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witness?
A $85 per hour.
Q Are you asked to write reports?
A Not really. I haven't been yet.
Q Have you reviewed any materials to help prepare you for today's deposition?
A Yes.
Q Can you describe generally, and I don't want to know anything you talked about with counsel, but describe the materials you looked at prior to today.
A Some of the correspondence that was in discovery in the past.
Q By correspondence, you mean the kind of exhibits I have just shown you?
A Yes.
Q Have you ever had a chance to go to Cleveland to examine documents in the Eaton repository?
A Yes.
Q Do you recall the first time you did that?
A A couple months ago.
Q Describe what you did. Were the documents handed to you? Or did you have to sit down like we did and go through boxes and boxes of stuff?
A Just like you did.
Q Now, in the course of doing that, did you set aside

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documents that you thought were helpful to your testimony?
A No, not really.
Q Did you find documents that had your name on it?
A Yes.
Q I have shown you a couple here. I may have a couple more. I will wait for that question and I will come back to that one.
Do you know if you are actually listed as a witness for Eaton in any other litigation other than possibly this one for asbestos specifically?
A No.
MR. QUICK: No, he doesn't know.
Q Other than the documents that we have just talked about, do you recall speaking to anybody, aside from counsel, any old employees or anything like that, anybody like that, who you contacted to assist in preparing for your testimony here today?
A No.
Q During the time frame from 1983 and 1991, can you estimate or can you tell me as between Abex and Carlisle who supplied more brake linings to Eaton?
A No, I can't really – I don't know what the split was. I think it sort of varied to tell you the truth over the years.
Q During the time frame 1983 to 1991, who were Eaton's

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major competitors in the axle business?
A What was their name – Rockwell.
Q Aside from Rockwell and Eaton, were there any other manufacturers that were competing for the axle business during that time frame?
A Well, Dana was building axles for International at that time, but it was like a contract deal primarily. Of course, Mack built their own axles during that period of time. That's about it as far as tractor. You know, there were obviously some other trailer manufacturers that manufactured different trailer axles, things like that.
Q Do you know if at any time during the time you worked at Eaton, did Eaton place warnings on any of the brakes they sold?
A No, not directly on the brake.
Q How about on the boxes that the brakes were in?
A Not that I'm aware of.
Q Are you familiar with whether or not Eaton ever instituted a safety program for its employees regarding the handling of asbestos products?
A I would say that through the period when OSHA became involved in some of the operations that, yes, Eaton complied with those regulations as they were implemented.
Q Do you know if they specifically, and do you have a specific recollection, of Eaton ever instituting a safety

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program that was designed for its employees specifically relating to the potential hazards of breathing in asbestos dust?
A Not that I'm aware of.
Q What I want to do is mark this as Exhibit 5.
(Exhibit 5, employee training program, was marked for identification.)
Q I will show that to counsel. This is a document dated October 1986 titled Employee Training Program for Asbestos, Eaton Corporation, Gallatin, Tennessee. In the upper right-hand corner, a date 10/23/86 and underneath it in print, Roger Reell, R-E-E-L-L. Take a couple minutes and if you need more time, let me know, and I have some basic questions about that document.
A Okay.
Q Have you ever seen that document before today?
A Yes, when I was going through them.
Q Does that refresh your memory at all as to whether or not Eaton ever developed a safety program regarding possible hazards of asbestos?
A Yes. I think as I mentioned as far as meeting OSHA regulations is concerned, yeah, I'm sure they did that.
Q Now, this says October 1986. Are you saying there was an earlier employee training program?
A No, I'm not aware of one.

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