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IN THE DISTRICT COURT
CAMERON COUNTY, TEXAS
138TH JUDICIAL DISTRICT

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SAMUEL OLIPHANT WOOLEY,
JR., et al.,

Plaintiffs,

-vs-

No. 94-09-04823 B

OWENS-CORNING FIBERGLAS
CORPORATION, et al.,

Defendants.

Deposition of

DOUGLAS WAYNE MERRILL

Monday, November 20, 1995

By Allen M. Stewart, Attorney at Law

DUPLICATE
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Reported by
TERI DARRENOUGUE, CM, CRR
CSR NO. 5106

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1 MR. STEWART: All right.

2 Q. Back on the record. Mr. Merrill, before the break,
3 we were talking a little bit about dust counts and the
4 like of Kelly-Moore asbestos-containing products. Let me
5 ask you, sir, with respect to the Kelly-Moore
6 asbestos-containing products that were dry powder in
7 25-pound bags, would you agree with me that those
8 products, when they were emptied out of their bag,
9 produced dust? You would agree with me?

10 A. Some dust.

11 Q. And that would be dust that you could see; correct?
12 Visible dust?

13 A. Perhaps, yes.

14 Q. And this would also be dust that could be breathed;
15 correct?

16 A. Correct.

17 Q. And these asbestos containing products, some of
18 them, such as a joint compound, once they were applied
19 would oftentimes be sanded, would they not?

20 A. Sanding occurred on the finishing coat depending on
21 how smooth it was.

22 Q. Well, and sanding could also occur on joint
23 compounds as well; correct?

24 MR. TRUNCALE: Let me interpose more of an
25 objection or question. What do you mean by the term
26 "often"? Go ahead.