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Q The form itself?
A Yes.
Q Can you describe what the form is?
A Interoffice correspondence form, just written communications between offices.
Q How was an interoffice correspondence used during the time that you were working at Eaton?
A Basically to communicate requests, basically in the form -- a formal record that that request had been made for the files and what have you.
Q Did the employees rely on information contained in interoffice correspondences to do their job, generally speaking?
MR. QUICK: Objection, go ahead and answer.
A Yes, generally.
Q Were these types of correspondence regularly used by employees to communicate with other employees of Eaton during the time you worked with Eaton?
A Yes.
Q The next one is Eaton Exhibit 3 which is in front of you. I will ask you some general questions. Do you recognize what Eaton Exhibit 3 is?
A Yes.
Q Can you describe generally what the form of the document is?

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A This particular one is a national accounts monthly report and basically it is a summary of the previous month's activities with our national account fleet customers and basically reporting it back to upper management.
Q During the time that you worked with Eaton, were you familiar with those kinds of monthly reports?
A Yes.
Q How were these monthly reports used by Eaton?
A Again, as communication of information, basically.
Q Did the employees of Eaton during the time that you were there regularly or routinely rely upon the information that was contained in those monthly reports to do business for Eaton?
A Yes.
Q Do you recognize that as it appears to be a copy of an Eaton monthly report. It actually has your name on it?
A Yes, it has my name on it.
Q Hobbie Exhibit 4. Do you recognize Hobbie Exhibit 4?
A Yes.
Q Can you describe what that particular document is?
A It is another monthly report from the marketing department of the then axle brake division in 1986.
Q During the time that you worked for Eaton, do you recall seeing those kinds of reports?

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A Yes.
Q Can you describe how those reports were used by Eaton employees?
A Again, it was a summary of the past month's activities in various areas as listed to update management and the other people that were copied and had some interest in what was going on as to what progress was being made or what have you in different areas.
Q During the time you were at Eaton, did employees of Eaton regularly rely upon the information that was contained in such reports to do business for Eaton?
MR. QUICK: Objection to what he knows about what other people relied on. Go ahead and answer.
A I would say yes.
Q That's all I want to ask about right now. I will come back to these. We were up to 1983. It looks like according to your CV -- well, let me step back.
During the time that you worked from 1959 through 1983 with Eaton, did you ever become aware of what the brake materials were made of that Eaton were using in its products?
A Generally, yes.
Q Generally, what was your understanding of what was contained in the brake products that were used by Eaton on their axles?

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A Prior to that period, it was an asbestos-type lining.
Q And prior to 1983, do you know where -- let me ask you this, prior to 1983, did Eaton, the company Eaton, ever manufacture asbestos brakes?
A No, not linings.
Q Where did Eaton obtain its asbestos linings from prior to 1983, if you know?
A I would say Abex and Carlisle primarily.
Q Do you recall the names of any other companies that they may have purchased asbestos linings from other than Abex and Carlisle prior to 1983?
A Raybestos, Manhattan, New Turn was the other one.
Q How did they compare to the purchases from Abex and Carlisle in terms of quantity?
A I would say much smaller quantities.
Q Did Eaton prior to 1983 ever sell a brake product under its name Eaton? Do you understand the question? In other words, did they ever sell a brake lining or a brake shoe with a lining on it under the name Eaton?
A Yes. A brake shoe assembled with a lining on it, yes.
Q Do you recall when Eaton first sold brake shoes with a lining on it prior to 1983, if you know?
A Personal knowledge probably goes back to about 1950.

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