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WALLACE and GRAHAM, P.A.

ATTORNEYS AT LAW

MONA LISA WALLACE †
WILLIAM M. GRAHAM ††
MICHAEL B. PROSS **
EDWARD L. PAULEY †
JOHN S. HUGHES, IV
CATHY A. WILLIAMS ***
WHITNEY V. WALLACE
AARON F. GOSS
MARK P. DOBY

525 NORTH MAIN STREET
SALISBURY, NORTH CAROLINA 28144

TELEPHONE: (704) 633-5244
FACSIMILE: (704) 633-9434

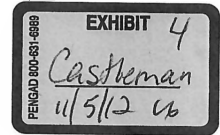
† Also licensed in PA, SC, TN and TX
†† Also licensed in TX
* Also licensed in MD and NY
** Also licensed in KY and WV
*** Also licensed in FL and NY

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October 29, 2012

Via Overnight

Barry Castleman
4406 Oxford St
Garrett Park, MD 20896



Re: Reddaway

Dear Mr. Castleman:

I am enclosing some materials regarding the Defendant Reddaway Manufacturing. This company was (and still is) a noted friction lining manufacturer and supplier. Among other things, Reddaway sold asbestos-containing woven brake lining rolls to Abex that Abex then sold under its own brand. I have tabbed the documents as follows:

1. Reddaway product brochures. Shows the products they offered. The "RBW Bonded Woven" is the industrial roll brake lining.
2. Reddaway sales ledgers and invoices. Shows how Reddaway sold the lining to Abex including 1983 forward.
3. FMSI documents – shows Reddaway a member of the FMSI.
4. Reddaway written interrogatory responses – Reddaway states it changed to nonasbestos in November 1986. Unfortunately even if true, this mean Reddaway was also still selling the asbestos lining in 1984, 1985, 1986, and customers were using it even later because it would take time for the existing stocks and inventories of the rolls of asbestos lining to be used up.
5. Reddaway air monitoring/testing documents – They show both corporate knowledge of asbestos hazards, and a propensity for asbestos fibers to release.
6. Reddaway "RNAW" Reddaway Non Asbestos Woven documents – These documents show that Reddaway had a nonasbestos alternative available as early as 1983. However

Reddaway unfortunately continued also selling the asbestos RBW version of the product through the end of 1986 or later.

7. Reddaway MSDS sheets – show RBW to be 50% asbestos.
8. Reddaway asbestos caution label documents – these show Reddaway attached a caution label to the outside of burlap bags it used to ship the rolls of lining in. We believe that Reddaway should have used a stronger warning and should have imprinted it directly onto the lining rolls themselves. The evidence is that when Abex got these bags from Reddaway, Abex threw away the bags thus getting rid of the warnings.
9. Reddaway miscellaneous documents. These have relevant information, for instance the July 1986 memo reveals some very high air sampling counts. The July 1986 Reddaway “Facts in Friction” newsletter bears reviewing. It discusses the OSHA regulations, complaining that they are “unbelievable in scope,” says as to the OSHA guidance for brake work, “That, you don’t even want to read,” and concludes “Obviously, OSHA is hell bent in getting us out of the asbestos business.”
10. Deposition of Ray Lecki. Mr. Lecki is a former Reddaway worker who used to supervise the weaving operation that took bobbins or spools of asbestos yarn to make the brake lining. He said the rolls of lining were packed in burlap bags that had a “tag” with a caution statement (post-OSHA) (Depo. p. 29). The current President of Reddaway, Mr. Walker, had testified that Reddaway switched to nonasbestos in 1983, but Mr. Lecki said that was wrong and Reddaway kept selling the asbestos lining as well through late 1986-87. (Depo. p. 44). Lecki said when they got advance warning of an upcoming OSHA inspection, Reddaway would do a “massive cleanup” of the plant. (Depo. p. 54). When the company knew OSHA was coming, everyone wore a mask. (Depo. p. 55). He said it was possible to stencil or print a warning on the lining if the company had wanted to, but they never did. (Depo. p. 77-78).
11. Deposition of Todd Walker. As noted for item (10), Lecki disputes various things that Reddaway president Walker says.
12. Miscellaneous Abex documents. These show that Abex had been using Reddaway product for NAPA. Also, that Abex did not finally specify the Reddaway non-asbestos RNAW product to replace the Reddaway RBW asbestos product until December 1986/January 1987.

Very truly yours,
WALLACE AND GRAHAM, P.A.

John Hughes, Esq.

Enc
Cc: Mike Pross