12 MS. PERRITANO: Objection, if you 13 know. 14 A. They wouldn't know how to -- how to 15 run the piping, so that it would run properly. 16 Q. (By Mr. Iola) So the customer has to 17 hook up the pump in accordance with these 18 specifications to properly work and maintain the 19 product that you're selling them, correct? 20 MS. PERRITANO: Objection. 21 A. Yes. 22 Q. (By Mr. Iola) And Warren knows that 23 at the time these drawings are made by Warren, 24 correct? 25 MS. PERRITANO: Objection, beyond the
Page 98 1 Q. Which we previously discussed is 2 exactly the order number that we previously 3 marked as Exhibit Number -- 4 MS. PERRITANO: I believe it was 7. 5 Q. (By Mr. Iola) 7, correct? 6 A. Yes. 7 Q. This is a lagging and outline, 8 correct? 9 A. Yes. 10 Q. What is a lagging and outline? 11 A. Well, the outline shows all the 12 critical dimensions of the size of the pump. The 13 lagging is the metal covering the steam cylinder. 14 Q. And the purpose of this drawing or 15 these two pages is to do what? 16 A. To show the customer the exact sizes 17 and locations of all pertinent information that 18 they would need, once the pump was delivered to 19 them. 20 Q. This drawing was made when? 21 A. This one was November of 1940. 22 Q. And it was approved by the Bureau of 23 Ships when? 24 A. March 20th, 1941. 25 Q. And this is a drawing that Warren	Page 100 1 scope, irrelevant. 2 A. I don't know what Warren's thinking 3 was at that time. 4 Q. (By Mr. Iola) Well, when Warren 5 makes these drawings, Warren understands that the 6 pump must be installed and lagged in accordance 7 with these or they wouldn't bother to make the 8 drawings, right? 9 MS. PERRITANO: Objection, relevance, 10 beyond the scope. 11 A. This is the information the customer 12 would need to make sure it was installed 13 properly. 14 Q. (By Mr. Iola) But this information 15 comes from Warren, correct? 16 A. Yes. 17 Q. Warren knows it's giving the customer 18 this information, correct? 19 A. Yes. 20 Q. Warren is knowledgeable about 21 educating the customer about the use of this 22 pump, correct? 23 MS. PERRITANO: Objection, beyond the 24 scope. 25 A. Yes.

Page 101 1 Q. (By Mr. Iola) Warren identifies a 2 list of material to be used on this pump, 3 correct? 4 A. Part -- Part of the list of 5 materials, yes. 6 Q. Part of the list of materials, right? 7 A. Yes. 8 Q. Part of the list of materials 9 includes material part number 232, correct? 10 A. Yes. 11 Q. And what is material part number 232? 12 A. Asbestos metallic cloth ring. 13 Q. And what do you understand asbestos 14 metallic cloth ring is? 15 MS. PERRITANO: Objection, if you 16 know. 17 A. Well, there's a further description 18 under remarks. 19 Q. (By Mr. Iola) And what does that 20 say? 21 A. It's 1/16th-by-one-inch wide. 22 Q. And what is the type of material? 23 A. The description on the drawing is 24 asbestos and it's material spec 33P2. 25 Q. And what does that mean, that the	Page 103 1 a balloon number that's called that's item 232. 2 It goes in the area around the -- between the 3 cylinder and this web, as a cushion between the 4 cylinder and the web and the metal web. 5 Q. And in somebody's writing it says 6 1/16-inch thick wide asbestos cloth ring, 7 correct? 8 A. Yes. 9 Q. There's two of those on the part 10 list, correct? 11 A. That is correct. 12 Q. Part number 233 is insulating 13 material, correct? 14 A. Yes. 15 Q. And there's not a quantity and the 16 material is listed as 85 percent magnesia, 17 correct? 18 A. Yes. It's further described as 19 specification 32M-2. 20 Q. And what does that mean to you? 21 A. That was the naval specification. 22 Q. And do you have an understanding of 23 what 85 percent magnesia insulation is? 24 MS. PERRITANO: Objection, beyond the 25 scope. Page 102 1 asbestos metallic cloth ring is asbestos? 2 MS. PERRITANO: Objection. What do 3 you mean what does it mean? 4 Q. (By Mr. Iola) What does it mean to 5 you, when you read that? 6 MS. PERRITANO: Objection, beyond the 7 scope, relevance. What something means to this 8 witness -- 9 Q. (By Mr. Iola) You can answer. If he 10 knows, he can answer. You got an objection. You 11 can answer. 12 MR. PERRITANO: I do have an 13 objection. And I want to just finish it, please. 14 It is not what -- What his understanding is, is 15 not relevant for purposes of this deposition. If 16 you have an understanding of what that means, go 17 ahead. 18 A. I mean, I can only go by what the 19 description on the drawing is. Either it was 20 made out of asbestos or contained asbestos. 21 Q. (By Mr. Iola) Where does that part 22 go on the drawing? 23 A. It goes under -- Need to look at 24 00239 drawing. On the area that you see that has 25 the webbing on it, it goes -- you'll see there's Page 104 1 A. Yes. 2 Q. (By Mr. Iola) What is your 3 understanding of what that is, sir? 4 MS. PERRITANO: Objection, beyond the 5 scope. 6 A. It's an asbestos material. 7 Q. (By Mr. Iola) Okay. And it's an 8 asbestos material that is listed on the list of 9 material by Warren Steam Pump Company, regarding 10 the vertical single fire and bilge pump, correct? 11 A. Yes. 12 MS. PERRITANO: Objection. 13 Q. (By Mr. Iola) And if we look on 14 drawing 238 and then extending over to drawing 15 239, we have a drawn out schematic of where the 16 85 percent magnesia asbestos insulation is to go 17 on the pump, correct? 18 A. Yes. 19 Q. And we see that about a quarter of 20 the way down on 238 and continuing over to 239, 21 where it says insulation around that block kind 22 of square, correct? 23 A. Yes. 24 Q. That is the 85 percent magnesia 25 insulation, correct?
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Page 105 1 A. It's inside of that, yes. 2 Q. Right. It's inside of that for a 3 number of inches, correct? 4 A. Yes. 5 Q. And approximately how many inches of 6 asbestos 85 magnesia insulation are we talking 7 about right there? 8 MS. PERRITANO: Objection, if you can 9 tell. 10 A. A cylinder length, according to the 11 drawing is 15-and-a-half inches and three inches 12 deep. 13 Q. (By Mr. Iola) So about three inches 14 of asbestos 85 percent magnesia; is that correct? 15 MS. PERRITANO: Objection. 16 A. On the drawing, yes. 17 Q. (By Mr. Iola) Okay. And the drawing 18 is what we go by, right? 19 A. Yes. 20 Q. And that part where it's being 21 insulated, is what? 22 A. Inside of that is the steam cylinder. 23 Q. So that's the steam cylinder and then 24 on the outside of the steam cylinder is the 25 asbestos insulation, correct?	Page 107 1 the drawing. 2 A. Yeah, it's not -- That part of it is 3 not identified. 4 Q. (By Mr. Iola) Okay. On 239, there's 5 a marker that says insulation 6 four-and-three-eighths inch, correct? 7 MS. PERRITANO: Give me one second to 8 find 239, please. 9 A. Yes. Yes. 10 Q. (By Mr. Iola) And that is a space of 11 four-and-three-eighths inches that is filled up 12 with insulation? 13 MS. PERRITANO: Objection, if you 14 know. 15 A. According to the drawing. 16 Q. (By Mr. Iola) And that's 17 four-and-three-eighths inches that's filled up 18 with 85 magnesia asbestos insulation, correct? 19 MS. PERRITANO: Objection. 20 A. Again, the drawing so noted. 21 Q. (By Mr. Iola) But the drawing is 22 what Warren presents to the customer, correct? 23 A. Yes. 24 Q. Who puts this insulation on the 25 product?
Page 106 1 A. And outside of that is the lagging. 2 Q. And the lagging is what? 3 A. Is sheet metal. 4 Q. And the lagging is installed where? 5 A. Location or on the pump? 6 Q. On the pump? 7 A. It's installed over the insulation. 8 Q. And location is anywhere there's the 9 insulation, you have lagging on the outside of 10 it, correct? 11 A. Yes. 12 Q. In addition, there's various arrows 13 on 238 and 239 drawings that show insulating 14 material of 85 percent magnesia smooth and 15 pointed with plastic, correct? 16 A. Yes. 17 Q. And one of the arrows shows an inch 18 and an eighth-inch of that, correct? 19 A. Yes. 20 Q. One of the arrows shows -- 21 A. Well, can -- That inch-and-an-eighth 22 is the size of the cover that goes over that. 23 Q. Okay. And how much insulation is 24 there? 25 MS. PERRITANO: If you can tell from	Page 108 1 A. Warren. 2 Q. Okay. And the insulation is put on 3 the product at Warren's facility, correct? 4 A. Yes. 5 Q. So Warren actually has to purchase 6 85 percent magnesia asbestos insulation to put on 7 the pump, before it ships it out the door, 8 correct? 9 MS. PERRITANO: Objection. 10 A. Yes. 11 Q. (By Mr. Iola) It's a component part 12 of the manufacturer of the pump, correct? 13 A. Yes. 14 Q. And so Warren then puts the metal -- 15 metal covering over the 85 percent magnesia 16 asbestos insulation to protect the insulation, 17 for whatever purpose, when it ships the product 18 out the door, correct? 19 MS. PERRITANO: Objection, compound. 20 A. Yes. 21 Q. (By Mr. Iola) In other words, the 22 metal covering, known as the lagging, goes over 23 the insulation containing asbestos, correct? 24 A. Yes. 25 Q. Warren workers actually installed the

Page 109 1 asbestos insulation on these pumps, correct? 2 MS. PERRITANO: On the particular 3 pumps at issue in this case? 4 Q. (By Mr. Iola) Yes, sir. 5 A. Yes. 6 Q. Do you know any protection that the 7 Warren workers wore when they were using and 8 handling asbestos-containing insulation? 9 MS. PERRITANO: Objection, beyond the 10 scope. To the extent you're asking about these 11 particular pumps -- 12 Q. (By Mr. Iola) If you know. 13 MS. PERRITANO: -- for this 14 particular ship, the witness may answer. 15 A. I haven't -- I haven't seen any 16 documentation or anything to say what they might 17 have done. 18 Q. (By Mr. Iola) Do you know where 19 Warren Steam Pump Company purchased the 20 85 percent magnesia asbestos insulation that went 21 on these fire and bilge pumps that were installed 22 on the USS Bausell? 23 A. No, I do not. 24 Q. There's another arrow on drawing 239 25 that indicates three inches of insulation at the	Page 111 1 correct? 2 A. Depends on what they wanted to do. 3 MS. PERRITANO: Objection, overly 4 broad. 5 Q. (By Mr. Iola) Right, but if they 6 were performing maintenance, for instance, on 7 this area of the pump, correct? 8 A. You would not have to -- 9 MS. PERRITANO: Objection as to the 10 use of the term "maintenance". 11 A. You would not have to tear through 12 the insulation to get there. 13 Q. (By Mr. Iola) Okay. How would you 14 get there? 15 A. You could remove the cover, this cap 16 piece and get to the cylinder that way. 17 Q. Okay. And if you remove the cover or 18 the cap piece to get to the cylinder, you would 19 disturb the seal, correct? 20 MS. PERRITANO: Objection. 21 A. You'd have to take the screws out, 22 yes. 23 Q. (By Mr. Iola) And you would have to 24 tear out this asbestos cloth ring? 25 A. No.
Page 110 1 bottom, I believe, correct? 2 MS. PERRITANO: Give me one second, 3 please. Thank you. 4 A. Yes. 5 Q. (By Mr. Iola) And that's an 6 additional three inches of 85 percent magnesia 7 asbestos insulation, correct? 8 MS. PERRITANO: Objection. 9 A. Yes. 10 Q. (By Mr. Iola) Now, if maintenance 11 had to be done on this part of the pump, the fire 12 and bilge pump, one would have to tear through 13 this insulation, correct? 14 MS. PERRITANO: Objection. Can you 15 define maintenance? 16 Q. (By Mr. Iola) Any type of work 17 maintenance? 18 MS. PERRITANO: Objection. The 19 question -- 20 A. Not necessarily. 21 MS. PERRITANO: -- is overly broad. 22 Q. (By Mr. Iola) If someone wanted to 23 get into this part of the pump that was insulated 24 with asbestos, they would have to somehow tear 25 through the asbestos-containing insulation,	Page 112 1 MS. PERRITANO: Objection. 2 Q. (By Mr. Iola) It would remain 3 intact? 4 A. Yes. 5 Q. And if you had to do any work on the 6 exterior where the insulation was, you would have 7 to get into that, as well, correct? 8 MS. PERRITANO: Objection. 9 A. I don't understand your question. 10 Q. (By Mr. Iola) Okay. If the 11 individual who was performing the work saw the 12 metal lagging and needed to come in that way, you 13 would remove the metal lagging first, correct? 14 MS. PERRITANO: Objection. I'm going 15 to object to the extent that you are asking the 16 witness to speculate as to what might or might 17 not have occurred. 18 MR. IOLA: If he doesn't know, he 19 simply needs to say that. 20 MS. PERRITANO: And he's not here to 21 offer testimony as to hypothetical maintenance 22 and/or other work that may or may not have been 23 done -- 24 Q. (By Mr. Iola) Mr. Doktor, are you -- 25 MS. PERRITANO: -- on these pumps.

Page 113 1 Q. (By Mr. Iola) You're not going to 2 testify at the time of the trial in this case 3 about any maintenance or repair work done on the 4 fire and bilge pump, correct? 5 MS. PERRITANO: Objection, to the 6 extent we have not made a determination yet as to 7 the extent of Mr. Doktor's testimony at trial. 8 At present, we do not have such a plan. 9 Q. (By Mr. Iola) Okay. Can you 10 personally testify, from your knowledge, about 11 the nature of how maintenance work would be 12 performed upon these pumps, fire and bilge 13 pumps -- 14 MS. PERRITANO: Generally? 15 Q. (By Mr. Iola) -- on board the USS 16 Bausell? 17 A. Depends on what maintenance they want 18 to do. 19 Q. In reading through any of the 20 testimony of Mr. Forest, or anybody else, the 21 interrogatory answers in this case, anything of 22 the nature, have you seen any discussion of work 23 performed on this pump? 24 A. Not that I can recall, no. 25 Q. Do you have personal knowledge of how	Page 115 1 MS. PERRITANO: Objection. Do not 2 answer that question. We're talking about a 3 hypothetical. I would advise you not to answer 4 that. 5 Q. (By Mr. Iola) Are you refusing to 6 answer? 7 A. Yes. 8 MR. IOLA: Okay. We'll certify that 9 one. 10 Q. (By Mr. Iola) Fire and bilge pumps 11 do what, sir? 12 A. Provide fluid to the fire main system 13 in fire condition or would pump out the bilge. 14 Q. How many fire and bilge pumps are 15 there on board the USS Bausell? 16 A. Four. 17 Q. Four different fire and bilge pumps, 18 correct? 19 A. When you say different? 20 Q. Separate entities? 21 A. Yes. 22 Q. Are they all located in the same 23 place? 24 A. I do not know. 25 Q. Each fire and bilge pump is driven
Page 114 1 maintenance work was performed aboard the fire 2 and bilge pumps aboard the USS Bausell, during 3 the time period when Mr. Gudmundson was on board 4 that ship? 5 A. No. 6 Q. You weren't there, correct? 7 A. Correct. 8 Q. You didn't oversee the others that 9 were his shipmates on board the ship, who might 10 have performed any maintenance and repair work, 11 correct? 12 A. Correct. 13 Q. You can't give any testimony if any 14 of those shipmates comes forward to say whether 15 that shipmate is saying -- is true and correct or 16 not, because you weren't there, right? 17 MS. PERRITANO: Objection, that calls 18 for a hypothetical. We don't have any of his 19 shipmates that have come forward yet with 20 specific testimony. If you have specific 21 testimony that you would like to show this 22 witness and ask him to take a look at that, 23 that's fine, but he's not going to say what might 24 happen in the future. 25 Q. (By Mr. Iola) You can answer.	Page 116 1 how, by what kind of power system? 2 A. It's a steam pump, so it uses steam 3 as its prime mover. 4 Q. Is it then driven by a turbine? 5 A. No. 6 Q. Pure steam? 7 A. Yes. 8 Q. Is the fire pump separate and 9 distinct from the bilge pump or is it called one 10 fire and bilge pump together? 11 A. It's called -- It's together, serves 12 several functions. 13 Q. The asbestos cloth ring is also 14 installed at the Warren facility, correct? 15 A. Yes. 16 Q. And the product, the fire and bilge 17 pump, is shipped out of the Warren facility with 18 the asbestos cloth ring already included, 19 correct? 20 A. Yes. 21 Q. Is there a handbook or an operation 22 manual that goes out the door with the fire and 23 bilge pump to the customer? 24 A. If it was requested. 25 Q. Okay. Have you come across any

Page 117 1 manual on fire and bilge pumps that was part of 2 what was sold and installed on the USS Bausell? 3 A. Not that I've seen, no. 4 Q. If one is requested, what types of 5 things are typically inside that manual? 6 MS. PERRITANO: Requested by the 7 customer? 8 MR. IOLA: Sure. 9 MS. PERRITANO: I didn't know if you 10 meant you. Objection, to the extent it's beyond 11 the scope of the depo, but go ahead. 12 A. Whatever their purchase order would 13 require. 14 Q. (By Mr. Iola) Have you made an 15 attempt to try to locate a manual, with respect 16 to what was sold to the USS Bausell in terms of 17 fire and bilge pumps? 18 A. We have conducted a search, yes. 19 Q. And you didn't find anything, 20 correct? 21 A. No, we did not. 22 Q. And you looked everywhere you 23 possibly could think of, correct? 24 A. Yes, sir. 25 Q. And did you contact the Naval	Page 119 1 record for a minute? 2 MR. IOLA: Yes. 3 VIDEOGRAPHER: The time is 10:27 4 (sic). We're off the record. 5 (Whereupon, an off-the-record 6 discussion was held.) 7 VIDEOGRAPHER: The time is 11:31 a.m. 8 This is cassette 2 in the deposition of Roland 9 Doktor. We're on the record. 10 Q. (By Mr. Iola) Mr. Doktor, you 11 understand we're back on the record and you're 12 still under oath? 13 A. Yes. 14 Q. We have now located, in fact, the 15 Warren Steam Pump Company instructions for 16 operation and maintenance manual of steam-driven 17 reciprocating pumps that was produced in the 18 initial production in this case, with respect to 19 the Gudmundson case and has a Bates stamp number 20 on the lower right corner. Will you read that 21 into the record, please? 22 A. WP-IL 00190 and it continues through 23 WP-IL 00212. 24 (Whereupon, Exhibit 10 was marked.) 25 Q. (By Mr. Iola) And this is entitled
Page 118 1 archives to determine if there was a handbook 2 there on fire and bilge pumps that was sold by 3 Warren Steam Pump Company? 4 A. No. 5 MS. PERRITANO: Objection. 6 Q. (By Mr. Iola) Are you aware that you 7 have previously produced in other litigation an 8 instruction manual regarding fire and bilge 9 pumps? 10 A. It's possible. 11 Q. Is there a distinction in your mind 12 between fire and bilge pumps that are aboard 13 other ships manufactured by Warren Pump Company 14 and the one that was on board the USS Bausell? 15 MS. PERRITANO: Objection. 16 A. There could be, I don't know. 17 Q. (By Mr. Iola) Okay. But your 18 testimony, as you sit here today, is you never 19 located the instruction manual by Warren Steam 20 Pump Company, Incorporated for operation and 21 maintenance of steam-driven reciprocating pumps 22 that were sold to the United States Navy or the 23 Government for installation on board the USS 24 Bausell DD-845, correct? 25 MS. PERRITANO: Can we go off the	Page 120 1 Warren Steam Pump Company, Incorporated, Warren, 2 Massachusetts, instructions for operation and 3 maintenance of steam-driven reciprocating pumps, 4 correct? 5 A. Yes. 6 Q. And it covers both fire and bilge 7 pumps and emergency feed pumps, correct? 8 A. Yes. 9 Q. And it covers vessels, including 10 DD-845, the USS Bausell, which was made at the 11 Bath Iron Works Corporation, correct? 12 A. Yes. 13 Q. Is there anywhere in this manual that 14 identifies to the customer a warning or caution 15 about asbestos on or in the pump? 16 MS. PERRITANO: Objection, to the 17 extent it's beyond the scope. Why don't you take 18 a minute to look through it? 19 A. Yeah, can I? 20 Q. (By Mr. Iola) Absolutely. 21 MS. PERRITANO: Relevance, also. 22 A. I don't see anything identified as a 23 caution or warning. 24 Q. (By Mr. Iola) In fact, there's 25 nothing in the document that even states the

Page 121	Page 123
1 asbestos insulation being used on the fire and 2 bilge pump, correct? 3 MS. PERRITANO: Objection, relevance, 4 beyond the scope. 5 A. I did not see anything. 6 Q. (By Mr. Iola) There's nothing that 7 states in the Warren Steam Pump Company operation 8 and maintenance manual for fire and bilge pumps, 9 regarding the care and maintenance of the 10 85 percent magnesia asbestos insulation around 11 the steam cylinder on the fire and bilge pump, 12 correct? 13 MS. PERRITANO: Objection, relevance, 14 beyond the scope. 15 A. No. 16 Q. (By Mr. Iola) Are you aware, as you 17 sit here today, of any subsequent period of time 18 where Warren Steam Pump Company warned or issued 19 a caution regarding the asbestos insulation 20 around the steam cylinder of the fire and bilge 21 pumps that were installed on the USS Bausell? 22 MS. PERRITANO: Objection, only to 23 the extent that we're dealing with the Bausell. 24 Was that the question? Are you talking about the 25 time frame associated with the pumps on the	1 witness may answer. 2 A. I have not seen any documentation. 3 Q. (By Mr. Iola) Did you know, 4 Mr. Doktor, at the time you were signing the 5 Verifications to the Interrogatories in the Wise 6 & Julian Madison County cases, that these fire 7 and bilge pumps contained 85 percent magnesia 8 asbestos insulation? 9 MS. PERRITANO: Objection. 10 A. I don't know what documents I looked 11 at during that time period. 12 Q. (By Mr. Iola) So as you sit here 13 today, you can't testify under oath to the 14 Members of this Jury, that you saw all these 15 drawings and had all this knowledge in your mind 16 at the time you executed the Verification to the 17 Affidavit -- to the Interrogatory Answers, 18 correct? 19 MS. PERRITANO: Objection. I 20 think -- I may be wrong, but I think that the 21 interrogatories are not necessarily in the 22 Gudmundson case, so I don't know that it's fair 23 to relate to the interrogatories to this case. 24 Q. (By Mr. Iola) You can answer. 25 MS. PERRITANO: With that
Page 122	Page 124
1 Bausell, while Mr. Gudmundson was on board, 2 correct? 3 MR. IOLA: Well, the pumps on the 4 Bausell we're dealing with. 5 MS. PERRITANO: What was -- Can I 6 have the question, again? 7 MR. IOLA: Sure. 8 MS. PERRITANO: I'm sorry. 9 Q. (By Mr. Iola) Do you know of any 10 other information in the form of a caution or 11 warning that was ever issued, regarding the fire 12 and bilge pumps installed on the USS Bausell, 13 from their date of installation forward that 14 cautioned or warned about the dangers or hazards 15 of asbestos? 16 MS. PERRITANO: I'm going to object 17 to the extent that the question seems to suggest 18 a time period beyond that which we are dealing 19 with in the Gudmundson case. I'm also going to 20 object to the extent that the question assumes 21 that Warren had any duty to warn, in this 22 particular case, or any duty to warn in general. 23 To the extent that the question seeks information 24 concerning the time period that Mr. Gudmundson 25 was on the Bausell and times prior to that, the	1 qualification, if you know, you can answer. 2 A. I don't know. 3 Q. (By Mr. Iola) The interrogatory 4 answers have citations in your answers to the use 5 of asbestos-containing products; do they not? 6 MS. PERRITANO: Objection, beyond the 7 scope. 8 A. Could you rephrase that? 9 Q. (By Mr. Iola) The interrogatory 10 answers have sentences which reflect that Warren 11 products may have contained asbestos, correct? 12 MS. PERRITANO: Objection, beyond the 13 scope, relevance. You can answer that generally. 14 A. Generally, yes. 15 Q. (By Mr. Iola) I mean the 16 interrogatories clearly state that some of the 17 pumps had gasket or packing components that 18 contained asbestos, right? 19 MS. PERRITANO: Objection, relevance, 20 beyond the scope. 21 A. Yes. 22 Q. (By Mr. Iola) And that's consistent 23 with what we've looked at in the drawings, so 24 far, correct? 25 A. Yes.

Page 125 1 Q. On board the units that were sold to 2 the United States Navy for installation on the 3 USS Bausell, correct? 4 A. Yes. 5 Q. And in addition, there's mention of 6 other asbestos products on board some of the 7 vessels, pumps, et cetera, that were sold to the 8 United States Government for installation, 9 correct? 10 MS. PERRITANO: Objection, relevance, 11 beyond the scope. 12 A. Yes. 13 Q. (By Mr. Iola) The next document I 14 would like to have you take a peek at, 15 Mr. Doktor -- 16 A. Do you want to leave this -- 17 Q. Yeah, please -- is from the 18 documents, last night, the supplemental group, it 19 would be WP -- Let me look exactly. WP-IL, it 20 looks like 0012 and the succeeding pages, which I 21 believe go through 0015. 22 (Whereupon, Exhibit 11 was marked.) 23 Q. (By Mr. Iola) Let me hand you what 24 we've marked as Deposition Exhibit Number 11, 25 sir, which is Bates stamp number pages WP-IL b	Page 127 1 Q. The emergency feed pump kicks in if 2 the main feed pump goes down for any reason, 3 correct? 4 A. It doesn't kick in automatically. It 5 has to be started. 6 Q. The emergency feed pump is run by 7 what kind of power unit? 8 A. It's direct-acting steam. 9 Q. Deposition Exhibit Number 11 is dated 10 November 27, 1943, correct? 11 A. Yes. 12 Q. Ordered by Warren Engineering, 13 correct? 14 A. Yes. 15 Q. For Gibbs and Cox, the naval 16 architect, correct? 17 A. Yes. 18 Q. For shipment to the Bath Iron Works 19 in Bath, Maine, correct? 20 A. Yes. 21 Q. Covers ships numbered DD-829 through 22 849, correct? 23 A. Yes. 24 Q. The USS Bausell is included as 25 DD-845, correct?
Page 126 1 00012 through 00015. Do you see those? 2 A. Yes. 3 Q. And those deal with what, sir? 4 A. This is the order for emergency feed 5 pumps. 6 Q. And the order number is what? 7 A. A-17908. 8 Q. These are emergency feed pumps, 9 correct? 10 A. Yes. 11 Q. What's an emergency feed pump? 12 A. If the primary feed pump should go 13 down, due to casualty, this pump would be able to 14 pick up some of the boiler load. 15 Q. For purposes of the Jury, what's a 16 feed pump? 17 A. It supplies the water back into the 18 boiler after it's been used in the main engines. 19 Q. It's a recirculating system, correct? 20 A. The steam system is, yes. 21 Q. And so for purposes of the Jury, the 22 idea is if you use the water somewhere else on 23 the vessel, it circulates back through the boiler 24 again, correct? 25 A. Yes, in simplest terms.	Page 128 1 A. Yes. 2 Q. In total this is a work order for 42 3 9-by-6-and-a-half-inch-by-16-inch vertical single 4 emergency feed pumps, correct? 5 A. Yes. 6 Q. How many of these vertical single 7 emergency feed pumps were installed upon the USS 8 Bausell? 9 A. Two. 10 Q. How do you know that? 11 A. There was 21 ships involved and the 12 order was for 42. 13 Q. If you go to the second page of the 14 document, WP-IL-00013, we see a stamp for 15 August 6, 1945 and underneath that it says 16 DD-845, two pumps, correct? 17 A. Yes. 18 Q. And what is the sentence underneath 19 that, if you know? 20 A. I can't read what it says. 21 Q. Okay. So this indicates that, at 22 least on August 6, 1945, two 23 9-inch-by-6-and-a-half-inch-by-16-inch vertical 24 single emergency feed pumps were installed upon 25 the USS Bausell, correct?

Page 129 1 A. Yes. 2 Q. Do you know where they were 3 installed? 4 A. No, I do not. 5 Q. Do you know if they were installed 6 side-by-side? 7 A. No, I do not. 8 Q. Do you know if they were installed in 9 each engine room on board the ship? 10 A. No, I do not. 11 Q. Do you know if the emergency feed 12 pump is typically installed in the engine room on 13 board the ship? 14 A. It would not be -- 15 MS. PERRITANO: Objection, if you 16 know. 17 A. It would not be in the engine room. 18 Q. (By Mr. Iola) It would not be? 19 A. No. 20 Q. And why is that? 21 A. It's related to the boiler. 22 Q. And so what's your testimony about 23 where it would be installed? 24 A. It would be located in the boiler 25 room.	Page 131 1 MS. PERRITANO: Objection, beyond the 2 scope, hypothetical, calls for an opinion. 3 A. I haven't seen the -- I haven't seen 4 the documents, so I wouldn't want to render an 5 opinion without seeing them. 6 Q. (By Mr. Iola) But if the naval 7 documents from the U.S. Navy indicate that that's 8 where these pumps were installed, you don't have 9 any reason to disbelieve that, do you? 10 MS. PERRITANO: Objection. 11 A. I mean, again, I haven't seen the 12 documents, but... 13 Q. (By Mr. Iola) Okay. But 14 hypothetically, if that's what they say? 15 A. Then that's probably correct. 16 Q. In other words, those documents 17 probably cover the situation better than your 18 recollection or speculation, correct? 19 MS. PERRITANO: Objection. 20 A. I would assume so, yes. 21 Q. (By Mr. Iola) Back to Deposition 22 Exhibit Number 10, which is the order for the 23 vertical single emergency feed pumps? 24 A. 11. 25 Q. I'm sorry, Number 11.
Page 130 1 Q. Have you looked at any of the 2 documents in the naval archives concerning the 3 installation of pumps and various other machinery 4 on board the USS Bausell? 5 A. Not that I'm aware of. 6 Q. Do you have any idea what the naval 7 archives documents at the Bureau of Ships 8 indicates where the emergency feed pump was 9 installed? 10 MS. PERRITANO: Objection, relevance. 11 A. No, I do not. 12 Q. (By Mr. Iola) Do you know of anyone 13 at Warren Pumps who has undertaken an 14 investigation to determine what the naval 15 archives records of the USS Bausell indicate 16 about the emergency feed pumps that were 17 installed? 18 MS. PERRITANO: Objection, relevance, 19 and it assumes that we have a duty to do that. 20 A. I do not know. 21 Q. (By Mr. Iola) Do you have any 22 reason, hypothetically, if those records indicate 23 that the emergency feed pumps were installed in 24 each engine room on board the USS Bausell, do you 25 have any reason to dispute that?	Page 132 1 A. Sorry. 2 Q. Correct. It says 42 3 9-inch-by-6-and-a-half-inch-by-16-inch vertical 4 single piston pumps, correct? 5 A. Yes. 6 Q. It says they contain John Crane 7 molded ring stuffing box packing, correct? 8 A. Yes. 9 Q. It says they contain Durabla valves, 10 correct? 11 A. Yes. 12 Q. It says no air chambers, correct? 13 A. Yes. 14 Q. Steam cylinders and valve chests to 15 be suitably lagged and insulated, correct? 16 A. Yes. 17 Q. That seems very similar to what we 18 saw in the fire and bilge pumps, correct? 19 A. Yes. 20 Q. Now, if we turn our attention from 21 Deposition Exhibit Number 10 -- I mean Number 11, 22 I'm sorry, the order document on vertical single 23 emergency feed pumps and we look at the drawings 24 we have on vertical single emergency feed pumps, 25 do you have any of those drawings in front of

Page 133	Page 135
1 you? 2 A. Yes. 3 Q. Do you have any drawings on spare 4 parts, regarding vertical single emergency feed 5 pumps? 6 A. I have the outline lagging and stroke 7 index and I have the sectional assembly list of 8 materials and spares. 9 Q. Okay. On the sectional assembly list 10 and spares? 11 A. That's a mouthful, isn't it? 12 Q. What's the Bates stamp number on that 13 one? 14 A. WP-IL 00246 and WP-IL 00247. 15 Q. Okay. Is that one drawing that's too 16 big to fit on one page? 17 A. Yes, it is. 18 Q. Okay. Let's mark that as Deposition 19 Exhibit Number 12, if you would, please, sir. 20 (Whereupon, Exhibit 12 was marked.) 21 Q. (By Mr. Iola) And that again, for 22 purposes of the record, is titled what, sir? 23 A. Sectional assembly list of material 24 and spares 9-by-6-by-16 vertical single emergency 25 feed pump.	1 the order is correct. 2 Q. And so this is an accurate drawing 3 for what was installed on the USS Bausell? 4 A. I believe so, even though the hull 5 numbers might be indicated incorrectly. 6 Q. Okay. On the list of materials, are 7 there any asbestos-containing materials for the 8 vertical single emergency feed pumps? 9 A. Give me a second. 10 Q. You bet. 11 A. Some of this is very difficult to 12 read, because it's such an old drawing. 13 MS. PERRITANO: It's also pretty 14 small print. 15 A. I don't see anything identified on 16 this -- on this particular one in that capacity 17 now. Maybe you can find something. I'm not 18 picking it up. The further away I go, the harder 19 it is to read. 20 Q. (By Mr. Iola) All right. So we 21 don't see anything on the drawing of the 22 sectional assembly list and spares Bates stamp 23 Number 246 and 247 that we've marked as Exhibit 24 Number 12 that contained asbestos, correct? 25 A. The drawing does not indicate that.
Page 134	Page 136
1 Q. Does that cover vertical feed pumps 2 that were installed on the USS Bausell DD-845? 3 MS. PERRITANO: Do you need this one? 4 THE WITNESS: Yeah, it's easier to 5 find it that way. 6 MS. PERRITANO: This is not part of 7 it, right? That's the next one? 8 THE WITNESS: That's the next one. 9 Q. (By Mr. Iola) Order Number A-17908. 10 A. That order is on here. However, it 11 doesn't correspond to the appropriate hull 12 numbers. 13 Q. It does not? 14 A. Unless I'm reading this -- This says 15 DD-859 to DD-849 for the A-17. 208, is that the 16 one? 17 Q. 908. 18 A. 908. I mean, like I said, there is a 19 little discrepancy between the order and the 20 drawing. 21 Q. So do you believe this drawing 22 appropriately reflects the sectional assembly 23 list and spares of vertical single emergency feed 24 pumps that were installed on the USS Bausell? 25 A. I think this is correct. I believe	1 Q. Let's look at the drawing for the 2 outline and lagging and stroke index for the 3 9-inch-by-6-and-a-half-by-16-inch vertical single 4 emergency feed pump that it's Bates stamped 5 number WP-IL 232 and 233. 6 MS. PERRITANO: Do you want to make 7 that the next exhibit? 8 MR. IOLA: I'm going to ask him a 9 question first. 10 Q. (By Mr. Iola) Do you see that 11 document, sir? 12 A. Yes. 13 Q. Is that one drawing that's too large 14 for a single page and consequently is made up of 15 two pages? 16 A. Yes, it is. 17 Q. Okay. Let's mark that one drawing, 18 which is WP-IL 232 and 233 entitled, outline 19 lagging and stroke index 20 9-inch-by-6-and-a-half-inch-by-16-inch vertical 21 single emergency feed pump as Deposition Exhibit 22 Number 13. 23 (Whereupon, Exhibit 13 was marked.) 24 Q. (By Mr. Iola) This is the outline 25 and lagging schedule for the vertical single

Page 137	Page 139
1 emergency feed pumps, correct? 2 A. Yes. 3 Q. And which includes the vertical 4 single emergency feed pumps installed upon the 5 USS Bausell DD-845, correct? 6 A. Yes. 7 Q. We know that, because the column says 8 DD-829 to 849, correct? 9 A. Yes. 10 Q. And it says Order Number A-17908, 11 correct? 12 A. Yes. 13 Q. Which corresponds to Deposition 14 Exhibit 11, which is the order number we 15 previously talked about for the emergency feed 16 pumps, correct? 17 MS. PERRITANO: I believe that was 18 this one. 19 A. Yes. The drawing, okay. I'm sorry. 20 MS. PERRITANO: That's okay. 21 Q. (By Mr. Iola) So when we -- When was 22 this drawing made? 23 A. December 10th, 1940. 24 Q. And it was signed off by the Bureau 25 of Ships when?	1 A. That's correct. 2 Q. It's 85 percent magnesia that you 3 previously testified is asbestos insulation, 4 correct? 5 MS. PERRITANO: Objection, if you 6 know. 7 A. Yes. 8 MS. PERRITANO: Beyond the scope of 9 his knowledge. 10 Q. (By Mr. Iola) We get back to 11 drawings on steam cylinders on the left-hand side 12 of the page, correct? 13 A. Yes. 14 Q. And around the steam cylinder is 15 insulation, correct? 16 A. It is -- 17 MS. PERRITANO: Take your time. 18 A. There is a note that it is insulated, 19 yes. 20 Q. (By Mr. Iola) And it says insulating 21 material of 85 percent magnesia smooth and 22 painted with plastic, correct? 23 MS. PERRITANO: Objection. 24 A. Pointed with plastic. 25 Q. (By Mr. Iola) Okay. And down from
Page 138	Page 140
1 A. March 10th, 1943. 2 Q. And this drawing, on the list of 3 material, it indicates part 232 is an asbestos 4 metallic cloth ring, again, correct? 5 MS. PERRITANO: Objection. 6 A. The description is, yes. 7 Q. (By Mr. Iola) The description is 8 asbestos metallic cloth ring, correct? 9 A. Yes. 10 Q. The number of them wanted is two, 11 correct? 12 A. Yes. 13 Q. Its material is made up of asbestos, 14 correct? 15 MS. PERRITANO: Objection, if you 16 know. 17 A. The drawing says asbestos, yes. 18 Q. (By Mr. Iola) And the remarks say 19 what? 20 A. 1/16th thick by one-inch wide. 21 Q. Okay. Part number 233 is insulating 22 material, correct? 23 A. Yes. 24 Q. It's not listed the total quantity, 25 correct?	1 that, shows a schematic where there's five and 2 five-eighths inches of insulation, correct? 3 A. In the cover, yes. 4 Q. And that's five and five-eighths 5 inches of asbestos-containing 85 percent magnesia 6 insulation, correct? 7 MS. PERRITANO: Objection, to the 8 extent that you know. 9 A. As noted on the drawing. 10 Q. (By Mr. Iola) And then below that is 11 another drawing indicating three inches at the 12 bottom, correct? 13 A. It's the same drawing, but, yes, 14 three inches. 15 Q. Three inches of asbestos 85 percent 16 magnesia insulation, correct? 17 MS. PERRITANO: Objection, to you 18 know -- to the extent you know. 19 A. Yes. 20 MS. PERRITANO: Beyond the scope. 21 Q. (By Mr. Iola) As you testified 22 previously, from your personal knowledge, this 23 85 percent magnesia asbestos insulation was 24 installed at the Warren Steam Pump Company 25 facility, correct?

Page 141 1 MS. PERRITANO: Objection, beyond the 2 scope. 3 A. Yes. 4 Q. (By Mr. Iola) Manufactured in 5 Warren, Massachusetts, correct? 6 A. Yes. 7 Q. And then delivered to the customer at 8 Bath Iron Works, correct? 9 A. Yes. 10 Q. Do you have knowledge as to where 11 Warren Steam Pump Company purchased this asbestos 12 85 percent magnesia insulation that was used in 13 the vertical single emergency feed pump? 14 A. No. 15 MS. PERRITANO: Particular pump at 16 issue? 17 Q. (By Mr. Iola) Sure. 18 A. I have not seen any information. 19 Q. With respect to all of these vertical 20 single emergency feed pumps that are in this 21 drawing listed as Exhibit Number 13, do you know 22 where Warren Steam Pump Company purchased 23 85 percent magnesia asbestos insulation? 24 MS. PERRITANO: Objection, beyond the 25 scope, relevance.	Page 143 1 about any maintenance work that might have been 2 performed on the vertical single emergency feed 3 pump on board the USS Bausell, correct? 4 MS. PERRITANO: Objection, beyond the 5 scope. 6 A. No. 7 Q. (By Mr. Iola) Do you have any 8 knowledge as to how maintenance work was 9 performed, as a matter of course, on vertical 10 single emergency feed pumps that were made 11 pursuant to this drawing, that's Deposition 12 Exhibit Number 13? 13 MS. PERRITANO: Objection, relevance, 14 and beyond the scope. 15 A. No. 16 Q. (By Mr. Iola) You can't testify in 17 front of this Jury at the time of the trial how 18 an individual would go about making maintenance 19 work on vertical single emergency feed pumps as 20 listed in this drawing, correct? 21 MS. PERRITANO: Objection, beyond the 22 scope. He is not designated for purposes of 23 today to talk about what types of work may or may 24 not have been done on the pumps at issue in the 25 case. We haven't made a decision yet as to
Page 142 1 A. I do not know. 2 Q. (By Mr. Iola) Are you familiar with 3 asbestos insulation? 4 MS. PERRITANO: Objection, beyond the 5 scope. 6 A. No, I'm not. 7 Q. (By Mr. Iola) Do you know anybody at 8 Warren Pumps who would be more knowledgeable 9 about the purchase of this asbestos insulation 10 for use on the emergency feed pump and 11 previously, the fire and bilge pump that was 12 installed aboard the USS Bausell? 13 A. No, I can't think of anybody that 14 would be. 15 Q. And you haven't located any records, 16 sales records, purchase records, which indicate 17 purchases by Warren Steam Pump Company of these 18 spare parts that contained asbestos, including 19 the 85 percent magnesia asbestos insulation, 20 correct? 21 A. That's correct. 22 MS. PERRITANO: For the Bausell? 23 A. That's correct. Yes. 24 Q. (By Mr. Iola) You're not familiar 25 and cannot testify, from your own knowledge,	Page 144 1 whether he might testify as to those areas in the 2 future, but he is not here today to talk about 3 that. And if we do, we would let you know ahead 4 of time. 5 MR. IOLA: Yeah, I appreciate that, 6 counsel. And for purposes of the record, in 7 addition to letting me know ahead of time, I 8 presume that we also would have an agreement for 9 me to come back and redepose -- 10 MS. PERRITANO: On those issues, 11 absolutely. 12 MR. IOLA: -- Mr. Doktor on those 13 issues before he walks into the courtroom in 14 Madison County, Illinois. 15 MS. PERRITANO: Yes. 16 Q. (By Mr. Iola) Mr. Doktor, let's turn 17 our attention to the documents, supplemental 18 documents, that were delivered last night, 19 document WP-IL 0004 through 00011, which I 20 believe are the orders for the fresh water pumps, 21 if you would, please, sir. 22 MS. PERRITANO: What did you say, 4 23 to 11? 24 MR. IOLA: Yes. 25 (Whereupon, Exhibit 14 was marked.)

Page 145 1 Q. (By Mr. Perritano) Sir, I've handed 2 you what we've marked as Deposition Exhibit 3 Number 14, which is Bates stamp WP-IL b 0004 4 through 00011, which is the order for the fresh 5 water pumps; is that correct? 6 A. Yes. 7 Q. And this order covers the fresh water 8 pumps that were installed on the USS Bausell, 9 correct? 10 A. Yes. 11 Q. And this is order number A-17888, 12 correct? 13 A. Yes. 14 Q. Dated November 11, 1943, correct? 15 A. Yes. 16 Q. And this is a total order for 42 17 2-SED-11 fresh water pumps with motors and 18 controls, correct? 19 A. Yes. 20 Q. And these were 42, two-inch single 21 stage, single suction, all bronze, close 22 connected right-hand centrifugal pumps, type 23 SED-11 with vertical discharge, correct? 24 A. That's the description, yes. 25 Q. How many of these pumps were	Page 147 1 were installed in each engine room aboard the USS 2 Bausell? 3 A. No, I do not. 4 Q. What was the driving power force 5 behind the fresh water pumps installed on the USS 6 Bausell? 7 A. Electric motor. 8 Q. Do you know who manufactured the 9 electric motor? 10 A. Drawing indicates that it was GE. 11 Q. GE being General Electric? 12 A. Yes. 13 Q. The drawing you're referring to in 14 front of you, sir, is that WP-IL 00243? 15 A. Yes, it is. 16 MR. IOLA: Okay. Let's mark as 17 Deposition Exhibit Number 15, WP-IL 00243. 18 (Whereupon, Exhibit 15 was marked.) 19 Q. (By Mr. Iola) Which appears to be 20 the sectional assembly outline, spare parts and 21 tools for the fresh water pump type 2-SED-11 for 22 Warren Steam Pump Company, which includes the 23 fresh water pumps that were installed on the USS 24 Bausell; is that correct? 25 A. Yes.
Page 146 1 installed on DD-845, the USS Bausell? 2 A. That would be two. 3 Q. If you would, please, turn to the 4 second page which is Bates stamped number WP-IL 5 B0005; do you see that, sir? 6 A. Yes. 7 Q. Midway down the middle column, almost 8 to the bottom, is an entry dated June 22, 1945, 9 correct? 10 A. Yes. 11 Q. Which says DD-844 through 5, correct? 12 A. Yes. 13 Q. And shows four pumps and four motors, 14 correct? 15 A. Yes. 16 Q. And based on that, you can determine 17 that two pumps were installed on DD-844, correct? 18 A. Yes. 19 Q. And two pumps were installed on 20 DD-845, the USS Bausell, correct? 21 A. Yes. 22 Q. Do you know where the fresh water 23 pumps were installed on the USS Bausell? 24 A. No, I do not. 25 Q. Do you know if the fresh water pumps	Page 148 1 Q. And this document consists of only 2 one page of the drawing; is that correct? 3 A. Yes. 4 Q. When was this drawing made? 5 A. This one was made four -- April 8th, 6 1943. 7 Q. When was it approved by the Bureau of 8 Ships? 9 A. It's very difficult to read, but it 10 looks like January 28, 1944. 11 Q. And all these drawings were made by 12 Warren Pumps, correct? 13 A. Yes. 14 Q. And at that time it was known as the 15 Warren Steam Pump Company, Incorporated, correct? 16 A. Yes. 17 Q. And we know it covers the Bausell, 18 because it has DD-829 through 849 and it has the 19 order number A-17858, I believe, correct? 20 A. 888. 21 Q. 888, I'm sorry. Is that correct? 22 A. Yes. 23 Q. Okay. And the list of material 24 indicates on piece number 15 a 1/32nd-inch thick 25 gasket that is an asbestos sheet gasket, correct?

Page 149	Page 151
1 A. Yes. 2 Q. Do you know what an asbestos sheet 3 gasket is, sir? 4 A. Yes. 5 Q. What is it? 6 A. It's a flat piece of material. 7 Q. And to make it into a gasket, does it 8 have to be cut? 9 A. Yes. 10 Q. And who cuts it? 11 MS. PERRITANO: Objection, if you 12 know, beyond the scope. 13 A. At our facility, it would be one of 14 our assemblers. 15 Q. (By Mr. Iola) One of your assemblers 16 actually cuts the gasket to fit whatever the 17 device is that the gasket is going between, 18 correct? 19 A. Correct. In this case it's a large 20 donut-looking piece. 21 Q. And a large donut-looking piece, is 22 approximately how large? 23 A. It would be approximately about 13 24 inches in diameter and about an inch thick. 25 Q. And that gasket goes between what?	1 Q. (By Mr. Iola) On the USS Bausell? 2 A. I have not seen any documents, no. 3 Q. Okay. Beyond seeing documents, do 4 you have knowledge that you can testify to the 5 Members of this Jury or is it beyond your 6 knowledge, about the maintenance schedule that 7 might be required to maintain and operate these 8 pumps that we have specifically talked about 9 aboard the USS Bausell? 10 MS. PERRITANO: Objection, beyond the 11 scope. 12 A. I don't know particularly about the 13 pumps on the Bausell. 14 Q. (By Mr. Iola) Good. So you're not 15 going testify at the time of the trial to the 16 Members of the Jury about any particular 17 maintenance schedule that these pumps would 18 require aboard the USS Bausell, correct? 19 MS. PERRITANO: Objection, beyond the 20 scope. As we've stated with respect to the other 21 pumps, depending on what evidence is developed, 22 if we intend to ask Mr. Doktor any questions 23 concerning maintenance procedures that were, in 24 fact, performed on the Bausell and want him to 25 comment on that, we will alert you to that ahead
Page 150	Page 152
1 A. It goes between pieces number -- 2 should be number 1 and 2. Pieces number 1 and 2, 3 the casing and the suction head. 4 Q. Is that the main entry to the pump? 5 A. Yes. 6 Q. So any time maintenance work is 7 performed on the interior of that pump, that 8 gasket has to be removed, correct? 9 MS. PERRITANO: Objection, beyond the 10 scope, relevance. 11 A. If they had to go inside the pump, 12 that is correct. 13 Q. (By Mr. Iola) Does this pump require 14 regular maintenance? 15 MS. PERRITANO: Objection, beyond the 16 scope, relevance. If you know. 17 A. For the internals, no. 18 Q. (By Mr. Iola) Okay. Are you able to 19 testify from your personal knowledge or knowledge 20 that you've gained from your review of documents 21 and material from the company, as to maintenance 22 schedules with respect to any of these pumps 23 we've talked about today? 24 MS. PERRITANO: Objection, beyond the 25 scope.	1 of time and give you the opportunity to ask him 2 whatever questions you would like over some 3 objections, potentially. 4 Q. (By Mr. Iola) Mr. Doktor, next I 5 want to turn your attention to the order 6 regarding salt water circulating booster pumps 7 and that is WP-IL b 00021 through WP-IL b 00024, 8 I believe; is that correct, sir? 9 MS. PERRITANO: Give me one second. 10 There you go. 11 (Whereupon, Exhibit 16 was marked.) 12 Q. (By Mr. Iola) We've handed you what 13 we've marked as Deposition Exhibit Number 16, 14 which is the order number A-17910, dated 15 December 15, 1943 for 21, 2-SED-6 pumps complete 16 with motor for salt water circulating booster 17 pumps for emergency diesel generator sets, 18 correct? 19 A. Yes. 20 Q. What are these, exactly? 21 A. This would supply the cooling water 22 to the emergency diesel generator. 23 Q. And that cooling water would be sea 24 water? 25 A. Yes.

Page 153 1 Q. How many of these salt water 2 circulating booster pumps for emergency diesel 3 generator were on board the USS Bausell DD-845? 4 A. One. 5 Q. How do you know that? 6 A. The order is for 21 pumps and there's 7 21 ships. 8 Q. And that's DD-829 through DD-849? 9 A. Yes. 10 Q. Do you see any individual notation, 11 like we've seen on some of the previous 12 documents, of exactly what date they were 13 installed on DD-845 or it was installed on 14 DD-845? 15 A. It appears that they were shipped 16 from our facility on June 29, 1945. 17 Q. Okay. 18 A. That was a tough one to find. 19 Q. And it's tough, because it says 20 DD-844 then hyphen five, then hyphen 6 -- 21 A. Six, right. 22 Q. And we're interpreting that to be 23 844, 845 and 846, correct? 24 A. Yes. 25 Q. What type of pumps were these salt	Page 155 1 MS. PERRITANO: Is 257, is that the 2 other half? 3 THE WITNESS: That's the other half. 4 Q. (By Mr. Iola) Okay. So what we've 5 identified is -- And let's mark for the record as 6 Deposition Exhibit Number 17 is WP-IL 256 and 7 257; is that correct? 8 A. Yes. 9 Q. And that is one drawing that extends 10 into two pages, correct? 11 A. Yes. That's correct. 12 Q. And so, consequently, we're going to 13 mark it with one exhibit sticker and call it 14 Exhibit Number 17. Okay? 15 A. Yes. 16 MS. PERRITANO: Do you want it on 256 17 or 257? 18 MR. IOLA: 256. 19 A. Would you like a moment to look at 20 this? 21 (Whereupon, Exhibit 17 was marked.) 22 Q. (By Mr. Iola) No, that's all right. 23 You can explain it to me. This is the sectional 24 assembly outline tools, spares and details for 25 the salt water circulating booster pump for
Page 154 1 water circulating booster pumps for emergency 2 diesel generator? 3 A. These were centrifugal pumps. 4 Q. They had a motor? 5 A. Yes. 6 Q. And what type of motor did they have? 7 A. Electrodynamic. 8 Q. Were these pumps insulated? 9 MS. PERRITANO: Is there another 10 sheet? 11 THE WITNESS: I only have -- 12 MS. PERRITANO: One. 13 THE WITNESS: I only have half of -- 14 Q. (Mr. Iola) One drawing, yeah. I 15 only have -- In terms of the drawings, for the 16 record real quick, we're looking at the drawings, 17 the only drawing I have on salt water circulating 18 booster pumps is WP-IL 00256; is that what you 19 have? 20 A. Yes. And it appears that, again, 21 this is half or this was two -- two sheets. 22 Q. Yeah, this is all I have as well, 23 sir. 24 A. Going through the -- looking at what 25 I have, I can't -- I can't find the pump.	Page 156 1 emergency diesel generator set type 2-SED-6 by 2 Warren Steam Pump Company, Incorporated, correct? 3 A. Yes. 4 Q. These drawings were made by Warren 5 Steam Pump Company, Incorporated, correct? 6 A. Yes. 7 Q. They were drawn when? 8 A. November 5th, 1941. 9 Q. Doesn't appear they were ever signed 10 off on directly by the Bureau of Ships, at least 11 on 256, does it? 12 A. I do not see a signature there, no. 13 Q. Okay. So we can't really tell what 14 the date of that is, correct? 15 A. That is correct. 16 Q. On the list of material, it indicates 17 on piece number 27 that there's a gasket that is 18 an asbestos sheet gasket, again, correct? 19 A. That is correct. 20 Q. And again, these are drawings of the 21 salt water circulating booster pumps for 22 emergency diesel generator set for the unit that 23 was on board the USS Bausell, DD-845, correct? 24 A. Yes. 25 Q. And we know that because it shows on

Page 157 1 the legend that it's DD-829 through 849, correct? 2 A. That is correct. 3 Q. And it shows order number A-17910, 4 which corresponds identically with Exhibit Number 5 17, that we previously talked about, correct? 6 A. Yes. 7 Q. I'm sorry, Exhibit Number -- 8 MS. PERRITANO: 16. 9 Q. (By Mr. Iola) 16, that we previously 10 talked about. We're discussing Exhibit Number 11 17. And as we have previously talked about 12 earlier today, it's fair to look at the legend of 13 all of the various ships that are on this drawing 14 and understand that this salt water circulating 15 booster pump was on all those ships, in addition 16 to the Bausell, correct? 17 A. That would be correct, yes. 18 Q. Okay. This gasket, that's an 19 asbestos sheet gasket, went where? 20 A. Let me just get the terminology for 21 you, between the casing and the suction head, 22 piece number 1 and piece number 4. 23 Q. Is this similar to what we just 24 discussed, a moment ago, on the fresh water pump? 25 A. Yes, it is. It's just a smaller <th data-bbox="812 144 1531 1896"> Page 159 1 if such insulation is present, you would expect 2 to see it on the drawing, as previously 3 identified by some of the other drawings, 4 correct? 5 A. Yes. 6 Q. And so the mere fact that it's absent 7 from the drawing indicates to you that it's not 8 there, correct? 9 A. Correct. 10 Q. Just as the mere fact that it's 11 present on the drawing, indicates to you that it 12 is there, correct? 13 MS. PERRITANO: Objection. 14 A. Yes. 15 THE WITNESS: Would you mind taking a 16 break? 17 MR. IOLA: Sure. Let's go off the 18 record and take a break. 19 VIDEOGRAPHER: The time is 12:19. 20 We're off the record. 21 (Whereupon, a brief break was taken.) 22 VIDEOGRAPHER: The time is 12:47 p.m. 23 We're on the record. 24 Q. (By Mr. Iola) Mr. Doktor, you 25 understand we're back on the record and you're </th>	Page 159 1 if such insulation is present, you would expect 2 to see it on the drawing, as previously 3 identified by some of the other drawings, 4 correct? 5 A. Yes. 6 Q. And so the mere fact that it's absent 7 from the drawing indicates to you that it's not 8 there, correct? 9 A. Correct. 10 Q. Just as the mere fact that it's 11 present on the drawing, indicates to you that it 12 is there, correct? 13 MS. PERRITANO: Objection. 14 A. Yes. 15 THE WITNESS: Would you mind taking a 16 break? 17 MR. IOLA: Sure. Let's go off the 18 record and take a break. 19 VIDEOGRAPHER: The time is 12:19. 20 We're off the record. 21 (Whereupon, a brief break was taken.) 22 VIDEOGRAPHER: The time is 12:47 p.m. 23 We're on the record. 24 Q. (By Mr. Iola) Mr. Doktor, you 25 understand we're back on the record and you're
Page 158 1 size. 2 Q. Smaller size, but again, the gasket 3 between the casing and the suction head, which 4 means any time you get inside the pump, you have 5 to remove this gasket, correct? 6 MS. PERRITANO: Objection, beyond the 7 scope, relevance. 8 A. You would have to replace it, if you 9 disturbed it, yes. 10 Q. (By Mr. Iola) And how many of these 11 gaskets were there on each salt water circulating 12 booster pump for emergency diesel generator? 13 A. One. Can I go back and answer the 14 question that you asked when we couldn't find the 15 drawing? 16 Q. Sure. 17 A. I do not see that there is any 18 insulation on this pump. 19 Q. Okay. And you do not see that 20 there's any insulation inside the pump, as well, 21 correct? 22 A. No. There is none noted on the 23 drawing and nothing is real visible on the 24 drawing. 25 Q. And again, you would expect to see -- <th data-bbox="812 1029 1531 1896"> Page 160 1 still under oath? 2 A. Yes. Thank you for the break. 3 Q. There are just a couple of other 4 drawings, I believe, that deal with some various 5 items, but I don't know that any other drawings 6 -- Do you know if you have any other drawings 7 that deal with any instruments or pumps that were 8 installed on the Bausell? 9 A. Not that I have -- Not that I have 10 seen. 11 Q. Okay. Good. Then we've concluded 12 our review then of all the drawings related to 13 the pumping products and systems that are on the 14 Bausell; is that correct? 15 A. I believe so, yes. 16 Q. Okay. We've talked about the fire 17 and bilge pump, correct? 18 A. Yes. 19 Q. We've talked about the emergency feed 20 pump, correct? 21 A. Yes. 22 Q. We've talked about the diesel 23 generating salt water circulating booster pump, 24 correct? 25 A. Yes. </th>	Page 160 1 still under oath? 2 A. Yes. Thank you for the break. 3 Q. There are just a couple of other 4 drawings, I believe, that deal with some various 5 items, but I don't know that any other drawings 6 -- Do you know if you have any other drawings 7 that deal with any instruments or pumps that were 8 installed on the Bausell? 9 A. Not that I have -- Not that I have 10 seen. 11 Q. Okay. Good. Then we've concluded 12 our review then of all the drawings related to 13 the pumping products and systems that are on the 14 Bausell; is that correct? 15 A. I believe so, yes. 16 Q. Okay. We've talked about the fire 17 and bilge pump, correct? 18 A. Yes. 19 Q. We've talked about the emergency feed 20 pump, correct? 21 A. Yes. 22 Q. We've talked about the diesel 23 generating salt water circulating booster pump, 24 correct? 25 A. Yes.

Page 161 1 Q. We've talked about the fresh water 2 pump? 3 A. Yes. 4 Q. And we started off talking about the 5 main circulating pump, correct? 6 A. Yes. 7 Q. And those were all the pumps you 8 initially identified that were on board the USS 9 Bausell, correct? 10 A. Yes. 11 Q. Okay. In addition, last night there 12 was some supplemental records that were delivered 13 to me that apparently you reviewed. One of which 14 was the Naval Auxiliary Machinery sections of the 15 book, correct? 16 A. There was a section of some -- Yes. 17 That's correct. 18 Q. You were aware what Naval Auxiliary 19 Machinery is, what that book is? 20 A. I'm familiar with this -- this 21 document, yes. 22 Q. Okay. This document is basically a 23 subsection from a very large naval machinery 24 book; is that correct, sir? 25 A. Yes.	Page 163 1 A. Yes. 2 Q. And if we turn further into the 3 preface, it describes that Naval Auxiliary 4 Machinery is a revision of Naval Auxiliary 5 Machinery published by the United States Naval 6 Institute in 1950, correct? 7 A. Yes. 8 Q. And this addition came out in May of 9 1952, correct? 10 A. Yes. 11 Q. And do you understand what the 12 purpose of this document was? 13 A. Not totally, no. 14 Q. Okay. Do you understand who put this 15 document together? 16 A. I'm not sure if it was the Navy 17 itself or the Naval Academy for use there. 18 MR. IOLA: Okay. Let's mark if we 19 could -- I'm out of stickers. 20 MS. PERRITANO: We are on 18. 21 (Whereupon, Exhibit 18 was marked.) 22 Q. (By Mr. Iola) Let's mark, if we 23 could, as Deposition Exhibit Number 18, Naval 24 Auxiliary Machinery, that's Bates stamp number 25 WP-IL b 00041 through, it appears, 00056; is that
Page 162 1 Q. Have you ever seen the entirety of 2 the naval machinery book? 3 A. No, I have not. 4 Q. It actually exists in more than one 5 part; are you aware of that? 6 A. I would assume so, yes. 7 Q. Okay. And so you understand that 8 what this is, is various copies of the 9 essentially preface, which are the Roman numeral 10 pages and then Chapter 2, which is the chapter 11 relating to packing and heat insulating 12 materials; is that correct? 13 A. Yes. 14 Q. And is this a document that was in 15 the possession of Warren Pumps that you 16 discovered in your search? 17 A. Yes. 18 Q. Okay. Is this document -- Is this 19 the portion that was discovered? In other words, 20 was a larger book discovered and this is all that 21 was copied or is this all that you had in your 22 records to begin it? 23 A. This was all we were able to find. 24 Q. Okay. And this is a revision dated 25 1952, correct?	Page 164 1 correct, sir? 2 A. Well, there's IL b 00056. 3 Q. Yes, sir. 4 A. Okay. 5 Q. And that is beginning on Bates stamp 6 Page 45, that's the start of Chapter 2, which is: 7 Packing and Heat Insulating Materials, correct? 8 A. Yes. 9 Q. Did you find this document? 10 A. No, I did not. 11 Q. Who found this document? 12 A. It was a search that counsel had 13 conducted. 14 Q. Did you have an opportunity to review 15 this document and read it from page-to-page? 16 A. Yes, I did. 17 Q. Okay. And what did you learn from 18 your review of this document? 19 MS. PERRITANO: Objection, beyond the 20 scope. 21 A. Like I said, it was just general 22 information for -- you know, just to kind of give 23 everybody the background of why insulation and 24 packing was used or, you know, what type of 25 equipment it might go on.

Page 165 1 Q. (By Mr. Iola) And your understanding 2 was this is kind of generally what the Navy was 3 talking about, in terms of insulating material, 4 gaskets, packing, et cetera, during the time 5 period that this document was written, correct? 6 MS. PERRITANO: Objection, relevance. 7 A. Yes. 8 Q. (By Mr. Iola) And this document was 9 written after the construction of the USS 10 Bausell, correct? 11 A. Yes. 12 Q. But this document, in May of 1952, 13 was precisely during the time period that 14 Mr. Gudmundson served as a shipmate on board the 15 USS Bausell, correct? 16 A. Yes. 17 Q. And this document talks about the 18 insulating materials that are being used on board 19 this various equipment, correct? 20 A. Yes. 21 Q. And it includes asbestos insulation, 22 correct? 23 A. I'm assuming so. I'm not sure what 24 paragraph you're looking at. 25 Q. Okay. I'm looking at Bates stamp	Page 167 1 insulation that we talked about earlier during 2 the deposition, correct? 3 MS. PERRITANO: Objection, if you 4 know. 5 A. I don't know specifically. 6 Q. (By Mr. Iola) Okay. It talks also 7 about asbestos insulation, correct? 8 A. Number 3, yes. 9 Q. It talks about asbestos pads and 10 blankets, correct? 11 A. Yes. 12 Q. It talks about asbestos tapes, 13 correct? 14 A. Yes. 15 Q. Then under Subheading 1, it says, "A 16 mixture of magnesia and asbestos containing about 17 85 percent magnesia predominated in the field of 18 heat insulating materials until the advent of 19 steam temperatures in excess of 500 degrees 20 Fahrenheit", correct? 21 A. Yes. 22 MS. PERRITANO: Objection. 23 Q. (By Mr. Iola) It talks about on the 24 very next page under Subheading 3, talks about 25 molded asbestos insulation of long length
Page 166 1 Page 47, under the Subheading 2-5 Insulating 2 Material? 3 A. Yes. 4 Q. The second paragraph for high 5 temperatures, recourse is had to basic minerals, 6 such as asbestos and then it continues forward, 7 correct? 8 A. Yes. 9 Q. And then on Subheading 2.6, 10 Application of Insulation, it describes how you 11 can apply pipe covering, block, insulating 12 cement, correct? 13 A. Yes. 14 Q. And then it continues down at the 15 bottom of that page, as well, with more 16 description. And then over to the next page, it 17 talks about the use of asbestos felt pads, as 18 well as block insulation and sectional pipe 19 insulation, correct? 20 A. Yes. 21 Q. And then under Subheading 2.7, Forms 22 of Service Materials, it talks about magnesia and 23 asbestos mixtures, correct? 24 A. Yes. 25 Q. Similar to the 85 percent magnesia	Page 168 1 asbestos fibers is suitable for temperatures up 2 to 850 degrees Fahrenheit, correct? 3 A. Yes, it does. 4 Q. And then on Bates stamp Page 51 it 5 talks about asbestos finishing cements and 6 asbestos pads and blankets, about midway down the 7 page, correct? 8 A. Yes. 9 Q. And you read about all this when you 10 reviewed this document, correct? 11 A. Yes. 12 Q. And you understood that during this 13 period of time in the early 1950s when 14 Mr. Gudmundson was aboard the USS Bausell that 15 asbestos-containing insulation products were 16 prevalent in use on naval vessels, correct? 17 MS. PERRITANO: Objection, beyond the 18 scope, relevance. 19 A. That's what the document explains, 20 yes. 21 Q. (By Mr. Iola) Other than the 22 technical manual that we talked about earlier 23 that regarded fire and bilge pumps and emergency 24 feed pumps, did you locate any other technical 25 manuals with respect to any other of these pumps,

Page 169 1 and I include main circulating pump, fresh water 2 pump, diesel generating salt water circulating 3 booster pump, that were on board the USS Bausell? 4 A. I don't believe there were any in 5 the... 6 Q. Just so the record is clear, the one 7 we identified was a maintenance and service 8 manual for emergency feed pumps and fire and 9 bilge pumps; is that correct? 10 A. Yes. 11 Q. And that's the only one you located, 12 correct? 13 A. Yes. 14 Q. Do you have any recollection of what 15 Mr. Gudmundson's job was aboard the USS Bausell? 16 A. In reading Mr. Forest's deposition, I 17 believe he was in the laundry or... 18 Q. And did you have an understanding of 19 what he did in the laundry room? 20 A. No, I didn't. 21 Q. Do you understand from Mr. Forest's 22 testimony where Mr. Forest worked upon the USS 23 Bausell? 24 A. I mean, he was an electrician, so he 25 could have been in various spaces.	Page 171 1 deposition. I just read the ones that pertained 2 to pumps. 3 Q. Okay. Did you read a summary of the 4 deposition or did you actually read the 5 deposition, itself? 6 A. I read the deposition, itself. 7 Q. Was it highlighted for you, directing 8 your attention to certain sections? 9 A. No. 10 Q. But you kind of skipped through it 11 just to look at, specifically, about what he said 12 about pumps? 13 A. Yes, sir. 14 Q. And what did he say about pumps? 15 A. He identified some of the pumps that 16 were on the ship and the different services, and 17 some of the things that might have been done to 18 those pumps. 19 Q. Some of the things that might have 20 been done to those pumps; you mean what? 21 A. Whether they were insulated, whether 22 they were worked on, those -- those types of 23 issues. 24 Q. And if they were insulated, did he 25 say whether or not they were insulated with
Page 170 1 Q. Including the engine room? 2 A. Potentially, yes. 3 Q. Including the fire room? 4 A. Yes. 5 Q. Including the boiler room? 6 MR. PERRITANO: Objection, if you 7 know. 8 A. Yes. 9 Q. (By Mr. Iola) Did he testify about 10 some of the work he did while on board the USS 11 Bausell? 12 A. I do not recall. 13 Q. Did he testify about some of the 14 maintenance jobs that he performed, which created 15 dust, while he was on board the USS Bausell? 16 A. I don't remember. 17 Q. Did he testify about how dust would 18 get on his clothes, when he was performing the 19 maintenance work on board the USS Bausell? 20 MS. PERRITANO: Objection. 21 A. I don't remember that. 22 Q. (By Mr. Iola) Did he testify who he 23 delivered his laundry to on board the USS 24 Bausell? 25 A. I didn't read the complete	Page 172 1 asbestos insulation? 2 MS. PERRITANO: Objection, to the 3 extent that your question assumes that the pumps 4 that Mr. Forest identified were actually Warren 5 pumps. 6 A. He did identify them as being 7 insulated, yes. 8 Q. (By Mr. Iola) He did identify the 9 pumps as being insulated with asbestos? 10 MS. PERRITANO: Objection, beyond the 11 scope, and also assumes -- To the extent that it 12 assumes that the pumps he identified were Warren 13 pumps. 14 A. Yes. 15 Q. (By Mr. Iola) Did he give specific 16 testimony, if you recall, about feed pumps? 17 A. Yes, I believe he did. 18 Q. And what did he say? 19 A. I think he was asked if they were 20 insulated or not. 21 Q. And what did he say? 22 MS. PERRITANO: Objection. Same 23 objection as before. 24 A. I believe he said that they were. 25 Q. (By Mr. Iola) He testified that the

Page 173 1 feed pumps were insulated with asbestos, correct? 2 MS. PERRITANO: Objection, beyond the 3 scope. 4 A. Yes. 5 MS. PERRITANO: And relevance. 6 Q. (By Mr. Iola) And the feed pumps 7 being insulated with asbestos is consistent with 8 what you've testified today in looking at the 9 drawings of the feed pumps, correct? 10 MS. PERRITANO: Objection, relevance, 11 beyond the scope and it assumes that Mr. Forest 12 was talking about the Warren pumps. 13 A. There are feed pumps and there are 14 emergency feed pumps. 15 Q. (By Mr. Iola) Okay. 16 A. I don't know which one he was talking 17 about. 18 Q. At least with respect to emergency 19 feed pumps on board the USS Bausell, as we 20 previously discussed today, Warren manufactured 21 at least one of those, correct? 22 A. Yes. 23 Q. And on that document that you and I 24 walked through that was a drawing, you identified 25 that it was insulated with asbestos, correct? Page 174 1 MS. PERRITANO: Objection, beyond the 2 scope. I think he testified that it was 3 insulated and lagged. 4 A. Correct. 5 Q. (By Mr. Iola) Okay. And it was 6 insulated with asbestos and it had lagging on top 7 of the asbestos insulation, correct? 8 A. That is correct. 9 Q. And that would be consistent with 10 what Mr. Forest testified, correct? 11 MS. PERRITANO: Objection. I think 12 Mr. Forest's testimony related to external 13 insulation on the pumps. I think that would be a 14 fair reading of his testimony. 15 Q. (By Mr. Iola) You can answer. 16 A. Can you repeat? I'm sorry. 17 Q. That would be consistent with what 18 Mr. Forester testified to -- Mr. Forest, 19 F-o-r-e-s-t, I'm sorry? 20 MS. PERRITANO: Objection. I think 21 Mr. Forest's testimony differed. 22 A. From what I read, I believe it was 23 that he was asked if they were insulated with 24 asbestos and he said yes. I think that's as far 25 as the explanation.	Page 175 1 Q. (By Mr. Iola) Do you know whether 2 the emergency feed pumps, after they were shipped 3 out by Warren with the asbestos insulation and 4 the metal lagging on them, after they were 5 installed on the ship, do you know if they were 6 insulated with further asbestos insulation? 7 MS. PERRITANO: Objection, relevance. 8 A. No, I do not. 9 Q. (By Mr. Iola) Do you know if the 10 fire and bilge pumps, after they were sent out by 11 Warren with the asbestos insulation and lagging, 12 if they were further insulated with asbestos 13 insulation while on board the ship? 14 MS. PERRITANO: Objection, relevance. 15 A. No. No, I do not. 16 Q. (By Mr. Iola) Do you have any 17 knowledge, at all, about whether once a Warren 18 fire and bilge pump or a Warren emergency feed 19 pump was shipped to the USS Bausell for 20 installation on the USS Bausell, whether it was 21 insulated on board the Bausell after it was 22 installed? 23 MS. PERRITANO: Objection, relevance, 24 beyond the scope. 25 A. I have no knowledge. Page 176 1 Q. (By Mr. Iola) Are you aware as to 2 whether Warren sent some of their people to the 3 ship at Bath Iron Works, specifically the USS 4 Bausell, while this equipment was installed? 5 A. I'm not aware of that. 6 Q. Are you aware of what communications 7 salesmen had from Warren Pump Company with the 8 United States Navy for the equipment that was 9 actually sold and installed on the USS Bausell? 10 A. I haven't seen any documentation, no. 11 Q. Are you aware as to whether or not 12 any technical folks, repair, maintenance, anybody 13 like that from Warren Pump ever went and 14 performed maintenance and repair work on any of 15 these pumps that were on board the USS Bausell 16 manufactured by Warren? 17 MS. PERRITANO: Objection, beyond the 18 scope, relevance. 19 A. I haven't seen any documentation, no. 20 Q. (By Mr. Iola) Other than seeing 21 documentation, you're not personally aware of any 22 such thing; is that correct? 23 A. That's correct. 24 Q. In preparation for your testimony 25 today, with respect to the USS Bausell and
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Page 177 1 Mr. Gudmundson's work on board that ship during 2 the period of time he was in the United States 3 Navy, have you looked at any other naval manuals, 4 naval technical brochures, regarding installation 5 of Navy equipment and pumps? 6 A. No, I have not. 7 Q. Have you seen any brochures that 8 Warren Pump -- Warren Steam Pump Company had 9 about any of these products that we talked about 10 today that were on board the USS Bausell? 11 A. Specifically, no. 12 Q. In other words, have you seen any 13 brochures of Warren Pump Company concerning main 14 circulating pumps that were sold, during the time 15 period the Bausell was built, to the United 16 States Navy? 17 A. We do have some advertising 18 information, but I think it's after the 1943, '44 19 time period. 20 Q. Right. And that advertising 21 information that you previously turned over to 22 us, contained a lot of pumps that weren't really 23 at issue in the Gudmundson case, with respect to 24 the Bausell, correct? 25 A. That's correct. Yes.	Page 179 1 board the USS Bausell, with respect to Warren 2 emergency feed pumps sold to the United States 3 Navy? 4 A. Not specifically, no. 5 Q. Same question with respect to fire 6 and bilge pumps. Did you see any brochures 7 between 1951 and 1959 regarding fire and bilge 8 pumps that were sold by Warren Steam Pump Company 9 to the United States Navy for installation on 10 board the USS Bausell? 11 A. No. 12 MS. PERRITANO: Randall, you were 13 saying '59, but I think it's '55. 14 MR. IOLA: He was on board the 15 Bausell in '55, I think he was in the Navy from 16 1951 to 1959. 17 MS. PERRITANO: To '59. Okay. 18 MR. IOLA: So just to cover that wide 19 scope. 20 Q. (By Mr. Iola) Mr. Doktor, tell me if 21 you don't have this knowledge, but do you have 22 any knowledge as to the type of asbestos that 23 85 percent magnesia asbestos insulation was? 24 MS. PERRITANO: Objection, beyond the 25 scope.
Page 178 1 Q. And so my question to you is: As 2 counsel would like, more focused on the Bausell 3 itself during the period of time where 4 Mr. Gudmundson actually served on the Bausell, 5 what I want to know is are you aware of any 6 literature by Warren Pump Company regarding the 7 main circulating pump for the period of time, 8 say, from 1951 through 1959? 9 A. Specifically, no. 10 Q. Okay. Did you see any brochures 11 regarding fresh water pumps sold by Warren to the 12 United States Navy that would have been installed 13 on the USS Bausell, between that same period of 14 time, 1951 to 1959? 15 A. No. 16 Q. Did you see any brochures regarding 17 diesel generating salt water circulating booster 18 pumps sold to the United States Navy by Warren 19 Pump Company, during the period of time when 20 Mr. Gudmundson was in the Navy from '51 to '59, 21 that were installed on the USS Bausell? 22 A. For that particular service, no. 23 Q. And did you see any brochures 24 regarding emergency feed pumps between 1959 -- 25 '51 to '59 during the time Gudmundson was on	Page 180 1 A. No, I do not. 2 Q. (By Mr. Iola) Warren Pump Company 3 attached its nameplate to most of these pump 4 products, correct? 5 A. Yes. 6 Q. Where would that nameplate go? 7 A. Could be various places on the pump. 8 Sometimes the drawing might show and sometimes it 9 might not. 10 Q. And what would the nameplate be made 11 out of? 12 A. Be brass, probably. 13 Q. And it would have like the production 14 number, the ship name, the ship number, the item 15 number for the order number? 16 A. Some of the drawings might actually 17 show you exactly what the nameplate contained. 18 Q. And those drawings designate exactly 19 what's to be on the nameplate, correct? 20 A. That's correct. 21 Q. And did they designate where the 22 nameplate is to be placed on the pump? 23 A. It may or may not. 24 Q. And once that nameplate is placed on 25 the pump, is that nameplate to be covered at any

Page 181	Page 183
1 point in time thereafter? 2 MS. PERRITANO: Objection, beyond the 3 scope. If you know. 4 Q. (By Mr. Iola) If you know. 5 A. I do not know. 6 Q. In other words, if the pump is 7 insulated after it leaves Warren Pump's facility, 8 do you know whether or not there's instruction to 9 leave the area where the nameplate is 10 uninsulated? 11 MS. PERRITANO: Objection, beyond the 12 scope, if you know. 13 A. I do not know. 14 Q. (By Mr. Iola) Are you aware of any 15 communications that any Warren Steam Pump Company 16 employees had with anybody at the United States 17 Government or the United States Navy at the time 18 these pumps were sold to the Navy for 19 installation on the USS Bausell? 20 A. I haven't seen any documentation. 21 Q. Are you aware of any supplier 22 relationships that Warren Steam Pump Company had 23 with any packing and gasket manufacturers or 24 companies, regarding sales during the time period 25 that these pumps were installed on the USS	1 Q. (By Mr. Iola) In other words, have 2 you undertaken any study, review, investigation, 3 to determine the entire totality of all the naval 4 machinery that was on board the USS Bausell when 5 Mr. Gudmundson was on board? 6 MS. PERRITANO: Objection, beyond the 7 scope. 8 A. No. 9 Q. (By Mr. Iola) Have you spoken, 10 Mr. Doktor, in relation to this case, the 11 Gudmundson case, on behalf of Warren Pumps, have 12 you had any conversation with anybody who was a 13 former Admiral in the United States Navy about 14 what might have been on board the USS Bausell? 15 A. No. 16 Q. Have you had any discussion with any 17 expert, maybe not an Admiral, about the 18 Gudmundson case and what naval machinery was on 19 board during the period of time that 20 Mr. Gudmundson served on board the USS Bausell? 21 MS. PERRITANO: Objection, work 22 product. But he hasn't, so I'll let him answer. 23 A. No, I have not. 24 Q. (By Mr. Iola) Haven't had any 25 discussion with Everett Cooper, have you?
Page 182	Page 184
1 Bausell? 2 A. No, I do not. 3 Q. Are you aware as to whether Warren 4 Steam Pump Company had any machinery repairmen 5 that were on call to the United States Navy, 6 during this period of time, when these pumps were 7 installed on the USS Bausell? 8 MS. PERRITANO: Objection, it assumes 9 they had machinery repairmen at any point in 10 time. 11 A. I do not know. 12 MR. IOLA: Well, I'd ask him that 13 question, but you'd probably tell me that that's 14 beyond the scope of what we're here for today. 15 MS. PERRITANO: I probably would. 16 MS. LACONTE: He catches on quickly. 17 Q. (By Mr. Iola) Are you aware, as you 18 sit here today, Mr. Doktor, of any other naval 19 pump machinery that was on board the USS Bausell? 20 MS. PERRITANO: Manufactured by 21 Warren or -- 22 Q. (By Mr. Iola) By anybody? 23 MS. PERRITANO: Objection, beyond the 24 scope. 25 A. No, I don't.	1 A. No. 2 Q. Do you know who Mr. -- Admiral Cooper 3 is? 4 A. The name is familiar, but I can't... 5 Q. Have you ever had any discussions 6 with Admiral Cooper? 7 A. No. 8 MS. PERRITANO: Ever? 9 A. They're a little out of my circle. 10 MR. IOLA: Never underestimate 11 yourself, Mr. Doktor. 12 Based on the agreement with counsel, 13 concerning our arrangement with respect to the 14 Gudmundson case, at this point in time, I'm not 15 going to have any further questions for 16 Mr. Doktor, subject to our agreement and the 17 re-review, if necessary, and re-deposition, if 18 necessary, of Mr. Doktor at a later point in 19 time. 20 MS. PERRITANO: We have no questions. 21 MR. IOLA: Does anybody on the phone 22 have any questions for Mr. Doktor? 23 MS. PERRITANO: Okay. We're done. 24 MR. IOLA: Sir, you have the right to 25 read and sign. Counsel may want to advise you.

A			
a17 134:15 a17488 70:8,9 a17858 148:19 a17888 145:11 a17908 126:7 134:9 137:10 a17909 80:16 89:16 97:24 a17910 152:14 157:3 ability 16:16 23:9 43:2 able 39:7 126:13 150:18 162:23 aboard 72:12 73:11 74:22 81:15 86:7,9 90:13 114:1,2 118:12 142:12 147:1 151:9,18 168:14 169:15 absent 159:6 absolutely 38:12 74:24 94:4 120:20 144:11 academy 31:1,3,6,16 163:17 accurate 93:18 135:2 186:3 acknowledges 186:2 acquired 38:1,13,15 action 8:3 187:16,18 active 35:9 adams 5:15 addition 9:23 13:14 71:25 106:12 125:5 144:7 157:15 161:11 163:8 additional 15:10 18:12,20 110:6 address 7:19 10:24 11:8 administer 8:7 26:22 administered 8:14 administration 26:12,14,19,24 27:6 administrator 1:5 4:5 27:7,9,12,16 28:1 33:6 admiral 183:13,17	184:2,6 admissible 47:12 advent 167:18 advertising 177:17 177:20 advice 54:12 advise 115:3 184:25 affidavit 123:17 aflcio 50:1 aft 73:24 74:1,6,14 aftermarket 25:2 46:4 afternoon 4:14 age 8:12 agents 55:16 ago 17:24 157:24 agree 42:21 47:12 agreed 7:1 72:20 agreement 7:9 10:8 144:8 184:12,16 ahead 10:10 46:1 55:11 90:6 102:17 117:11 144:3,7 151:25 air 82:1 85:21 132:12 airport 4:15 8:5 187:7 al 1:9 4:9 7:25 8:1 alert 151:25 alexis 6:5 9:13 allen 5:11,14 allow 10:10 alton 4:21 answer 16:13 34:3,6 34:7 38:8 43:5 46:2 51:15,21 52:10 56:9 77:11 84:8,17 90:7 93:15 102:9 102:10,11 109:14 114:25 115:2,3,6 123:1,24 124:1,13 158:13 174:15 183:22 answered 16:19,23 17:1 answering 16:15 answers 16:18,22,25 17:2,5,11 52:3,12 52:16 53:2,2 54:7,8	54:13,13,18,19,23 54:23 113:21 123:17 124:4,4,10 anybody 34:20 37:18 40:19 44:15 45:13 45:19,22 46:6,19 113:20 142:7,13 176:12 181:16 182:22 183:12 184:21 anymore 35:23 apparently 161:13 appear 80:7 156:9 appearances 8:22 appearing 4:23 5:1,5 5:9,17,21 6:4 appears 32:3 147:19 153:15 154:20 163:25 application 166:10 apply 166:11 appreciate 16:9 144:5 appropriate 36:6 134:11 appropriately 134:22 approval 96:2,3,3 approved 95:25 98:22 148:7 approximately 15:12 18:17 49:20 50:9 105:5 149:22,23 april 11:20 12:3,14 31:23 32:3,8 148:5 architect 127:16 architects 81:1 archives 63:1 86:13 118:1 130:2,7,15 ardizzone 24:23 ardizzzone 24:20,24 24:25 45:23 ardizzzones 46:3 area 22:16 36:12 102:24 103:2 111:7 181:9 areas 19:18,23,25 20:8,11,18,22 21:11 22:8 144:1 arent 91:21	arguments 22:18 arrangement 184:13 arrive 31:2 arrived 29:21 37:24 arrow 109:24 arrows 106:12,17,20 asbestos 11:25 35:10 51:7,12 52:14 76:20 77:25 78:6 90:1,2,20 91:10,25 92:7 93:6,12,21 95:17 101:12,13,24 102:1,1,20,20 103:6 104:6,8,16 105:6,14,25 107:18 108:6,16,23 109:1 109:20 110:7,24 111:24 116:13,18 120:15 121:1,10,19 122:15 123:8 124:11,18 125:6 135:24 138:3,8,13 138:17 139:3 140:15,23 141:11 141:23 142:3,9,18 142:19 148:25 149:2 156:18 157:19 165:21 166:6,17,23 167:7 167:9,12,16,25 168:1,5,6 172:1,9 173:1,7,25 174:6,7 174:24 175:3,6,11 175:12 179:22,23 asbestoscontaining 77:5,6,7 78:16 90:5 90:9 93:1,25 109:8 110:25 124:5 135:7 140:5 168:15 asked 16:3 61:16,18 75:9 158:14 172:19 174:23 asking 47:1 60:11,12 64:25 109:10 112:15 asks 77:10 assemblers 149:14 149:15 assembly 76:17 77:4 87:10 88:3 133:7,9

133:23 134:22
 135:22 147:20
 155:24
assist 20:10
assistance 34:22
 54:12
associated 121:25
associates 5:23
association 4:20 6:9
 42:5
assume 16:14 25:7
 25:22 29:14 43:6
 69:12,15 95:3
 131:20 162:6
assumes 122:20
 130:19 172:3,11,12
 173:11 182:8
assuming 49:9 69:9
 69:11 165:23
attach 9:20,24
attached 3:10 180:3
attempt 64:8 117:15
attend 30:23,25
attention 79:16,23
 96:14 132:20
 144:17 152:5 171:8
attorney 187:15,17
august 128:15,22
automatically 127:4
auxiliary 3:7 161:14
 161:18 163:3,4,24
avenue 4:20 11:1
aware 16:24 17:4
 19:2 34:23 35:8
 51:4 62:3,25 65:11
 66:19 67:14,20,25
 69:4 86:15,23
 93:25 118:6 121:16
 130:5 161:18 162:5
 176:1,5,6,11,21
 178:5 181:14,21
 182:3,17

B

b0005 146:5
back 18:2 22:6,16
 32:13,16,25 33:3,5
 38:25 50:20 68:19
 73:2 75:15,22 87:6
 119:11 126:17,23

131:21 139:10
 144:9 158:13
 159:25
background 23:12
 164:23
bad 41:18,18
baldagya 40:10,10
 40:25
balloon 103:1
bank 5:14
barry 21:9
based 54:8,9 78:3
 146:16 184:12
bash 5:10 9:7,7
basic 166:5
basically 161:22
bates 14:12,15,17,18
 14:21 15:6,17 76:4
 76:10,13,15 80:2
 87:14 96:14 97:8
 119:19 125:25
 133:12 135:22
 136:4 145:3 146:4
 163:24 164:5
 165:25 168:4
bath 63:9,10,11 67:7
 69:24 73:12 81:2,3
 81:15 86:17 120:11
 127:18,19 141:8
 176:3
bausell 14:5,8 15:18
 22:13 23:8 51:19
 61:23,25 62:3,7,9
 62:12,21 63:2,7,14
 63:23 65:16 66:2
 66:16,20 71:22
 72:2,5,12,20 73:6
 73:11,16 74:5,10
 74:22 81:10 86:7,9
 86:14,21 88:10
 90:14,16,18 96:9
 97:18 109:22
 113:16 114:2
 115:15 117:2,16
 118:14,24 120:10
 121:21,23 122:1,4
 122:12,25 125:3
 127:24 128:8,25
 130:4,15,24 134:2
 134:24 135:3 137:5

142:12,22 143:3
 145:8 146:1,20,23
 147:2,6,24 148:17
 151:1,9,13,18,24
 153:3 156:23
 157:16 160:8,14
 161:9 165:10,15
 168:14 169:3,15,23
 170:11,15,19,24
 173:19 175:19,20
 175:21 176:4,9,15
 176:25 177:10,15
 177:24 178:2,4,13
 178:21 179:1,10,15
 181:19 182:1,7,19
 183:4,14,20
bay 12:23
bear 34:13
began 50:21
beginning 13:23
 20:7 31:6 164:5
behalf 1:16 4:13 8:5
 8:23,25 9:3,5,7,10
 9:11,13,16,17
 20:13 23:4 183:11
belief 54:25
believe 12:6 14:21
 45:1 69:21 73:3,7
 79:15,23 91:20
 98:4 110:1 125:21
 134:21,25 135:4
 137:17 144:20
 148:19 152:8 160:4
 160:15 169:4,17
 172:17,24 174:22
bell 13:2,5
bergman 12:13
bergmans 35:12
best 16:16 23:8 43:1
 54:24
bet 135:10
beth 5:6 9:17
better 28:17 38:22
 39:7 83:24 131:17
beyond 21:19,20
 47:2,8 55:10 60:8
 60:16 71:18 84:6
 84:16 85:12 99:25
 100:10,23 102:6
 103:24 104:4 109:9

117:10 120:17
 121:4,14 122:18
 124:6,12,20 125:11
 131:1 139:8 140:20
 141:1,24 142:4
 143:4,14,21 149:12
 150:9,15,24 151:3
 151:5,10,19 158:6
 164:19 168:17
 172:10 173:2,11
 174:1 175:24
 176:17 179:24
 181:2,11 182:14,23
 183:6
bifocals 91:21
big 97:4 133:16
bilge 66:13 79:17,20
 80:9 81:13,18 82:1
 82:5,5,15 85:22
 86:14,19 87:11
 88:4,8 90:10 94:17
 95:17,20 96:8,25
 97:13,17 104:10
 109:21 110:12
 113:4,12 114:2
 115:10,13,14,17,25
 116:9,10,16,23
 117:1,17 118:2,8
 118:12 120:6 121:2
 121:8,11,20 122:12
 123:7 132:18
 142:11 160:17
 168:23 169:9
 175:10,18 179:6,7
bind 20:2 23:5
birth 11:6
bit 22:14 23:12 35:18
 47:7
blankets 167:10
 168:6
bliss 46:21
block 104:21 166:11
 166:18
board 23:7 55:19
 65:15 66:1 113:15
 114:3,9 115:15
 118:14,23 122:1
 125:1,6 129:9,13
 130:4,24 143:3
 153:3 156:23 161:8

165:14,18 169:3
 170:10,15,19,23
 173:19 175:13,21
 176:15 177:1,10
 179:1,10,14 182:19
 183:4,5,14,19,20
boiler 73:22 126:14
 126:18,23 129:21
 129:24 170:5
book 161:15,19,24
 162:2,20
booster 152:6,16
 153:2 154:1,18
 155:25 156:21
 157:15 158:12
 160:23 169:3
 178:17
boston 4:14,15 6:2
 8:5 11:21 12:15,18
 187:7,7
bother 100:7
bothsided 58:1,4
bottom 53:15 87:19
 89:5 110:1 140:12
 146:8 166:15
box 5:11 83:1 132:7
boy 76:7,16
brass 180:12
break 49:18 75:11
 75:19 77:11 159:16
 159:18,21 160:2
breaks 71:5
bridges 11:1
brief 75:19 87:6
 159:21
briefly 49:12
broad 110:21 111:4
brochures 177:4,7
 177:13 178:10,16
 178:23 179:6
bronze 145:21
brookfield 11:9
broom 4:24
brothers 46:16,19
brought 75:12
build 60:22 61:5
building 5:15 60:18
 96:3
built 61:3 62:4 67:7
 73:14 177:15

bureau 96:2 98:22
 130:7 137:24 148:7
 156:10
burroughs 4:24
business 7:19
buyout 32:10 39:19

C

c4647 70:7
california 12:1,17,19
 12:20
call 19:8 59:12 70:3
 155:13 182:5
called 55:20 57:13
 103:1 116:9,11
calls 114:17 131:2
cant 40:18 71:2
 73:19 85:20 92:4
 114:13 123:13
 128:20 142:13
 143:16 154:25,25
 156:13 184:4
cap 111:15,18
capacity 31:11
 135:16
care 58:3 79:6 121:9
careful 28:14
carefully 187:12
carl 4:24 9:5
carolina 42:6
carried 27:20
case 11:20 12:11,17
 13:23 17:1 18:21
 21:20 35:12 47:3,5
 52:3 56:16 58:23
 61:14 71:4,8,10
 89:15 109:3 113:2
 113:21 119:18,19
 122:19,22 123:22
 123:23 143:25
 149:19 177:23
 183:10,11,18
 184:14
cases 16:3 123:6
casing 150:3 157:21
 158:3
cassette 119:8
cast 82:18
casualty 126:13
catches 182:16

category 21:25 22:1
 22:20,25
cause 187:12
caused 32:6
caution 120:14,23
 121:19 122:10
cautioned 122:14
ccr 1:22
cement 76:21 166:12
cements 168:5
centre 5:6
centrifugal 50:14
 145:22 154:3
centrifugally 82:18
certain 38:2,13
 39:14,24 65:11,18
 65:21 67:11 69:5
 171:8
certainly 20:6
certainteed 5:9 9:8
certificate 187:3
certification 76:14
certified 1:23 4:16
 7:5,17 187:5
certify 1:18 115:8
 187:6,15
cetera 125:7 165:4
chambers 82:1 85:21
 132:12
change 39:8 44:1
changed 39:1,4
 43:19 47:23 48:5
changing 43:23
chapter 162:10,10
 164:6
charged 34:21
chest 83:4
chests 132:14
chicago 5:2,19 6:6
chief 35:7
circ 76:23
circle 20:21 184:9
circuit 1:1,1 4:1,1
 8:1,2
circulates 126:23
circulating 66:7,9,9
 66:10 70:22 72:8
 72:12 73:4,5,10,17
 74:20 75:4,6,14
 76:2,15,18 77:1

78:13,15 152:6,16
 153:2 154:1,17
 155:25 156:21
 157:14 158:11
 160:23 161:5 169:1
 169:2 177:14 178:7
 178:17
circumstances 54:12
citations 124:4
city 5:6 11:2
civil 8:3
class 67:11,15 74:10
 74:13 81:6
classes 67:13
clean 69:20
clear 22:20 36:5,9
 47:8 68:9 74:16
 79:5 169:6
clearly 124:16
close 145:21
cloth 101:12,14
 102:1 103:6 111:24
 116:13,18 138:4,8
clothes 170:18
colfax 42:2,4
college 4:20 30:23,25
 31:19
colthard 40:16,16
 41:12
column 72:15,16
 89:2,5,10 137:7
 146:7
come 22:6,16 32:16
 75:15 112:12
 114:19 116:25
 144:9
comes 100:15 114:14
 186:1
commensurate
 56:11
comment 151:25
commercial 26:23
commission 186:13
 187:20
commissioned 187:5
common 50:15
commonly 73:21
communication 65:2
communications
 64:20 176:6 181:15

companies 181:24	connected 145:22	copying 58:11	95:2,6 97:1,4,10,14
company 4:23 5:10	consequently 136:14	corner 11:9 59:1	97:18,21,24 98:5,8
6:9 7:19 20:2 23:6	155:12	70:6 119:20	99:1,6,19,24
25:4 32:11 36:2,17	consisted 15:12	corp 81:3	100:15,18,22 101:3
36:20,21 37:16	consistent 124:22	corporate 10:6 20:2	101:9 103:7,10,11
38:1,13,15 39:1,16	173:7 174:9,17	20:12 21:13 35:19	103:13,17 104:10
47:18 65:13 69:24	consists 21:10 148:1	36:7 37:1,4,7 43:23	104:17,22,25 105:3
89:11 94:15 97:10	constructed 62:12	47:11,16 52:5	105:14,25 106:10
104:9 109:19 118:3	62:22 63:3,3,7,15	corporation 5:9 9:8	106:15,18 107:6,18
118:13,20 119:15	63:23 67:3 96:9	120:11	107:22 108:3,8,12
120:1 121:7,18	construction 62:8,9	correct 10:20 11:22	108:18,23 109:1
140:24 141:11,22	94:10,13 165:9	14:2 15:4,8,13,18	110:1,7,13 111:1,7
142:17 147:22	contact 117:25	17:2,8,12,15,20	111:19 112:7,13
148:15 150:21	contain 93:21 132:6	18:9,13 19:9 21:14	113:4 114:6,7,11
156:2,5 176:7	132:9	21:16 23:9,17	114:12,15 115:18
177:8,13 178:6,19	contained 52:7 77:25	24:17 28:12,13	116:14,19 117:20
179:8 180:2 181:15	78:6 91:24 93:12	29:22 30:9 31:12	117:23 118:24
181:22 182:4	102:20 123:7	31:16 32:20,23	120:4,7,11 121:2
complete 24:7 36:7	124:11,18 135:24	35:10,15,24 36:2	121:12 122:2
58:12 152:15	142:18 177:22	36:13,18,22 38:3,9	123:18 124:11,24
170:25	180:17	39:3,12,17,22	125:3,9 126:9,19
completely 16:15	containing 51:7,12	41:21,24 42:2,7,11	126:24 127:3,10,13
component 108:11	90:20 92:7 108:23	42:13,17,23 43:1	127:16,19,22,25
components 25:5,7	167:16	43:10,13 46:4	128:4,16,25 131:15
25:11 51:7,12,17	continue 47:13	47:18,21,24 48:3,6	131:18 132:2,4,7
124:17	continued 48:1	48:10,13 49:23	132:10,12,15,18
composite 25:5,7,11	continues 119:22	50:4,10,16,22 51:1	134:25 135:1,24
composites 25:13,16	166:6,14	51:9 52:3,18 53:8	137:1,5,8,11,16
compound 108:19	continuing 49:10	53:11,16,22,24	138:4,8,11,14,22
concerning 122:24	104:20	54:4,19,24,25 55:8	138:25 139:1,4,12
130:2 151:23	continuous 33:8	55:20 56:21,24	139:15,22 140:2,6
177:13 184:13	continuously 26:1	57:5 58:10 59:5,10	140:12,16,25 141:5
187:11	27:11 45:2 48:1,8	59:16 60:1,23 61:6	141:8 142:20,21,23
concluded 160:11	contract 26:11,11,14	62:1,4,5,9 64:3	143:3,20 145:5,9
185:6	26:19 27:5,7,8,12	65:16,19,22 66:17	145:12,14,18,23
concluding 14:18	27:16 28:1 33:5	66:23 67:4 68:13	146:9,11,14,17,20
condensate 73:17	contracts 26:22,25	68:16 70:10,13,24	147:24 148:2,12,15
74:20 75:3	27:2	71:9,12,17 72:1,5,9	148:19,21,25
condenser 70:22	controller 45:18	72:21 73:14 74:3	149:18,19 150:8,12
72:8,11 75:6,14	controls 145:18	76:2 78:16,17	151:18 152:8,18
76:1,15,18,25	controversy 187:12	80:21,23 81:3,7,10	153:23 155:7,10,11
78:12,15	conversation 64:17	81:16,21 82:10,16	156:2,5,14,15,18
condensing 73:4,5	183:12	82:19,23 83:1,5,21	156:19,23 157:1,2
73:10	cooling 152:21,23	83:25 84:4,12,20	157:5,16,17 158:5
condition 115:13	cooper 183:25 184:2	85:17 86:7,10	158:21 159:4,8,9
conditions 27:2	184:6	87:12,15,25 88:1,5	159:12 160:14,17
conducted 33:15	copied 87:24 162:21	88:11,18,21,25	160:20,24 161:5,9
86:17 117:18	copies 13:7 162:8	89:11,16,19 90:2	161:15,17,24
164:13	copy 20:24 21:1,4	90:11,16,25 91:16	162:12,25 163:6,9
confirm 96:23	58:1 69:20	93:9 94:11,15 95:1	164:1,7 165:5,10

165:15,19,22 166:7
 166:12,19,23 167:2
 167:7,10,13,20
 168:2,7,10,16
 169:9,12 173:1,9
 173:21,25 174:4,7
 174:8,10 176:22,23
 177:24,25 180:4,19
 180:20 187:13
correctly 51:20
correspond 89:13
 134:11
corresponds 89:18
 137:13 157:4
couldnt 158:14
counsel 7:2,2,9 8:21
 10:9 20:10 33:15
 33:16 54:13 64:10
 64:12 144:6 164:12
 178:2 184:12,25
 187:15,17
country 28:18
county 1:2 4:2 8:2
 17:7 52:15 53:3
 123:6 144:14 187:1
 187:6
couple 66:4 160:3
course 54:18 143:9
court 1:1 4:1 7:18
 8:2,6,15 22:17
 51:18
courtroom 144:13
courts 55:3
cover 23:12 106:22
 111:15,17 131:17
 134:1 140:3 179:18
covered 180:25
covering 84:24 85:2
 98:13 108:15,22
 166:11
covers 120:6,9
 127:21 145:7
 148:17
cox 80:23,25 127:15
crane 1:9 4:9 5:22
 8:1 9:16 82:25
 132:6
create 43:4 83:21
created 170:14
crebs 5:6

critical 98:12
csr 1:22
cummings 53:24
current 54:24
currently 10:3 41:23
 42:1
cushion 103:3
customer 55:8 68:4,6
 70:12,17 98:16
 99:4,4,10,16
 100:11,17,21
 107:22 116:23
 117:7 120:14 141:7
customers 29:20
 68:12 89:8
cut 149:8
cuts 149:10,16
cylinder 82:20 83:9
 83:10 84:20 89:23
 91:8,8,19 92:3,23
 98:13 103:3,4
 105:10,22,23,24
 111:16,18 121:11
 121:20 139:14
cylinders 83:4
 132:14 139:11

D

dale 49:4,5
dangers 122:14
daniel 5:22 9:15
data 17:23 76:14
date 10:1 11:6 39:5,8
 48:9 52:20 56:14
 59:4,7 64:2 95:25
 96:4 122:13 153:12
 156:14 186:3
dated 21:10 54:3
 56:23 57:18,18
 59:21 60:1 61:14
 64:2 69:23 80:18
 95:21 127:9 145:14
 146:8 152:14
 162:24
dates 50:20
davis 6:2 33:19
day 4:14 52:17 54:3
 186:2,9 187:19
days 185:2,3
dd645 88:10

dd805 72:16
dd808 72:16
dd809 89:2
dd829 81:6 88:20,24
 89:19 97:20 127:21
 137:8 148:18 153:8
 157:1
dd844 146:11,17
 153:20
dd845 66:20 72:21
 72:23 73:6 81:10
 85:16 118:24
 120:10 127:25
 128:16 134:2 137:5
 146:1,20 153:3,13
 153:14 156:23
dd849 81:7 97:21
 134:15 153:8
dd859 134:15
deal 22:12 51:19
 80:8 126:3 160:4,7
dealing 21:21 56:19
 121:23 122:4,18
deals 22:20
deceased 1:6 4:6
 40:24 41:4,16
december 31:23 32:4
 32:8 59:8 60:1
 61:14 63:21 137:23
 152:15
decided 32:11
decision 143:25
deep 105:12
defendant 4:23 5:1,5
 5:13,18,22 6:1,5
defendants 1:10 4:10
 5:9 7:3 8:1
define 25:17 110:15
degrees 83:21,23
 167:19 168:2
delaware 39:17
delivered 98:18
 141:7 144:18
 161:12 170:23
demand 70:19
department 29:6
 30:7 51:24 77:23
 81:14
depending 151:21
depends 28:17 55:21

111:2 113:17
depo 117:11
deponent 9:22
deposed 11:13 12:8
 12:14
deposes 8:15
deposition 1:14 2:11
 2:12 4:12 7:3,23
 8:4 9:20,22,24,25
 10:5,7,10 11:19,21
 11:24,25 12:17
 13:25 17:18,23,25
 19:7,12,14,17 21:8
 22:2 58:19 60:8
 63:18 64:16 69:22
 74:17 79:1,10 80:1
 80:12 87:18 89:15
 96:19 97:7 102:15
 119:8 125:24 127:9
 131:21 132:21
 133:18 136:21
 137:13 143:11
 145:2 147:17
 152:13 155:6
 163:23 167:2
 169:16 171:1,4,5,6
 185:6 186:2 187:13
 187:16
depots 28:11,12,16
described 103:18
describes 82:23
 163:3 166:10
description 82:2,22
 88:16 91:20 101:17
 101:23 102:19
 138:6,7 145:24
 166:16
design 29:6 61:10
 66:3 85:1
designate 180:18,21
designated 20:12,19
 21:12 22:23 23:4
 143:22
designation 59:14
 84:7
designed 42:25 60:5
 60:5
desire 22:6
destroyed 68:15,21
 69:6

destroyers 66:25
 67:2,3,6,11,25
 74:10,13
details 155:24
determination 113:6
determine 63:2
 86:13,18 118:1
 130:14 146:16
 183:3
determined 65:19
develop 25:13
developed 36:21
 151:21
development 28:23
 28:25 29:3
device 149:17
diameter 149:24
didnt 39:21 43:3
 114:8 117:9,19
 169:20 170:25
didomenico 44:21,23
 44:24 45:5
diesel 66:8 152:17,22
 153:2 154:2 156:1
 156:22 158:12
 160:22 169:2
 178:17
differed 174:21
different 32:12
 81:21 82:9 115:17
 115:19 171:16
difficult 135:11
 148:9
diligent 54:11
dimensions 98:12
directacting 56:20
 63:20 127:8
directing 171:7
directly 156:10
disbelieve 93:17,20
 131:9
discharge 145:23
disclosed 64:21
discover 18:20
discovered 54:17
 64:12 162:16,19,20
discovery 33:20
discrepancy 134:19
discussed 98:1
 157:24 173:20

discussing 23:3
 157:10
discussion 87:4
 113:22 119:6
 183:16,25
discussions 184:5
dispute 130:25
distinct 116:9
distinction 118:11
disturb 111:19
disturbed 158:9
document 35:15
 53:5 57:9,11,13,16
 57:24 58:11 59:1
 61:9 70:3,4 72:24
 74:17,19,20 80:11
 81:12 82:13 85:15
 89:21 120:25
 125:13 128:14
 132:22 136:11
 144:19 148:1
 161:21,22 162:14
 162:18 163:12,15
 164:9,11,15,18
 165:5,8,12,17
 168:10,19 173:23
documentation 27:1
 56:3,15 109:16
 123:2 176:10,19,21
 181:20
documents 13:16,19
 13:22 14:10,13,25
 15:7,11,20 18:12
 18:16,20 33:12
 34:22 35:3,9,14
 54:10 65:11 66:1
 68:10,23 69:1
 75:13 79:17,19
 80:8 96:16 123:10
 125:18 130:2,7
 131:4,7,12,16
 144:17,18 150:20
 151:2,3 153:12
doesnt 49:16 59:13
 78:9 84:9,10 94:21
 96:1,1 112:18
 127:4 134:11 156:9
doktor 1:14 4:13
 7:24 8:11 10:1,17
 21:12,22 23:2

33:10 34:2 35:18
 36:14 42:22 47:1
 47:15 51:5 52:2
 53:11 58:9,19 60:4
 64:15 83:11 87:8
 87:23 112:24 119:9
 119:10 123:4
 125:15 144:12,16
 151:22 152:4
 159:24 179:20
 182:18 183:10
 184:11,16,18,22
 186:1,6 187:9
doktors 10:5 113:7
dont 12:9,25 16:6,8,9
 20:10 21:1,3 29:11
 33:24 34:3,6,6,12
 34:17,18 37:9,12
 37:17 39:5 40:1
 41:11 42:18,19
 43:17 44:18 49:14
 51:24 52:22 55:4
 56:14 58:3,14
 59:19 63:4 65:1
 67:9 69:12,13 74:7
 75:10 78:22 79:2
 85:9,10,11,24 86:2
 86:10 95:15 100:2
 112:9 114:18
 118:16 120:17,22
 123:10,22 124:2
 131:8 135:15,21
 151:12 160:5 167:5
 169:4 170:16,21
 173:16 179:21
 182:25
donutlooking 149:20
 149:21
door 108:7,18
 116:22
drawing 2:16,18,19
 2:23,24 3:4,6 74:19
 77:3 87:23 88:2,2
 88:17 90:8,22 92:1
 92:9,11 93:5,7,11
 93:13,18 94:1,21
 95:20 96:7 97:3,9
 98:14,20,25 99:11
 101:23 102:19,22
 102:24 104:14,14

105:11,16,17 107:1
 107:15,20,21
 109:24 133:15
 134:20,21 135:2,12
 135:21,25 136:1,13
 136:17 137:19,22
 138:2,17 140:9,11
 140:13 141:21
 143:11,20 147:10
 147:13 148:2,4
 154:14,17 155:9
 157:13 158:15,23
 158:24 159:2,7,11
 173:24 180:8
drawings 13:24
 15:15 22:13,21
 55:5 65:21 73:7
 75:1,2,13 76:2,19
 76:20 78:12,13
 79:6,10 86:25 87:9
 88:15 96:14,24
 99:23 100:5,8
 106:13 123:15
 124:23 132:23,25
 133:3 139:11
 148:11 154:15,16
 156:4,20 159:3
 160:4,5,6,12 173:9
 180:16,18
drawn 95:23 104:15
 156:7
driven 115:25 116:4
driving 83:12 147:4
due 126:13
duly 187:5,10
durabla 132:9
dust 170:15,17
duties 23:24 25:11
 26:4,21 27:15,18
 28:8 29:4,17
duty 24:16 122:21,22
 130:19

E

earlier 14:11 39:20
 89:14 94:24 157:12
 167:1 168:22
early 12:7 57:4 59:23
 168:13
easier 20:16 134:4

ed 40:10
educated 34:9
educating 100:21
edwardsville 4:25
 5:11
effect 57:4 63:22
 64:2 96:7
effectively 99:11
effort 67:5
eight 4:14 32:3 70:21
 72:18
eighthinch 106:18
either 51:1 63:1
 64:25 102:19
electric 147:7,9,11
electrical 49:25
electrician 169:24
electrodynamic
 154:7
elgin 5:23
elses 24:16
emergency 66:12
 120:7 126:4,8,11
 127:1,6 128:4,7,24
 129:11 130:8,16,23
 131:23 132:23,24
 133:4,24 134:23
 135:8 136:4,21
 137:1,4,15 141:13
 141:20 142:10
 143:2,10,19 152:17
 152:22 153:2 154:1
 156:1,22 158:12
 160:19 168:23
 169:8 173:14,18
 175:2,18 178:24
 179:2
employed 10:20,22
 10:25 29:25 30:1
 37:15 40:20 41:1,5
 41:12 187:15,17
employee 34:21 54:1
 187:17
employees 29:5
 39:15,25 49:19
 181:16
employment 28:19
 30:4 33:8
engine 73:22,23,24
 73:25 74:2,6,13

 129:9,12,17 130:24
 147:1 170:1
engineer 25:21,23
 26:2,5 28:2,4,7,20
 29:9,13,16 31:22
 32:20,23 33:4 35:7
engineering 45:10
 69:24 80:21 81:14
 127:12
engines 126:18
ensure 27:1
entire 57:24 183:3
entirety 162:1
entities 115:20
entitled 53:7 119:25
 136:18
entity 47:20
entry 146:8 150:4
equipment 63:13
 164:25 165:19
 176:4,8 177:5
errors 54:15
essentially 162:9
estate 1:5 4:5
et 1:9 4:9 7:25 8:1
 125:7 165:4
everett 183:25
everybody 164:23
evidence 1:14 4:12
 9:21,25 151:21
exact 39:5,8 98:16
exactly 62:15 73:19
 76:8 81:23 91:6
 98:2 125:19 152:20
 153:12 180:17,18
examination 2:4
 10:13 187:13
examined 4:13 8:12
 187:12
excess 83:21 167:19
excuse 24:23
excused 185:9
executed 123:16
exhibit 2:11,12,13,14
 2:15,16,17,18,19
 2:20,22,23,24,25
 3:4,5,6,7 9:20,24
 19:13 21:8,15 22:4
 52:25 58:17,19
 63:18 69:18,22

 74:18 78:21 79:1
 79:10,12,13 80:1,6
 80:12 87:18,21
 89:15 96:19,21
 97:7 98:3 119:24
 125:22,24 127:9
 131:22 132:21
 133:19,20 135:23
 136:7,21,23 137:14
 141:21 143:12
 144:25 145:2
 147:17,18 152:11
 152:13 155:6,13,14
 155:21 157:4,7,10
 163:21,23
exhibits 3:10 8:19
existence 48:21
 54:16
exists 162:4
expect 42:15 158:25
 159:1
expert 183:17
expires 186:13
 187:20
explain 155:23
explains 168:19
explanation 174:25
extending 104:14
extends 155:9
extent 21:18,23
 48:19 55:10 56:8
 60:8 77:10 109:10
 112:15 113:6,7
 117:10 120:17
 121:23 122:17,20
 122:23 140:8,18
 172:3,11
exterior 112:6
external 174:12

F

facilities 48:20
facility 48:15 49:7,24
 94:15,19,25 95:5
 108:3 116:14,17
 140:25 149:13
 153:16 181:7
fact 31:10 119:14
 120:24 151:24
 159:6,10

factual 42:17
factually 42:25
fahrenheit 167:20
 168:2
fair 16:16 123:22
 157:12 174:14
fairness 52:1
fall 12:7 18:1,5 31:4
 31:7
familiar 34:25 73:18
 74:7,9,12 142:2,24
 161:20 184:4
familiarity 46:18
family 16:23
far 12:5 54:17
 124:24 174:24
feed 66:12 120:7
 126:4,8,11,12,16
 127:1,2,6 128:4,7
 128:24 129:11
 130:8,16,23 131:23
 132:23,24 133:4,25
 134:1,23 135:8
 136:4,21 137:1,4
 137:15 141:13,20
 142:10 143:2,10,19
 160:19 168:24
 169:8 172:16 173:1
 173:6,9,13,14,19
 175:2,18 178:24
 179:2
feel 20:1 48:22 60:9
felt 166:17
fibers 168:1
field 29:9,13,16
 167:17
file 68:14,18,20 69:1
 69:3,5,17
filed 17:7 52:15 53:2
files 68:12
filled 107:11,17
finally 95:24
financially 187:17
find 75:13 77:13
 91:3 107:8 117:19
 134:5 135:17
 153:18 154:25
 158:14 162:23
 164:9
finds 58:16

fine 22:5,15,24 34:5
48:23 49:11,13
76:12 114:23
finest 61:5
finish 102:13
finishing 168:5
fire 66:13 73:22
79:17,19 80:8
81:13,18 82:1,4,5
82:14 85:22 86:14
86:19 87:11 88:4,8
90:10 94:17 95:17
95:20 96:8,25
97:13,17 104:10
109:21 110:11
113:4,12 114:1
115:10,12,13,14,17
115:25 116:8,10,16
116:22 117:1,17
118:2,8,12 120:6
121:1,8,11,20
122:11 123:6
132:18 142:11
160:16 168:23
169:8 170:3 175:10
175:18 179:5,7
firm 3:12 4:20,24 5:2
5:6,10,14,18,22 6:2
6:5 12:24 13:4
first 21:5 22:13
25:22 27:8 28:3
37:23 52:10 57:22
69:21 112:13 136:9
187:10
fit 97:4 133:16
149:16
five 4:14 140:1,4
153:20
fiveighths 140:2,4
fix 71:5
flat 149:6
floor 5:7
flow 49:18
fluid 115:12
fluids 50:15,21
flush 22:8
focused 178:2
folks 9:4 176:12
followup 34:14
force 147:4

foregoing 186:1
forenoon 4:14
forest 14:1 113:20
169:22 172:4
173:11 174:10,18
174:19
forester 174:18
forests 13:25 169:16
169:21 174:12,21
form 58:10 83:9
122:10
former 183:13
forms 166:21
forth 54:14,22
forward 48:2 52:10
73:25 74:1,6,14
114:14,19 122:13
166:6
found 164:11
founded 36:1,16
47:17
four 72:17 85:16,21
86:6 90:13,15,15
90:18 115:16,17
146:13,13 148:5
fourandthreeeight...
107:6,11,17
frame 21:21 22:1
48:22 55:21 56:8
61:1,8,15,17,21
121:25
francisco 12:22
free 48:22 60:9
fresh 66:8 79:15
144:20 145:4,7,17
146:22,25 147:5,21
147:23 157:24
161:1 169:1 178:11
front 21:2 86:24 87:9
132:25 143:17
147:14
fuels 50:22
full 10:15 25:1
fulltime 31:14
fully 16:14 24:10,13
functions 27:21
116:12
furnish 60:23
furnished 60:19
further 10:11 36:5

101:17 103:18
135:18 163:2 175:6
175:12 184:15
187:15,16
future 114:24 144:2

G

gained 150:20
gap 33:7
garlock 6:5 9:14
gary 45:14
gasket 51:6 77:18,20
77:25 89:23 90:5,9
91:2,7,10,13,19,23
91:24 92:3,5,20,21
93:2,12,21 124:17
148:25,25 149:3,7
149:16,17,25 150:8
156:17,18 157:18
157:19 158:2,5
181:23
gaskets 51:11 77:6
90:20,24 93:25
94:9 95:8,11,17
158:11 165:4
ge 147:10,11
gear 51:1
gearing 67:15,18
74:9,13
gears 35:17
gehring 67:16
general 44:19 45:3
47:3 59:19 122:22
147:11 164:21
generally 51:21
113:14 124:13,14
165:2
generated 70:18
generating 160:23
169:2 178:17
generator 66:8
152:17,22 153:3
154:2 156:1,22
158:12
gentlemen 12:10
george 6:9 7:16
40:12
getting 51:25 55:6
gibbs 80:23,25
127:15

give 36:7 38:23
57:23 58:8 64:15
71:4 78:10 91:3
94:2 107:7 110:2
114:13 135:9 152:1
152:9 164:22
172:15
given 19:5 66:14
68:4 186:3 187:14
giving 100:17
glasses 94:7
go 10:10 23:11 32:6
32:17,22 46:1
55:11 64:8 67:24
89:4 90:6 93:8
102:16,18,22
104:16 105:18
117:11 118:25
125:21 126:12
128:13 135:18
143:18 150:11
152:10 158:13
159:17 164:25
180:6
goes 38:24 47:2
84:24 102:23,25
103:2 106:22
108:22 116:22
127:2 149:25 150:1
going 10:9 16:14
21:24 32:9 39:21
47:5,10 48:18 50:6
51:22 58:10 78:23
112:14 113:1
114:23 122:16,19
136:8 149:17
151:15 154:24
155:12 184:15
good 55:2 151:14
160:11
gori 5:6 9:17,17
government 55:16
55:18 59:18,21,24
60:19,21 71:3 72:5
118:23 125:8
181:17
graduate 30:11,14
graduated 30:8
graduation 30:21
31:8,9,10,15,19

great 87:20
group 42:2,4 66:24
 67:1,2 75:8,12 79:1
 79:12 87:18 125:18
gudmundson 1:4,6
 4:4,6 7:25 8:24
 14:7 21:20,22 47:2
 48:21 55:10 56:8
 58:23 114:3 119:19
 122:1,19,24 123:22
 165:14 168:14
 177:23 178:4,20,25
 183:5,11,18,20
 184:14
gudmundsons 14:2
 16:22 61:22,24
 169:15 177:1
guess 22:19 28:16
 41:19
gunky 5:2

H

half 154:13,21 155:2
 155:3
hamilton 31:23 32:7
 32:17,22
hand 52:24 53:1
 58:18 69:21 91:19
 125:23 187:19
handbook 116:21
 118:1
handed 145:1 152:12
handing 69:19
handled 50:15
handling 109:8
hanley 13:4
hannifin 5:10 9:8
happen 39:22 114:24
happened 87:24
happens 23:1
harder 135:18
harley 13:4
harvey 1:5 4:5
hasnt 183:22
havent 109:15,15
 131:3,3,11 142:15
 143:25 176:10,19
 181:20 183:24
hazards 122:14
head 34:19 39:9

65:25 91:7,8 150:3
 157:21 158:3
heading 70:3
headquarters 42:6
heads 61:4 89:23
hear 22:18
hearing 10:8,11,12
 22:7
heat 162:11 164:7
 167:18
heated 83:15
hebrank 4:24
held 10:11 22:7
 26:10 27:4 87:4
 119:6
hepler 4:24
heres 58:2
hereto 186:2 187:17
hereunto 187:19
herzog 5:6
hes 20:18 35:7 40:24
 41:16 45:25 112:20
 114:23
heyl 5:10,14
high 30:8,11,14,22
 166:4
highlighted 171:7
hilton 4:15 8:5 187:7
hired 31:14
historian 37:7
history 35:19 36:7
 37:2,4 47:11,16
hk 38:2,7,14
hold 26:13 87:1
 91:19
holley 40:6,8,20
hook 99:17
houdaille 39:11,12
 39:16
hour 22:7
hours 4:14 18:18
hull 134:11 135:4
human 46:23
hyphen 153:20,20
hypothetical 112:21
 114:18 115:3 131:2
hypothetically
 130:22 131:14

I

ibm 6:6
id 9:19,23 20:4 51:19
 57:20 182:12
idea 126:22 130:6
identical 82:15
identically 89:18
 157:4
identified 19:12
 57:15 77:17,22
 94:24 107:3 120:22
 135:15 155:5 159:3
 161:8 169:7 171:15
 172:4,12 173:24
identifies 77:5 101:1
 120:14
identify 20:9 33:17
 34:16 54:7 64:25
 76:4,11 172:6,8
identifying 70:2
ignored 99:10
ii 5:11
il 4:21,25 5:3,11,15
 5:19,23 6:6 164:2
ill 34:15 51:15 58:16
 183:22
illinois 1:2 4:2 8:3
 15:8,17 16:3 17:8
 52:16 144:14 187:2
 187:6,8
im 7:17 16:14,24
 19:2 21:24 23:14
 24:6 32:1,1 34:23
 35:22 40:18 47:5
 48:18 49:9 51:20
 60:10,12 64:16,24
 67:18 69:9 73:18
 74:7 79:21 85:8
 86:15,23 88:13
 112:14 122:8,16,19
 130:5 131:25
 132:22 134:14
 135:17 136:8
 137:19 142:6
 148:21 157:7
 161:20 163:16,19
 165:23,23,25
 174:16,19 176:5
 184:14
immediately 31:9
imo 5:18 9:10 41:21

41:24
inadvertent 54:14
inch 106:17 107:6
 149:24
inchandaneighth
 106:21
inches 105:3,5,11,11
 105:13 107:11,17
 109:25 110:6 140:2
 140:5,11,14,15
 149:24
include 81:9 169:1
included 116:18
 127:24
includes 101:9 137:3
 147:22 165:21
including 78:13
 88:10 120:9 142:18
 170:1,3,5
incorporated 9:23
 20:3,14 21:14 23:5
 35:20 36:17 38:3
 38:14 39:2,12,15
 39:16 41:21,24
 43:19,23 44:2,10
 47:24 48:3 51:6
 52:12 53:10 65:12
 97:10 118:20 120:1
 148:15 156:2,5
incorrectly 135:5
index 133:7 136:2,19
indicate 94:21
 130:15,22 131:7
 135:25 142:16
indicated 74:18,19
 135:5
indicates 20:18
 76:20 82:14 85:15
 86:6 93:5 109:25
 128:21 130:8 138:3
 147:10 148:24
 156:16 159:7,11
indicating 140:11
individual 10:4
 12:14 17:2 24:19
 34:16 35:14 37:15
 38:22 44:4,20
 112:11 143:18
 153:10
individually 1:4 4:4

68:1	instances 71:16	interpreting 153:22	107:4,10,16,21
industrial 46:13	institute 163:6	interrogatories	108:11,21 109:4,12
industries 5:1,18	instruction 118:8,19	15:23,25 16:4	109:18 110:5,10,16
9:10,12 39:11	181:8	17:11 52:14 123:5	110:22 111:5,13,23
41:21,24	instructions 2:20	123:21,23 124:16	112:2,10,18,24
information 21:19	119:15 120:2	interrogatory 16:18	113:1,9,15 114:25
24:1 42:12,16 43:8	instruments 160:7	16:22,25 17:5 52:3	115:5,8,10 117:8
52:7 54:10,16,24	insulated 83:5 84:20	52:16 53:1 113:21	117:14 118:6,17
55:3,10 63:8 71:24	105:21 110:23	123:17 124:3,9	119:2,10,25 120:20
73:9 78:4,9 98:17	132:15 139:18	introduce 25:13	120:24 121:6,16
100:11,14,18	154:8 171:21,24,25	introduction 50:19	122:3,7,9 123:3,12
122:10,23 141:18	172:7,9,20 173:1,7	56:11	123:24 124:3,9,15
164:22 177:18,21	173:25 174:3,6,23	invented 56:6	124:22 125:13,23
ingersollrand 4:23	175:6,12,21 181:7	investigation 54:11	129:18 130:12,21
9:6	insulating 76:21	130:14 183:2	131:6,13,21 133:21
initial 62:7 94:10,13	103:12 106:13	involved 39:25 40:1	134:9 135:20 136:8
119:18	138:21 139:20	44:1,5,15 128:11	136:10,24 137:21
initially 161:8	162:11 164:7 165:3	iola 2:4 4:20 8:23,23	138:7,18 139:10,20
inquiry 10:10 19:18	165:18 166:1,11	9:4,19 10:14 18:23	139:25 140:10,21
inside 105:1,2,22	167:18	20:20 21:1,7 22:5	141:4,17 142:2,7
117:5 150:11 158:4	insulation 76:21	22:11,15,24 23:2	142:24 143:7,16
158:20	77:6 78:16 83:9	32:2 33:23 36:11	144:5,12,16,24
install 99:5	84:4,25 85:2	37:14 38:8,12,21	147:16,19 149:15
installation 65:15	103:23 104:16,21	42:12 43:5 44:16	150:13,18 151:1,14
66:16 74:21 81:15	104:25 105:6,25	46:1,3 47:15 48:25	152:4,12 154:14
86:19 118:23	106:7,9,23 107:5	49:11,16,19 50:8	155:4,18,22 157:9
122:13 125:2,8	107:12,18,24 108:2	50:13,19,25 51:4,9	158:10 159:17,24
130:3 175:20 177:4	108:6,16,16,23	51:14 52:1,9,21,24	163:18,22 165:1,8
179:9 181:19	109:1,8,20,25	53:15 55:6,7,13	167:6,23 168:21
installed 62:7 67:21	110:7,13,25 111:12	56:13 57:3,7,10,23	170:9,22 172:8,15
67:23 68:1 73:4,5	112:6 121:1,10,19	58:2,7,9,15,18	172:25 173:6,15
73:11,17,21 74:21	123:8 139:3,15	60:12,21 61:2,12	174:5,15 175:1,9
85:23 86:4 88:25	140:2,6,16,23	62:20 65:10 67:10	175:16 176:1,20
94:10 96:8 97:18	141:12,23 142:3,9	67:24 68:19,25	179:14,18,20 180:2
100:6,12 106:4,7	142:19 158:18,20	69:10,19 71:10,15	181:4,14 182:12,17
108:25 109:21	159:1164:23	71:21 72:3 75:10	182:22 183:1,9,24
116:14 117:2	165:21 166:10,18	75:22 76:25 77:24	184:10,21,24 185:4
121:21 122:12	166:19 167:1,7,25	78:5,11,22,25 79:4	iron 63:9,10 67:7
128:7,24 129:3,5,8	168:15 172:1 174:7	79:7,9,14 80:7	69:24 73:12 81:2
129:12,23 130:9,17	174:13 175:3,6,11	82:13 83:20,24	81:15 86:17 120:11
130:23 131:8 134:2	175:13 179:23	84:3,8,17 85:10,14	127:18 141:8 176:3
134:24 135:3 137:4	intact 112:3	86:1,22 87:8,17,22	irrelevant 100:1
140:24 142:12	intend 151:22	90:7,19 91:15	island 49:4,6 94:25
145:8 146:1,17,19	intended 99:3	92:10 93:7,15,24	isnt 133:11
146:23 147:1,5,23	interested 64:16	94:9,23 95:14,24	issue 21:6,6,17 22:22
153:13,13 160:8	187:18	96:13,18,22 98:5	38:23 109:3 141:16
175:5,22 176:4,9	interior 150:7	99:9,16,22 100:4	143:24 177:23
178:12,21 181:25	internals 150:17	100:14 101:1,19	issued 19:7 59:24
182:7	international 49:25	102:4,9,21 104:2,7	121:18 122:11
instance 35:12 111:6	internship 31:11	104:13 105:13,17	issues 21:23 22:21

29:20 144:10,13
171:23
item 79:14 103:1
180:14
items 89:9 160:5
itt 5:1 9:12
ive 19:24 69:22
117:3 145:1

J

james 5:2 9:11
jane 1:4 4:4 7:24
8:24
january 1:16 4:13
7:22 21:10 22:3
32:25 148:10 186:2
187:19
jeff 5:10 9:7
job 31:18 169:15
jobs 170:14
john 1:9 4:9 5:22
7:25 9:16 34:24
37:22 45:11 82:25
132:6
judicial 1:1 4:1 8:2
judith 6:1
judy 9:2
julian 3:11 4:20 17:7
20:17 21:9 52:15
53:3 123:6
june 146:8 153:16
jury 60:3 62:15
123:14 126:15,21
143:17 151:5,16

K

kasper 5:2 9:11,11
kazan 13:2
keep 68:12 84:11
kick 127:4
kicks 127:1
kind 34:4 59:24 61:2
104:21 116:1 127:7
164:22 165:2
171:10
kindly 20:6 96:18
know 11:19 12:20
18:1 33:22,23,24
34:3,5,7,13,16,17
34:18 35:4,19 37:6

37:9,12,17,18,23
38:5,18,21 39:4,5,6
39:21,24 40:1,3,6
40:23 41:3,7,9,15
42:9,19 43:17,18
43:22 44:4,13,14
46:25 47:6 51:14
51:24 52:22 56:14
57:7,11,11,12,19
59:12,19 62:20
63:4 64:11 65:18
67:8,9,22 68:3 69:8
69:13,14,16 72:14
74:5 78:2,3,8 83:18
84:6 85:7,10,11,23
85:24 86:3,5,10,11
90:19 91:9,12 93:4
93:12 94:20 95:10
95:15,16 99:13,14
100:2 101:16
107:14 109:6,12,18
112:18 115:24
117:9 118:16 122:9
123:3,10,22 124:1
124:2 128:10,19
129:2,5,8,11,16
130:12,20 137:7
138:16 139:6 140:8
140:18,18 141:21
142:1,7 144:3,7
146:22,25 147:8
148:17 149:2,12
150:16 151:12
153:5 156:25 160:5
160:6 164:22,24
167:4,5 170:7
173:16 175:1,5,9
178:5 181:3,4,5,8
181:12,13 182:11
184:2
knowledge 16:16
23:9 34:8,9,15 43:1
44:9 52:8 54:9 63:6
64:5,13 85:13
113:10,25 123:15
139:9 140:22
141:10 142:25
143:8 150:19,19
151:4,6 175:17,25
179:21,22 187:11

knowledgeable
36:12 44:8 100:20
142:8
known 43:9 66:10,20
108:22 148:14
knows 36:8 52:6,20
52:23 99:22 100:17
102:10
korzec 45:20,20 46:7
46:10
kristen 5:18 9:9

L

labeled 87:14
laconte 5:14 8:25,25
10:2 20:24 21:3,9
77:15 182:16 185:3
lagged 83:5 84:21,23
100:6 132:15 174:3
lagging 77:7 96:24
97:12,15,16 98:7
98:10,13 99:10
106:1,2,4,9 108:22
112:12,13 133:6
136:2,19,25 174:6
175:4,11
landberg 40:12,14
41:5
large 136:13 149:19
149:21,22 161:23
larger 162:20
largest 55:7
larry 40:6
lasalle 5:19
late 12:6
laundry 169:17,19
170:23
law 3:11 4:20,24 5:2
5:6,10,14,18,22 6:2
6:5 12:24 13:4
lawful 8:12
lawyers 18:9,16
28:15 64:18
leading 43:12
leakage 91:13
learn 164:17
leave 125:16 181:9
leaves 181:7
left 32:17,22 39:20
41:9 88:16

lefthand 72:16
139:11
legal 7:17
legault 34:24 35:8,13
37:22,23 45:10,12
45:13
legaults 35:5
legend 157:1,12
length 105:10 167:25
letter 2:13 20:16,25
21:4,9 22:4
letting 144:7
leverage 32:10 39:19
libbares 6:9 7:16
license 1:24
limitations 54:22
limited 54:15
line 1:19 53:16 85:20
85:21
lines 84:14,19
lisa 5:14 8:25
lisas 20:17
list 56:2 76:17 77:4
87:10 88:3 89:21
92:10 101:2,4,6,8
103:10 104:8 133:7
133:9,23 134:23
135:6,22 138:2
148:23 156:16
listed 19:18 79:15
103:16 104:8
138:24 141:21
143:20
listing 88:17
lists 59:1
literature 178:6
litigation 14:12 15:8
17:6 33:12 35:10
52:14 53:3 57:17
64:9 118:7
little 22:14 23:12
35:18 47:7 82:21
134:19 184:9
llc 5:13 6:1 10:23,25
35:24 43:10,13,20
43:24 44:2,11,17
48:6,9 53:12
load 126:14
locate 64:9 74:17
79:19 117:15

168:24
located 30:19 42:6
 48:12 54:10 63:10
 68:10 76:1 79:18
 115:22 118:19
 119:14 129:24
 142:15 169:11
locating 34:22
location 33:20 48:16
 48:25 49:3 106:5,8
locations 98:17
lodge 47:3
logan 4:14 187:7
long 18:17 26:13
 28:24 31:5 44:24
 87:25 167:25
longer 37:19 41:8
look 13:15 14:24
 18:1 19:16 20:4,7
 33:13 57:8,10
 61:16,18 74:23
 75:1,9,11 88:16
 93:11 94:2 102:23
 104:13 114:22
 120:18 125:19
 132:23 136:1
 155:19 157:12
 171:11
looked 13:20 117:22
 123:10 124:23
 130:1 177:3
looking 65:25 72:8
 79:21 154:16,24
 165:24,25 173:8
looks 125:20 148:10
lost 87:2
lot 177:22
louis 5:7 6:10 7:21
lower 91:7 119:20
luck 41:18

M

ma 6:2
macdonald 4:24
machinery 3:7 130:3
 161:14,19,23 162:2
 163:4,5,24 182:4,9
 182:19 183:4,18
madison 1:2 4:2 8:2
 17:7 52:15 53:3

123:6 144:14
magnesia 103:16,23
 104:16,24 105:6,14
 106:14 107:18
 108:6,15 109:20
 110:6 121:10 123:7
 139:2,21 140:5,16
 140:23 141:12,23
 142:19 166:22,25
 167:16,17 179:23
mahoney 6:6
main 66:7 70:21 72:8
 72:11 73:3,5,10,16
 74:20 75:3,6,14
 76:1,15,18,23,25
 78:12,14 115:12
 126:18 127:2 150:4
 161:5 169:1 177:13
 178:7
maine 63:11 81:3
 127:19
maintain 99:18
 151:7
maintenance 2:21
 110:10,15,17 111:6
 111:10 112:21
 113:3,11,17 114:1
 114:10 118:21
 119:16 120:3 121:8
 121:9 143:1,8,18
 150:6,14,21 151:6
 151:17,23 169:7
 170:14,19 176:12
 176:14
major 26:7
making 143:18
manager 23:14,23
 25:2,5,6,10 26:11
 26:14,19 27:5,19
 27:19,22 44:19
 45:3,21 46:4,13,23
managers 45:7
manner 99:8
manual 116:22
 117:1,5,15 118:8
 118:19 119:16
 120:13 121:8
 168:22 169:8
manuals 168:25
 177:3

manufacture 61:10
manufactured 24:11
 24:13 50:9,14 66:2
 88:9 94:18,25 95:4
 118:13 141:4 147:8
 173:20 176:16
 182:20
manufacturer
 108:12
manufacturers 42:5
 181:23
manufactures 50:3
manufacturing
 45:21 94:15 95:5
march 59:22,23 64:6
 96:5 98:24 138:1
mario 44:21
maritime 31:1,3,6,16
mark 5:11 21:3,8
 46:7,8 57:24 58:14
 58:15 78:20,21,25
 80:1 87:17 96:19
 133:18 136:17
 147:16 155:5,13
 163:18,22
marked 8:20 21:15
 22:4 58:17,19
 69:18,22 79:13
 80:6,12 87:21
 96:21 98:3 119:24
 125:22,24 133:20
 135:23 136:23
 144:25 145:2
 147:18 152:11,13
 155:21 163:21
marker 107:5
marketing 24:2
 28:10
marking 20:9 52:25
 79:10 97:6
marks 72:15 81:5
massachusetts 4:15
 8:5 11:3,10 30:20
 30:22 31:1,2,6,16
 36:18 48:13,17
 49:1 94:18 95:6
 120:2 141:5
master 17:10
material 50:15 77:19
 77:20,21,25 78:6

88:3 89:22,22 90:1
 90:1 92:11 101:2,9
 101:11,22,24
 103:13,16 104:6,8
 104:9 106:14
 133:23 138:3,13,22
 139:21 148:23
 149:6 150:21
 156:16 165:3 166:2
materials 51:25
 87:10 101:5,6,8
 133:8 135:6,7
 162:12 164:7
 165:18 166:22
 167:18
matt 45:20 46:14
matter 7:24 49:16
 143:9
matters 10:12 19:17
 187:11
matushek 5:19
mccambridge 6:5
mccarthy 5:2
mcclain 12:24 13:2
mcnulty 4:24 9:5,5
mean 16:1 17:25
 24:9 26:25 43:6
 67:23 71:10 84:22
 89:3 90:4 101:25
 102:3,3,4,18
 103:20 124:15
 131:11 132:21
 134:18 169:24
 171:20
meaning 14:22 73:22
means 102:7,16
 158:4
meant 117:10
mechanism 83:12
meet 18:9
meets 61:5
member 42:1
members 60:3 62:15
 123:14 151:5,16
memory 57:12
mention 49:12 125:5
mentioned 89:14
 186:3
mere 159:6,10
merged 39:11

merit 4:16
met 18:15 27:3
metal 84:24 85:1
 98:13 103:4 106:3
 108:14,15,22
 112:12,13 175:4
metallic 77:22
 101:12,14 102:1
 138:4,8
metropolitan 6:9
 7:20
middle 10:18 146:7
midway 82:22 146:7
 168:6
mil 56:16,19,23 57:4
 57:13,15,17,18
 58:21 59:1,4,10,13
 59:13 61:13 63:21
 64:1
military 2:14 55:22
 56:11 59:25 60:4
 60:14,20 63:12,19
milp19158 59:3
 63:21
mind 34:13 118:11
 123:15 159:15
mine 58:2,16
minerals 166:5
minus 15:13
minute 57:25 119:1
 120:18
missouri 7:21
mixture 167:16
mixtures 166:23
mo 5:7 6:10
molded 83:1 132:7
 167:25
moment 35:18 75:11
 155:19 157:24
monroe 42:6
months 32:3
morning 22:18 58:3
 58:22 68:8
motion 10:4,5 21:17
 51:18
motions 10:7
motor 147:7,9
 152:16 154:4,6
motors 145:17
 146:13

mouthful 133:11
move 47:6,13 52:10
 78:18
mover 116:3
multiple 67:13
multiply 90:15
mute 77:16

N

name 7:16 10:16,18
 12:10,11 24:21
 33:17 39:2,4,8 40:7
 40:13 43:19 48:6
 65:1 66:15 74:11
 180:14 184:4
nameplate 180:3,6
 180:10,17,19,22,24
 180:25 181:9
names 40:5 47:23
 66:6
naturally 95:3
nature 113:11,22
naval 3:7 55:19
 59:18 63:1 81:1,16
 86:13 103:21
 117:25 127:15
 130:2,6,14 131:6
 161:14,18,23 162:2
 163:3,4,5,17,23
 168:16 177:3,4
 182:18 183:3,18
navy 23:15,24 24:3
 25:14 26:8,23 55:8
 59:16 62:1 71:3
 77:23 118:22 125:2
 131:7 163:16 165:2
 176:8 177:3,5,16
 178:12,18,20 179:3
 179:9,15 181:17,18
 182:5 183:13
necessarily 47:12
 52:6 63:16 84:9,10
 110:20 123:21
necessary 184:17,18
need 10:12 47:6 58:1
 78:22 84:9,10 94:6
 98:18 100:12
 102:23 134:3
needed 112:12
needs 112:19

neither 187:15
never 118:18 184:10
new 23:14,23 24:2,4
 24:8 28:10
night 15:1,12 68:11
 79:18 125:18
 144:18 161:11
nilles 5:19
nods 34:19
nonmetal 25:18
normally 34:13
north 5:6,19 42:6
notarial 187:3
notary 4:16 7:6
 53:22 186:12 187:6
 187:23
notation 153:10
note 139:18
noted 107:20 140:9
 158:22
notice 2:11,12 9:21
 9:25 10:4 19:9,17
 19:19 21:11,18,24
 22:20
notices 19:7
november 80:18
 98:21 127:10
 145:14 156:8
number 9:20,24
 14:18,18 19:13
 20:10 21:8,25 22:1
 58:19 59:2 63:18
 69:22 70:2,5,9
 74:18 76:5,13,16
 77:14,19,21 79:10
 79:12 80:2,13,16
 87:14,18,19 89:6
 89:11,14,15,22,25
 90:14,21,24 91:6
 91:16 92:2,19
 96:20 97:7,23 98:2
 98:3 101:9,11
 103:1,12 105:3
 119:19 125:24,25
 126:6 127:9 131:22
 131:25 132:21,21
 133:12,19 134:9
 135:23,24 136:5,22
 137:10,14 138:10
 138:21 141:21

143:12 145:3,11
 146:4 147:17
 148:19,24 150:1,2
 150:2 152:13,14
 155:6,14 156:17
 157:3,4,7,10,22,22
 163:23,24 167:8
 180:14,14,15,15
numbered 14:12
 80:2 127:21
numbering 14:16
numbers 20:21,22
 76:11 88:24 92:16
 97:8 134:12 135:5
numeral 162:9

O

oakland 12:23
oath 8:7,14 63:17
 75:24 119:12
 123:13 160:1
 187:12
object 45:25 48:19
 112:15 122:16,20
objection 37:10 38:4
 38:10,17 42:8
 44:12 47:4 48:24
 49:10 50:5,11,17
 50:23 51:2,8,13,21
 55:9 56:7 57:6 60:7
 60:16,25 61:7
 68:22 69:7 71:7,13
 71:18 77:9 78:1,7
 82:12 83:17,22
 84:2,5,15 85:6 90:6
 90:17 91:11 92:8
 93:3,22 99:7,12,20
 99:25 100:9,23
 101:15 102:2,6,10
 102:13 103:24
 104:4,12 105:8,15
 107:13,19 108:9,19
 109:9 110:8,14,18
 111:3,9,20 112:1,8
 112:14 113:5
 114:17 115:1
 117:10 118:5,15
 120:16 121:3,13,22
 123:9,19 124:6,12
 124:19 125:10

129:15 130:10,18
 131:1,10,19 138:5
 138:15 139:5,23
 140:7,17 141:1,24
 142:4 143:4,13,21
 149:11 150:9,15,24
 151:10,19 158:6
 159:13 164:19
 165:6 167:3,22
 168:17 170:6,20
 172:2,10,22,23
 173:2,10 174:1,11
 174:20 175:7,14,23
 176:17 179:24
 181:2,11 182:8,23
 183:6,21
objections 52:13
 152:3
obtain 51:11
obtained 69:1
occasions 11:15
occurred 112:17
oconnell 5:22,23
 9:15,15
offer 112:21
offered 32:15
office 13:8 20:17
 33:17
offtherecord 87:3
 119:5
oh 18:18
oils 50:21
okay 12:2 14:24
 16:11,21,25 17:4
 18:4,8 19:3 20:20
 22:11,24 29:13
 30:3 31:21 33:16
 34:10,18,24 35:5
 35:20,22 36:11
 37:14,18 40:25
 41:17 46:1 53:14
 53:14 54:3 55:2,25
 57:21 58:7,25
 60:12 61:24 63:5
 63:17 64:11,14,18
 64:22 65:2,7 66:22
 67:1,10,14 68:5,9
 68:25 69:13 71:15
 72:7 73:2,8,13
 74:16 75:1,7,10

76:8,13 77:13
 78:11,18 79:2,8
 80:11 82:9,13,21
 83:16 84:10,13,22
 89:7 90:19 92:16
 92:19 94:9 104:7
 105:17 106:23
 107:4 108:2 111:13
 111:17 112:10
 113:9 115:8 116:25
 118:17 128:21
 131:13 133:9,15,18
 135:6 136:17
 137:19,20 138:21
 139:25 147:16
 148:23 150:18
 151:3 153:17 155:4
 155:14 156:13
 157:18 158:19
 160:11,16 161:11
 161:22 162:7,18,24
 163:14,18 164:4,17
 165:25 167:6 171:3
 173:15 174:5
 178:10 179:17
 184:23
old 24:12 135:12
once 98:18 175:17
 180:24
oneinch 138:20
ones 171:1
operate 48:1 99:6
 151:7
operated 48:9
operation 2:20
 116:21 118:20
 119:16 120:2 121:7
opinion 131:2,5
opportunity 13:10
 13:15 18:9,11
 19:11,16,21 22:17
 152:1 164:14
opposed 24:12,14
order 2:15,17,22,25
 3:5 10:6 21:18
 51:19 55:3 68:3,6
 69:23 70:5,9,12,16
 70:17,20 72:18
 80:14,16 82:3 89:6
 89:8,11,16 97:23

98:2 117:12 126:4
 126:6 128:2,12
 131:22 132:22
 134:9,10,19 135:1
 137:10,14 145:4,7
 145:11,16 148:19
 152:5,14 153:6
 157:3 180:15
ordered 80:20 81:13
 127:12
orders 79:19 144:20
original 3:10 15:2,6
 16:2 73:2
originally 17:25
 18:25
outage 87:7
outline 61:2,6 76:14
 96:24 97:12,15,16
 98:7,10,11 99:10
 133:6 136:2,18,24
 147:20 155:24
outlines 21:11
outside 105:24 106:1
 106:9
overly 110:21 111:3
oversee 114:8
owned 38:7,15 41:23

P

packing 51:7,12
 77:20 78:6 83:1
 124:17 132:7
 162:11 164:7,24
 165:4 181:23
pads 166:17 167:9
 168:6
page 1:19 2:3,10 3:3
 20:7 53:4 57:22
 58:12 69:20 82:22
 85:14 97:4 128:13
 133:16 136:14
 139:12 146:4 148:2
 164:6 166:1,15,16
 167:24 168:4,7
pages 15:12,13 21:11
 79:24 80:8 87:24
 96:12 98:15 125:20
 125:25 136:15
 155:10 162:10
pagetopage 164:15

painted 139:22
pairs 86:4
paperwork 68:5
paragraph 165:24
 166:4
parker 5:9 9:8
part 8:13 28:17
 51:23 55:13,17
 56:15 89:22 90:14
 90:21,24 91:6,15
 92:2,16,19 93:9
 101:4,4,6,8,9,11
 102:21 103:9,12
 105:20 107:2
 108:11 110:11,23
 117:1 134:6 138:3
 138:21 162:5
participate 35:2
particular 51:17
 72:6,25 73:18 74:8
 82:7 86:2 95:12
 109:2,11,14 122:22
 135:16 141:15
 151:16 178:22
particularly 42:18
 151:12
parties 187:16,17
parts 24:15 70:23
 71:1,4 76:17,21
 77:4 78:16 91:14
 133:4 142:18
 147:20
parttime 30:5
paskiewicz 1:22
 4:15 7:4,18 187:5
peace 49:4,5
peek 125:14
pending 10:3 21:18
people 27:20,22 85:5
 176:2
peoria 5:15
percent 103:16,23
 104:16,24 105:14
 106:14 108:6,15
 109:20 110:6
 121:10 123:7 139:2
 139:21 140:5,15,23
 141:12,23 142:19
 166:25 167:17
 179:23

performed 113:12
113:23 114:1,10
143:2,9 150:7
151:24 170:14
176:14
performing 111:6
112:11 170:18
period 18:2 32:2,7
32:16,18 39:20
55:11 56:4 63:15
65:14,15 67:4
114:3 121:17
122:18,24 123:11
165:5,13 168:13
177:2,15,19 178:3
178:7,13,19 181:24
182:6 183:19
perritano 6:1,2 9:2,2
18:22 20:15 21:5
21:16 22:9,12,19
22:25 31:25 33:19
33:22 36:4 37:10
38:4,10,17 42:8
43:3 44:12 45:24
46:2,24 48:18 49:9
49:14,17 50:5,11
50:17,23 51:2,8,13
51:15 52:4,19,22
53:13 55:4,9 56:7
57:1,6,8,25 58:5,8
58:14 60:7,16,25
61:7 62:17 65:8
67:8,22 68:17,22
69:7,12,14 71:7,13
71:18 72:2 76:23
77:9 78:1,7,20,23
79:2,5,8 82:12
83:17,22 84:2,5,15
85:6,9,12,25 86:21
90:6,17 91:11 92:8
93:3,13,22 94:5,20
95:12,22 96:12
98:4 99:7,12,20,25
100:9,23 101:15
102:2,6,12 103:24
104:4,12 105:8,15
106:25 107:7,13,19
108:9,19 109:2,9
109:13 110:2,8,14
110:18,21 111:3,9

111:20 112:1,8,14
112:20,25 113:5,14
114:17 115:1 117:6
117:9 118:5,15,25
120:16,21 121:3,13
121:22 122:5,8,16
123:9,19,25 124:6
124:12,19 125:10
129:15 130:10,18
131:1,10,19 134:3
134:6 135:13 136:6
137:17,20 138:5,15
139:5,8,17,23
140:7,17,20 141:1
141:15,24 142:4,22
143:4,13,21 144:10
144:15,22 145:1
149:11 150:9,15,24
151:10,19 152:9
154:9,12 155:1,16
157:8 158:6 159:13
163:20 164:19
165:6 167:3,22
168:17 170:6,20
172:2,10,22 173:2
173:5,10 174:1,11
174:20 175:7,14,23
176:17 179:12,17
179:24 181:2,11
182:8,15,20,23
183:6,21 184:8,20
184:23 185:1
person 36:6 37:8,11
37:13 43:7 44:8
personal 34:8 52:7
54:9 113:25 140:22
150:19
personally 33:10
113:10 176:21
pertained 171:1
pertinent 98:17
pete 40:16
phone 9:4 77:16
184:21
phrase 35:23
pick 75:15 126:14
picking 135:18
piece 77:14,19,21
92:23 111:16,18
148:24 149:6,20,21

156:17 157:22,22
pieces 150:1,2
pierce 6:2 33:19
pile 74:25
pipe 166:11,18
pipng 99:15
piston 132:4
place 11:21 12:18
43:13,16 94:14
115:23
placed 180:22,24
places 180:7
plaintiff 1:7,16 4:7
4:13,19 7:2 8:13,24
plaintiffs 7:25 8:6
9:21 52:13
plan 113:8
plastic 77:22 106:15
139:22,24
plate 91:20
play 47:9
plaza 5:11 6:6
please 10:15,18 11:6
11:8 13:19 20:7
23:25 24:21 25:4
25:17 34:13 40:7
40:13 44:22 75:2
76:5,9 77:12,16
96:19 102:13 107:8
110:3 119:21
125:17 133:19
144:21 146:3
plus 15:13
pohlman 6:9 7:19
point 34:1 52:25
64:18 181:1 182:9
184:14,18
pointed 106:15
139:24
porter 38:2,7,14
portion 59:25 162:19
portions 69:5
position 23:13,16,23
25:3,6,8,10,19,23
26:10,13 27:4,25
28:21 29:7,14
32:15,19 33:3 35:6
38:22 45:3
possession 13:8
162:15

possible 118:10
possibly 117:23
potentially 152:3
170:2
power 87:2,6 116:1
127:7 147:4
powerdriven 56:20
63:20
precisely 165:13
precut 95:9
predominated
167:17
preface 162:9 163:3
preparation 13:16
13:20 15:21 17:19
18:6 19:13 54:18
176:24
prepared 54:9
presence 53:21
present 6:8 23:13,21
48:9 113:8 159:1
159:11
presently 10:20
49:21 50:3,6 54:16
presents 107:22
president 44:16,18
presume 144:8
pretty 135:13
prevalent 168:16
previous 153:11
previously 15:16
18:24 19:12 63:22
63:25 98:1,2 118:7
137:15 139:3
140:22 142:11
157:5,9,11 159:2
173:20 177:21
primarily 27:18
primary 126:12
prime 116:3
print 135:14
prior 18:4 25:3,19
26:9 27:5 28:1,19
29:7,24 30:4 31:10
59:10 122:25
privileged 64:20
65:2
probably 28:16
131:15,17 180:12
182:13,15

problem 20:11 46:25
procedures 151:23
proceed 10:9
process 55:17
procured 35:14
produced 4:13 8:12
 13:23 14:11,25
 15:7,11,16 18:24
 18:25 19:1 33:12
 57:17 58:22 61:13
 118:7 119:17
product 25:18 77:10
 99:19 107:25 108:3
 108:17 116:16
 183:22
production 35:15
 119:18 180:13
products 23:7 24:2,4
 24:8,12 25:15
 26:23 55:19 56:2
 124:5,11 125:6
 160:13 168:15
 177:9 180:4
professional 7:5
programs 23:14,24
pronouncing 51:20
pronunciation 28:17
properly 99:5,5,15
 99:18 100:13
protect 108:16
protection 85:3,4
 109:6
protective 10:6
 21:17 51:18
provide 24:1 28:10
 73:9 115:12
provided 63:8 68:7
 68:11,24
public 4:16 7:6
 186:12 187:6,23
published 42:13,16
 163:5
pull 58:10
pump 23:7 24:7 26:7
 29:19 36:2,17,20
 36:21 37:15,24
 38:1,2,13,13,15,16
 39:1 42:2,4,5 47:17
 50:8,21,25 51:1
 60:22 61:3,5,10,11

65:13 66:7,8,9,9,11
 66:12,13 71:11,16
 71:23 72:6,9 73:17
 76:2,15,17,24 77:1
 79:16,17 82:6,8,20
 83:13 85:22 88:4,8
 89:23 90:10,21,25
 91:8,19 92:3,3,14
 92:17,22,22,24
 94:11,13,15,17,18
 94:19,24 95:4,13
 95:18,20 96:25
 97:10,13 98:12,18
 99:4,11,17 100:6
 100:22 101:2 104:9
 104:10,17 106:5,6
 108:7,12 109:19
 110:11,12,23 111:7
 113:4,23 115:13,25
 116:2,8,9,10,17,23
 118:3,13,20 119:15
 120:1,15 121:2,7
 121:11,18 126:11
 126:12,13,16 127:1
 127:2,6 129:12
 130:8 133:25 136:4
 136:21 140:24
 141:11,13,15,22
 142:10,11,17 143:3
 147:21,22 148:15
 150:4,7,11,13
 154:25 155:25
 156:2,5 157:15,24
 158:4,12,18,20
 160:17,20,23 161:2
 161:5 169:1,2,3
 175:18,19 176:7,13
 177:8,8,13 178:6,7
 178:19 179:8 180:2
 180:3,7,22,25
 181:6,15,22 182:4
 182:19
pumping 160:13
pumps 5:13 6:1 9:1,3
 9:23 10:23,25 15:7
 15:8,16,17 16:19
 17:1,11 19:8 20:3
 20:14 21:13 22:22
 23:5,8,13 24:5
 25:14,20,23 26:2,6

26:10,15,20 27:5,9
 27:13,17 28:1,4,8
 28:20,25 29:3,6,8
 29:17,21,24 30:2
 31:11,15,18 32:9
 32:14,23 33:8,11
 35:20,24 36:1,16
 37:7 39:2,10,14,15
 39:25 41:20,23
 42:1,23 43:9,13,19
 43:20,23,24 44:2,2
 44:5,9,10,11,17,25
 45:6 47:17,24 48:2
 48:6,9,12 49:8,20
 49:23 50:3,4,14,15
 51:5,17 52:12
 53:10,12 56:19
 60:13,18 62:6,25
 63:19 65:12,12
 66:1,15,15,22
 67:11,14,20 68:1
 68:12 70:13,19,22
 72:4,12,18 73:4,5
 73:11 74:21 75:4,6
 75:14 76:19 78:13
 78:15 79:20 80:9
 80:15 81:13,18
 82:1,5,15 85:16
 86:14,19 87:12
 88:7,9 90:16,18
 94:14 95:25 96:2,8
 97:17 99:1 109:1,3
 109:11,21 112:25
 113:12,13 114:2
 115:10,14,17 117:1
 117:17 118:2,9,12
 118:21 119:17
 120:3,7,7 121:8,21
 121:25 122:3,12
 123:7 124:17 125:7
 126:5,8 128:4,7,16
 128:24 130:3,13,16
 130:23 131:8,23
 132:4,18,23,24
 133:5 134:1,24
 135:8 137:1,4,16
 141:20 142:8
 143:10,19,24
 144:20 145:5,8,17
 145:22,25 146:13

146:17,19,23,25
 147:5,23 148:12
 150:22 151:8,13,17
 151:21 152:6,15,17
 153:2,6,25 154:1,3
 154:8,18 156:21
 160:7 161:7 162:15
 168:23,24,25 169:8
 169:9 171:2,12,14
 171:15,18,20 172:3
 172:5,9,12,13,16
 173:1,6,9,12,13,14
 173:19 174:13
 175:2,10 176:15
 177:5,14,22 178:11
 178:18,24 179:2,6
 179:8 181:7,18,25
 182:6 183:11
pumpsillinois 14:22
purchase 39:25 89:5
 89:6 95:8,11 97:23
 108:5 117:12 142:9
 142:16
purchased 39:10,15
 41:20 109:19
 141:11,22
purchases 142:17
purchasing 51:23
pure 116:6
purpose 42:22 43:22
 71:1 91:9 98:14
 108:17 163:12
purposes 22:2,10
 102:15 126:15,21
 133:22 143:22
 144:6
pursuant 143:11
put 10:2 55:19 61:4
 70:18 79:7 87:19
 108:2,6 163:14
puts 99:1 107:24
 108:14

Q

qpl 55:20 56:2,4,6
quaboag 30:16,18,21
qualification 124:1
qualified 56:2
quantities 66:23
quantity 103:15

138:24
quarter 43:18
 104:19
quash 10:4
question 1:18 13:24
 16:8,11,13,15 34:2
 38:9,11 51:16 52:9
 64:24,25 68:20
 69:4 73:3 110:19
 112:9 115:2 121:24
 122:6,17,20,23
 136:9 158:14 172:3
 178:1 179:5 182:13
questions 10:14 16:2
 36:8 48:23 151:22
 152:2 184:15,20,22
quick 94:3 154:16
quickly 182:16
quimby 36:21 38:6
 38:15 50:20,25
quite 38:25

R

randall 4:20 8:23
 20:15 36:4 45:24
 49:9 179:12
range 97:20
read 13:11 19:22
 20:21 37:1,3 38:19
 85:20 92:4 102:5
 119:20 128:20
 135:12,19 148:9
 164:15 168:9
 170:25 171:1,3,4,6
 174:22 184:25
 185:2 186:1
reading 113:19
 134:14 169:16
 174:14
real 31:18 94:3
 154:16 158:23
really 33:24 42:19
 49:14 51:24 60:11
 87:23 156:13
 177:22
reason 93:17,20
 127:2 130:22,25
 131:9
reasonably 54:11
recall 11:17 12:2,5,8

12:11,13 14:15,23
 113:24 170:12
 172:16
received 85:16
reciprocating 50:14
 56:20 63:19 118:21
 119:17 120:3
recirculating 126:19
recognize 53:18
recollected 54:17
recollection 131:18
 169:14
record 7:16 10:3,16
 15:4 21:7 33:14
 34:4 36:6,10 47:8
 48:19,24 74:16
 75:15,18,21,23
 76:5 79:9 87:2,6,22
 96:23 97:8 119:1,4
 119:9,11,21 133:22
 144:6 154:16 155:5
 159:18,20,23,25
 169:6 185:7 187:13
recording 7:15
records 33:11,13
 54:15 65:19 86:18
 130:15,22 142:15
 142:16,16 161:12
 162:22
recourse 166:5
redepose 144:9
redemption 184:17
reduced 187:13
refer 78:24
reference 58:23
referred 57:16
referring 67:2
 147:13
reflect 21:7 124:10
reflecting 15:5 68:6
reflects 134:22
refusing 115:5
regarded 168:23
regarding 35:10
 75:3 87:9 104:9
 118:8 121:9,19
 122:11 133:4 152:6
 177:4 178:6,11,16
 178:24 179:7
 181:24

regional 30:16
registered 4:16 7:5
regular 150:14
relate 123:23
related 46:14 129:21
 160:12 174:12
 187:15
relating 162:11
relation 183:10
relationships 181:22
relative 187:17
relevance 47:4 50:6
 50:11,17,23 51:2,8
 61:8 71:7,13,19
 84:15 100:9 102:7
 120:21 121:3,13
 124:13,19 125:10
 130:10,18 141:25
 143:13 150:10,16
 158:7 165:6 168:18
 173:5,10 175:7,14
 175:23 176:18
relevant 18:21 60:13
 102:15
remain 31:5 112:2
remained 47:20
remains 69:3
remarks 101:18
 138:18
remember 12:9,25
 40:4 170:16,21
remove 111:15,17
 112:13 158:5
removed 150:8
render 131:4
repair 113:3 114:10
 176:12,14
repairmen 182:4,9
repairs 24:14
repeat 174:16
rephrase 16:10
 81:24 124:8
replace 158:8
report 45:7
reporter 1:23 4:16
 4:16 7:5,6,18 8:6
 8:15 187:5
reporting 6:9 7:19
 27:20,23
representative 9:22

10:7 19:8 20:2,13
 21:13 23:4 52:5
represented 4:19,24
 5:1,5,10,14,18,22
 6:1,5
requested 116:24
 117:4,6
require 61:3 117:13
 150:13 151:18
required 27:21
 60:19 151:7
requires 84:3
rereview 184:17
rereviewed 18:5
research 28:22,25
 29:2 62:24 63:1
 86:12,16,17
residential 11:8
resource 46:23
respect 10:6 17:6
 23:7 47:4 55:18
 59:25 71:21 72:3
 117:15 119:18
 141:19 150:22
 151:20 168:25
 173:18 176:25
 177:23 179:1,5
 184:13
responding 8:14
response 34:14
responsibilities
 23:25 25:12 26:5
 26:21 27:16 28:9
 29:4,18
responsibility 24:17
rest 92:4
restate 16:10 38:11
resume 29:10
review 13:11 16:5,21
 18:3,12,19 19:11
 19:22 65:10 150:20
 160:12 164:14,18
 183:2
reviewed 13:22,24
 13:25 14:10 15:5,6
 15:10,15,21,24
 17:18 18:16 161:13
 168:10
reviewing 17:22
revision 162:24

163:4
rhode 49:4,5 94:25
rice 11:9
right 35:23 39:9
 42:17 43:2 56:17
 58:25 65:3 69:2
 71:6 72:7,21,24
 75:5 77:14 79:21
 88:16 89:23 92:11
 93:8,12 100:8
 101:6 105:2,7,18
 111:5 114:16
 119:20 124:18
 134:7 135:20
 153:21 155:22
 177:20 184:24
 185:2
righthand 70:6
 145:22
ring 13:2,4 83:1
 101:12,14 102:1
 103:6 111:24
 116:13,18 132:7
 138:4,8
rmr 1:22
road 4:15 5:23 11:9
 187:7
robert 46:21
rod 77:22
roland 1:14 4:13
 7:24 8:11 10:1,4,17
 53:11 119:8 186:1
 186:6 187:9
roman 162:9
room 73:22,22,22,23
 73:24,25 74:2,6
 129:9,12,17,25
 130:24 147:1
 169:19 170:1,3,5
rooms 74:13
roughly 23:19
royster 5:10,14
rudolph 10:19
ruling 51:18
run 99:15,15 127:6

S

s471 59:11
sale 81:14 88:9
sales 24:1 25:21,23

26:2,5,7 28:2,3,7
 28:10,20 31:22
 32:20,23 33:4
 42:24 46:13 65:11
 68:14,18,20 69:1,3
 69:5,17 80:14
 142:16 181:24
salesmen 176:7
salt 66:10 152:6,16
 153:1,25 154:17
 155:25 156:21
 157:14 158:11
 160:23 169:2
 178:17
san 12:22
sangamon 187:1,6
sarah 1:22 4:15 7:4
 7:18 187:5
satisfying 55:18
saw 112:11 123:14
 132:18
saying 114:15
 179:13
says 8:15 21:24 55:1
 59:4,9 81:2 89:2,5
 89:10,25,25 90:8
 103:5 104:21 107:5
 128:15,20 132:2,6
 132:9,12 134:14
 137:7,10 138:17
 139:20 146:11
 153:19 167:15
schedule 136:25
 151:6,17
scheduled 10:8
 17:25
schedules 150:22
schematic 104:15
 140:1
school 30:6,8,12,15
 30:22
scope 21:19 47:8
 60:8,17 71:19 84:6
 84:16 100:1,10,24
 102:7 103:25 104:5
 109:10 117:11
 120:17 121:4,14
 124:7,13,20 125:11
 131:2 139:8 140:20
 141:2,25 142:5

143:5,14,22 149:12
 150:10,16,25
 151:11,20 158:7
 164:20 168:18
 172:11 173:3,11
 174:2 175:24
 176:18 179:19,25
 181:3,12 182:14,24
 183:7
scratch 24:11,13
screw 38:2,13,16
 51:1
screws 111:21
sea 66:9 152:23
seal 111:19 187:19
seals 91:7,13
search 33:11,14,21
 35:2 117:18 162:16
 164:12
searching 35:9
seattle 35:13
sec 58:9
second 20:17 21:6,17
 58:8 85:14 91:3
 94:2 107:7 110:2
 128:13 135:9 146:4
 152:9 166:4
section 161:16
sectional 76:16 77:4
 133:7,9,23 134:22
 135:22 147:20
 155:23 166:18
sections 161:14
 171:8
sed11 145:23
see 12:22 25:24 53:5
 69:25 75:13 88:17
 88:20 89:22 90:22
 94:8 96:15 102:24
 102:25 104:19
 120:22 121:5 126:1
 128:14 135:15,21
 136:10 146:5
 153:10 156:12
 158:17,19,25 159:2
 178:10,16,23 179:6
seeing 131:5 151:3
 176:20
seeks 21:19 55:10
 122:23

seen 56:3 84:13
 109:15 113:22
 117:3 123:2 131:3
 131:3,11 141:18
 151:2 153:11
 160:10 162:1
 176:10,19 177:7,12
 181:20
segal 6:5
sell 71:2
selling 99:19
senior 37:15
sense 22:10
sent 3:11 175:10
 176:2
sentence 128:18
sentences 124:10
separate 115:20
 116:8
september 52:17
 53:13,14 54:4
 85:16
served 14:7 45:2
 165:14 178:4
 183:20
serves 45:5 116:11
service 29:9,13,16
 61:22,24 66:4
 166:22 169:7
 178:22
services 171:16
set 14:24 15:1,2
 17:10,15 43:7
 54:14,22 58:12
 156:1,22 187:19
sets 17:5 60:21
 152:17
seven 18:18
sheet 95:11 106:3
 148:25 149:2
 154:10 156:18
 157:19
sheets 154:21
ship 14:4 22:22
 51:20 69:24 72:19
 73:19 74:8 81:2
 82:7,11 85:25 86:2
 88:24 96:3 109:14
 114:4,9 129:9,13
 171:16 175:5,13

176:3 177:1 180:14
180:14
shipmate 14:2
114:15 165:14
shipmates 114:9,14
114:19
shipment 127:18
shipped 116:17
153:15 175:2,19
ships 63:21 72:17
81:6,16,21 88:10
88:18 96:2 98:23
108:7,17 118:13
127:21 128:11
130:7 137:25 148:8
153:7 156:10
157:13,15
shipyard 63:6 67:25
73:13
shipyards 26:8
shop 49:24
short 32:16
shorthand 1:23 4:16
7:4,6 187:5
show 52:19 57:2 75:2
98:16 99:3 106:13
114:21 180:8,17
shows 97:20 98:11
106:17,20 140:1
146:13 156:25
157:3
sic 119:4
side 139:11
sidebyside 129:6
sides 58:11
sign 184:25 185:2
signature 7:8 52:20
53:16,19 156:12
185:8 186:2
signed 52:2,4,11,16
53:21 137:24 156:9
signing 123:4
similar 132:17
157:23 166:25
simplest 126:25
simply 34:3,4,17
36:13 71:16 87:18
112:19
sinars 5:19
singer 6:6

single 82:1,14 87:11
88:4,8 90:10 96:25
97:13,17 104:10
128:3,6,24 131:23
132:4,22,24 133:4
133:24 134:23
135:8 136:3,14,21
136:25 137:4
141:13,20 143:2,10
143:19 145:20,21
sir 10:15,25 12:12,16
13:1,3,6,19 14:3,4
14:9,14 15:3,5,19
16:17,20,24 17:3,9
17:13,21 18:10,17
19:6,10 20:6 22:16
23:10,20,22 24:18
24:22 26:3 27:14
29:11,23 30:10,24
31:13,17,20 32:5
32:21,24 33:9
34:11 35:1,21,25
36:3,19,23 37:20
37:25 39:13,18,23
41:11,22,25 42:3
43:11,14,25 44:3
45:4,16 46:1,5,9,11
46:15,17 47:19
49:3 53:1,5 54:25
55:15 59:7,10 60:2
64:4,19,23 65:4,6
66:12,21,24 69:21
69:25 70:24 74:17
75:2,22 76:2,9
78:19 79:14 86:1
87:15 89:24 91:5
92:12 95:14 96:16
104:3 109:4 115:11
117:24 125:25
126:3 133:19,22
136:11 144:21
145:1 146:5 147:14
149:3 152:8 154:23
161:24 164:1,3
171:13 184:24
185:4
sit 14:6 44:7 63:5
118:18 121:17
123:12 182:18
situation 71:22

131:17
six 18:18 21:11
153:21
size 98:12 106:22
158:1,2
sizes 98:16
skipped 171:10
small 49:7 135:14
smaller 157:25 158:2
smooth 106:14
139:21
socalled 37:6
sold 65:15 66:16,23
71:11,11,16,23,25
72:4 74:21 117:2
117:16 118:2,22
125:1,7 176:9
177:14 178:11,18
179:2,8 181:18
somebody 24:16
52:6
somebodys 103:5
sorry 24:6 32:1,1
67:18 88:13 122:8
131:25 132:1,22
137:19 148:21
157:7 174:16,19
sort 76:22 77:8
south 5:2
space 107:10
spaces 169:25
spare 24:14 70:23
71:1,4 133:3
142:18 147:20
spares 70:22,23
71:12,17,25 87:10
88:3 133:8,10,24
134:23 135:22
155:24
speaking 33:18 47:2
99:8
speaks 60:6
spec 57:13,15,18,18
58:21 59:1,4,10,13
59:18,19,24,25
61:13 63:22 64:2
101:24
special 1:5 4:5 72:15
81:5
specialist 7:17

specific 15:17 114:20
114:20 172:15
specifically 11:18
21:20 56:14 62:23
151:8 167:5 171:11
176:3 177:11 178:9
179:4
specification 2:14
55:22 59:11,15,17
59:20 60:4,14,20
60:22 63:12,19
64:6,9,12 77:23
90:1 103:19,21
specifications 56:12
99:18
specs 56:17,19,23
57:4
speculate 85:9,13
112:16
speculation 131:18
spell 24:21 30:17
40:7,13 44:22
spelled 22:3
spoke 39:20
spoken 183:9
square 6:2,10 7:20
104:22
ss 187:1
st 5:7 6:10 7:21
stage 145:21
stamp 76:4 80:2 97:8
119:19 125:25
128:14 133:12
135:22 145:3
163:24 164:5
165:25 168:4
stamped 14:12,15,22
15:6,17 96:14
136:4 146:4
standard 31:23 32:7
52:13
start 69:19 164:6
started 33:25 36:20
127:5 161:4
starting 14:17
state 8:22 10:15
11:20 34:4 36:18
39:17 96:22 124:16
187:2,6
stated 151:20

states 24:2 25:14
 55:8 59:16,18 62:1
 71:2,3 118:22
 120:25 121:7 125:2
 125:8 163:5 176:8
 177:2,16 178:12,18
 179:2,9 181:16,17
 182:5 183:13
status 32:11
steam 36:2,17,20
 38:1,13 39:1 47:17
 50:8 65:13 83:3,9
 83:10,14,21 84:3
 84:11,11,13,19,19
 94:14 97:9 98:13
 104:9 105:22,23,24
 109:19 116:2,2,6
 118:3,19 119:15
 120:1 121:7,11,18
 121:20 126:20
 127:8 132:14
 139:11,14 140:24
 141:11,22 142:17
 147:22 148:15
 156:2,5 167:19
 177:8 179:8 181:15
 181:22 182:4
steamdriven 118:21
 119:16 120:3
sticker 155:13
stickers 163:19
stipulated 7:1
stopped 80:4
streak 41:18
streamline 22:14
streepey 5:18 9:9,9
street 5:6,15,19
 10:24
stretching 40:18
stroke 133:6 136:2
 136:19
structure 43:24
 47:16
study 183:2
stuffing 83:1 132:7
subheading 166:1,9
 166:21 167:15,24
subject 54:14,22
 184:16
subscribed 186:8

subsection 161:23
subsequent 121:17
succeeding 125:20
suction 49:8 145:21
 150:3 157:21 158:3
suggest 122:17
suggests 82:25 83:3
suitable 168:1
suitably 83:4 132:15
suite 5:2,11,15,19,23
 6:6,10 7:20
summarize 47:16
summary 171:3
summer 12:7 30:1,4
 30:6 31:12
supercede 57:3
supercedes 57:18
superheated 83:16
supersedes 59:9
supervise 29:5,19
supervisor 28:22,24
 29:2 96:3
supplement 15:1
 18:25
supplemental 15:11
 17:15 52:12 53:2
 54:8,13,19,23
 79:18 125:18
 144:17 161:12
supplied 62:8 63:14
supplier 95:16
 181:21
supplies 126:17
supply 28:11 152:21
sure 32:10 52:21,24
 60:10 79:4 100:12
 117:8 122:7 141:17
 158:16 159:17
 163:16 165:23
surf 42:18
switch 35:17
sworn 4:13 8:12
 187:10
sylvia 53:24
system 28:11 70:18
 115:12 116:1
 126:19,20
systems 160:13

T

take 10:11 12:18
 20:23 43:15 57:8
 58:16 75:10 94:5,6
 111:21 114:22
 120:17 125:14
 139:17 159:18
 185:1
taken 1:16 7:4 8:4
 75:19 159:21 186:2
 187:16
takes 94:14
talk 35:18 55:4,24
 143:23 144:2
talked 137:15 150:23
 151:8 157:5,10,11
 160:16,19,22 161:1
 167:1 168:22 177:9
talking 48:20 55:22
 55:23 76:24 105:6
 115:2 121:24 161:4
 165:3 173:12,16
talks 165:17 166:17
 166:22 167:6,9,12
 167:23,24 168:5
tape 47:9
tapes 167:12
tear 110:12,24
 111:11,24
technical 168:22,24
 176:12 177:4
technically 47:1
technology 36:21
 38:2,14,16 50:20
telephonically 4:23
 5:1,5,9,17,21 6:4
tell 13:19 16:9 34:12
 34:14,17 36:13
 39:7 42:23 44:7
 60:3 65:1,24 66:6
 69:14 73:19 83:7
 105:9 106:25
 156:13 179:20
 182:13
tells 81:12 83:8
 88:23 93:8
temperatures 166:5
 167:19 168:1
term 28:14 84:23
 111:10
terminal 4:15 187:7

terminology 157:20
terms 27:2 47:10
 51:16 117:16
 126:25 154:15
 165:3
testified 139:3
 140:21 172:25
 173:8 174:2,10,18
testify 20:1,13,19
 21:14,22,25 63:17
 113:2,10 123:13
 142:25 143:16
 144:1 150:19 151:4
 151:15 170:9,13,17
 170:22 187:10
testimony 13:16,21
 15:5,21 17:19 18:6
 20:3 23:6 38:23
 112:21 113:7,20
 114:13,20,21
 118:18 129:22
 169:22 172:16
 174:12,14,21
 176:24 186:3
 187:14
testing 29:6
thank 16:12 58:13
 75:16 110:3 160:2
 185:4
thats 21:5,10 22:5,15
 24:16 28:13 30:19
 35:16 36:23,24
 42:10,12,14,16,20
 48:23 49:11,12
 55:1,2 56:16 61:14
 62:5 65:2 69:4 70:5
 75:4 76:12 79:21
 82:2 83:12,24 88:1
 90:4,8,9 91:23
 92:21 93:8 95:2
 97:6 103:1,1
 105:23 107:16,17
 110:5 114:23
 124:22 131:7,14,15
 133:11,15 134:7,8
 136:13 137:20
 139:1 140:4 142:21
 142:23 143:11
 145:24 153:8 155:3
 155:11,22 157:18

161:17 163:24
 164:6 168:19
 169:11 174:24
 176:23 177:25
 180:20 182:13
theres 17:10,14
 20:16 66:4 72:17
 72:17,18 82:9,21
 91:15 101:17
 102:25 103:9,15
 106:8,12 107:4
 109:24 120:24
 121:6 125:5 140:1
 153:6 156:17
 158:20 164:2 181:8
theyre 87:14 184:9
thick 103:6 138:20
 148:24 149:24
thing 56:1 176:22
things 22:14 37:3
 47:6 117:5 171:17
 171:19
think 22:13 38:24
 40:18 46:20 47:2,6
 47:13 51:16 77:24
 78:5 117:23 123:20
 123:20 134:25
 142:13 172:19
 174:2,11,13,20,24
 177:18 179:13,15
thinking 100:2
third 1:1 4:1 8:2
thoroughly 22:8
thought 72:20
three 23:18 26:16
 27:24 79:6 105:11
 105:13 109:25
 110:6 140:11,14,15
time 7:23 10:1 16:7
 18:2 21:21 22:1,10
 23:17 32:7,16,18
 34:1 39:21 42:19
 48:15,22 49:12
 53:1 55:11,21 56:4
 56:8 60:25 61:7,15
 61:17,20 63:15,22
 64:18 65:14 67:4
 75:17,20 77:11
 87:5 94:5 96:7
 99:23 100:3 113:2

114:3 119:3,7
 121:17,25 122:18
 122:24 123:4,11,16
 139:17 143:17
 144:4,7 148:14
 150:6 151:15 152:1
 158:4 159:19,22
 165:4,13 168:13
 177:2,14,19 178:3
 178:7,14,19,25
 181:1,17,24 182:6
 182:10 183:19
 184:14,19 185:5
times 51:6 122:25
title 25:1 45:17 46:3
 46:12,22
titled 133:22
today 7:22 10:8
 13:12,17,21 14:6
 15:22 16:7 17:20
 17:23 18:6 19:14
 21:23 23:6 34:1
 44:7 59:12 63:5,9
 64:16,24 118:18
 121:17 123:13
 143:23 144:2
 150:23 157:12
 173:8,20 176:25
 177:10 182:14,18
todays 22:2
tollgate 5:23
tool 42:24
tools 147:21 155:24
top 20:7 39:9 58:25
 65:25 70:6 174:6
total 81:20 128:2
 138:24 145:16
totality 183:3
totally 163:13
touching 187:11
tough 153:18,19
town 30:7
traced 95:23
transaction 43:12,15
 44:5,10
transcribed 7:7
transcript 3:11
 186:1,3
transcripts 13:8,11
 13:14

trial 47:9 113:2,7
 143:17 151:15
troubleshoot 29:19
true 4:25 54:23
 57:19 114:15 186:3
 187:13
truth 187:11,11
try 32:12 117:15
turbine 116:4
turn 46:24 53:4
 79:16,23 96:14
 132:20 144:16
 146:3 152:5 163:2
turned 56:16 177:21
twain 5:11
two 11:16 29:1 72:13
 72:19 73:3,10
 74:20 87:24 90:23
 90:24 91:14 96:12
 96:23 97:8 98:15
 103:9 128:9,16,22
 136:15 138:10
 146:2,17,19 154:21
 154:21 155:10
twainch 145:20
type 51:25 66:1
 94:23 101:22
 110:16 145:22
 147:21 153:25
 154:6 156:1 164:24
 179:22
types 82:4 117:4
 143:23 171:22
typewriting 7:7
typically 117:5
 129:12
typing 77:15

U

unclear 78:14
underestimate
 184:10
underneath 45:5
 85:19 128:15,18
understand 14:1,7
 16:6,8,10 17:10,14
 19:6 23:3 65:5
 75:23 88:15 101:13
 112:9 119:11
 157:14 159:25

162:7 163:11,14
 169:21
understanding 35:11
 35:16 36:23,24
 38:6 42:10 56:5,10
 61:13 62:11,14
 64:1 96:6 102:14
 102:16 103:22
 104:3 165:1 169:18
understands 65:8
 100:5
understood 16:14
 168:12
undertaken 130:13
 183:2
undiscovered 54:14
unfortunately 41:16
unidentified 77:19
uninsulated 84:13
 181:10
union 29:5 50:1
unionized 49:23
unit 71:2 127:7
 156:22
united 24:2 25:14
 55:8 59:16,17
 61:25 71:2,3
 118:22 125:2,8
 163:5 176:8 177:2
 177:15 178:12,18
 179:2,9 181:16,17
 182:5 183:13
units 24:7 26:7 28:11
 125:1
upper 70:6 91:8
use 61:10 76:10
 100:21 111:10
 124:4 126:22
 142:10 163:17
 166:17 168:16
uses 116:2
uss 23:7 63:7 65:16
 66:2,16,19 71:22
 73:6 74:22 81:9
 86:7,9,13 88:10
 90:13 96:8 97:18
 109:22 113:15
 114:2 115:15 117:2
 117:16 118:14,23
 120:10 121:21

122:12 125:3
 127:24 128:7,25
 130:4,15,24 134:2
 134:24 135:3 137:5
 142:12 143:3 145:8
 146:1,20,23 147:1
 147:5,23 151:1,9
 151:18 153:3
 156:23 161:8 165:9
 165:15 168:14
 169:3,15,22 170:10
 170:15,19,23
 173:19 175:19,20
 176:3,9,15,25
 177:10 178:13,21
 179:1,10 181:19,25
 182:7,19 183:4,14
 183:20

V

valve 83:4 132:14
valves 132:9
vandalia 4:25 5:11
variety 81:20 82:10
various 51:6 66:15
 82:4 88:10,18
 106:12 130:3
 157:13 160:4 162:8
 165:19 169:25
 180:7
verification 52:2,5
 52:11 53:7 54:6
 123:16
verifications 123:5
verified 17:2,6,12
version 59:10 82:10
versus 7:25
vertical 81:25 82:14
 87:11 88:4,8 96:25
 97:13,17 104:10
 128:3,6,23 131:23
 132:3,22,24 133:4
 133:24 134:1,23
 135:8 136:3,20,25
 137:3 141:13,19
 143:2,9,19 145:23
vessel 73:14 126:23
vessels 55:19 120:9
 125:7 168:16
viacom 5:5 9:18

video 7:17
videographer 6:8
 7:15 8:21 75:17,20
 87:1,5 119:3,7
 159:19,22 185:5
videotaped 1:14 4:12
 9:21,25
vince 24:20,25
viscous 50:21
visible 158:23
voelker 5:10,14
vs 1:8 4:8

W

wacker 5:2
wait 57:6,25
waived 7:8 185:8
walked 173:24
walks 144:13
want 23:11 34:6,7
 35:17 45:24 47:3,7
 48:23 49:11,14
 57:11 64:14 65:9
 66:3,4 68:9,19
 76:10 79:16 96:13
 102:13 113:17
 125:16 131:4 136:6
 151:24 152:5
 155:16 178:5
 184:25
wanted 36:9 110:22
 111:2 138:10
war 62:13,18,19 67:5
warn 122:21,22
warned 121:18
 122:14
warning 64:14
 120:14,23 122:11
warren 5:13 6:1 9:1
 9:3,23 10:23,24
 11:3 14:22 15:7,8
 15:16,17 16:19
 17:1,11 19:8 20:3
 20:13 21:13 23:5,8
 23:13 24:5 25:14
 25:20,23 26:2,5,10
 26:14,20 27:5,9,13
 27:17,25 28:4,8,19
 28:25 29:3,8,16,21
 29:24 30:2,7,20,22

31:11,15,18 32:9
 32:13,16,23 33:8
 33:11 34:20,21
 35:20,24 36:1,1,16
 36:16,20 37:7,15
 37:19,24 38:1,12
 39:1,2,10,14,15,24
 40:21 41:6,9,13,20
 41:23 42:1,16,23
 43:9,9,12,19,20,23
 43:24 44:2,2,4,8,10
 44:11,17,25 45:6
 47:17,17,24 48:2,6
 48:9,12,13,16 49:1
 49:20,23 50:3,9,13
 50:21 51:11 52:12
 53:10,12 54:1
 60:13 62:25 65:12
 65:13 66:2,15
 68:12 69:23 70:13
 72:4 73:4 80:20
 81:14 82:6 88:7,9
 94:14,14,18,19
 95:5,5,8,11,25 96:1
 97:9 98:25 99:22
 99:23 100:4,5,15
 100:17,20 101:1
 104:9 107:22 108:1
 108:5,14,25 109:7
 109:19 116:14,17
 118:3,13,19 119:15
 120:1,1 121:7,18
 122:21 124:10
 127:12 130:13
 140:24 141:5,11,22
 142:8,17 147:22
 148:12,15 156:2,4
 162:15 172:4,12
 173:12,20 175:3,11
 175:17,18 176:2,7
 176:13,16 177:8,8
 177:13 178:6,11,18
 179:1,8 180:2
 181:7,15,22 182:3
 182:21 183:11
warrens 51:5 55:7
 100:2 108:3
washington 11:20
 35:13
wasnt 32:10 51:23

62:4 75:8
water 66:8,9,10
 79:15 83:15,16
 126:17,22 144:20
 145:5,7,17 146:22
 146:25 147:5,21,23
 152:6,16,21,23,24
 153:1 154:1,17
 155:25 156:21
 157:14,24 158:11
 160:23 161:1 169:1
 169:2 178:11,17
way 22:16 47:7
 104:20 111:16
 112:12 134:5
ways 38:25 66:4
web 103:3,4,4
webbing 102:25
website 37:5 42:13
 42:16,19,22 43:7
weed 6:5 9:13,13
welcome 36:8
went 12:21 20:16
 40:23 41:10 51:24
 109:20 157:19
 176:13
west 4:25 5:11
weve 19:12 80:12
 124:23 125:24
 135:23 145:2
 150:23 151:20
 152:12,13 153:11
 155:4 160:11,16,19
 160:22 161:1
whats 11:6 24:25
 45:17 50:6 58:18
 59:7 80:2 91:18
 126:11,15 129:22
 133:12 180:19
whereof 187:19
whos 37:14,18 44:16
wide 101:21 103:6
 138:20 179:18
window 62:21
winthrop 6:2
wise 3:11 4:20 17:7
 20:17 52:15 53:3
 123:5
witness 7:8,9 34:19
 58:13 65:9 75:16

94:6 102:8 109:14 112:16 114:22 123:1 134:4,8 154:11,13 155:3 159:15 185:9 186:1 187:12,14,19 witnesss 84:6 words 14:16 99:9 108:21 131:16 162:19 177:12 181:6 183:1 wore 109:7 work 27:11 30:5 32:6 99:11,18 110:16 112:5,11,22 113:3,11,22 114:1 114:10 128:2 143:1 143:8,19,23 150:6 170:10,19 176:14 177:1 183:21 worked 31:10,22 169:22 171:22 workers 108:25 109:7 working 46:18 works 63:9,10 67:7 69:24 73:12 81:2 81:15 86:17 120:11 127:18 141:8 176:3 world 42:23 62:13 62:18,19 67:5 worldwide 42:4 wouldnt 44:14,14 63:16 99:14 100:7 131:4 wp 87:19 125:19 wpil 14:22 69:20 76:6,6,7,13 79:24 80:2,3 85:15 87:14 87:15 96:19 119:22 119:23 125:19,25 133:14,14 136:5,18 144:19 145:3 146:4 147:14,17 152:7,7 154:18 155:6 163:25 wpil00013 128:14 wpil00238 96:15 wpil00239 96:15 wpil00244 79:11	writing 103:5 187:13 written 165:5,9 wrong 123:20 wsp 89:10 X Y yeah 37:12 55:6 66:6 81:25 107:2 120:19 125:17 134:4 144:5 154:14,22 year 12:7 30:6,11 years 23:18 26:16 29:1 62:15,17 yesterday 18:3,4,8 18:11,15,22,23 19:5 youd 79:1 111:21 182:13 youll 36:13 47:13 58:12 102:25 young 45:14,15 youre 16:15 17:4 28:18 33:17 35:8 36:7,12 60:10 62:3 65:11 75:23 76:24 78:23 93:25 99:19 109:10 113:1 119:11 142:24 147:13 151:14 159:25 165:24 176:21 youve 13:20 23:16 65:19 84:13 150:20 173:8 Z zip 11:4,11 0 00011 144:19 145:4 00012 126:1 00015 126:1 00016 79:24 80:3 00017 85:15 00020 80:3 00021 152:7 00024 152:7 0004 144:19 145:3	00041 163:25 00056 163:25 164:2 0012 125:20 0015 125:21 00190 119:22 00212 119:23 00238 96:19 00239 102:24 00240 87:15 00241 87:15 00243 147:14,17 00244 76:6,13 00245 76:6,14 79:11 00245b 76:7,16 79:11 00246 133:14 00247 133:14 00256 154:18 01083 11:5 01506 11:12 02110 6:2 031538 1:6 4:6 8:3 084004225 1:24 1 1 2:11 8:19 9:20 19:13 21:25 22:1 32:25 59:22,23 64:6 69:20 101:21 103:6 138:20 148:24 150:2,2 157:22 167:15 185:5 10 2:4,20 6:2 75:17 75:20 87:5 119:3 119:24 131:22 132:21 100 5:11 49:22 1025 5:2 103 4:25 5:11 10th 137:23 138:1 11 2:22 11:7 119:7 125:22,24 127:9 131:24,25 132:21 137:14 144:23 145:14 114 1:19 119 2:21 12 2:23 21:10 85:16 133:19,20 135:24	159:19,22 187:20 124 5:15 125 2:22 83:21 12th 22:3 13 1:19 2:24 136:22 136:23 141:21 143:12 149:23 133 2:23 136 2:24 14 2:25 144:25 145:3 185:5 141 11:9 144 2:25 147 3:4 15 3:4 147:17,18 148:24 152:15 150 5:2 152 3:5 155 3:6 15andahalf 105:11 16 3:5 11:7 152:11 152:13 157:8,9 161 89:22 90:14,21 90:24 162 91:16,18 92:16 163 3:7 92:2 164 92:19 16inch 103:6 16th 138:20 16thbyoneinch 101:21 17 3:6 69:23 155:6 155:14,21 157:5,11 18 1:16 3:7 4:13 7:22 163:20,21,23 1897 36:18 47:18 18th 186:2 19 33:1 47:18 159:19 19158 60:1 1939 57:5,19 59:22 59:23 64:6 1940 95:23 98:21 137:23 1940s 55:24 56:1 1941 62:16,21 63:15 63:23 65:14 96:5 98:24 156:8 1943 69:23 80:18 127:10 138:1 145:14 148:6
---	--	--	--

152:15 177:18
1944 148:10
1945 62:16,21 63:15
63:24 65:14 85:16
128:15,22 146:8
153:16
1950 36:22 38:3,16
50:21 163:6
1950s 168:13
1951 61:19,20 62:4
178:8,14 179:7,16
1952 162:25 163:9
165:12
1955 56:24 57:18
59:8 60:1 61:14,19
61:20 63:13,21
1957 39:2 47:20,23
48:2
1959 178:8,14,24
179:7,16
1972 39:10
1974 30:13,22 31:4,7
1977 30:1,4 31:12
1978 29:15,17,21,24
31:8,16 33:8
1982 29:3,7,17
1984 28:6,7,20 29:4
32:19
1985 31:23 32:3,4,8
32:8 39:14
1986 27:10,11,17
28:1,8 31:24 32:19
1989 41:20
1990 26:20 27:6,12
27:17
1991 26:17
1994 26:1,6,9,20
1995 25:25 45:1 50:9
50:13
1996 45:1
1999 25:9,19 26:2,6

2

2 2:12 8:19 9:24 20:7
89:25 119:8 150:2
150:2 162:10 164:6
166:9,21
200 6:6
2001 23:19 25:3
2003 11:20 12:3,14

2004 35:24 43:13,19
44:11 48:2,5,8
52:17 54:4
2005 1:16 4:13 7:22
21:10 186:2,9
187:19
2007 187:20
2040 6:10
208 134:15
20th 96:5 98:24
21 2:13 7:23 128:11
152:15 153:6,7
2100 5:19
212 83:23
21st 187:19
22 146:8
220 5:23
232 101:9,11 103:1
136:5,18 138:3
233 103:12 136:5,18
138:21
238 96:24 104:14,20
106:13
239 96:24 104:15,20
106:13 107:4,8
109:24
24 11:20 12:3,14
244 76:19 78:13 79:7
245 76:19 78:13
245b 77:3 78:14
246 135:23
247 135:23
24th 5:6
25 166:1
256 155:6,16,18
156:11
257 155:1,7,17
25inch 70:21
27 119:3 127:10
156:17
28 75:17 148:10
29 59:8 60:1 61:14
63:21 153:16
2950 7:20
2nd 62:13,17,19 67:5
2sed11 145:17
147:21
2sed6 152:15 156:1

3

3 2:13 21:8,15 22:4
69:20 167:8,24
30 80:18 185:2,3
31 119:7
31st 31:24
32m2 103:19
32ndinch 148:24
33p2 101:24
3555 4:20
3rd 52:17 54:3

4

4 2:14 58:17,20
63:18 144:22
157:22
41 75:20
42 128:2,12 132:2
145:16,20
44 177:18
45 164:6
467 5:11
47 159:22 166:1
471 64:6

5

5 2:15 69:18,22
74:18 146:11
500 167:19
51 168:4 178:20,25
515 5:6
55 87:5 179:13,15
56 11:7 15:12
57 19:17 20:8
58 2:14
59 178:20,25 179:13
179:17
5th 156:8

6

6 2:16 79:1,10,12,13
128:15,22 153:20
166:9
600 5:15
60123 5:23
60602 5:19
60606 5:3
60611 6:6
61602 5:15
62002 4:21
62025 4:25 5:11

63101 5:7
63102 6:10 7:21
645 5:23
69 2:15
6by9by12 81:25
87:11 88:4,8 96:25
97:13,17
6by9by12s 82:15
6th 5:6

7

7 2:17 80:2,6,13
89:15 98:4,5
166:21
703 77:20
727 77:21
79 2:16

8

8 2:11,12,18 87:18
87:21
80 2:17
801 1:25
80s 47:10
82 11:1
84 81:19,20,23 82:14
844 153:23
845 73:1 88:12,13
153:23
846 153:23
849 88:20,24 89:19
127:22 137:8
148:18 157:1
85 4:15 31:25 32:1,1
103:16,23 104:16
104:24 105:6,14
106:14 107:18
108:6,15 109:20
110:6 121:10 123:7
139:2,21 140:5,15
140:23 141:12,23
142:19 166:25
167:17 179:23
187:7
850 168:2
86 28:6 31:25 33:2,3
87 2:18
888 148:20,21
8th 148:5

9

9 2:19 7:23 96:20,21
97:7

90 26:18

908 134:17,18

90s 47:10

91 26:18,20 27:6,12
27:17

94 25:25

95 26:1,6,9

96 2:19

9by6andahalfinch...
128:3

9by6by16 133:24

9inchby6andahalf...
136:3

9inchby6andahalfi...
128:23 132:3
136:20