

DAVIES, McFARLAND & CARROLL, P.C.

ATTORNEYS AT LAW

THE TENTH FLOOR, ONE GATEWAY CENTER
PITTSBURGH, PENNSYLVANIA 15222-1416
(412) 281-0737
Fax (412) 261-7251

ERIC K. FALK
Direct Dial: (412) 338-4722
E-Mail: efalk@dmcp.com

June 3, 2003

Jason E. Luckasevic, Esquire
Goldberg, Persky, Jennings & White, P.C.
1030 Fifth Avenue, Third Floor
Pittsburgh, PA 15219

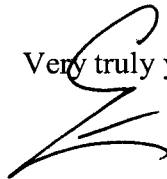
RE: Robert F. Adams and Naomi Adams, his wife vs. General Motors
Corporation, et al. No. 7870 of 2002 (Westmoreland County)

Dear Jason:

Enclosed please find the transcripts of Maremont's representative, Carl Liggett, taken on 9/26/01, 12/12/01, 3/29/02, and 8/15/02.

After reviewing these transcripts, please advise as to whether you still believe it will be necessary to proceed with the deposition of the Maremont representative. If so, I will have to make arrangements for the deposition to take place at a time and place other than June 24 at your office.

Very truly yours,



Eric K. Falk

EKF/sla
Enclosures

cc: Defense Counsel of Record (w/o enc.)

In The Matter Of:

WILLIAM L. COTTON, ET AL.

-VS-

A.P. GREEN REFRACTORIES
COMPANY, ET AL.

No. B-150, 374-AK

Videotaped Deposition of:

CARL LIGGETT

August 15, 2002

COPY

BENUSKA REPORTING

P.O. Box 513

Downers Grove, Illinois 60515

(630) 834-7828

Word index included with this Multi-Page

2
1

Page 1

1 IN THE DISTRICT COURT OF
 2 JEFFERSON COUNTY, TEXAS
 3 60TH JUDICIAL DISTRICT
 4
 5 WILLIAM L. COTTON, et al.,)
 6 Plaintiffs,)
 7 -vs-) Cause No.
 8 A.P. GREEN REFRACTORIES) B-150, 374-AK
 9 CO., et al.,)
 10 Defendants.)
 11
 12 The videotaped deposition of CARL
 13 LIGGETT, called for examination pursuant to Notice
 14 and pursuant to the Rules of Civil Procedure for
 15 the United States District Courts pertaining to the
 16 taking of depositions, taken before Roselind C.
 17 Benuska, C.S.R. No. 084-002031, Certified Shorthand
 18 Reporter and a Notary Public within and for the
 19 County of DuPage and State of Illinois, at 8000
 20 Joliet Road, McCook, Illinois, on the 15th day of
 21 August 2002 at the hour of 10:58 o'clock a.m.
 22
 23
 24

Page 2

1 APPEARANCES:
 2
 3 BRENT COON & ASSOCIATES
 4 (3550 Fannin
 5 Beaumont, Texas 77701), by:
 6 MR. BRENT COON,
 7 MR. JASON L. CANSLER, and
 8 MR. MICHAEL RUNYAN,
 9 Representing the Plaintiffs,
 10
 11 KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP
 12 (1633 Broadway
 13 New York, New York 10019-6799), by:
 14 MR. JOHN C. CANONI,
 15 -and-
 16 GERMER, BERNSEN & GERTZ, LLP
 17 (550 Fannin
 18 Suite 1025
 19 Beaumont, Texas 77701), by:
 20 MS. PAULA H. BLAZEK,
 21 Representing Maremont;
 22
 23
 24

Page 3

1 APPEARANCES: (Continued)
 2
 3 JENNER & BLOCK
 4 (One IBM Plaza
 5 Chicago, Illinois 60611-7602), by:
 6 MR. EDWARD P. ZAENGLE,
 7 Representing Dresser Industries;
 8
 9 ANDREWS & KURTH L.L.P.
 10 (600 Travis
 11 Suite 4200
 12 Houston, Texas 77002), by:
 13 MS. LISA E. BROWN,
 14 Representing Bechtel Defendants and
 15 Amoco Defendants;
 16
 17 GOODIN, ORZESKE & BLACKWELL, P.C.
 18 (9102 North Meridian Street
 19 Suite 400
 20 Indianapolis, Indiana 46260), by:
 21 MS. JENNIFER L. BLACKWELL,
 22 Representing Borg-Warner.
 23
 24

Page 4

1 I N D E X
 2 WITNESS EXAMINATION
 3 CARL LIGGETT
 4 By Mr. Coon 8
 5
 6
 7
 8 E X H I B I T S
 9 NUMBER MARKED FOR ID
 10
 11 NO EXHIBITS MARKED
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 5

Page 7

1 THE VIDEOGRAPHER: My name is Slawomir Kojro,
2 I'm a video technician for Depovision located at 53
3 West Jackson Boulevard, Chicago, Illinois.

4 The date is August 15, 2002. The time is
5 10:58 a.m.

6 We are present here today at 8000 Joliet
7 Road, McCook, Illinois, with reference to the case
8 entitled William L. Cotton, et al. versus A.P.
9 Green Refractories Company, et al. pending in the
10 60th District Court of Jefferson County, Texas.
11 Case number B-150.

12 The witness is Carl Liggett.

13 An audiovisual recording of this
14 deposition is at the request of plaintiff.

15 Will the court reporter please identify
16 herself and swear in the witness.

17 THE COURT REPORTER: Rose Benuska, Benuska
18 Court Reporting.

19 Would you raise your right hand, please.
20 (Witness Sworn).

21 MR. COON: Okay. For purposes of the record
22 can we get the identification of the parties.

23 We have Brent Coon, Jason Cansler and
24 Michael Runyan for plaintiffs.

Page 6

1 MR. ZAENGLE: Edward Zaengle for Dresser
2 Industries.

3 MS. BLACKWELL: Jennifer Blackwell for
4 Borg-Warner Corporation.

5 MS. BROWN: Lisa Brown for the B.P. Amoco and
6 Bechtel various defendants.

7 MS. BLAZEK: Paula Blazek for Maremont
8 Corporation.

9 MR. CANONI: John Canoni for Maremont
10 Corporation.

11 MR. COON: Paula, are you going to wear hats
12 for anyone else today?

13 MS. BLAZEK: No.

14 MR. COON: I guess for the record we take this
15 pursuant to notice and pursuant to rules, reserve
16 objections other than form.

17 MS. BLAZEK: Correct.

18 MR. COON: And we had a discussion before the
19 deposition, plaintiff's counsel and defense
20 counsel, with respect to the use of Mr. Liggett's
21 deposition. And it's my understanding we have an
22 agreement that we can use Mr. Liggett's deposition
23 in other presently pending matters or future

24 matters involving my law firm without the necessity

1 of redeposing Mr. Liggett in the event it becomes
2 necessary to proffer some of his testimony at trial
3 and we don't have to get into issues of
4 availability of the witness, is that correct?

5 MS. BLAZEK: That's correct. And it goes both
6 ways, Maremont would also be able to use the
7 deposition.

8 MR. COON: We have no objections. And we also
9 have I believe reached an agreement with respect to
10 the authentication of those documents that have
11 been produced by Maremont which I believe are all
12 Bates stamped with a prefix of an MAR and then a
13 Bates number on it, as I understand it, with
14 respect to those documents received before the
15 deposition today that were produced as part of the
16 discovery in this matter where those Bates numbers
17 we don't have an authentication issue, correct?

18 MS. BLAZEK: That's correct.

19 MR. COON: And Maremont will reserve whatever
20 other objections they deem appropriate, is that
21 correct?

22 MS. BLAZEK: Correct.

23 MR. CANONI: Correct.

24 MS. BLAZEK: I guess the only other

Page 8

1 stipulation is if one objection can be good for
2 all?

3 MR. COON: Certainly.

4 Are we ready to proceed?

5 MS. BLAZEK: I believe so.

6 CARL LIGGETT,
7 called as a witness herein, having been first duly
8 sworn, was examined and testified as follows:

9 EXAMINATION

10 BY MR. COON:

11 Q. Good morning, Mr. Liggett. Could I have
12 you state your name and address for the record
13 please, sir?

14 A. My name is Carl Liggett, 2182 University
15 Drive, Naperville, Illinois.

16 Q. Where is Naperville, Mr. Liggett?

17 A. Naperville is a suburb of Chicago about
18 20 miles west.

19 Q. I had the pleasure of meeting you just
20 briefly before the deposition today, and it's my
21 understanding that you are a person that a company
22 by the name of Maremont believes to be
23 knowledgeable regarding their past involvement in
24 the manufacturing, use or distribution of

Page 9

Page 11

1 asbestos-containing products, mostly brake shoes
2 and things of that nature, is that correct?

3 A. That is correct.

4 Q. We are here at the offices of is it
5 Precision --

6 A. Accurate Partitions Corporation.

7 Q. Accurate Partitions Corporation. Are you
8 employed at this facility at this time?

9 A. Yes, I am.

10 Q. So we are taking the deposition here at
11 your offices for your convenience as an employee
12 here so you didn't have to travel into town and do
13 this at a lawyer's office?

14 A. That's correct.

15 Q. I take it that this was something that
16 was done at your request?

17 A. Yes.

18 Q. Have you had the opportunity to give a
19 deposition concerning these or similar matters in
20 the past?

21 A. Yes, I have.

22 Q. Could you tell me briefly the
23 circumstances in terms of the number of times and
24 very briefly what the nature of those claims were,

1 those other cases in which you gave a deposition
2 involved a claim of one or more persons suffering
3 from an asbestos-related disease as a result of
4 exposure to Maremont manufactured products?

5 A. That is my understanding, that there was
6 alleged asbestos sickness.

7 Q. Do you know the final disposition of any
8 of those claims, if they are all still pending or
9 not?

10 A. I'm not sure of any of that.

11 Q. Have you been requested to be available
12 in the trial of any asbestos-related matters on
13 behalf of Maremont?

14 A. Yes, I have.

15 Q. Do you know of any other cases that are
16 pending at this time in which you have been
17 requested to be available for trial?

18 A. No, I do not.

19 Q. Do you have any relationship with
20 Maremont at this time?

21 A. No, I don't.

22 Q. Do you get paid anything as a retainer or
23 as a stipend for being a consultant for Maremont to
24 be available for depositions of this nature?

Page 10

Page 12

1 if you know?

2 A. I would say three or four times I have
3 been deposed regarding my knowledge of Maremont in
4 relation to their manufacture and distribution of
5 friction materials.

6 Q. Have you ever testified in trial
7 concerning any of those matters?

8 A. No, I have not.

9 Q. Do you recall the circumstances in which
10 you gave those prior depositions in terms of the
11 time, how long ago was it?

12 A. They have all been in the last year.

13 Q. Do you know anything about the parties
14 that requested your deposition?

15 A. Not very much.

16 Q. Do you know anything about the law firms
17 for the plaintiffs that were involved in any of
18 those matters in terms of where they were located
19 or their names?

20 A. No, I really don't.

21 Q. Do you know anything about the style of
22 the cases that were involved?

23 A. No, I don't.

24 Q. Is it your understanding that each of

1 A. Yes, I do.

2 Q. Can you tell us briefly about the
3 circumstances in which you are made available for
4 Maremont to testify in these matters.

5 A. I have been asked and agreed to make
6 myself available, and I have done that.

7 Q. Do you have a written contract with
8 anyone to make yourself available?

9 A. No, I do not.

10 Q. Was this something that was arranged with
11 representatives of Maremont or their attorneys or
12 both?

13 A. It was arranged with attorneys for
14 Maremont.

15 Q. I take it they contacted you and told you
16 generally what may be involved and you all worked
17 out the terms of a financial agreement for you to
18 be available?

19 A. Yes, we did.

20 Q. Did you have an attorney representing
21 your interest to negotiate the terms of anything?

22 A. No, I did not.

23 Q. Can you briefly tell us what your
24 understanding of this working relationship is?

Page 13

Page 5

1 A. That I would make myself available for
 2 depositions and they would pay me for my time.
 3 Q. Is there a limitation on the amount of
 4 depositions that you can make yourself available
 5 for, the time or circumstances or length or
 6 locations?
 7 A. That's not come up to date.
 8 Q. Just playing it by ear?
 9 A. So far.
 10 Q. What is the financial consideration for
 11 being available?
 12 A. \$175 an hour.
 13 Q. Is that for your time involved in just
 14 giving the depositions?
 15 A. Yes, it is.
 16 Q. Is there any preparation time that's also
 17 involved?
 18 A. Yes, there is.
 19 Q. Have you been able to meet with the
 20 attorneys or former employees or present employees
 21 of Maremont with respect to things to review or
 22 discuss in preparation for being available for a
 23 deposition such as this?
 24 A. Help me understand that question a little

1 A. Yes, I have.
 2 Q. Can you tell us what you recall having
 3 reviewed before today with respect to assisting you
 4 in preparing for depositions such as this?
 5 A. I remember reviewing a couple of
 6 depositions from people that were in the sales and
 7 marketing departments of Maremont.
 8 Q. Any recollection of the names of those
 9 individuals?
 10 A. Bob Stienmetz, Chuck Burkett.
 11 Q. How do you spell Bob's last name?
 12 A. I'm guessing. S-t-i-e-n-m-e-t-z.
 13 MR. CANONI: I think it's e-i-n
 14 MR. COON: E-i-n? Maybe Steinmein?
 15 MR. CANONI: Steinmetz. He had everything
 16 else right.
 17 MR. COON: Steinmetz. M-e-i-n-z?
 18 MR. CANONI: No. S-t-e-i-n-m-e-t-z.
 19 MR. COON: Okay.
 20 MR. CANONI: He just inverted the "i" and "e."
 21 MR. COON: Gotcha.
 22 BY MR. COON:
 23 Q. And Chuck Burkett, would that have been
 24 Charles Burkett?

Page 14

Page 16

1 better.
 2 Q. Yes, sir. I just need to know if you
 3 have looked at documents or reviewed material or
 4 depositions or other things to further educate
 5 yourself with respect to things you may testify to
 6 today and in the other depositions you've given.
 7 A. Yes, I have.
 8 Q. And can you give us some idea of the type
 9 of documents and things you've reviewed to assist
 10 your memory and probably refresh your memory to
 11 some degree about the past dealings of Maremont?
 12 A. Most of the documents I have reviewed
 13 would have been documents that were presented by
 14 Maremont's counsel to the plaintiff's counsel and I
 15 was asked to identify or explain, if I could, what
 16 those documents were.
 17 Q. Would that have been from your prior
 18 working familiarity with some of the correspondence
 19 involving Maremont?
 20 A. Yes, it would.
 21 Q. Have you been asked to review or read any
 22 prior depositions of persons involved in this
 23 litigation, either plaintiffs or defendants or
 24 other witnesses?

1 A. Yes.
 2 Q. Were they both former employees of
 3 Maremont?
 4 A. Yes, they were.
 5 Q. Have you talked to either of those
 6 gentlemen?
 7 (Short interruption).
 8 MR. COON: Let's go off the record briefly.
 9 THE VIDEOGRAPHER: Off the record, 11:09.
 10 (Discussion had off the record).
 11 THE VIDEOGRAPHER: On the record, 11:11.
 12 BY MR. COON:
 13 Q. Mr. Liggett, we were talking about some
 14 of the depositions that you had reviewed. Do you
 15 remember a Mr. Steinmetz?
 16 A. Correct.
 17 Q. Mr. Burnett or Burkett?
 18 A. Burkett.
 19 Q. Burkett. Any other individuals?
 20 A. None that I can recall at this time.
 21 Q. Have you also had an opportunity to talk
 22 to anyone, including those gentlemen?
 23 A. I have spoken to Mr. Steinmetz.
 24 Q. Do you recall briefly the circumstances

Page 17

Page 19

1 in which you had spoken to him in terms of the
2 times, frequency?

3 A. Once or twice purely social.

4 Q. Okay. You all maintained a social
5 relationship over the years since you left there?

6 A. No, we have not.

7 Q. But you met him socially in some social
8 environment?

9 A. As a result of this litigation I became
10 aware of his phone number and gave him a phone call
11 and said hello.

12 Q. Okay. Does he still live in the Chicago
13 area?

14 A. Yes, he does.

15 Q. And Mr. Burkett, any conversations with
16 him?

17 A. Yes, one, very brief.

18 Q. With either one of these discussions did
19 it involve clarification of things they may have
20 said in their deposition?

21 A. No, it did not.

22 Q. Do you know anything about the
23 circumstances in which either of these gentlemen
24 gave their depositions?

Page 18

1 A. No, I don't.

2 Q. Did you have an understanding that
3 related to matters similar to these that they gave
4 depositions as a result of their employment at
5 Maremont --

6 A. Yes.

7 Q. -- in asbestos-related matters?

8 A. Yes, I did.

9 Q. Have you given depositions in anything
10 other than these asbestos proceedings?

11 A. Yes, I have.

12 Q. Could you tell us briefly about those
13 please, sir?

14 MR. CANONI: Are you asking just for Maremont
15 or ever?

16 BY MR. COON:

17 Q. No, just generally. First for Maremont.
18 Have you given depositions for Maremont in anything
19 other than these asbestos-related matters?

20 A. No, I have not.

21 Q. But you have given depositions in matters
22 unrelated to your employment with Maremont?

23 A. Yes, I have.

24 Q. Could you tell us very briefly the

1 circumstances in which you gave those other
2 depositions?

3 A. I gave a deposition in relation to the
4 performance of a paving job for a plant parking
5 lot.

6 Q. On behalf of whom?

7 A. On behalf of the company that I was
8 employed by.

9 Q. And what company was that, sir?

10 A. That was Alliance Wall Corporation.

11 Q. Was that over a contract dispute or
12 something?

13 A. Yes, it was.

14 Q. Okay. Any other depositions?

15 A. There was a steel quality dispute at
16 Alliance Wall Corporation.

17 Q. Again was that a contract matter?

18 A. Yes, it was.

19 Q. Any other times?

20 A. There was a product liability issue at
21 Accurate Partitions.

22 Q. Real briefly the circumstances involved
23 in that claim.

24 A. A door fell off its hinge at a health

Page 20

1 club and hit a woman's toe and she was suing the
2 health club and Accurate.

3 Q. Okay. Any others?

4 A. None that I can recall.

5 Q. Were you a personal party to any of those
6 other matters?

7 A. No, I was not. Excuse me, I just
8 recalled another deposition.

9 Q. Yes, sir.

10 A. I went through a divorce and gave
11 depositions in that, and I was a personal party.

12 Q. I understand. Any others?

13 A. No.

14 Q. Mr. Liggett, do you have a curriculum
15 vitae, what a lot of folks call a resume?

16 A. Yes, I do.

17 Q. Do you have one available with you, sir?

18 A. Not in this room.

19 Q. Do you have one in the building?

20 A. Yes.

21 Q. We may ask for a break later, but briefly
22 can you tell us from the resume what it would
23 reflect in terms of your educational background,
24 and then we would like to follow through briefly

Page 17 - Page 20

Page 21

Page 3

1 your employment history.
 2 A. Okay.
 3 Q. Where were you born and raised?
 4 A. Nashville, Tennessee.
 5 Q. And you finished school there?
 6 A. Yes, high school.
 7 Q. Any college?
 8 A. The University of Tennessee in Knoxville.
 9 Q. And graduate?
 10 A. BS degree in industrial management.
 11 Q. What year, sir?
 12 A. 1965.
 13 Q. And from there?
 14 A. I worked less than one year for Ford
 15 Motor Company in Lorain, Ohio.
 16 Q. Doing what, sir?
 17 A. As a foreman on an assembly line.
 18 Q. What kind of cars did you build, other
 19 than good cars?
 20 A. Econoline trucks.
 21 Q. Econoline trucks. And from there?
 22 A. The U.S. Air Force.
 23 Q. How long?
 24 A. Four years.

Page 22

1 Q. And what did you do for the U.S. Air
 2 Force?
 3 A. I was an aircraft maintenance officer
 4 attaining the rank of captain.
 5 Q. Honorable discharge?
 6 A. Yes.
 7 Q. And what years?
 8 A. From 1966 to 1970.
 9 Q. Any wartime service?
 10 A. It was the Vietnam War.
 11 Q. Did you see any active duty in Vietnam?
 12 A. I was in Vietnam for one day.
 13 Q. And where were you for the duration of
 14 the time you were with the U.S. Air Force?
 15 A. I was stationed at Lackland Air Force
 16 Base, Shenute Air Force Base, Langley Air Force
 17 base, did rotations to Germany and England, and was
 18 at McGuire Air Force Base.
 19 Q. Were you involved in aircraft maintenance
 20 for the duration of your tenure with the military?
 21 A. Yes, I was.
 22 Q. And what did you do upon discharge from
 23 the military, sir?
 24 A. I joined Procter & Gamble Corporation.

1 Q. What city and what was your job?
 2 A. I went to Tunkhannock, Pennsylvania, as a
 3 team leader.
 4 Q. And what does a team leader do, sir?
 5 A. Foreman.
 6 Q. In the manufacturing processes?
 7 A. Manufacturing Pampers disposable
 8 diapers. And I moved from Tunkhannock to Modesto,
 9 California.
 10 Q. Still with Procter & Gamble?
 11 A. Yes.
 12 Q. What year would this have been?
 13 A. I'm not sure I can remember the years.
 14 Q. Ballpark.
 15 A. '70 to '73 or '4.
 16 Q. And what did you do in California, sir?
 17 A. I was a department manager.
 18 Q. What were your responsibilities as a
 19 department manager?
 20 A. I managed six Pampers converters that ran
 21 24 hours a day, 7 days a week.
 22 Q. Again these are the disposable diapers?
 23 A. That's correct.
 24 Q. Okay. And how long did you have that

Page 24

1 position?
 2 A. A year and a half.
 3 Q. And where did you go from there, sir?
 4 A. Maremont Corporation.
 5 Q. And what precipitated leaving Procter &
 6 Gamble and going to work at Maremont?
 7 A. A good friend of mine from the Air Force
 8 had gone to work for Maremont, he told me about an
 9 opportunity in Nashville, Tennessee; Nashville was
 10 my home, I was married and had a child at that
 11 point, so it was getting the family closer
 12 together.
 13 Q. Was your family from growing up in
 14 Nashville still there?
 15 A. Yes.
 16 Q. Was this also promotional in any nature
 17 in terms of raise, better opportunities?
 18 A. Yes, it was.
 19 Q. Okay. And this would have been 1974?
 20 A. '73 I believe.
 21 Q. '73. And what was your initial position
 22 at Maremont?
 23 A. Operations manager.
 24 Q. And could you tell us what an operations

Page 25

Page 27

1 manager at Maremont would do?
 2 A. The operations manager was responsible
 3 for all of the manufacturing operations at that
 4 location.
 5 Q. This is in Nashville?
 6 A. Yes, it is.
 7 Q. And how long did you hold that position?
 8 A. Three years approximately.
 9 Q. What was your next title, sir?
 10 A. Then I had responsibility for that
 11 facility and also as operations manager for another
 12 facility in Ohio.
 13 Q. What was the location, sir?
 14 A. Paulding, Ohio.
 15 Q. How do you spell that?
 16 A. P-a-u-l-d-i-n-g.
 17 Q. How long did you retain the position as
 18 operations manager for both the Nashville and
 19 Paulding locations?
 20 A. For about a year.
 21 Q. Where from there?
 22 A. Then I stayed in the same job but moved
 23 from Maremont to Nuturn.
 24 Q. Was that as a result of the sale of those

1 A. The president of Nuturn and I decided to
 2 end our business relationship with each other so I
 3 resigned and looked for new employment.
 4 Q. I take it you all had some disagreements
 5 over certain things?
 6 A. That would be a fair assumption.
 7 Q. Were they personal or professional?
 8 A. Professional.
 9 Q. What was that gentleman's name, sir?
 10 A. Bob Rogers.
 11 Q. He was the president?
 12 A. Correct.
 13 Q. Did you report directly to him at that
 14 time?
 15 A. Yes, I did.
 16 Q. Okay. And so you go to work in Oklahoma
 17 in '81. What was your title there, sir?
 18 A. I think it was vice president,
 19 manufacturing.
 20 Q. What did they manufacture?
 21 A. Porcelain finishes on light gauge steel
 22 for writing surfaces and architectural wall panels.
 23 Q. How is it that you found out about this
 24 company?

Page 26

Page 28

1 product lines to Nuturn?
 2 A. Yes, it was.
 3 Q. We'll talk more about that later. This
 4 was in 1975, '76?
 5 A. I believe that was around 1977.
 6 Q. '77. Okay. How long did you stay with
 7 Nuturn?
 8 A. Until 1981.
 9 Q. Any other title changes between '77 and
 10 '81?
 11 A. I became vice president of operations at
 12 the Smithville, Tennessee, plant.
 13 Q. And what did that title involve?
 14 A. Running all the manufacturing operations
 15 at that facility.
 16 Q. And from there, sir?
 17 A. Went to Alliance Wall Corporation in
 18 Oklahoma.
 19 Q. What year was this, '81?
 20 A. I believe so.
 21 Q. What was the purpose of leaving -- is it
 22 Nuturn?
 23 A. Correct.
 24 Q. What was the purpose of leaving Nuturn?

1 A. I was seeking employment and a search
 2 firm called me.
 3 Q. Was this going on while you were still
 4 working at Nuturn?
 5 A. It was right after I left Nuturn.
 6 Q. Okay. How long did you work there, sir?
 7 A. Five years.
 8 Q. So this would take us to about '86?
 9 A. Correct.
 10 Q. What did you do during your tenure at
 11 that facility from '81 to '86?
 12 A. I ran the manufacturing operations.
 13 Q. And your title through that duration?
 14 A. Vice president of manufacturing.
 15 Q. Where did you go in '86?
 16 A. Went to Sterling Technologies.
 17 Q. And your title there?
 18 A. General manager.
 19 Q. What did Sterling Technologies do?
 20 A. Made sheet metal enclosures for
 21 computers.
 22 Q. What was your reason for going to work at
 23 Sterling Technologies?
 24 A. Alliance Wall was bought and sold two

Page 29

Page 1

1 times and I decided it was time to look for a more
2 stable job.

3 Q. Were there rumors about layoffs or
4 something that would impact your position at
5 Alliance in light of the fact they had sold out a
6 couple of times?

7 A. No.

8 Q. Just created an environment of
9 instability?

10 A. Correct.

11 Q. Okay. And how was it that you were able
12 to obtain employment at Sterling Technologies?

13 A. An attorney friend of mine knew that they
14 needed a manager and arranged an introduction.

15 Q. Where were you working at at Alliance
16 Wall, what location was that?

17 A. Okmulgee, Oklahoma.

18 Q. Okmulgee. And where was Sterling
19 Technologies?

20 A. Tulsa, Oklahoma.

21 Q. How long did you retain employment at
22 Sterling Technologies?

23 A. Three years.

24 Q. And your title during that tenure?

Page 30

1 A. Was the general manager.

2 Q. This would take us to about '89 or '90?

3 A. Somewhere in that vicinity.

4 Q. Where did you go from there, sir?

5 A. To Union Metal Corporation.

6 Q. What did Union Metal do?

7 A. Union Metal made light poles.

8 Q. Like street lights or residential --

9 A. Street lights, traffic lights, stadium
10 lights.

11 Q. Where were they located?

12 A. Muskogee, Oklahoma.

13 Q. I would ask you some follow-up questions
14 on that, but we'll do it off the record.

15 What was your title there, sir?

16 A. General manager.

17 Q. How long did you retain that position?

18 A. About three years.

19 Q. Again Mr. Liggett, the purpose of leaving
20 Sterling?

21 A. The company closed.

22 Q. Was that a bankruptcy or just sellout?

23 A. No. There was a sale and the previous
24 owner and the new owner got into a legal dispute.

1 and sued each other to a standstill.

2 Q. Did that business close its doors?

3 A. Yes, it did.

4 Q. What did you do for your duration at
5 Union Metal, general manager?

6 A. Yes.

7 Q. That takes us to about '93?

8 A. I can't remember the exact dates --

9 Q. Sure.

10 A. -- but...

11 Q. Okay. Where did you go from there?

12 A. From there I went to Custom Frames
13 Corporation.

14 Q. Where was that?

15 A. Tullahoma, Tennessee.

16 Q. Did you actively seek out employment at
17 cities with strange names?

18 A. No.

19 Q. What was your title at Custom Frames?

20 A. I was the general manager.

21 Q. How did you obtain employment at Custom
22 Frames, sir?

23 A. The Union Metal plant closed when four
24 plants were consolidated into one, so I was seeking

Page 32

1 employment and again a search firm found me.

2 Q. How long did you stay at Custom Frames?

3 A. About two years.

4 Q. This takes us to the mid '90s?

5 A. Correct.

6 Q. Where did you go from there, sir?

7 A. Came here to Accurate Partitions.

8 Q. Have you retained permanent employment
9 with Accurate since '95?

10 A. Since about, yes.

11 Q. You haven't had employment elsewhere
12 since coming to work here at Accurate?

13 A. No, I have not.

14 Q. Have you always worked in McCook?

15 A. Yes.

16 Q. At the facility we're in today?

17 A. That's correct.

18 Q. And your initial title, sir?

19 A. Was general manager.

20 Q. And title today?

21 A. Is general manager.

22 Q. Responsibilities?

23 A. Total responsibility for the sales,
24 manufacture of toilet partitions.

Page 33

Page 35

1 Q. By that we are talking about if you go to
2 a restroom in a public facility there may be these
3 metal partitions between the various facilities in
4 the restroom, that's the type of stuff you guys
5 make here?

6 A. That's the type of stuff we make.

7 Q. Anything else you all make here?

8 A. We make those same partitions out of
9 stainless steel, solid plastic phenolic, and
10 plastic laminate.

11 Q. Do you make anything else other than
12 partitions?

13 A. No, we don't.

14 Q. Is this the only manufacturing facility
15 for your company?

16 A. No, it is not.

17 Q. Where are your other manufacturing
18 facilities?

19 A. We share one in Toccoa, Georgia.

20 Q. Who do you report to, sir?

21 A. I report to the owner.

22 Q. His name or her name?

23 A. Peter Rolla.

24 Q. Spelling?

1 manufacturing anything that contained asbestos?

2 A. Not to the best of my knowledge.

3 Q. You did work at Ford assembling Econoline
4 trucks?

5 A. That's correct.

6 Q. And this would have been in the '70s as
7 well, correct?

8 A. That's correct.

9 Q. Actually was that '73?

10 A. I'll change my answer. The brakes on the
11 trucks.

12 Q. I was going to ask about the brakes on
13 the trucks, if you were involved in the part of the
14 assembly process that involved application of the
15 brakes, linings or clutches in any of those
16 vehicles?

17 A. No, I was not.

18 Q. What part of the assembly line did you
19 work on, or supervise?

20 A. I worked in the department called Trim.

21 Q. Is that exterior trim?

22 A. No. That's primarily the interior seats,
23 headlinings, dashboards, instrument panels.

24 Q. So by the time these vehicles reached

Page 34

Page 36

1 A. R-o-l-l-a.

2 Q. Is he actively involved in operations of
3 the company as well?

4 A. Yes, he is.

5 Q. Is this a privately-owned facility?

6 A. Yes, it is.

7 Q. Is it owned by him individually or a
8 family or trust, or do you know?

9 A. It is owned by him, his sister and
10 father.

11 Q. And that takes us current?

12 A. That's correct.

13 Q. Do you have any other plans at this time
14 employment-wise?

15 A. No, I don't.

16 Q. Mr. Liggett, I'm going to go back and ask
17 you a number of questions regarding one area of
18 your employment, and it's going to be concerning
19 your years at Maremont and in turn Nuturn. But
20 before I do that I want to ask you just briefly
21 about the other places of employment from a generic
22 standpoint.

23 First, at any of these other companies

24 that you worked at were any of them involved in

1 your division in the assembly process all the
2 frame, engines, transmissions, those components
3 were all fully assembled?

4 A. There was four major departments. There
5 was the Chassis, there was the Body, there was the
6 Paint and the Trim. It started in Body, went to
7 Paint, then to Trim, and Chassis was the final
8 department before it left the factory.

9 Q. During your time at Ford Motor was there
10 any involvement with you and any of the other
11 management folks concerning the brake shoes or
12 clutches in any of those vehicles?

13 A. No, there was not.

14 Q. Did you have an understanding as to
15 whether or not the vehicles at that time were still
16 containing brake shoes and clutches that had
17 asbestos as one of the ingredients, so to speak, in
18 those products?

19 A. At that time I was right out of college.
20 It was my first job and I did not concern myself
21 with the composition of the brakes.

22 Q. Do you recall during your time at Ford
23 Motor whether or not there were ever discussions
24 with management people at the facility and any of

Page 37	Page
1 the folks that were working in the assembly 2 processes about the fact that some parts of the car 3 contained parts made out of asbestos? 4 A. I don't recall any conversations like 5 that. 6 Q. Did you know whether or not there were 7 OEM accounts for the acquisition of the brakes and 8 clutches? 9 A. Can you explain that question? 10 Q. Yes, sir. Did you know whether or not 11 Ford manufactured their own brakes and clutches or 12 if they were acquired from other manufacturers for 13 assembly at their facility? 14 A. I would have not had knowledge of that. 15 Q. Any of the other places that you worked 16 at that made products that may have contained 17 asbestos? 18 A. Again none that I can recall. 19 Q. When you worked for the U.S. government 20 at -- for the U.S. Air Force, were you personally 21 involved in the maintenance of the air fleet? 22 A. I was personally involved in supervising 23 the maintenance of aircraft. 24 Q. Did you ever do any of the mechanic work	1 have been the years approximately 1973 until you 2 left Nuturn, which was '81? 3 MR. CANONI: You mean his personal knowledge? 4 BY MR. COON: 5 Q. First the years you worked at Maremont 6 was '73 to '77, correct? 7 A. Correct. 8 Q. And then Nuturn acquired Maremont, 9 correct? 10 A. Correct. 11 Q. Or those parts that were relevant to your 12 occupation? 13 A. That's correct. 14 Q. And so from '77 to '81 -- 15 A. That's correct. 16 Q. -- that would be the time frame you were 17 employed with Nuturn? 18 A. Yes, it would. 19 Q. After you left Nuturn did you have any 20 involvement with that facility -- any of their 21 facilities? 22 A. No, I did not. 23 Q. You were never brought back in to consult 24 on any kind of matters or make any type of
Page 38	Page 40
1 yourself? 2 A. No, I did not. 3 Q. Do you know anything about the airplanes 4 with respect to whether or not they contain 5 asbestos materials in the wheel housings or drums 6 or any of the other components? 7 A. No, I don't. 8 Q. We've gone through a long chronology, 9 Mr. Liggett. I'm trying to go off my notes. When 10 you got out of the Air Force that was around '70, 11 correct? 12 A. Correct. 13 Q. And your first employment after that, was 14 that Maremont? 15 MS. BLAZEK: Procter & Gamble. 16 BY MR. COON: 17 Q. It was Procter & Gamble for two or three 18 years? 19 A. Procter & Gamble. 20 Q. Until about '73 and then you went to 21 Maremont, correct? 22 A. That's correct. 23 Q. So the years that you would have known 24 about the activities of Maremont and Nuturn would	1 executive decisions or consult with Nuturn? 2 A. I don't believe I was. 3 Q. And the same question with respect to 4 when you were at Nuturn as it related to Maremont, 5 did you ever go back and do anything for Maremont 6 with respect to consulting, supervising, 7 contracting with them after your departure in '77? 8 MR. CANONI: Other than his purpose for 9 today? 10 BY MR. COON: 11 Q. Yeah. 12 A. I'm not sure how I would draw the line. 13 I continued in the same job. I didn't go back and 14 do any separate consulting for Maremont that I'm 15 aware of. 16 Q. Okay. Let's talk about, really focus in 17 on your years of employment at Maremont and 18 Nuturn. You were the operations manager at the 19 Nashville, Tennessee, facility, is that correct? 20 A. That's correct. 21 Q. Was that your initial position there? 22 A. Yes, it was. 23 Q. Was that a Monday to Friday type job? 24 A. Yes, it was.

Page 41

Page 43

1 Q. Was this a union facility?
 2 A. No, it was not.
 3 Q. What did Maremont manufacture?
 4 A. Are you referring to that facility?
 5 Q. Yes, sir. Maybe I need to enlarge it.
 6 First at that facility.
 7 A. Well, they didn't manufacture anything at
 8 that facility. They assembled brake shoes.
 9 Q. When you went to work at Maremont in 1973
 10 do you know how many different facilities they
 11 had?
 12 MR. CANONI: For friction products?
 13 BY MR. COON:
 14 Q. For anything.
 15 A. I'm sure I couldn't name all of them. I
 16 could tell you some of them.
 17 Q. Let me break that down for you. Where
 18 was, to your knowledge, the parent headquarters of
 19 Maremont in '73?
 20 A. In Chicago.
 21 Q. Any idea of the number of employees that
 22 Maremont retained in 1973?
 23 A. No, I don't.
 24 Q. What was your understanding of what

1 A. Yes, I did.
 2 Q. Purposes generally?
 3 A. Might be a conference on something like
 4 personnel or purchasing.
 5 Q. To your knowledge was asbestos used in
 6 the assembly of any of the shock absorbers?
 7 A. Not to my knowledge.
 8 Q. Let's talk next about exhaust systems.
 9 Where were the exhaust system manufacturing
 10 facilities?
 11 A. There was one in Loudon, Tennessee.
 12 That's the only facility I can think of right now.
 13 Q. Did they have particular trade names for
 14 the exhaust system products?
 15 A. Cherry Bomb was one.
 16 Q. Were these customized muffler systems for
 17 aftermarket application?
 18 A. I believe all of their mufflers were for
 19 aftermarket applications.
 20 Q. Were they involved in the manufacture of
 21 headers, things like that, performance, enhanced
 22 performance type equipment?
 23 A. Not to my knowledge.
 24 Q. To your knowledge did any of the exhaust

Page 42

Page 44

1 business activities Maremont was engaged in at that
 2 time?
 3 A. It's my understanding that they made
 4 shock absorbers, exhaust systems, friction
 5 products, and machine guns.
 6 Q. Anything else?
 7 A. Not that I can think of right now.
 8 Q. Let me ask you about each of those.
 9 Shock absorbers, were these for vehicles?
 10 A. Yes, they were.
 11 Q. Where were they manufactured?
 12 A. Pulaski, Tennessee. I think they made
 13 some in Maine.
 14 Q. Do you know what brand names these were
 15 sold under?
 16 A. Some of the brand names I think were
 17 Gabriel was the main brand name.
 18 Q. Yes, sir. Any others you recall?
 19 A. Not that I can recall right now.
 20 Q. Did you have any involvement in the
 21 operations of any of these shock absorber
 22 facilities at any time?
 23 A. No, I did not.
 24 Q. Did you ever go to those plants?

1 system products that Maremont made comprise
 2 asbestos?
 3 A. Not to my knowledge when I worked there.
 4 Q. Would these be the years '73 to '77?
 5 A. Correct.
 6 Q. Do you have an understanding that some of
 7 their exhaust systems contained asbestos at times
 8 prior to your employment?
 9 A. No, I did not.
 10 Q. After your employment?
 11 MR. CANONI: Do you mean does he know whether
 12 they contained asbestos after he left, or after he
 13 left did he know whether they contained asbestos?
 14 BY MR. COON:
 15 Q. Either way. Basically the way you
 16 answered the first question made me believe that
 17 there might have been a time that you were aware
 18 that they did manufacture some exhaust systems with
 19 asbestos either before or after your employment.
 20 A. I do believe at some time they did have
 21 some asbestos-containing products in some of their
 22 mufflers.
 23 Q. Do you have any idea of what years those
 24 would have entailed?

Page 45

1 A. No, I don't.

2 Q. Do you have any idea if they were years

3 before you went to work there versus after you left

4 there?

5 A. I don't know that.

6 Q. Do you know what part of the muffler

7 system would have comprised any asbestos?

8 A. It probably would have been a piece of

9 the muffler.

10 Q. With respect to -- let me backup real

11 briefly. The shock absorbers, were those all

12 aftermarket?

13 A. To the best of my knowledge they were.

14 Q. And by aftermarket we are talking about

15 products that were not sold directly to the

16 manufacturers of vehicles, for instance Ford, but

17 ones that would be distributed to the retail market

18 to sell to individual customers for replacement on

19 original equipment?

20 A. That's correct.

21 Q. Let's next talk briefly about machine

22 guns.

23 A. Okay.

24 Q. Where was the manufacturing facility for

Page 46

1 machine guns?

2 A. Saco Lowell Manufacturing in Maine.

3 Q. Were these all for military application?

4 A. Yes, they were.

5 Q. Were these all government contracts?

6 A. Yes, they were.

7 Q. Do you know what type of machine guns

8 were manufactured there?

9 A. No, I don't.

10 Q. Again to your knowledge the use of any

11 asbestos in the assembly of any of the machine

12 guns?

13 A. I wouldn't have had any knowledge of

14 that.

15 Q. Next friction products. By friction

16 products what are you talking about?

17 A. Paulding, Ohio, and Nashville, Tennessee.

18 Q. These were the same two facilities that

19 you were the general manager of?

20 A. That's correct.

21 Q. What was manufactured at the Paulding,

22 Ohio, facility?

23 A. Paulding manufactured drum brake linings,

24 disc brake pads, clutch facings, and truck block

Page 7

1 Q. And real briefly for the edification of

2 jurors that would not be familiar with those type

3 of products, could you describe very briefly what

4 each one of those does.

5 A. On vehicles that have drum brakes you

6 have a shoe. On that shoe is mounted a lining.

7 The lining is what rubs against the drum to stop

8 the vehicle.

9 Disc brake pads you have a steel backing

10 plate that has a friction pad fastened to it that

11 rubs against the rotor to stop a disc brake car.

12 A clutch facing would be a component in a

13 manual transmission car. The clutch facing would

14 be assembled to a backing plate and provides the

15 friction when you engage the clutch.

16 Truck block is very similar to a drum

17 brake except on trucks their brakes are so big that

18 they might have two or more separate pieces of

19 block fastened to this big shoe that goes into the

20 brake assembly, and that shoe would rub against a

21 big drum providing the stopping power for a truck.

22 Q. And with respect to each of those

23 products that were manufactured at the Paulding,

24 Ohio, facility, were those OEM accounts or

Page 48

1 aftermarket or both?

2 A. To the best of my knowledge they were all

3 aftermarket products.

4 Q. So to your knowledge none of those

5 products from the Paulding, Ohio, facility were

6 sold directly to the manufacturers of automobiles

7 for use in their original assembly of vehicles?

8 A. That is correct.

9 Q. How did each of these products that were

10 manufactured at the Paulding, Ohio, facility reach

11 the end users?

12 Was there a distribution system?

13 A. There were a variety of distribution

14 systems.

15 Q. Was there a difference in the

16 distribution system between the Paulding, Ohio,

17 facility and the Nashville, Tennessee, facility?

18 A. Yes, there were.

19 Q. In light of that we'll ask about each one

20 of them separately then. Let's first talk about

21 the Paulding, Ohio, facility. Do you know how long

22 it had been manufacturing these products you just

23 described?

24 A. I believe they started -- as Maremont or

Page 49

1 as anything?
 2 Q. As anything.
 3 A. Probably started in the 1930s.
 4 Q. I tell you what, if you don't mind,
 5 Mr. Liggett, let's backup briefly with respect to
 6 Maremont. We did not discuss the corporate
 7 history.
 8 Do you know anything about when Maremont
 9 originally was created and circumstances of its
 10 origination?
 11 A. No, I don't.
 12 Q. Do you know what state it was originally
 13 founded or anything about the founding members of
 14 that company?
 15 A. No, I don't.
 16 Q. You did have an understanding that the
 17 Paulding facility had been opened since the '30s?
 18 A. The Paulding facility I believe at least
 19 since the '50s.
 20 Q. But you thought there was a facility
 21 involved in the manufacture of these products
 22 predating the '50s?
 23 A. Yes.
 24 Q. Where would that facility have been?

Page 50

1 A. California.
 2 Q. And did that facility go back to the
 3 '30s?
 4 A. I think so.
 5 Q. Was that also a Maremont or a predecessor
 6 to Maremont?
 7 A. That was a predecessor.
 8 Q. Was that Grizzly?
 9 A. The original may have preceded even
 10 Grizzly.
 11 Q. Do you know what the original's name
 12 might have been?
 13 A. No, I don't.
 14 Q. So there may have been some company out
 15 there that Grizzly acquired, but for whatever
 16 purposes you know Grizzly was in business at least
 17 before the '50s and Maremont acquired Grizzly?
 18 A. That's my understanding.
 19 Q. And that's, I take it, when the
 20 California location was closed and transferred to
 21 Paulding, Ohio?
 22 A. That's correct.
 23 MR. CANONI: Wait. Do you mean as part of the
 24 transaction with Maremont?

Page 51

1 BY MR. COON:
 2 Q. Not necessarily with the transaction, but
 3 eventually the facilities in California relocated
 4 to Paulding, is that correct?
 5 A. That's my understanding.
 6 Q. And this was something that occurred
 7 after Maremont acquired the Grizzly product line?
 8 MR. CANONI: Objection as to form.
 9 BY MR. COON:
 10 Q. If you know.
 11 A. To the best of my knowledge Grizzly moved
 12 from California to Ohio before Maremont had
 13 anything to do with it.
 14 Q. Do you know the purpose of Grizzly's
 15 relocation to Ohio?
 16 A. I've only heard anecdotal stories.
 17 Q. What were they briefly?
 18 A. That the owner of Grizzly enjoyed
 19 pheasant hunting, that the pheasant hunting was
 20 great in Paulding, Ohio, and so he made friends
 21 there and relocated his factory.
 22 Q. He must really like pheasant hunting.
 23 Is the pheasant hunting really that good?
 24 A. I'm not a pheasant hunter.

Page 52

1 Q. So we've got Grizzly the best you know
 2 relocated in Paulding, Ohio, at the time Maremont
 3 acquired it?
 4 A. That's correct.
 5 Q. And what was the distribution system for
 6 these products out of the Paulding, Ohio, facility?
 7 A. The drum brake linings and disc pads were
 8 primarily sold to brake rebuilders.
 9 Q. What do we mean by that?
 10 A. These are people that will take old brake
 11 shoes, remove the old lining and take a new piece
 12 of friction material similar to what the Paulding,
 13 Ohio, plant manufactured.
 14 They would cleanup the old shoe, paint
 15 it, assemble a new friction surface to it and sell
 16 that to a warehouse distributor who would sell that
 17 to a jobber which would sell that to an auto parts
 18 store where the do-it-yourself mechanic or gas
 19 stations, et cetera, could go buy rebuilt brake
 20 shoes.
 21 Q. I take it the purpose of selling rebuilt
 22 brake shoes was that the cost was less than the
 23 acquisition of a brand new brake shoe?
 24 A. It's cheaper to clean up an old brake

Page 53

Page 5

1 shoe and paint it than it is to buy a new one,
 2 that's correct.
 3 Q. And basically you can take an old brake
 4 shoe where it may have rusted up a little bit or
 5 just have a little bit of wear and tear and it has
 6 a worn out pad or shoe on it, and you can just take
 7 it in, clean it up, put new shoes on it and it will
 8 essentially do about as good as a new one?
 9 MR. CANONI: Objection as to form. You said
 10 shoe. I think you mean lining.
 11 BY MR. COON:
 12 Q. Or lining.
 13 A. That's essentially correct.
 14 Q. Now the shoe is the metal part?
 15 A. That's correct.
 16 Q. And then the lining is what I call pads,
 17 but it's a misnomer probably. But the lining is
 18 the part that's comprised of asbestos?
 19 A. It's called the friction material.
 20 Q. Were there major acquirers of the product
 21 lines, the rebuilding companies that you dealt
 22 with?
 23 A. Say that question again please.
 24 Q. Yes, sir. Were there certain major

1 similarly for the disc pads?
 2 A. Yes, it did.
 3 Q. And these would be for cars that had what
 4 they call power disc brakes?
 5 A. They wouldn't have to be power disc
 6 brakes, they would just have to be disc brakes.
 7 Q. And then you also talked about clutch
 8 facings. These would be for vehicles that are
 9 manual?
 10 A. Manual transmissions.
 11 Q. And how did the distribution system work
 12 for those products?
 13 A. It was very similar but there were a much
 14 smaller number of companies that rebuilt clutches
 15 so they had a very small number of customers that
 16 they sold clutch facings to.
 17 Q. Okay. And truck blocks.
 18 A. The people that rebuilt passenger car
 19 brakes are not the same people that rebuild truck
 20 brakes.
 21 Q. And when we talk about trucks are we
 22 talking about passenger trucks or are we talking
 23 about commercial vehicles?
 24 A. We're talking about primarily big trucks,

Page 54

Page 56

1 customers that you were involved with in the
 2 rebuilding kits?
 3 A. There were many small rebuilders.
 4 Q. Were they scattered all over the United
 5 States?
 6 A. Yes, they were.
 7 Q. Did Maremont keep a list of all of their
 8 customers?
 9 A. I'm sure they did.
 10 Q. Like a Rolodex?
 11 Was there any kind of master list, a
 12 phone book list, or anything like that?
 13 A. I'm sure there was.
 14 Q. Would you know anything about that, or
 15 would that be something other departments would
 16 know more about, like sales and marketing?
 17 A. Certainly sales and marketing would know
 18 more about that than I would.
 19 Q. And what else do we have on the
 20 distribution system? We talked about the brakes,
 21 these are the drum brakes. You described the
 22 distribution system for those, correct?
 23 A. Right.
 24 Q. Did the distribution system work very

1 be they 18 wheelers or dump trucks or buses or
 2 anything large.
 3 Q. Typically like Peterbilts, Macks, things
 4 like that?
 5 A. That's correct.
 6 Q. Again with respect to truck blocks, were
 7 any of the products manufactured at the Paulding
 8 facility sold as original equipment to any of the
 9 truck manufacturers?
 10 A. Not to the best of my knowledge.
 11 Q. Again predominantly aftermarket?
 12 A. Through what are called heavy duty
 13 rebuilders.
 14 Q. Okay. Could you briefly give us some
 15 kind of idea of how -- I'm just trying to get a
 16 mental picture of the Paulding facility and what's
 17 going through the manufacturing process and how
 18 everything ends up at the rebuilding facilities.
 19 Could you just kind of walk us through
 20 what would be typically going on at the Paulding,
 21 Ohio, facility.
 22 A. Raw materials would be purchased.
 23 Q. What type of raw materials would you
 24 need?

Page 57

Page 59

1 A. Asbestos.
 2 Q. Anything else?
 3 A. Resins and friction modifiers.
 4 Q. What do you mean by friction modifiers?
 5 A. When you put on the brakes you don't want
 6 your car to just absolutely lockup and skid to a
 7 stop so you want there to be a combination between
 8 stopping and not stopping. When you go through
 9 water you don't want to lose your friction.
 10 As you go down steep mountains you don't
 11 want your brakes to overheat and lose their
 12 friction.
 13 So these different modifiers give you
 14 uniform braking characteristics over a wide range
 15 of operating parameters.
 16 Q. Okay. In the sale of the friction -- you
 17 call it the friction material. In the sale of a
 18 friction material to these rebuilders for drum
 19 brakes, what would be the part or parts that the
 20 Paulding, Ohio, facility would sell?
 21 A. Say that question again.
 22 Q. Yes, sir. I want to walk through each of
 23 the four product lines you told us about. As I
 24 understand the Paulding facility was predominantly

1 auto parts supply house or whatever and get a
 2 remanufactured set of brake shoes, for instance,
 3 for their vehicle?
 4 A. Or it could be a gas station that would
 5 go buy those and put it on for an individual that
 6 dropped his car off at a gas station for a brake
 7 job.
 8 Q. Sure. And what you're basically talking
 9 about is you have vehicles that are bought new and
 10 over the time of using brakes to stop, the brakes
 11 wear out, correct?
 12 A. Correct.
 13 Q. And eventually you have to get the brakes
 14 replaced?
 15 A. That's correct.
 16 Q. And in doing that you don't need to go
 17 buy all brand new stuff, instead you can buy the
 18 parts that have just been rebuilt to replace the
 19 parts that have worn out, which were typically the
 20 traction material parts?
 21 A. That's a fair statement.
 22 Q. Okay. Now, with respect to the drum
 23 brakes, the Paulding facility made what was called
 24 the lining?

Page 58

Page 60

1 involved in the manufacturing of the friction
 2 material that went to the rebuilders to use to
 3 remanufacture the drum brakes and disc pads, et
 4 cetera, correct?
 5 A. That's correct.
 6 Q. The Paulding facility did not actually
 7 manufacture, for instance, the drum brake?
 8 A. No, they did not.
 9 Q. And that involved the shoe, the metal
 10 parts, things like that, springs?
 11 A. That's correct.
 12 Q. What the Paulding facility manufactures
 13 was just one of the parts, that part being the
 14 friction material that went on the disc pad kits or
 15 the drum brake kits?
 16 A. That's correct.
 17 Q. And then the Paulding facility in turn
 18 sold those individual parts to the rebuilding
 19 companies that put together the kits and then sold
 20 them through their own distribution systems to
 21 eventually reach an end user?
 22 A. That's correct.
 23 Q. And typically in that environment the end
 24 user would be somebody that would come in to an

1 A. Brake lining.
 2 Q. And this is a part that went over the
 3 shoe that when you mash on the brake pedal it
 4 pushes the hydraulic fluid into compression and
 5 pushes the shoe up against the drum?
 6 A. Correct.
 7 Q. And that's what stops the car?
 8 A. That's correct.
 9 Q. And in making this you needed asbestos,
 10 resins and friction modifiers?
 11 A. That's correct.
 12 Q. Where did the asbestos come from?
 13 A. There are asbestos manufacturers that
 14 produce that for sale.
 15 Q. How would it be supplied to the Paulding,
 16 Ohio, facility?
 17 A. Typically in 50 pound bales.
 18 Q. And this would just be the raw asbestos?
 19 A. Yes, it would.
 20 Q. Were there specifications with respect to
 21 the quality of the asbestos that was used for the
 22 friction material?
 23 A. There were different grades of asbestos
 24 that had different friction properties and a

Page 61	Page 63
1 formula would have one or more grades in it. 2 Q. With respect to the friction material 3 that was used for the drum brakes, the lining, were 4 there different types of asbestos grades that were 5 used for different customer demands? 6 A. Yes. 7 Q. Could you briefly go through why you have 8 different types of grades, what kind of purposes 9 that would involve? 10 A. There are a variety of grades of brake 11 linings. Some will last a lot longer than others. 12 Q. So one of the reasons would be 13 durability? 14 A. Durability. 15 Q. Okay. 16 A. Performance would be a second, and 17 vehicle application would be a third. 18 Q. And I take it that within each of these 19 there would be different cost variables? 20 A. That's correct. 21 Q. So you could buy an inexpensive brake 22 shoe that had a friction material that may not hold 23 up as long or last as long as some that were 24 manufactured that may last longer?	1 Q. Do you know which asbestos mines Maremont 2 acquired the asbestos for the friction material? 3 A. I think I know some. 4 Q. Yes, sir. Any names would help. 5 A. Vermont Asbestos Group, Thetford Mines. 6 Q. Thetford, is that T-h-e-t? 7 A. T-h-e-t-f-o-r-d. 8 Q. Did you have an understanding if that was 9 a mine owned by Johns Manville? 10 A. I don't recall. 11 Q. Any others? 12 A. Quebec. 13 Q. Q-u-e-b-e-c, as in Quebec, Canada? 14 A. Right. 15 Q. Right? 16 A. And Johns Manville. 17 Q. Do you recall the acquisition of any 18 asbestos in the fiber form from a company called 19 Raybestos Manhattan? 20 A. I don't recall that. 21 Q. From a company called Union Carbide or 22 Colidgria? 23 A. I don't recall that. 24 Q. From a company called AC&L?
Page 62	Page 64
1 A. That is correct. 2 Q. And then some of them were higher 3 performance, some of them were lower performance? 4 A. That's correct. 5 Q. Would that be based more on the type of 6 car that they went on, for instance a sports car 7 that had higher performance characteristics, or 8 were a lot of these higher versus lower performance 9 brake friction materials applicable to the same 10 vehicles? 11 A. A lot was applicable to the same vehicle, 12 and that's why I said vehicle application would be 13 the third, where a large car needs different brakes 14 than a small car, or a sports car needs more than a 15 family sedan. 16 Q. Do you know where the 50 pound bales of 17 asbestos were provided to the Paulding, Ohio, 18 facility from? 19 A. They bought from a variety of sources 20 over time. 21 Q. Did they buy from the actual manufacturer 22 or was there a distributor involved? 23 A. Typically they would buy from the 24 asbestos mine.	1 A. Say that again. 2 Q. AC&L. 3 A. No, I don't. 4 Q. Did Maremont keep records of where they 5 were acquiring their asbestos? 6 A. They certainly did at the time with 7 purchase orders and payables. 8 Q. Do you know if there was a repository 9 that Maremont kept as a central location for all of 10 their billing and sales and raw material 11 acquisitions? 12 A. I'm not sure I understand the question. 13 Q. Sure. Since you had multiple facilities 14 was there a central location for warehousing that 15 type of record keeping information in terms of 16 distribution of products, sales of products, the 17 cost and source of acquisition of raw materials, 18 like the invoices -- 19 A. Well, if there was any -- 20 Q. -- bills of lading? 21 A. -- purchasing activity that would have 22 all been done in Paulding if you are referring to 23 the purchase of asbestos. 24 Q. Okay. Within these facilities most of

Page 65

1 the documentation would have stayed at that
2 facility, not been transferred to a central
3 repository or central location?

4 A. There was no central repository that I'm
5 aware of.

6 Q. Okay. Was there an engineering
7 department at the Paulding facility, or other
8 facilities for that matter, that determined the
9 specifications of asbestos grades for the various
10 friction material products?

11 A. Help me understand that.

12 Q. Yes, sir. Did Maremont have their own
13 engineering department or research department that
14 would determine what particular characteristics
15 they needed from the asbestos fibers to determine
16 what grade to use in the assembly of the -- in the
17 manufacturing of the various friction material
18 products that were made at the Paulding facility?

19 A. From my personal knowledge they had an
20 engineering department that only tested whether the
21 products were meeting the performance
22 characteristics. They had existing formulas, they
23 continued to use those formulas, they did not
24 develop any new products or new formulas to my

Page 66

1 knowledge.

2 Q. Okay. Do you know who devised the
3 formulas that were used at that facility?

4 A. No. They had been in existence way
5 before I knew of it.

6 Q. Okay. The engineering department, was
7 that located at the Paulding facility?

8 A. Yes, it was.

9 Q. What was the name of that facility? Was
10 it called the Paulding facility?

11 A. Paulding facility.

12 Q. And Mr. Liggett, the facility's name that
13 provided the raw asbestos material for the friction
14 materials that we were just talking about, were
15 they the same ones that provided the raw asbestos
16 for all the friction materials that were used at
17 that facility?

18 A. There was one other company called Amatex
19 that produced an asbestos yarn wound around a brass
20 core that was used in the clutch facings.

21 MR. COON: Is anybody here for Amatex today?

22 BY MR. COON:

23 Q. Mr. Liggett, what was involved in the
24 assembly of the part of the product which I take it

Page 67

1 again was a friction material part for the clutch
2 facings?

3 A. Again Paulding only produced the clutch
4 facings, they did not do any assembly.

5 Q. And what was the finished product that
6 came out of there?

7 What was the clutch facing, what did that
8 look like?

9 A. A clutch facing for broad generalization
10 looked like a Frisbee. It was perhaps a 12 inch
11 diameter disc that was about two inches wide and a
12 quarter of an inch thick. So it looked like a big
13 doughnut.

14 Q. And was this again very similar to the
15 brake linings you described awhile ago in terms of
16 its composition, which was asbestos resins and
17 friction modifiers?

18 A. And it had the brass wire.

19 Q. The brass wire. What was the purpose of
20 the brass wire?

21 A. I can't answer that.

22 Q. Do you know what the asbestos composition
23 typically was of the friction materials that were
24 manufactured at the Paulding facility?

Page 68

1 A. It would be my estimation that they
2 ranged from 30 to 50 percent.

3 Q. Do you know if there were particular
4 types of asbestos fibers that were used more than
5 others?

6 A. Yes, there were.

7 Q. And what were those, sir?

8 A. I don't remember all of the grades. I
9 just know that there were some common grades that
10 were used frequently in a variety of the products.

11 Q. Okay. Do you know whether or not the
12 grades of asbestos reflected the asbestos fibers
13 being a different type of fiber or just a different
14 quality of fiber, or do you know the difference?

15 A. I believe it was primarily the length of
16 the fiber.

17 Q. Do you know whether or not there were
18 certain types of asbestos fibers that were used
19 more than others?

20 A. Well, there was only one type of asbestos
21 that was used in all friction materials at
22 Paulding.

23 Q. Was that the chrysotile?

24 A. Yes, it was.

Page 69

Page

1 Q. What were the reasons why chrysotile was
2 used as the asbestos fiber type as opposed to some
3 of the other fiber types?

4 A. To the best of my knowledge that was used
5 because its performance characteristics were most
6 suitable for friction materials.

7 Q. Let's next talk about the Nashville
8 facility. What was manufactured there?

9 A. There was no manufacturing that occurred
10 at Nashville, there was assembly. Some of the
11 brake linings and disc pads that Paulding produced
12 instead of going to brake rebuilders went to Allied
13 Drive in Nashville.

14 Q. Allied Drive being the location?

15 A. Allied Drive being the location and the
16 name of that facility.

17 Q. So the Paulding facility was in Paulding,
18 Ohio, was just referenced as the Paulding facility,
19 correct?

20 A. That's correct.

21 Q. The Nashville facility was referenced by
22 the street it was on?

23 A. That's correct.

24 Q. And that was Allied Drive?

Page 70

1 A. That's correct.

2 Q. And this was mostly an assembly facility?

3 A. That's correct.

4 Q. And what was assembled there?

5 A. Drum brakes and disc pads.

6 Q. And these were all rebuilt kits?

7 A. No. They were always put on new shoes
8 and new disc brake plates.

9 Q. Any clutches or truck blocks there?

10 A. There was a heavy duty distribution
11 center there that shared the building with the
12 passenger car division and they assembled some
13 truck blocks there.

14 Q. Were any clutches assembled there?

15 A. No.

16 Q. Were any heavy duty clutch assemblies
17 distributed there?

18 A. Did you say heavy duty clutches?

19 Q. Yes, sir.

20 A. No.

21 Q. But you did have the heavy duty
22 distribution system for the drum brakes and disc
23 pads?

24 MR. CANON: Objection as to form.

1 BY MR. COON:

2 Q. Or did I misstate your testimony?

3 A. Heavy duty drum brakes.

4 Q. Okay. But not pads?

5 A. Not pads.

6 Q. Did any of the larger equipment at that
7 time have disc pads?

8 A. Not to my knowledge.

9 Q. So there really wasn't a market for that?

10 A. That's correct.

11 Q. And this was all new equipment?

12 A. Yes, it was.

13 Q. Were there OEM accounts for that or was
14 that all also aftermarket?

15 A. That was all aftermarket.

16 Q. So basically a customer could have an
17 option of going into a parts house and buying a new
18 kit or a rebuilt kit?

19 A. No, that's not correct.

20 Q. Okay. What would be -- clarify for us
21 why you would have a Nashville facility that's
22 making all new equipment and you have your other
23 facility making parts that were for rebuilt kits.

24 A. The Nashville facility had primarily one

Page 72

1 customer, Sears, and Sears wanted to offer a better
2 product than the rebuilt market offered.

3 Q. And when we're talking Sears we're
4 talking about the Sears department stores?

5 A. That's correct.

6 Q. And most of those had an automobile I
7 guess repair facility attached to them?

8 A. Auto Service Center.

9 Q. You could go in and have routine repairs
10 made there like changing tires, brakes and
11 mufflers, things like that?

12 A. That's correct.

13 Q. To your knowledge did any of them ever
14 operate paint and body shops as well?

15 A. I would have no knowledge of that.

16 Q. Okay. So I've got a better understanding
17 of what Maremont was doing we had the Paulding
18 facility that was basically involved in making the
19 friction materials for mostly, or almost I guess
20 exclusively the aftermarket companies that were
21 doing the rebuilt kits which were for the drum
22 brakes, disc pads and the clutches and heavy
23 equipment blocks?

24 A. Correct.

Page 69 - Page 72

Page 73

Page 75

1 Q. And then you had separately the Nashville
 2 facility that really had two products, one was the
 3 complete manufacture, assembly -- I guess complete
 4 assembly of drum brakes and disc pads for Sears?
 5 A. Correct.
 6 Q. And then separately at the Nashville
 7 facility you had a heavy duty distribution system
 8 for truck blocks?
 9 A. Truck blocks and other related truck
 10 parts that were primarily metal only and had no
 11 friction material component.
 12 Q. Okay. And where were the distribution
 13 systems set up for the heavy duty products that
 14 came out of the Nashville facility?
 15 A. They were just sold to truck heavy duty
 16 parts rebuilders around the United States.
 17 Q. So they went from the Nashville facility
 18 directly to whoever wanted them?
 19 A. That's correct.
 20 Q. And as I understand it the Nashville
 21 facility there was no manufacturing taking place,
 22 it was all assembly?
 23 A. That's correct.
 24 Q. And in the assembly of the drum brakes

1 sell enough of them?
 2 A. That's correct.
 3 Q. Any idea who the suppliers would have
 4 been for those customers?
 5 A. I think Lear Seigler was one.
 6 Q. Where were they at?
 7 A. I don't recall.
 8 Q. Anyone else?
 9 A. That's the only one I can think of right
 10 now.
 11 Q. How do you spell that?
 12 A. L-e-a-r, capital S-e-i-g-l-e-r. I'm
 13 guessing at that.
 14 Q. Who were your other major competitors for
 15 the manufacturing of the friction materials at the
 16 Paulding facility?
 17 A. I think that could have been Bendix,
 18 Raybestos. That's all I can think of right now.
 19 Q. Do you know what Maremont's market
 20 share was for the friction materials through the
 21 '70s?
 22 MR. CANONI: Objection as to form.
 23 THE WITNESS: I would guess that it was less
 24 than 5 percent.

Page 74

Page 76

1 and disc pads at the Nashville facility the
 2 friction materials would have still come from the
 3 Paulding facility?
 4 A. That's correct.
 5 Q. Did the Nashville facility ever acquire
 6 any of its friction materials from other
 7 manufacturers?
 8 A. They may have.
 9 Q. And what leads you to believe that they
 10 may have acquired some from other manufacturers?
 11 A. There were some applications, meaning
 12 some vehicles that are not very popular that did
 13 not justify the Paulding facility tooling up to
 14 produce those parts so they could have been sourced
 15 from other suppliers.
 16 Q. So I understand this would be cars that
 17 just didn't have very much in terms of volume
 18 sales?
 19 A. That's correct.
 20 Q. And it did not justify the cost of
 21 setting up all the equipment to manufacture the
 22 replacement friction equipment or even the new
 23 friction pads or the friction materials for the
 24 assembly of brake parts because you just didn't

1 BY MR. COON:
 2 Q. Who was the biggest player during that
 3 time?
 4 A. Bendix and Raybestos were both very
 5 large.
 6 Q. And with respect to the assembly facility
 7 with Sears, did Sears have other customers or other
 8 vendors for the assembled products?
 9 A. Not for the brakes. Excuse me, Maremont
 10 I believe provided the majority. If they needed to
 11 go outside and source something on their own, if
 12 they were out of stock then they were free to go to
 13 any jobber or parts store and get whatever else
 14 they needed.
 15 Q. How did the distribution system of the
 16 assembled drum brakes and disc pads from the
 17 Nashville facility get to the Sears facilities for
 18 use and installation in cars?
 19 A. Ask that again please.
 20 Q. Yes, sir. You have the Nashville
 21 facility that is basically they have one customer,
 22 Sears, correct?
 23 A. Correct.
 24 Q. And they are making all new drum brakes

Page 77	Page
1 and disc pads using the friction materials from 2 your Paulding facility, correct? 3 A. Right. 4 Q. Once you put all of it together at the 5 Nashville facility how would it reach the various 6 Sears facilities to be installed in cars? 7 A. Primarily Maremont would combine 8 shipments from their shock, exhaust and brake group 9 and deliver directly to the Sears store. 10 Q. Was there any warehousing of the 11 assembled products? 12 A. I'm sure there was. 13 Q. Was warehousing all at the Nashville 14 facility on the premises there? 15 A. We did warehouse a considerable amount of 16 brake systems or brake sets. I don't know what 17 other warehouse facilities Maremont had. 18 Q. Do you know if there were any off site 19 warehousing of the assembled products made at the 20 Nashville facility? 21 A. Not to my knowledge. 22 Q. Do you know if there was any off site 23 warehousing of the friction materials that were 24 made at the Paulding facility?	1 The friction materials that were made 2 there, how would they end up being shipped to the 3 various customers? 4 A. They would either go LTL or UPS. 5 Q. LTL being what? 6 A. Less than truckload by a common carrier. 7 Q. And would there be truckload customers? 8 A. Not to my knowledge. 9 Q. So the vast majority of these shipments 10 would be for quantities smaller than a truckload? 11 A. That's correct. 12 Q. So this distribution, was it outsourced 13 to UPS, et cetera? 14 A. Just call a truck line to deliver your 15 product. 16 Q. Were these purchases typically FBO? 17 A. Most were FOB. 18 Q. Yeah, FOB. I've been to the FBO today so 19 I got it on my brain. 20 But this was all FOB shipments? 21 A. Correct. 22 Q. And with respect to the Sears 23 distribution, how did that work? 24 A. That was done primarily by contract
Page 78	Page 80
1 A. Not to my knowledge. 2 Q. And as I understand there were no 3 distribution systems in place for either the 4 friction materials or the assembly products in 5 terms of it was made at Nashville, then it was 6 shipped to a distribution center operated by 7 Maremont say on the West Coast or East Coast for 8 eventual distribution from those hubs to the 9 individual Sears stores? 10 A. I don't recall there being any. Whether 11 at various times they might have had them for a 12 short period of time, I don't recall. 13 Q. How would the process generally work? 14 Sears had stores all over America, correct? 15 A. Correct. 16 Q. And did Maremont service all those stores 17 nationwide? 18 A. Yes, they did. 19 Q. And they also, I take it, serviced a 20 whole lot of these rebuilders national as well? 21 A. That's correct. 22 Q. For the friction materials that you all 23 were selling them. Let me talk first about the 24 Paulding facility.	1 carriers. 2 Q. Who were the contract carriers? 3 A. The primary contract carrier was Crete 4 Carrier Corporation. 5 Q. Is that C-r-e-t-e? 6 A. Yes. 7 Q. Did you all have a contract with them? 8 A. Maremont did. 9 Q. Would Crete ship the assembled kits to 10 all the Sears stores as an exclusive provider? Let 11 me reask that. 12 Would Crete come up to your facility and 13 just load it all up with the assembled kits and 14 just take them out and drop them off at all the 15 different Sears stores that had deliveries? 16 A. In a simplified fashion that's pretty 17 correct. 18 Q. How would the orders take place? If a 19 Sears store needed certain assembled kits, how 20 would that transfer from what they needed get to 21 your facility and then get the parts to them? 22 A. Sears reported every day the parts they 23 sold, and that would generate automatic 24 replenishment orders in Maremont's computer and

Page 81

Page 83

1 Maremont would then respond to that replenishment
2 order and ship it out.

3 Q. How long had that relationship been in
4 existence?

5 A. I don't know.

6 MR. CANONI: The automatic replenishment?

7 BY MR. COON:

8 Q. Yeah, first the automatic replenishment.

9 A. I don't know.

10 Q. How long had Maremont had a business
11 relationship with Sears like the one you described
12 at the Nashville facility?

13 A. I can't answer that.

14 Q. Do you know if it went back to the '60s?

15 A. I don't know.

16 Q. It was just something that was in place
17 when you arrived in '73?

18 A. That's correct.

19 Q. How long had the Nashville facility been
20 in operation?

21 A. I'm not sure of that question.

22 Q. Had it been in operation for more than 10
23 years before your arrival?

24 A. I don't think so. I think it was perhaps

Page 82

1 closer to five years.

2 Q. Do you know if there was a location
3 before that one?

4 A. Prior to being in Nashville it was
5 located in the Paulding, Ohio, facility.

6 Q. Okay. So they actually had the assembly
7 business taking place at the Paulding facility up
8 until a few years before your arrival?

9 A. That's correct.

10 Q. So this would be some time in the what,
11 the late '60s?

12 A. I'm guessing at the dates.

13 Q. You went to work at Maremont in '73,
14 correct?

15 A. That's correct.

16 Q. So if it was five years or so ballpark we
17 are talking '67, '68, give or take a year or two?

18 A. If you understand I'm guessing at the
19 five years, yes.

20 Q. Sure. Do you have any understanding as
21 to why the assembly facility was separated from the
22 Paulding facility and relocated in Nashville?

23 A. When Sears was brought on as a major
24 customer for the friction products I don't think

1 they had the space to accommodate that. Most of
2 Maremont's other manufacturing facilities were in
3 Tennessee, so by having the friction material
4 assembly for Sears in Tennessee they could combine
5 them with the trucks for the distribution.

6 Q. Did the Maremont facilities also ship to
7 Sears the shock absorbers and exhaust systems you
8 were telling us about earlier?

9 A. Yes.

10 Q. Did any of these go through a central
11 distribution warehouse?

12 A. No, they did not.

13 MR. CANONI: You mean the Maremont
14 distribution warehouse?

15 BY MR. COON:

16 Q. Yeah. So if Sears needed shocks they had
17 to go to one facility, if they needed exhaust
18 systems they had to notify another Maremont
19 facility, if they needed friction brake shoe kits
20 the Nashville facility?

21 A. No. Again they had an automatic
22 replenishment system where they reported their sale
23 of shocks, exhausts and friction products on a
24 regular basis to Maremont. Maremont would enter

Page 84

1 that into one computer system that would generate a
2 demand on each of the manufacturing plants.

3 Q. Okay. So there was a central inputting
4 system. Sears notified one facility at Maremont of
5 what their needs were by this replenishment system?

6 A. Yes, they did.

7 Q. Where was this information sent to?

8 A. Nashville, Tennessee.

9 Q. So as I understand, the Sears system
10 set-up is they sold products, whether shock
11 absorbers, mufflers or brake shoe kits that
12 automatically was -- that information was sent by
13 computer to Maremont?

14 A. Correct.

15 Q. And Maremont's contract with Sears was
16 such that they just took another one off the shelf
17 at Maremont or made some more and shipped those
18 straight back to Sears to replenish the ones they
19 had just sold?

20 A. That's correct.

21 Q. And how did Sears notify Maremont? You
22 said there was a computer system, correct?

23 A. That's correct.

24 Q. Did each Sears store have an ability to

Page 85

Page

1 transfer that information directly to Maremont or
2 did it go through a central repository or storage
3 facility at Sears to then transfer that information
4 to Maremont?

5 A. I don't know.

6 Q. Once it went from Sears to Maremont did
7 it go to a central location at Maremont for
8 notification to the various manufacturing
9 facilities or did that information simultaneously
10 go to all of them, or did it go to each store based
11 -- each manufacturing facility based on what they
12 manufactured there?

13 A. It went to one place at Maremont.

14 Q. And that was the Nashville facility?

15 A. There was a separate facility in
16 Nashville that was called Airways Plaza.

17 Q. Airways Plaza. And was this the place
18 that the information went to?

19 A. Yes, it was.

20 Q. And at Airways Plaza they would then take
21 the information from Sears where they had notified
22 Maremont we sold so many shocks, so many brake
23 shoes, so many of this and that and we need you to
24 replenish them, correct?

Page 86

1 A. Correct.

2 Q. And then the Airways facility would then
3 notify, I take it, each of the manufacturing or
4 assembly facilities to let them know that these
5 were the things that needed to be replenished with
6 Sears?

7 A. That's correct.

8 Q. How many folks worked at the Airways
9 facility?

10 A. I'm going to guess 200.

11 Q. And did they have responsibilities for
12 anything other than tracking this information that
13 we're talking about?

14 A. Yes, they did.

15 Q. What else did they have responsibilities
16 for?

17 A. They had some sales and marketing people
18 there and they had quite a few financial people
19 there.

20 Q. Was this more or less the corporate
21 headquarters for Maremont at that time?

22 A. The corporate headquarters was always in
23 Chicago. This was a regional office.

24 Q. Do you know why they had a lot of their

1 financial folks at this facility as opposed to
2 their corporate headquarters?

3 MR. CANONI: Objection as to form.

4 THE WITNESS: No, I don't.

5 MR. COON: Let's go off the record a minute.

6 THE VIDEOGRAPHER: Off the record, 12:32.

7 (Whereupon, a break was taken
8 from 12:32 until 1:40 p.m.)

9 THE VIDEOGRAPHER: We're on the record at
10 1:40.

11 BY MR. COON:

12 Q. Mr. Liggett, we took a break and we had
13 left off with the distribution system and how the
14 Sears information was exchanged through the
15 Maremont system. And next, sir, I want to direct
16 our attention to the next company you worked for.
17 I think I have a pretty good understanding of how
18 the Maremont facility operated.

19 I want to next talk about Nuturn. As I
20 understand it from your testimony earlier today you
21 worked for Maremont from about '73 to '77, is that
22 correct?

23 A. Correct.

24 Q. And then you went to work for Nuturn from

Page 88

1 '77 until some time in the '80s?

2 A. That's correct.

3 Q. Was that '81?

4 A. Yes, it was.

5 Q. And the reason you went to work for
6 Nuturn was because there was some sales transaction
7 involving Maremont and Nuturn involving some of
8 their product lines where you stayed with the
9 successor company, is that correct?

10 A. That's correct.

11 MR. CANONI: Objection as to form.

12 BY MR. COON:

13 Q. Could you tell me a little bit about that
14 transaction as you understand it?

15 A. It's my understanding that Turner &
16 Newall wanted to enter the United States friction
17 material market, that Maremont found that friction
18 materials were not distributed through the same
19 channels as all of their other products, so a buyer
20 and a seller met and made a deal.

21 Q. Was Nuturn a Turner & Newall entity, a
22 subsidiary of some sort?

23 A. It was.

24 Q. Was it created for the express purpose of

Page 89

Page 91

1 acquiring a friction product line in the United
2 States?

3 A. I can't answer that.

4 Q. As you understood Turner & Newall was not
5 in the friction business before the acquisition of
6 the Maremont facilities?

7 MR. CANONI: Objection as to form.

8 THE WITNESS: No, that's not my
9 understanding.

10 BY MR. COON:

11 Q. Okay. I misunderstood. Maybe if you
12 tell me again I'll try to follow you.

13 A. Turner & Newall owned Ferodo Friction
14 Materials and Ferodo wanted to enter the U.S.
15 friction material market.

16 Q. Let me backup then. Turner & Newall was
17 a British facility?

18 A. British company, yes.

19 Q. They had a number of subsidiaries, some
20 of which were involved in asbestos manufacturing
21 processes?

22 A. That's my understanding.

23 Q. Did you know anything about the long
24 history of Turner & Newall with respect to asbestos

Page 90

1 litigation?

2 A. No, I did not.

3 Q. Have you ever been more informed with
4 respect to the long history of asbestos litigation
5 involving Turner & Newall?

6 A. No, I have not.

7 MR. CANONI: Brent, let me just say, you know,
8 Mr. Liggett is not here today as a representative
9 for Nuturn. I'll allow you to ask some general
10 questions, but I would rather that we confine our
11 questions today to Maremont.

12 MR. COON: Okay. Just trying to find a little
13 bit more about what he knew and didn't know with
14 respect to that company.

15 MR. CANONI: I just don't want that to be
16 binding on Maremont.

17 MR. COON: I understand.

18 MR. CANONI: Because he's not going to be
19 binding the company with respect to those
20 questions.

21 BY MR. COON:

22 Q. Let me follow-up then a little more on
23 the corporate lines. Was Nuturn, as you understand
24 it, a company that was totally unassociated with

1 Maremont from the standpoint of joint venture,
2 shareholder, anything like that?

3 A. I believe that Maremont initially had
4 some interest in Nuturn.

5 Q. Do you have any understanding as to what
6 that interest was?

7 A. I don't know exactly.

8 Q. Who was the president of Maremont at that
9 time?

10 A. Byron Pond.

11 Q. Is Mr. Pond still around?

12 A. I think he's still alive.

13 Q. Do you know if he's still associated with
14 Maremont?

15 A. I don't think he is.

16 Q. Do you think he's retired?

17 A. I think he has.

18 Q. And I take it you don't really have any
19 personal knowledge with respect to the type of
20 interest Maremont retained in the transfer of
21 certain assets to Nuturn?

22 A. I believe there are documents that speak
23 to that.

24 Q. Were you involved in any of the

Page 92

1 negotiations between T&N or their Nuturn entity and
2 Maremont?

3 A. No, I was not.

4 Q. Do you know any of the individuals that
5 were involved in that?

6 A. Yes, I do.

7 Q. Could you name the names for me please,
8 sir?

9 A. Bob Rogers and Byron Pond.

10 Q. And that was the president of Maremont at
11 the time as well as the owner?

12 A. No. He was just the president. Bob
13 Rogers was the president of Nuturn.

14 Q. Yes, sir, that's what I meant, owner of
15 Nuturn.

16 A. He's not the owner.

17 Q. Maybe -- I lost you somewhere. You
18 mentioned Mr. Rogers name earlier and I thought he
19 had an ownership interest in Maremont?

20 A. He was an employee of Maremont.

21 Q. Okay. He became president of Nuturn?

22 A. That's correct.

23 Q. Do you know what Mr. Rogers did before
24 becoming president of Nuturn?

Page 93

Page

1 A. He was not an employee of Maremont at
2 that time. I don't remember what he was doing.
3 Q. Do you know if he was already associated
4 with Turner & Newall in some capacity?
5 A. I don't think he was.
6 Q. Are you aware of any other friction
7 entities that were owned by Turner & Newall at that
8 time? You mentioned Ferodo.
9 A. That's the only one I'm familiar with.
10 Q. Do you know anything about the ownership
11 interest of Wagner or Numoabex as they may have
12 related to Turner & Newall?
13 A. No, I don't.
14 Q. Do you know anything about Wagner?
15 A. I know they were a friction material
16 manufacturer.
17 Q. Were they a competitor of Maremont at any
18 point in time?
19 A. Yes, they were.
20 Q. In what respects?
21 A. To the best of my recollection Wagner
22 made friction materials and Grizzly made friction
23 materials and they would compete in the rebuilder
24 market.

Page 94

Page 96

1 Q. What about Numoabex?
2 A. I'm not familiar with Numoabex.
3 Q. Or Abex?
4 A. I've heard the name Abex. I can't tell
5 you what they do.
6 Q. How about American Brake?
7 A. I've heard that name and I believe that
8 is the same company as Abex, but I can't tell you
9 what they did.
10 Q. What assets were transferred from
11 Maremont to Nuturn in '77?
12 A. I don't know if I can give you a
13 definitive list, but I know the Paulding, Ohio,
14 facility --
15 Q. Okay.
16 A. -- and the Allied Drive facility were
17 transferred.
18 Q. This being all of the friction aspects of
19 the Maremont entities at that time, correct?
20 A. That's correct.
21 Q. To your knowledge did it not involve the
22 shock absorber lines and the exhaust system lines?
23 A. I don't believe it involved those two
24 lines at all.

1 Q. Now what's your understanding of Ferodo's
2 activities at the time Turner & Newall acquired, or
3 the Nuturn entity of Turner & Newall acquired
4 Maremont's friction product lines?
5 A. Help me understand that question a little
6 better.
7 Q. Yes, sir. At the time of this
8 transaction, 1977, what was your understanding of
9 what Ferodo's business activities were?
10 A. Ferodo was a major worldwide manufacturer
11 of friction products. They had extensive research
12 and development capabilities.
13 Q. Did they have any operating enterprises
14 in the United States at that time?
15 A. Not that I'm aware of.
16 Q. And as I take it from your testimony
17 today it's your general understanding that T&N had
18 the desire to get more involved in the American
19 market with respect to friction products?
20 A. That's correct.
21 Q. And that was one of the motivating
22 factors in creating the Nuturn facility, to acquire
23 the friction product lines of Maremont?
24 A. It was a way to enter the friction market

1 in the United States.
2 Q. Do you know whether or not the Nuturn
3 organization or entity was associated in any
4 respect to Ferodo from a corporate standpoint?
5 A. I know there was heavy exchange of
6 information and formulas. How exactly it was
7 structured corporately, I don't know how that was.
8 Q. That was between Ferodo and Nuturn?
9 A. That's correct.
10 Q. So they had a working relationship, you
11 just did not know what type of corporate
12 relationship they had?
13 A. That's correct. I don't know if the
14 corporate relationship was with Turner & Newall or
15 with Ferodo.
16 Q. Do you know where -- let me backup. In
17 1977 at the time this transaction occurred do you
18 know where Maremont's what I would call their
19 headquarters are?
20 A. Yes.
21 Q. Was that in Chicago?
22 A. Yes, it was.
23 Q. Did you know anything else about the
24 corporate structure in terms of where the company

Page 97

Page 99

1 had been originally incorporated or chartered?
 2 A. No, I don't.
 3 Q. Do you know what type of corporation it
 4 was set up as?
 5 A. No, I don't.
 6 Q. With respect to Nuturn, do you know where
 7 its corporate headquarters were in 1977?
 8 A. Yes, I do.
 9 Q. And where was that, sir?
 10 A. Nashville, Tennessee.
 11 Q. Was this at the Allied Drive location or
 12 the Airways location or elsewhere?
 13 A. It was elsewhere.
 14 Q. Where was that, sir?
 15 A. I don't remember the exact address. It
 16 was in Nashville.
 17 Q. Was this a new construction facility that
 18 they moved to or acquisition of existing property?
 19 A. They rented office space in an office
 20 complex.
 21 Q. Was there a transfer of records regarding
 22 invoices, billings, and all of the other things
 23 that related to the friction products side of
 24 Maremont from their corporate headquarters in

1 A. Yes, they would.
 2 Q. What changed, if anything, with respect
 3 to management at these facilities?
 4 A. The only significant change would have
 5 been Bob Rogers who had left Maremont coming back
 6 as the president of Nuturn.
 7 Q. What years was Bob Rogers president of
 8 Maremont?
 9 A. I don't believe Bob Rogers was ever
 10 president of Maremont.
 11 Q. What years was he at Maremont?
 12 A. I can't answer that.
 13 Q. Brian Pond, was he the president of
 14 Maremont at the time of the sale?
 15 A. Byron, B-y-r-o-n.
 16 Q. Byron Pond?
 17 A. Correct. And your question?
 18 Q. Yes, sir, you just answered that for me.
 19 How long had he held that position? Do you know
 20 what years?
 21 A. I don't know what years.
 22 Q. Do you know if he was president when you
 23 went to work there in '73?
 24 A. No, he was not.

Page 98

Page 100

1 Chicago to the Nuturn headquarters in Nashville?
 2 MR. CANONI: Objection as to form.
 3 THE WITNESS: I would think most of those
 4 records would have been held at the manufacturing
 5 and assembly facilities and would have just stayed
 6 there.
 7 BY MR. COON:
 8 Q. Do you know what, if any, types of
 9 records from Maremont that were kept elsewhere,
 10 such as their headquarters in Chicago, that would
 11 have been transferred over to Nuturn at the time of
 12 the acquisition?
 13 MR. CANONI: Objection as to form.
 14 THE WITNESS: I wouldn't know that.
 15 BY MR. COON:
 16 Q. With respect to the sale, did pretty much
 17 all the same operational procedures stay in place
 18 in terms of the manpower, their product lines and
 19 things like that at the time of the initial
 20 acquisition by Nuturn of these particular Maremont
 21 facilities?
 22 A. Yes, they did.
 23 Q. With respect to pay scales, all that
 24 stayed about the same?

1 Q. Do you know who the president was at that
 2 time?
 3 A. Rick Black.
 4 Q. Do you know what capacity Bob Rogers had
 5 at Maremont?
 6 A. He had some title as head of the
 7 Passenger Car Division of the Friction Products
 8 Group.
 9 Q. Which facility did he work at?
 10 A. The Allied Drive facility in Nashville.
 11 Q. Were you all -- you were in management at
 12 that same facility, right, as --
 13 A. Yes, I was.
 14 Q. -- general manager?
 15 Did he report to you or did you all have
 16 lateral positions?
 17 A. I reported to him. He was my boss.
 18 Q. At the Allied Drive facility in '77 what
 19 was the corporate structure there? Do you have a
 20 president just at that facility?
 21 A. I don't remember Bob Rogers title,
 22 whether he was general manager or president of that
 23 division. He would have been the top person at
 24 that facility. I reported to him. There were

Page 101

Page 1

1 supervisors that reported to me, and then there
 2 were the production workers.
 3 Q. So you were second in command of the
 4 Nashville facility --
 5 A. That's correct.
 6 Q. -- in '77?
 7 A. That's correct.
 8 Q. And you reported to Mr. Rogers, although
 9 you do not recall specifically what his title was?
 10 A. That's right.
 11 MR. CANONI: Let me just -- I don't know that
 12 the witness is clear. Was Bob Rogers there in
 13 '77?
 14 THE WITNESS: Oh, excuse me.
 15 MR. CANONI: I didn't know whether you were
 16 restricting your question to '77.
 17 THE WITNESS: I was thinking when I joined the
 18 business. I'm sorry.
 19 BY MR. COON:
 20 Q. Okay. In '73?
 21 A. Right.
 22 Q. So in '73 when you went to work there at
 23 the Nashville facility Mr. Rogers was in charge?
 24 A. That's correct.

Page 102

1 Q. You just don't know what his title was?
 2 A. That's right.
 3 Q. But your title was general manager and
 4 you reported directly to him?
 5 A. No. My title was operations manager.
 6 Q. Okay, operations manager. And you
 7 reported directly to Mr. Rogers?
 8 A. That's correct.
 9 Q. Do you know who Mr. Rogers reported to?
 10 A. I can't think of his name. He reported
 11 to someone who reported to Rick Black and later
 12 reported to Byron Pond. But there was a position
 13 called national accounts.
 14 Q. Yes, sir.
 15 A. And the head of that group is who Bob
 16 Rogers reported to. His name escapes me.
 17 Q. Would he be in Chicago?
 18 A. Yes.
 19 Q. Okay. So Mr. Rogers -- in the chain of
 20 command you reported to Mr. Rogers, Mr. Rogers
 21 reported to somebody in Chicago?
 22 A. That's correct.
 23 Q. Who then reported to Mr. Black?
 24 A. That's correct.

1 Q. Who was president of Maremont?
 2 A. That's correct.
 3 Q. With respect to the other facility, that
 4 would be Paulding, Ohio?
 5 A. Right.
 6 Q. Were you also an operations manager
 7 there?
 8 A. Not when I started.
 9 Q. Okay. But at some point in time?
 10 A. That's correct.
 11 Q. Let's backup. At Nashville at some point
 12 in time Mr. Rogers left and you then I take it
 13 reported to someone else?
 14 A. That's right.
 15 Q. What was that gentleman's name again?
 16 A. Byron Pond.
 17 Q. That was Byron Pond.
 18 And then did Mr. Pond also then report to
 19 that same gentleman in Chicago that Mr. Rogers had
 20 reported to?
 21 A. No. Byron Pond at this point was
 22 president of Maremont.
 23 Q. Okay. I'm starting to get confused
 24 again. Was he at the -- Mr. Pond, was he at the

Page 104

1 Nashville facility?
 2 A. No. He was in Chicago.
 3 Q. Okay. Did at some point in time you end
 4 up kind of taking Mr. Rogers' position at the
 5 Nashville facility?
 6 A. When Mr. Rogers left I and the person
 7 that was in charge of sales and marketing then did
 8 not have a boss and we reported to Byron Pond on an
 9 interim basis.
 10 Q. That's why I lost you. When Mr. Rogers
 11 left you didn't report to him?
 12 A. It's confusing.
 13 Q. But it's because they just left that
 14 position vacant?
 15 A. That's correct.
 16 Q. So again try to go back over this. When
 17 you started in '73 you're operations manager in
 18 Nashville, you report to Mr. Rogers. Mr. Rogers
 19 reported to someone in Chicago who reported to the
 20 president Mr. Black?
 21 A. Correct.
 22 Q. When Mr. Rogers left some time between
 23 '73 and '77 his position in Nashville was not
 24 filled?

Page 105

Page 107

1 A. That's correct.
 2 Q. And so that left a void to anyone you
 3 reported to at the Nashville facility?
 4 A. Right.
 5 Q. And instead you reported on up the chain
 6 to Mr. Pond?
 7 A. Who by then had become president of
 8 Maremont after Rick Black left.
 9 Q. So you actually bypassed two positions;
 10 one was reporting to Mr. Rogers and then whoever
 11 Mr. Rogers reported to in Chicago?
 12 A. That's correct.
 13 Q. Do you know if that position in Chicago
 14 had also been vacated?
 15 A. Yes, it had.
 16 Q. Were there a number of positions that
 17 were becoming open for whatever reasons that were
 18 not being filled for a particular reason?
 19 A. I would say the management structure was
 20 changing as different people had different ideas
 21 how it could best be organized.
 22 Q. They were just kind of feeling their way
 23 through that during this time frame?
 24 A. Organizations of that size change.

Page 106

1 Q. Okay. Now let's talk about briefly the
 2 Paulding facility where you were also a manager,
 3 correct?
 4 A. Correct.
 5 Q. Who did you report to at that facility?
 6 A. When I went there I was the top person at
 7 that facility.
 8 Q. Was that title also operations manager?
 9 A. Yes, it was.
 10 Q. And for that facility they did not have a
 11 person such as Mr. Rogers?
 12 A. That's correct.
 13 Q. Did you report directly to the president
 14 at that facility?
 15 A. No. Initially I reported still to Bob
 16 Rogers.
 17 Q. Who was in Nashville?
 18 A. Who was in Nashville.
 19 Q. Okay. And then after Mr. Rogers left did
 20 you report to Mr. Pond --
 21 A. That's correct.
 22 Q. -- for that as well?
 23 So the Paulding facility did not have a
 24 position between you and this person in Chicago

1 that you would normally have reported to?
 2 A. That's correct.
 3 Q. Going back to Nuturn, they had their
 4 corporate headquarters in Nashville, correct?
 5 A. No -- yes.
 6 Q. And they still had the operating facility
 7 that was previously the Maremont Nashville
 8 facility?
 9 A. That's correct.
 10 Q. They had the operating facility that was
 11 previously the Paulding, Ohio, Maremont facility?
 12 A. That's correct.
 13 Q. What about the distribution center
 14 contact with Sears, the Airways facility, did that
 15 remain in place?
 16 A. Well, that was still part of Maremont.
 17 Q. Okay.
 18 A. That did not change when Maremont sold
 19 the Friction Products Group to Turner & Newall.
 20 Q. How did -- did the continued relationship
 21 with Sears -- strike that.
 22 Did the relationship with Sears as it
 23 related to Nuturn continue as Sears relationship
 24 with Maremont had previously existed?

Page 108

1 A. I'm a little confused.
 2 Q. Okay. Sears had a reordering process?
 3 A. That's correct.
 4 Q. And in fact you had a name for it,
 5 replacement or replenishment I think you called it,
 6 right?
 7 A. That's correct.
 8 Q. With this replenishment system that went
 9 through the Airways facility in Nashville, correct?
 10 A. That's correct.
 11 Q. When Maremont sold certain operations to
 12 Nuturn, did Sears continue to conduct business with
 13 the Nuturn entity?
 14 A. They continued to send their
 15 replenishment orders to the Airways facility and
 16 then Maremont would transmit those to Nuturn.
 17 Q. That was my next question. So the way
 18 that Sears reported their replenishment continued
 19 to go through the Airways system in Nashville which
 20 was still Maremont owned?
 21 A. That's right.
 22 Q. Even after Nuturn acquired the Maremont
 23 facilities in Nashville and Paulding?
 24 A. That's correct.

Page 109

Page 1

1 Q. Do you know what kind of consideration
2 was given for Maremont providing those services?

3 A. No, I don't.

4 Q. Do you know how long that relationship
5 continued?

6 A. No, I don't.

7 Q. Did it continue through the duration of
8 your employment with Nuturn in '81?

9 A. Yes, it did.

10 Q. So as I understand the way the system
11 would have worked with Sears on the new product
12 brake shoe work that was -- this was all out of
13 Nashville, correct?

14 A. Yes.

15 Q. The replenishment systems for the brake
16 shoes. It would have been that Sears would have
17 still run through their same system as they had
18 when you worked for Maremont and everything would
19 go to Airways which was still Maremont owned on the
20 computer database to indicate what needed to be
21 replenished?

22 A. That's correct.

23 Q. And at the Airways system they would make
24 a determination as to whether or not the

1 requests for replenishment to distinguish what
2 Maremont could continue to provide versus what
3 Nuturn would provide?

4 A. Well, they would only send to Nuturn
5 those products that were produced by Nuturn. They
6 wouldn't send a shock absorber replenishment
7 schedule to a brake assembly plant.

8 Q. They being Airways?

9 A. That's correct.

10 Q. So when the information from Sears got to
11 Airways as to what they needed Airways would
12 separate out what Maremont could replace, like
13 shock absorbers and mufflers, and send that
14 information on to the Maremont entities for
15 replenishment, correct?

16 A. That's correct.

17 Q. And then they would send the information
18 as it related to replacement of the brake items
19 that were now being manufactured by Nuturn on to
20 the Nuturn facilities?

21 A. That's correct.

22 Q. Where did Airways report that to, to
23 Nashville?

24 A. Yes.

Page 110

Page 112

1 replenishment items that Sears needed were things
2 that were made by Maremont or things made by Nuturn
3 as a result of the sale, correct?

4 A. That's correct.

5 Q. And so if Sears business auto repair
6 shops -- what were those called, the Sears shops?

7 A. Sears Service Centers.

8 Q. When the Sears Service Centers reported
9 into the system to Airways that they needed brake
10 shoes of certain make and model, then Airways
11 relayed that information on to Nuturn, correct?

12 A. That's essentially correct.

13 Q. And by the same token they would then
14 continue to have also relayed to the remaining
15 Maremont facilities that made the shock absorbers
16 and muffler systems that same type of information?

17 A. That's correct.

18 Q. How did the transfer of information from
19 Airways to Nuturn take place? How would they
20 relate to you what Sears needed for replenishment?

21 A. The reports that showed the replenishment
22 needs by Sears store would print out on a printer
23 at Nuturn.

24 Q. Would they be able to segregate out the

1 Q. Did it go to the Nashville headquarters
2 or to the Nashville manufacturing facility -- or
3 assembling facility?

4 A. It could go to either.

5 Q. Did any of it ever go to the Paulding
6 facility?

7 A. No, it did not.

8 Q. Paulding still had no involvement in
9 sending anything to Sears from a replenishment
10 standpoint because that was all rebuilt?

11 Actually Paulding was actually just the
12 friction materials?

13 A. That's correct.

14 Q. And Sears was never ordering just the raw
15 or friction material parts?

16 A. You are correct.

17 Q. Do you know how long this process
18 remained in place after you left Nuturn in '81?

19 A. No, I don't.

20 Q. You had told us that you left Nuturn for
21 some disagreements with the president there?

22 A. That's correct.

23 Q. And that was Mr. Rogers?

24 A. That's right.

Page 113

Page 115

1 Q. Had you had some problems with Mr. Rogers
2 while he was working with you at Maremont before
3 Nuturn acquired it?
4 A. Mr. Rogers was a challenging boss.
5 Q. In what ways?
6 A. He was pretty hardheaded and arrogant.
7 He was fairly demanding.
8 Q. Do you know why he had left Maremont
9 during your tenure there?
10 A. He had a hard time getting along with his
11 bosses at Maremont.
12 Q. Being Mr. Black and others?
13 A. That's correct.
14 Q. Was he invited to leave?
15 A. I believe that it was his initiative.
16 Q. Do you know where he went to?
17 A. I can't remember.
18 Q. But when Nuturn came in to acquire
19 Maremont Mr. Rogers came back to work for Nuturn?
20 A. That's correct.
21 Q. Do you know how it was that the Nuturn
22 executives knew about Mr. Rogers or how it worked
23 out that Mr. Rogers was able to obtain employment
24 with Nuturn?

Page 114

1 A. I think the Maremont people recommended
2 that they talk to him.
3 Q. Was that because they weren't going to
4 have to deal with him?
5 A. Quite probably.
6 Q. So any way, I guess you were not
7 pleasantly surprised to see Mr. Rogers return when
8 Nuturn acquired the company -- the parts of the
9 company that you were working for?
10 A. Bob Rogers was not a bad person, he just
11 was an unusual person.
12 Q. And I take it you all tried to get along
13 for a few years and after four years of dealing
14 with that management style you decided to seek
15 greener pastures?
16 A. That's correct.
17 Q. Was there any particular incident that
18 led up to the decision, or was it just an ongoing
19 process of agreeing to disagree?
20 A. There was probably an incident that led
21 up to the final decision.
22 Q. Was it of anything particularly
23 substantive?
24 A. Not really.

1 MR. COON: Is this a good place to break?
2 THE VIDEOGRAPHER: End of tape 1. Off the
3 record at 2:08.
4 (Whereupon, a break was taken
5 from 2:08 until 2:11 p.m.)
6 THE VIDEOGRAPHER: This is tape 2 continuing
7 the deposition of Carl Liggett. The time is 2:11
8 on the record.
9 BY MR. COON:
10 Q. Mr. Liggett, we talked earlier about
11 things you were able to review before your
12 testimony today. Do you recall that?
13 A. Yes, I do.
14 Q. Had you been able to read any of your old
15 depositions that you gave before today?
16 A. Yes, I have.
17 Q. Do you still keep those, sir?
18 A. You know, I truly don't remember if I
19 reviewed them and sent them back or if I kept a
20 copy.
21 Q. Do you know if you keep anything
22 regarding the things you reviewed to help refresh
23 your memory or to be better informed about the
24 company that you had worked for?

Page 116

1 A. I pretty much start fresh for each
2 deposition.
3 Q. You don't have like a box of goodies in
4 your office that you go back and dig through to get
5 ready?
6 A. No, I don't.
7 Q. Okay. Are there things that have been
8 prepared for you to assist you in providing this
9 type of testimony?
10 A. No, there's not.
11 Q. Have you been called upon to go back and
12 actually go back to the company and conduct any
13 type of what I would call an investigation going
14 out and talking to people that work there or trying
15 to find particular documents or anything like that?
16 A. No, I have not.
17 Q. And have not been asked to?
18 A. I have not been asked to do that.
19 Q. Okay. I do not know which documents that
20 you have had an opportunity to see and which ones
21 you have not, but my office has been provided with
22 a number of them, some of which you may be familiar
23 with and some others that you may not.
24 We are going to go through some of those

Page 117

Page 1

1 today. And one of those documents are legal
2 discovery documents that are called the
3 Interrogatories. Are you familiar with
4 Interrogatories?

5 A. Yes, I am.

6 Q. Have you assisted Maremont in providing
7 information in response to these types of
8 questionnaires?

9 A. I had a general meeting with John Canoni
10 and some other attorneys from his firm where I
11 tried to give them my best recollection of people,
12 places and things. I don't know if any of that
13 information has been used in helping them prepare
14 Interrogatories or not.

15 Q. They basically just called you in to ask
16 you a lot of questions thinking that you were a
17 person that could help provide information to
18 respond to those discovery requests?

19 A. They called me in for information. I
20 don't know if it was discovery requests that they
21 were seeking to prepare then.

22 Q. Have you ever read any of the discovery
23 requests?

24 A. No.

Page 118

1 Q. Have you ever signed off on any of them
2 in any of the cases?

3 A. I have signed my depositions.

4 Q. Yes, sir.

5 A. And I have signed a couple of
6 affidavits. I don't believe I have had anything to
7 do with discovery requests.

8 Q. What was the context of the affidavits
9 that you had provided in the past?

10 A. Primarily as to what names the products
11 were marketed under.

12 Q. Those products being the friction
13 products?

14 A. That's correct.

15 Q. With respect to the friction materials
16 that were sold through the Paulding facility, was
17 there any name that was associated with those?

18 Was there a trademark attached to the
19 material?

20 A. Yes, there was.

21 Q. What was it?

22 A. There were several.

23 Q. Do you know the names offhand of any of
24 them?

1 A. I can give you some of them.

2 Q. Yes, sir.

3 A. Grizzly was the primary trade name.

4 Q. Was that for the --

5 A. Friction materials.

6 Q. -- friction materials? Was this for all
7 the friction materials?

8 A. No.

9 Q. This include the linings and the pads or
10 what?

11 A. It was just for the brake linings and
12 disc pads and some of the truck block.

13 Q. None of the clutches?

14 A. I don't believe so.

15 Q. Now, Grizzly was, as I understand, the
16 predecessor manufacturer of these product lines, or
17 at least some of these product lines that was
18 acquired by Maremont some time in the past?

19 A. That's correct.

20 Q. Was Grizzly the name of the company as
21 well as the trademark of their products?

22 A. Yes, it was.

23 Q. And so when Maremont acquired that

24 company they continued to go forward making those

Page 120

1 same products and same friction materials under the
2 same trademark names?

3 A. Yes, they did.

4 Q. Were there other trade names that
5 Maremont created after acquisition of the Grizzly
6 product lines?

7 A. Yes, there would have been.

8 Q. Do you recall the names of any of those,
9 sir?

10 A. Brake-In-A-Box.

11 Q. Is that B-r-a-k-e, I assume?

12 A. Correct.

13 Q. Brake-In-A-Box?

14 A. All-In-One.

15 Q. Yes, sir.

16 A. There were other names. I don't believe
17 they were created after Maremont bought it. Some
18 of them probably existed before.

19 Q. Do you recall the names of those?

20 A. Saftigrip.

21 Q. Would these have been Grizzly products?
22 Not Grizzly trademark, but Grizzly Manufacturing
23 Company?

24 A. I think so.

Page 121

Page 123

1 Q. So Grizzly Manufacturing Company had a
2 number of products that had the Grizzly name as the
3 trade name on them, like Grizzly brake linings,
4 etcetera?

5 A. Well, if you remember they had different,
6 you know, the good, better and best brands.

7 Q. And in addition to the Grizzly trademark
8 products they had some other ones, the one you just
9 mentioned?

10 A. Saftigrip.

11 Q. Saftigrip.

12 A. Tru-Gard, Silvertip.

13 Q. Were those products also brake linings
14 and pads and truck blocks?

15 A. Yes.

16 Q. Was there a distinction based on the
17 quality or the performance of those products that
18 was reflected in the trade name?

19 A. Yes, there was.

20 Q. Could you tell us about that please, sir?

21 A. I couldn't tell you which trademark at
22 this time was associated with which quality level,
23 I just don't recall. But you had your premium
24 brand, you had your economy brand and you had your

Page 122

1 middle-of-the-road brand.

2 Q. Do you know whether or not the Grizzly
3 trade name products, being the brake lines, pads
4 and truck blocks were all the lower end, middle end
5 or top end?

6 A. No, I don't.

7 MR. CANONI: Objection as to form.

8 BY MR. COON:

9 Q. Now the Brake-In-A-Box and the
10 All-In-Ones, were those product lines created after
11 Maremont acquired Grizzly?

12 A. I believe they were.

13 Q. Where were those products assembled or
14 manufactured?

15 A. At the Allied Drive facility in
16 Nashville.

17 Q. Neither of these were just the friction
18 materials I take it?

19 A. No. They would have been the assembled
20 brake sets.

21 Q. Were these the predominant two names of
22 the brake sets that came out of the Nashville
23 facility for Sears?

24 A. Yes, they were.

1 Q. What distinguished one from the other?

2 A. One had strictly four shoes or four disc
3 pads, the other in addition to the shoes and pads
4 had the rubber parts to rebuild the wheel cylinder
5 and the little metal parts, the springs, hold-down
6 springs, return springs, clips that would hold it
7 on the backing plate.

8 Q. It would be just a somewhat more complete
9 replacement kit?

10 A. That's correct.

11 Q. Do you remember which one was which?

12 A. I believe the Brake-In-A-Box was just the
13 brake pads and I believe the All-In-One was the
14 complete.

15 Q. The Brake-In-A-Box included pads or
16 linings?

17 A. That's correct.

18 MR. CANONI: Do you mean Brake-In-A-Box or
19 Over-The-Counter?

20 THE WITNESS: Excuse me, I mean
21 Over-The-Counter.

22 BY MR. COON:

23 Q. What was Over-The-Counter? I missed
24 something.

Page 124

1 A. Over-The-Counter was if you went in to do
2 a brake job you would just get the brake shoes or
3 disc pads.

4 The All-In-One would be for the Sears
5 mechanic to do in their service center.

6 Q. Okay. That gives me a better
7 understanding.

8 So out of the Allied Drive facility where
9 Maremont, later Nuturn were turning out the
10 assembled kits this was all still new kits,
11 correct?

12 A. Yes.

13 Q. And they were all still, subject to the
14 exceptions you gave us earlier, comprised of
15 friction material that came from the Paulding
16 facility?

17 A. That's correct.

18 Q. Both while it was at Maremont and then
19 later as it became Nuturn?

20 A. That's correct.

21 Q. And at the Nashville facility while it
22 was Maremont were the boxes called the
23 Brake-In-A-Box and All-In-One at that time as well?

24 A. Ask that again.

Page 125

Page

1 Q. Yes, sir. When Maremont owned the Allied
2 Drive facility where they were putting together the
3 assembled kits was Maremont making the
4 Brake-In-A-Box and the All-In-One?
5 MR. CANONI: Over-The-Counter and All-In-One.
6 THE WITNESS: Over-The-Counter and
7 All-In-One.
8 BY MR. COON:
9 Q. Okay. The Brake-In-A-Box was -- I lost
10 you again. Over-The-Counter was just the shoes and
11 pads?
12 A. That's right.
13 Q. And All-In-One was a complete kit?
14 A. That's right.
15 Q. Where did Brake-In-A-Box come from?
16 A. I think that was another product line
17 that Maremont was going to try to develop and sell
18 to non-Sears accounts and was never very
19 successful.
20 Q. Do you know if they marketed that product
21 at all?
22 A. I think they tried to with no success.
23 Q. Do you know what time frame that
24 involved?

Page 126

1 A. No, I don't.
2 Q. Now the Over-The-Counter product line,
3 these were the assembled kits which was the four
4 shoes or pads for replacement on one vehicle, front
5 tires, back tires?
6 A. Right.
7 Q. And then the All-In-One would have been
8 the same thing, it would include the shoes and pads
9 as well as the spring assemblies for replacement of
10 some of the other parts that tended to show a
11 little more wear and tear than others?
12 A. That's correct.
13 Q. Now the All-In-Ones as I understand were
14 -- both the All-In-Ones and the Over-The-Counters
15 were being manufactured or put together while
16 Maremont was operating from '73 to '77 during your
17 tenure?
18 A. That's correct.
19 Q. And both of those product lines continued
20 after Nuturn acquired Maremont in '77?
21 A. Yes, they did.
22 Q. And both those product lines continued
23 through the duration of your employment at Nuturn
24 through '81 when you left?

1 A. That's correct.
2 Q. Do you know how long either one of those
3 product lines continued after you left?
4 A. No, I don't.
5 Q. Do you know how long either one of those
6 product lines had been in existence before your
7 arrival in '73?
8 A. No, I don't.
9 MR. CANONI: '77.
10 BY MR. COON:
11 Q. Was it '73?
12 A. '73.
13 Q. As I further understand the All-In-One
14 products were exclusively for your Sears business?
15 A. That's correct.
16 Q. And was that also again for the duration
17 of the time you were at Maremont and Nuturn?
18 A. That's correct.
19 Q. Those kits never went out to any other
20 distributors or retailers or wholesalers?
21 A. Not to the best of my knowledge.
22 Q. And with respect to the Over-The-Counter,
23 those were to all your customers except for Sears?
24 MR. CANONI: Objection as to form.

Page 128

1 THE WITNESS: The Over-The-Counter also went
2 to Sears for their sales to the do-it-yourselfer.
3 BY MR. COON:
4 Q. We need to break that down a little more
5 then. The All-In-Ones were exclusive to Sears,
6 correct?
7 A. Exclusive to Sears and primarily for
8 their mechanics to use in their back shops.
9 Q. So if someone came in to one of their
10 service centers to have the shoes replaced quite
11 often Sears would get the All-In-One kit to replace
12 both the shoes or pads as well as the clips and
13 springs?
14 A. That's correct.
15 Q. But as I also understood, and what I
16 think you were saying is that Sears sometimes would
17 instead of using the All-In-One kit that was more
18 complete would use the Over-The-Counter system?
19 A. No. What I said was, or what I meant to
20 say was if you drove in to Sears you could either
21 leave the car for them to do the brake job or you
22 could buy the brake shoes to take home yourself.
23 If you left it for them they did a
24 complete brake job that included turning your drums

Page 129

1 and rotors, replacing your shoes and pads,
2 rebuilding your wheel cylinders and replacing all
3 the springs and hold-down hardware.

4 If you were going to do the job yourself
5 they sold you a box that just had the brakes or
6 pads, which you would take home to your garage and
7 change yourself.

8 Q. That would be for the do-it-yourselfer?

9 A. That's for the do-it-yourselfer.

10 Q. Could the do-it-yourselfer ever acquire
11 the All-In-One kits from Sears?

12 A. I don't know.

13 Q. Did Sears sell any kits other than the
14 ones that were provided by Maremont and later
15 Nuturn?

16 A. Again they had the freedom and
17 flexibility to go outside and buy from the local
18 jobbers if they were out of stock on any part.

19 Q. But that was not the typical situation,
20 that would be the atypical, like out of stock and
21 it hadn't been replenished or a real oddball part?

22 A. I don't think I can speak authoritatively
23 to how often they were out of stock. But it was
24 certainly Maremont's intent that they be in stock

Page 130

1 most of the time.

2 Q. Did Maremont or Nuturn ever attempt to do
3 the same type of setup that they had with Sears
4 with the other major chains that had similar
5 enterprises? For instance, I think Montgomery Ward
6 had a service center for some period of time, did
7 they not?

8 A. I know it was considered, but that was a
9 very delicate issue because that could have upset
10 Sears and they didn't want to do anything that
11 would jeopardize that business.

12 Q. So it was your understanding they were
13 content enough with the Sears business that they
14 didn't really want to do anything that Sears would
15 deem to be adversely competitive to them?

16 A. That's the way it worked out.

17 Q. Who were the other major accounts that
18 would have been competitors to the Sears repair
19 systems?

20 A. There's Goodyear, Firestone, most of the
21 major oil companies. At one time almost every gas
22 station had mechanics that did repair work.

23 Q. And I take it Sears also did have similar
24 setups like this for other parts that they could

Page 131

1 normally replace, like batteries, things like that?

2 A. That's correct.

3 Q. Maremont was never involved in any of
4 those other parts replacement activities, were
5 they?

6 MR. CANONI: Other than the ones he's already
7 mentioned?

8 BY MR. COON:

9 Q. Other than the ones we've talked about.

10 A. Yes. Shocks, exhaust and brakes.

11 Q. Never got involved in headlights or any
12 of the other things that could be categorized as
13 your traditional replacement parts?

14 A. Not to the best of my knowledge.

15 Q. Oil filters, air filters, spark plugs,
16 things like that?

17 A. I don't think so.

18 Q. Mr. Liggett, I'm just going to ask you
19 some questions kind of randomly out of some of this
20 discovery that's been provided to us that you may
21 be able to clear up.

22 One of those had identified a mailing
23 address, their primary mailing address for Maremont
24 Corporation as a place in Columbus, Indiana.

Page 132

1 Do you know anything about Maremont's
2 activities in Columbus, Indiana?

3 A. I believe that is where their current
4 official address is.

5 Q. Do you know why they would have an
6 official address there and their corporate
7 headquarters in Chicago, or has their corporate
8 headquarters changed?

9 A. I believe the corporate headquarters
10 changed when Maremont was purchased by Arvin who
11 was located in Columbus, Indiana.

12 Q. Okay. Well, that's something else I need
13 to follow up real briefly with you on then. You
14 worked for Maremont from '73 to '77 and then
15 Maremont sold out certain activities to Nuturn?

16 A. That's correct.

17 Q. But you have been able to keep up to some
18 degree with respect to Maremont's corporate
19 activities since then I take it?

20 A. I have.

21 Q. Could you briefly tell us what happened
22 to Maremont after '77?

23 A. I certainly kept up only on a very casual
24 basis. I just know that Maremont was acquired by

Page 133

1 Arvin.
 2 Q. What is Arvin?
 3 A. Arvin --
 4 Q. Harvin?
 5 A. A-r-v-i-n.
 6 Q. What does Arvin do, if you know?
 7 A. Automotive parts, shocks and exhausts.
 8 Q. Do you know about when this took place?
 9 A. No, I don't.
 10 Q. And you believe them to be a Columbus,
 11 Indiana, principally located facility?
 12 A. Yes, I do.
 13 Q. Were they ever competitors of Maremont
 14 with respect to any friction product lines?
 15 A. No, they were not.
 16 Q. I take it they -- I was going to say I'm
 17 presuming. Did they have preexisting shock and
 18 exhaust systems before acquiring Maremont?
 19 A. Yes, they did.
 20 Q. Is there still a Chicago facility for
 21 Maremont, do you know one way or the other?
 22 A. I don't know.
 23 Q. We had also asked Maremont to list for us
 24 a number of the different products that they had

Page 134

1 manufactured that had asbestos in them. Let me
 2 read the names to you.
 3 You mentioned Grizzly, correct?
 4 A. Correct.
 5 Q. There was a product line called Ultra.
 6 Were you familiar with Ultra?
 7 A. Yes.
 8 Q. What was that?
 9 A. That was a brand of brake lining.
 10 Q. What years was it manufactured?
 11 A. I don't recall.
 12 Q. During your tenure?
 13 A. Yes.
 14 Q. Duration of your tenure?
 15 A. Yes.
 16 Q. Both at Maremont as well as Nuturn?
 17 A. Yes.
 18 Q. Was that product sold to the retail
 19 sector or to Sears or where?
 20 A. Primarily to the rebuilder market.
 21 Q. What distinguished it from the other
 22 product lines you've already described for us?
 23 A. It's just one more. I mentioned there
 24 were several brands. I couldn't recall all of the

Page 135

1 brands.
 2 You want to refresh my memory perhaps I
 3 can tell you whether or not I remember them.
 4 Q. That's kind of what we are doing here I
 5 think.
 6 A. Okay.
 7 Q. Leland.
 8 A. That was a group of metal parts that were
 9 sold for heavy duty trucks.
 10 Q. Do you know what would have contained
 11 asbestos on those metal parts?
 12 A. I don't think anything would.
 13 Q. If Maremont provided answers to discovery
 14 that Leland -- some Leland parts did contain
 15 asbestos, I take it that's news to you?
 16 MR. CANONI: Objection as to form.
 17 THE WITNESS: To the best of my knowledge the
 18 heavy duty group distributed Grizzly and Leland.
 19 Grizzly was the umbrella group for all of their
 20 friction materials and Leland was the group for
 21 their spring brakes and shock absorber parts and
 22 cam shafts.
 23 BY MR. COON:
 24 Q. Where did those come out of?

Page 136

1 A. They were all purchased and resold.
 2 Q. Was that a rebranded product?
 3 A. I don't know if rebrand would be the
 4 right description, but they didn't make any of
 5 them. They bought them from other sources and then
 6 just sold them in a Leland catalogue.
 7 Q. Was Leland a national supplier of some
 8 sort?
 9 A. Leland was a nationally-recognized source
 10 for the suspension and brake parts that went under
 11 a truck.
 12 Q. What about Hyper, H-y-p-e-r?
 13 A. Hyper would be another brand of friction
 14 material.
 15 Q. Manufactured in?
 16 A. Paulding, Ohio.
 17 Q. Was this for again the linings and pads,
 18 clutches?
 19 A. I don't remember -- yes -- which ones
 20 were for truck block and which ones were for
 21 passenger cars.
 22 Q. And you told us about the All-In-One and
 23 Over-The-Counters.
 24 Saftigrip?

Page 137

Page 139

1 A. That's another brand of friction lining.
 2 Q. Manufactured in Paulding?
 3 A. Correct.
 4 Q. Again any distinguishing characteristics
 5 of that product line?
 6 A. None that I can recall.
 7 Q. Made during the duration of your tenure
 8 there?
 9 A. Yes, they were.
 10 Q. DD Silvertip?
 11 A. Another brand of brake lining.
 12 Q. Any distinguishing characteristics, low
 13 end, high end or certain product lines?
 14 A. I don't recall.
 15 Q. X-T Woven?
 16 A. X-T Woven would have been one of the
 17 clutch facings.
 18 Q. Manufactured in Paulding?
 19 A. Correct.
 20 Q. Again duration of your employment?
 21 A. Yes, it was.
 22 Q. Any specific product lines?
 23 A. Clutch facings.
 24 Q. I'm sorry, for particular products, like

1 Q. You mentioned the Brake-In-A-Box. You
 2 mentioned Cherry Bomb. Those were mufflers,
 3 correct?
 4 A. That's correct.
 5 Q. Were these the type that would replace a
 6 muffler and screw onto an exhaust pipe?
 7 A. They would replace a muffler. I don't
 8 believe they screwed onto an exhaust pipe.
 9 Q. And Maremont, did Maremont have some
 10 brake product lines that were under their own name?
 11 A. No, they did not.
 12 Q. There were questions asked of Maremont
 13 with respect to the asbestos composition of their
 14 products and they indicated that a number had 32 to
 15 65 percent composition in the friction material.
 16 Is that consistent with your history or
 17 recollection?
 18 A. Yes, it is.
 19 Q. And there were a number of different
 20 asbestos categories. That's a 5R, a 6D, 7D, 7M and
 21 8T.
 22 Were these again the grades that you were
 23 talking about earlier?
 24 A. Those would be consistent with what I

Page 138

Page 140

1 cars, trucks, heavy equipment?
 2 A. Virtually all of their clutch facings
 3 were for passenger cars or light duty trucks.
 4 Q. Syncro, S-y-n-c-r-o?
 5 A. Friction material.
 6 Q. Again in Paulding?
 7 A. Yes.
 8 Q. Again duration of your employment?
 9 A. Yes, it was.
 10 Q. Anything specific about that product?
 11 A. Not that I can recall.
 12 Q. SS Metallic?
 13 A. Another brand of friction materials made
 14 in Paulding during my tenure. Specifics I can't
 15 recall.
 16 Q. Tru-Gard?
 17 A. Another brand of friction material made
 18 in Paulding during my tenure. Specifics of which I
 19 can't recall.
 20 Q. Saftibond?
 21 A. Another brand of friction material, same
 22 as the previous two.
 23 Q. The Stop Box.
 24 A. I don't recall The Stop Box.

1 recall about the grades we purchased.
 2 Q. As I understand it from your testimony
 3 you think that one of the major distinctions from
 4 the grade dealt with the fiber length?
 5 A. That's correct.
 6 Q. They also mentioned that they made some
 7 asbestos -- well, actually they used asbestos
 8 papers that were not manufactured by Maremont but
 9 were used on certain muffler products.
 10 Do you know anything about the asbestos
 11 papers for the muffler division?
 12 A. It's my understanding that they did use
 13 asbestos-containing papers in some mufflers for
 14 some period of time.
 15 Q. Do you know if that would have been the
 16 Cherry Bombs or some other ones?
 17 A. I don't know.
 18 Q. Do you know where they acquired their
 19 asbestos-containing papers for use in the mufflers?
 20 A. No, I don't.
 21 Q. Did you know any of the guys that worked
 22 in the design and engineering departments?
 23 A. Design and engineering departments of
 24 what?

Page 141

Page 143

1 Q. Of Maremont for their friction product
 2 lines.
 3 A. Yes, I did.
 4 Q. Who were the guys that you recall being
 5 out there when you were there?
 6 A. Frank Skelton and Steve Wyss.
 7 Q. That's W-y-s-s?
 8 A. That's right. I think so.
 9 Q. Do you know who designed -- let me
 10 backup. The friction materials that were sold to
 11 the companies that used it to make the rebuilt
 12 brake kits, do you know how those products were
 13 shipped to them?
 14 A. Yes, I do.
 15 Q. Could you tell me about that please, sir?
 16 A. Typically a number of linings would be
 17 nestled one against the other and put in a box. I
 18 don't recall the exact quantities. It could have
 19 been from 10 to 50 sticks of lining in a box and
 20 they would be put in a larger box, a master box and
 21 shipped to the different rebuilders.
 22 Q. And this would be from the Paulding
 23 facility?
 24 A. That's right.

Page 142

1 Q. Did the Paulding facility -- let me ask
 2 you first. With respect to the brake linings,
 3 we're talking about a friction material that's got
 4 a curve to it --
 5 A. That's right.
 6 Q. -- kind of comport to the drum of the
 7 wheel?
 8 A. Or the shoe.
 9 Q. Or the shoe. And with those products was
 10 the Maremont facility where they manufactured
 11 those, were they able to preform those or did they
 12 have to go through some process where they were
 13 shaped in some fashion?
 14 A. Well, all linings were made with an arc
 15 to them so that they would approximate the arc of
 16 the brake shoe.
 17 Q. Was there any finishing that was required
 18 once you had a basic arc to go back and make sure
 19 that it properly fit the shoes that they were made
 20 to go on?
 21 A. Yes, they were.
 22 Q. Was this done on some kind of grinding or
 23 sanding apparatus?
 24 A. Yes, it was.

1 Q. Could you tell me just briefly if you
 2 were to walk through the Paulding facility how that
 3 manufacturing process took place from raw material
 4 --
 5 MR. CANONI: The finishing part of it?
 6 BY MR. COON:
 7 Q. Yes. First from the raw products coming
 8 in and you go through blending. You've got specs
 9 on how to blend them, correct?
 10 A. That's correct.
 11 Q. They showed you which asbestos type to
 12 use in terms of the grade and the composition of
 13 the resin and binders?
 14 A. You had a recipe.
 15 Q. And you take that recipe and you make the
 16 product?
 17 A. That's correct.
 18 Q. And once you make the product, is that
 19 all done in like big vats or hoppers?
 20 A. It's done in large mixers.
 21 Q. And once the ingredients are all mixed up
 22 what was the next process in the formulation of the
 23 final product?
 24 A. Depends on which type of lining you're

Page 144

1 talking about. Some were oil-based and some were
 2 resin-based.
 3 Q. Why did it matter whether it was oil- or
 4 resin-based?
 5 A. The oil-based linings were less expensive
 6 and the resin-based linings were more expensive but
 7 had better performance.
 8 Q. And what differed with respect to the
 9 process in which the products were made if they
 10 contained oil or resin?
 11 A. The oil-based linings were extruded.
 12 Q. I'm sorry, what's meant by that?
 13 A. You have an auger that takes a mixture
 14 and forces it through a die. Like you would
 15 squeeze toothpaste out of a tube, you're extruding
 16 the toothpaste out and it comes out in a round
 17 shape.
 18 Well, if you had a square end on there
 19 you could extrude a square shape and we had a
 20 rectangular die that you would use an auger that
 21 would force the oil-based mixture at high pressure
 22 through a die. It would make a roll, maybe 25 feet
 23 long, you would put that on a rack and move it to
 24 an oven. You would cure it in that oven.

Page 145

Page 147

1 You would then take that cured roll and
2 put it into a saw and it would cut it off in 6 to
3 12 inch segments.

4 Those segments would then go through a
5 machine that extruded an adhesive onto the back.
6 That would then go through an oven that would cure
7 the adhesive so they wouldn't stick to each other
8 and they would then be put in a box and shipped to
9 the rebuilder.

10 Q. So at some point you would end up with
11 something that's more or less a rectangular-shaped
12 block?

13 A. It would be very similar to me cutting
14 off two inches of this pad right here and curving
15 it like that. That's what it would look like.

16 Q. So the product at that stage was still
17 malleable enough to get a curve to it without --

18 A. It was when it was extruded. After it
19 went through the oven it was much more rigid. It
20 still had some flexibility to it, but now it was
21 stiff and then it would be cut to length and have
22 the adhesive put on it.

23 Q. So you had a rectangle. Would this be a
24 rectangle, kind of like maybe a board would be like

Page 146

1 a 2 by 12 beam or something?

2 A. No. This rectangle is about a quarter of
3 an inch thick, 2 inches wide and 12 inches long.
4 That's typical.

5 Some would be as narrow as an inch, some
6 might be as wide as 3 inches, some would be as
7 short as 6 inches, some would be as long as 12 to
8 14 inches.

9 Q. So generally it would come out as kind of
10 a long, thin plank that would be cut into sections?

11 A. That's correct.

12 Q. And these sections would be generally the
13 width that you wanted to use for the actual brake
14 lining?

15 A. That's correct.

16 Q. And you were -- they were still -- the
17 product was malleable enough at that point to put a
18 curve to it that would be relatively representative
19 of the fit on the brake shoe?

20 A. Well, it was extruded such that it did
21 have a curve and it would be coiled up and big
22 coils would be cured so that as it cured it already
23 had a coil preset to it.

24 Q. And then once it got into the ovens the

1 product hardened?

2 A. It cured, yes.

3 Q. And then you had some minor ability to
4 flex a product a little more for final form at that
5 time?

6 A. That's correct.

7 Q. And then after that was there still some
8 grinding or shaping that needed to take place to
9 get you to the exact dimensions you needed?

10 A. Not at Paulding, Ohio. That would be
11 done by the rebuilder or the Allied Drive facility
12 in Nashville.

13 Q. So at the Paulding facility they just did
14 the cutting to get your sections?

15 A. Of the oil-based linings.

16 Q. But there was no final grinding or
17 sanding to get the final fit?

18 A. That's correct.

19 Q. That really needed to be done when you
20 had the shoe to make sure you had true proper
21 conformance?

22 A. Actually it needed to be done after the
23 drum had been turned and you knew the exact inside
24 diameter of the drum that you were trying to fit.

Page 148

1 Q. Briefly what -- and that's for telling us
2 about the oil-based process. How did the resin-
3 based process work?

4 A. Resin-based was different in that after
5 it was extruded it was cut, it was then put in
6 molds and cured, and it was not very flexible.

7 MR. COON: This is a good place to break.

8 THE VIDEOGRAPHER: Off the record, 2:44.

9 (Whereupon, a break was taken
10 from 2:44 until 3:02 p.m.)

11 (Whereupon, Ms. Lisa Brown
12 exited the deposition proceedings.)

13 THE VIDEOGRAPHER: On the record, 3:02.

14 BY MR. COON:

15 Q. Mr. Liggett, we have gone through some of
16 the documents that were produced to us from
17 Maremont and some of them talked about a company --
18 let me find it here. I thought I had the right
19 one. It's a new Venezuelan trademark application.

20 Do you know anything about efforts by
21 Maremont or Nuturn to take products that they were
22 manufacturing in America and sell those abroad?

23 A. No, I don't.

24 Q. Do you know whether or not Maremont or

Page 149

Page 151

1 Nuturn had any manufacturing facilities or assembly
2 facilities or distribution facilities outside the
3 United States?

4 A. Are you asking if Maremont or Nuturn had
5 any facilities outside the United States?

6 Q. Yes, sir, involved in the manufacturing
7 or distribution of anything that contained
8 asbestos?

9 A. Not that I'm aware of.

10 Q. Do you know anything about any activities
11 in Venezuela?

12 A. No, I do not.

13 Q. Did you know a Mr. John Mills at
14 Maremont?

15 A. I did not personally know him. I
16 recognize the name.

17 Q. Do you know who he was?

18 A. I believe he was in the legal department.

19 Q. Any reason that you know of why Maremont
20 would have been registering the Grizzly trademarks
21 in other countries?

22 A. No, I wouldn't.

23 Q. Do you know if there were any efforts
24 during the years of your tenure for any companies

Page 150

1 outside the United States to manufacture products
2 with the same trademarks as Maremont or Nuturn had
3 for sale either in other countries or in the United
4 States?

5 A. I'm not personally aware of that.

6 Q. Did you hear of anything like that?

7 A. No, I didn't.

8 Q. We were also provided some brochures.
9 And Counsel, this is one marked 3162 sequentially,
10 it's a Leland quality parts.

11 And you mentioned them earlier I believe
12 in your testimony, didn't you, sir?

13 A. Yes, I did.

14 Q. They listed parts for axles, brakes and
15 wheels for use on trucks, tractors, trailers and
16 buses. That's kind of broad categories. But first
17 let me ask you, as I recalled Maremont owned the
18 Leland product line?

19 A. That's correct.

20 Q. Was Leland in business for itself before
21 Maremont acquired it?

22 A. I don't know.

23 Q. Do you know when it was acquired or if it
24 even was an acquired business?

1 A. No, I don't know.

2 Q. You don't know if Maremont just created
3 it as a separate subsidiary or separate line of
4 products?

5 A. I don't know that.

6 Q. Anything about when it came into
7 existence or when it ended its existence?

8 A. No, I don't know.

9 Q. Do you know anything about the products
10 that they manufactured under the Leland names?

11 MR. CANONI: Objection as to form.

12 THE WITNESS: I don't believe they
13 manufactured any parts under the Leland name. I
14 think they bought those and redistributed them.

15 BY MR. COON:

16 Q. I think we talked about that a little bit
17 earlier. Was there a redistribution under any kind
18 of rebranding where they acquired stuff and put any
19 of the Maremont trademarks or names on it and then
20 resold them or put them back into the marketplace?

21 A. To the best of my knowledge they did not
22 try to put a brand or trademark on it. They were
23 just a company that brought together from many
24 sources these parts and you could now go to one

Page 152

1 source to get the parts for under your truck.

2 Q. Do you know whether or not Maremont or
3 Nuturn rebranded any other company's friction
4 materials or brake assemblies?

5 MR. CANONI: Objection as to form.

6 THE WITNESS: Say that again please.

7 BY MR. COON:

8 Q. Yes, sir. Do you know whether or not
9 Maremont or Nuturn ever engaged in the practice of
10 what I call rebranding, that is they would take
11 products that they manufactured, say the Paulding
12 facility on the friction materials, you told us
13 about all the different trade names of the friction
14 materials that came out of there, correct?

15 A. Okay.

16 Q. Did they ever take those same product
17 lines that came out of the Paulding facility and
18 allow some other company to call those products
19 that came out of that facility their own products?
20 For instance, give me one of your competitor's
21 names again.

22 A. Bendix.

23 Q. Okay, Bendix. Somebody like Bendix where
24 they make arrangements for the Paulding facility to

Page 153

Page 155

1 make friction materials and then allowed Bendix to
2 put the Bendix name or logos on it. Any kind of
3 agreements like that with anyone?

4 A. I'm not aware of any.

5 Q. The reverse of that; are you aware of any
6 circumstances where Bendix or some other company
7 that was in the business of making friction
8 materials allowed or had some sort of agreement,
9 either written or otherwise, with Maremont or
10 Nuturn in which that company made the product and
11 allowed Maremont or Nuturn to put their names or
12 trademarks on them?

13 A. Not that I'm aware of.

14 MR. CANONI: Other than what he's already
15 testified to?

16 MR. COON: I'm trying to remember any
17 examples.

18 MR. CANONI: Testified at least to Lear
19 Seigler.

20 BY MR. COON:

21 Q. Yeah, Lear Seigler. Anything other than
22 that?

23 A. Well, in that situation we would just be
24 selling brakes that had their lining on it. We

Page 154

Page 156

1 wouldn't change the Lear Seigler identification to
2 one of our own.

3 Q. Was Lear Seigler identified in any way on
4 those products?

5 A. Typically on the edge brand the
6 manufacturer would be identified.

7 Q. When you shipped out the friction
8 materials from the Paulding facility what
9 identifying marks were there on the product itself?

10 A. The edge brand had an MG.

11 Q. What do you mean the edge brand?

12 MR. CANONI: Do you mean edge code?

13 THE WITNESS: Edge code.

14 BY MR. COON:

15 Q. What do you mean by the edge code?

16 A. As you extrude this there was a little
17 wheel that imprinted an indented -- or printed mark
18 on the edge of the lining so that if you held a
19 shoe up and looked at the edge of it you could tell
20 what friction characteristics it was and who made
21 it.

22 Q. What would typically be on that edge?
23 Would the trademark be on there?

24 A. No.

1 Q. Would the trade name be on there?

2 A. No.

3 Q. Just code numbers?

4 A. Just some code letters.

5 Q. And for a lay person how would you
6 distinguish one company's friction material from
7 another with those code numbers?

8 A. There is an organization called FMSI,
9 Friction Material Standard Institute, and each
10 manufacturer would register their code with them.

11 Q. And what was the purpose of doing this?

12 A. So that you could tell whether or not you
13 made the lining.

14 Q. And what was the purpose of being able to
15 determine whether you made the lining once it got
16 into the marketplace?

17 A. I guess just so if there was -- someone
18 said that your lining didn't stop their car you
19 could look at it and see if it was yours.

20 Q. Okay. That would be from a product
21 defect standpoint?

22 A. I would assume.

23 Q. Any other examples of reasons you would
24 think that you would have this coding on the edge

1 of the brake shoe or disc?

2 A. It gave the friction characteristics so a
3 mechanic that was familiar could tell if you were
4 putting high performance or low performance
5 products on a given vehicle.

6 Q. From the standpoint of replacement, could
7 a mechanic look at the disc, or say the brake
8 lining when he takes the drum off and disassembles
9 it, can he look at the edge?

10 Is there still enough material there
11 typically to look at the edge and determine the
12 characteristics that you just described for
13 replacement purposes?

14 A. At some point there is no longer enough
15 left to see it.

16 Q. That's just because of the grinding of
17 the brake lining, as it gets to the point of repair
18 the coding's been worn off just like the rest of
19 the lining's been worn off?

20 A. That's correct.

21 Q. So from the standpoint of a replacement
22 it typically is difficult for the mechanic to look
23 at the edge of the lining and determine from it

24 what the proper replacement product would be if he

Page 157

Page 159

1 was just trying to get as close as he could to the
2 same quality of lining as was on there originally?

3 MR. CANONI: Objection as to form.

4 THE WITNESS: That's probably correct.

5 BY MR. COON:

6 Q. With respect to the original equipment,
7 were there catalogues that provided the specific
8 information on the quality and characteristics of
9 the OEM brake lining?

10 A. No, not the quality characteristics, just
11 the friction characteristics.

12 Q. Was Maremont or Nuturn ever involved in
13 any kind of rebranding agreement just with the
14 manufacturers where, for instance, if someone were
15 to go to a Chevy dealer with a Chevy vehicle and
16 want genuine Chevrolet or genuine GM replacement
17 parts, did any of those replacement parts for GM,
18 Ford, Chrysler, any of the manufacturers ever come
19 from Maremont or Nuturn?

20 A. Maremont did not sell to the original
21 equipment or the original replacement market.

22 Q. And I take it then as I understand how
23 this worked it would be unlikely for Maremont or
24 Nuturn to have their friction materials on brake

Page 158

1 linings that went on to replacement vehicles where
2 the replacement was through a name identified with
3 the original equipment such as Motorcraft, Mopar or
4 General Motors?

5 A. If you're asking did Maremont's products
6 ever end up with those trade names, the answer
7 would be no, they did not.

8 Q. It had to be because the only time you
9 all were selling just the friction material was to
10 companies that were doing the rebuilt kits?

11 A. Maremont was never sophisticated enough
12 in its technology or large enough in its
13 manufacturing volume to handle accounts of that
14 size.

15 Q. Okay. I'm just trying to work through
16 that process though as well. The friction
17 materials that were made at the Paulding facility
18 went on products that were in the rebuilt kit
19 market?

20 A. That's correct.

21 Q. And to your knowledge were any of the
22 major manufacturers ever involved in purchasing
23 rebuilt kits to sell as new replacement parts for
24 their vehicles?

1 A. Not to my knowledge.

2 Q. The only time to your knowledge Maremont
3 or Nuturn was involved in actual assembly of their
4 products where they went on as a new kit was in
5 their dealings with Sears?

6 A. That's when they went on a new brake shoe

7 --

8 Q. Yes, sir.

9 A. -- but for Sears Service Centers those
10 were not sold to Ford or Chevy dealerships.

11 Q. Was anything on the kits that were made
12 for the Sears product lines that we've been talking
13 about, did they ever have markings on them that
14 indicated it was a Maremont or Nuturn product or a
15 Sears product or did they come in an unidentified
16 box? What kind of labeling was involved?

17 A. I'm confused what you're asking.

18 Q. Yes, sir. The boxes that you told us the
19 assembled kits were put in at the Nashville
20 facility for distribution to the Sears repair
21 centers under this replenishment agreement --

22 A. Right.

23 Q. -- did they go in a certain shape or
24 color box that identified it as being a Sears

Page 160

1 product line or a Maremont or Nuturn product line?

2 A. They went as a Sears product line.

3 Q. Was Nuturn or Maremont logo'd or
4 trademark identification characteristics on the box
5 on the outside, on the inside, on instructions or
6 on any of the pieces of the assembled product or
7 even the disassembled parts?

8 MR. CANONI: Objection as to form.

9 THE WITNESS: For Sears?

10 BY MR. COON:

11 Q. Yes, sir, for the ones that went to
12 Sears.

13 A. No, they weren't.

14 Q. So if you went to Sears and got one of
15 these Sears mechanics to do the complete brake shoe
16 replacement and they opened up the box, unless they
17 knew the arrangements between Sears and Maremont
18 they wouldn't have anything in the box to indicate
19 to them who the actual manufacturer of the product
20 was or who assembled the product?

21 A. That's correct.

22 Q. Do you know of any reasons that Sears
23 would have wanted to have their identifying names
24 or logos on the products since you all had an

Page 161

Page 163

1 arrangement where these were for the kits just sold
2 to the Sears center for replacement to a customer's
3 car any way?

4 MR. CANONI: Objection as to form.

5 BY MR. COON:

6 Q. Do you understand what I mean?

7 A. I'm confused.

8 Q. Yes, sir. Well, if the Sears customer
9 went to a Sears store to get the brake shoes
10 replaced --

11 A. Right.

12 Q. -- where he wants Sears mechanics to do
13 it --

14 A. Right.

15 Q. -- he's not going to go up to a parts
16 counter and pick out the company's parts that he
17 wants to be put on there, correct?

18 A. That's correct.

19 Q. He can't go up there and say I want the
20 Bendix brakes put on the car, right?

21 A. That's right.

22 Q. He just goes in to get his brakes
23 replaced.

24 A. That's right.

Page 162

Page 164

1 Q. He doesn't have a clue who actually
2 manufacturers the brakes.

3 A. That's right.

4 Q. And he doesn't really have a choice in
5 the matter, correct?

6 A. That's correct.

7 Q. He just goes in and he gets whatever they
8 use, and what Sears used was your product?

9 A. That's right.

10 MR. CANONI: Objection as to form.

11 BY MR. COON:

12 Q. Is that correct?

13 A. I think so.

14 Q. Under most circumstances. You explained
15 for us I think sometimes it did not occur. But for
16 the most part that's the way it worked.

17 So in that scenario the customer isn't
18 picking up off the shelf, is he, the product he
19 wants to apply.

20 He's not going to say I go to this wall
21 and I pick out brake shoes that are for my vehicle
22 and now I recognize that Sears trade name so I'm
23 going to pick them out and give them to the
24 mechanic to put on my car.

1 He's not involved in picking out the
2 product at all, is he?

3 A. I don't think so.

4 Q. Typically he just goes in and says I need
5 new brakes?

6 A. I'm trying to compare this if I went to
7 Sears to buy a battery and I want a Sears Die Hard
8 battery. I don't know who makes the Sears Die Hard
9 battery. I don't know if that's made by one
10 company or four different companies or different
11 levels, I just go get a Sears Die Hard.

12 I think that's what people did, they went
13 to get Sears brakes for their car.

14 Q. Right. And when we're talking Die Hard
15 that's a trade name that has identifying
16 characteristics to the customer, right?

17 A. That's true.

18 Q. In terms of durability. It has a
19 reputation for being a good battery?

20 A. It has a reputation for being a Sears
21 battery.

22 Q. Right. And it's a Die Hard battery.
23 Sears makes other batteries too, or sold other
24 batteries, did they not?

1 A. I don't think so, but I don't know.

2 Q. Okay. With respect to the brake shoes
3 where they go in there and say I want a particular
4 trade name of brake shoe, like I want a Sears
5 Grizzly brake shoe.

6 A. I don't understand the question.

7 Q. You have batteries that have a trade name
8 of Die Hard.

9 A. Okay.

10 Q. The brake shoes and other parts that were
11 sold to the Sears stores for application on a
12 customer's vehicle did not have a trademark name?

13 A. That's correct.

14 Q. So they can't go in there and say for
15 instance all of these different names that you told
16 us earlier were the trade names of the friction
17 materials or brake shoes that were sold or
18 assembled by Maremont and Nuturn, like Grizzly,
19 those were your identifying trade names, right?

20 A. They were sold by Maremont primarily to
21 the rebuilder market where the rebuilder could
22 identify with these different brands.

23 Q. Sure.

24 A. What was sold to Sears was a set of

Page 165

Page 167

1 brakes, period.

2 Q. And they may be Grizzly or one of the
3 other names you gave us, but from the customer's
4 standpoint they would have no clue?

5 A. That's correct.

6 Q. And on the boxes themselves were no
7 identifying characteristics or logos or trademarks
8 of Maremont or Nuturn in terms of which product was
9 being provided, correct?

10 A. That's correct.

11 Q. Just said Sears?

12 A. That's correct.

13 Q. Do you recall anything else that would
14 have been contained on the box other than
15 information identifying them as Sears products?

16 A. As far as logos or trademarks?

17 Q. Sure, anything. What would a typical box
18 look like?

19 Mechanic goes and pulls it out, I guess
20 you would have to have information showing some
21 kind of part number to identify it as fitting on a
22 certain type of vehicle, make and model, correct?

23 A. That's correct.

24 Q. Anything else other than the name?

Page 166

1 A. There would be a date code.

2 Q. And what would the date code reflect,
3 when it was manufactured?

4 A. The month and year it was manufactured,
5 assembled.

6 Q. Is there any relevance to that in terms
7 of the longevity of the product?

8 A. Just so if there was ever a problem you
9 would be able to identify the time period --

10 Q. It's not like milk --

11 A. -- that it was assembled.

12 Q. -- there's no expiration date on them, is
13 there?

14 A. No, there is not.

15 Q. Okay. So it's just to be able to
16 identify to go back to a patch in time when a
17 product was made if there was a problem?

18 A. That's correct.

19 Q. Quality control issues?

20 A. That's correct.

21 Q. Anything else you can think of?

22 A. There was a warning that the product
23 contained asbestos fibers.

24 Q. We're going to talk about that a little

1 more. You got the warning. Anything else?

2 A. There was probably a mileage guarantee on
3 some of them.

4 Q. Do you recall what the mileage guarantees
5 typically would have been with the different types
6 of products?

7 A. I believe the oil-based lining was 25,000
8 miles and the resin-based lining was 40,000 miles.

9 Q. Let me ask you this. First, anything
10 else that you can recall on the boxes?

11 A. Nothing I can recall right now.

12 Q. We were also provided with a Sears
13 brochure, it's called The Story Of A Quality
14 Lining, Sears S-40 Brake Shoes. Does S-40 have any
15 type of relevance to you?

16 A. I can't recall exactly.

17 Q. Do you know whether or not Sears had more
18 than one name or trademark or whatever you want to
19 call it for their product lines other than S-40?

20 A. Well, they had the 40,000 mile resin-
21 based product that was used in their service center
22 for the complete brake job, they had the 25,000
23 mile Over-The-Counter for the do-it-yourselfer.

24 Q. Do you know if the S-40 indicates that's

Page 168

1 the 40,000 mile product?

2 A. You know, I don't recall, but that would
3 seem logical.

4 Q. Let me show you this briefly. Have you
5 seen this?

6 Counsel, this is 1436 and sequential
7 pages.

8 Have you seen that kind of brochure
9 before?

10 A. I have seen this document, but I have
11 never read all of it.

12 Q. Okay. Do you know why Sears would have a
13 sales brochure that to me would appear to be
14 something that would be sent out to other people to
15 promote sales?

16 MR. CANONI: Objection as to form.

17 THE WITNESS: Ask that again.

18 BY MR. COON:

19 Q. Yes, sir. I'm just trying to
20 understand. We have a Sears catalogue here that
21 talks about one of the product line. We again
22 would presume this to be something that actually
23 came from Nuturn or Maremont, right?

24 A. Okay.

Page 169

Page 171

1 MR. CANONI: Objection as to form.
 2 BY MR. COON:
 3 Q. The -- it goes into talking about the
 4 product and how it's made, manufactured and
 5 everything.
 6 First, do you have any clue as to who
 7 this type of brochure would have been intended for?
 8 A. Yes, I do.
 9 Q. Who would that have been?
 10 A. The people that were trying to talk
 11 customers into getting a complete brake job instead
 12 of just buying the Over-The-Counter do-it-yourself
 13 shoes.
 14 Q. So if a guy wanted to come in for the
 15 inexpensive brake job that would just involve
 16 replacing the shoes, they might be talked into
 17 getting the higher end product line and the
 18 complete product line after looking at additional
 19 information?
 20 A. After being told additional information
 21 by a mechanic or sales representative who had been
 22 trained in the differences and the features of the
 23 two products.
 24 Q. Do you know how the compensation systems

Page 170

Page 172

1 worked for the Sears mechanics or people who worked
 2 in those departments?
 3 A. No, I don't know.
 4 Q. Do you know if they were flat-salaried
 5 folks or if they worked on commissions or a
 6 combination?
 7 A. I don't know.
 8 Q. Did you have anything to do with the
 9 putting together of this type of brochure?
 10 A. No, I did not.
 11 Q. Do you know whether or not folks at
 12 Maremont or Nuturn assisted Sears in putting this
 13 information together?
 14 A. I don't know who did that.
 15 Q. All these pictures in here appear to be
 16 pictures of the manufacturing process of the brake
 17 linings as well as some other photos. But Sears,
 18 to your knowledge, did not have their own
 19 manufacturing facility, did they?
 20 A. To the best of my knowledge they did not.
 21 Q. So all these pictures when it talks about
 22 Sears in here, are these pictures of your company?
 23 A. Would you like for me to look at any
 24 particular photo?

1 Q. Sure. Please look at the first page.
 2 It's got Sears stamped on it. Is that a picture of
 3 your company?
 4 A. This is typical of the manufacturing
 5 process at Paulding. That could have been taken at
 6 the Paulding plant.
 7 Q. Okay. And what that would show there is
 8 a large stack of the brake linings?
 9 A. It looks like brake linings that have
 10 been riveted to the brake shoe.
 11 Q. Okay. Now, the riveting to the brake
 12 shoe, did that occur in Paulding or Nashville?
 13 MR. CANONI: Objection as to form.
 14 BY MR. COON:
 15 Q. Or somewhere else?
 16 A. It occurred in both. It occurred in
 17 Paulding prior to that process being moved to the
 18 Allied Drive facility in Nashville, then it
 19 occurred in Nashville.
 20 Q. Well, I lost you there. I thought at
 21 some point we determined that the friction
 22 materials were made but no assembly occurred at the
 23 Paulding facility?
 24 A. I believe I --

1 Q. I might have been mistaken.
 2 A. -- spoke earlier saying they moved that
 3 to Nashville, Tennessee, when they got the Sears
 4 business because the Paulding plant couldn't handle
 5 the increase in volume and it put the assembly in
 6 Tennessee close to where the trucks were running to
 7 pick up the mufflers and the shocks.
 8 Q. Can you tell from that photo if that is
 9 the Paulding facility or possibly the Nashville
 10 facility after the transfer of location occurred?
 11 A. Well, I can't tell for sure it was either
 12 facility. I just know that they did rivet, stack
 13 them on boards and stacked them that way at the
 14 Paulding facility.
 15 Q. And if you look a page or two in I think
 16 there's a couple more photos. Can you identify
 17 that photograph?
 18 A. No, I can't.
 19 Q. Next page?
 20 A. That would be a picture of a Littleford
 21 mixer. That's very typical of how the batches in
 22 Paulding, Ohio, were prepared.
 23 Q. The page on the bottom there, is that
 24 1439?

1 A. Yes, it is.

2 Q. So there is two photos there, the top
3 photo shows -- I tell you what, if you don't mind,
4 could you turn it around, aim it at the camera and
5 explain what that is?

6 A. Both of these photos are consistent with
7 the manufacturing process that occurred in
8 Paulding, Ohio. The top one is a Littleford mixer
9 that's mixing the formula or recipe, the bottom
10 photo shows the linings being put into an oven for
11 curing.

12 Q. So if we look here this would be a -- the
13 lady here would be an operator? I can't tell if
14 that's a lady or gentleman.

15 A. I can't tell either. I think it's a
16 gentleman.

17 Q. That would be one of the operators for
18 the mixer?

19 A. That's correct.

20 Q. And then on the bottom if we can show
21 that for the camera again, this is a gentleman
22 operating a forklift and bringing in a stack of the
23 brake linings?

24 A. That's a rack that the linings would be

1 put on different layers so you could put many
2 linings at one time into the oven and he would pick
3 that rack up with a forklift and take it in and out
4 of the oven.

5 Q. So the doors here, this is what actually
6 opens up into the oven?

7 A. That's correct.

8 Q. And I think there is somebody else
9 standing inside the oven there, so I take it it's
10 not always hot?

11 A. Well, it's cool when you go in, they shut
12 the door, it goes through a predetermined heat
13 cycle, then it's cooled down and then you can open
14 the door and remove the products.

15 Q. Next page showed what's called a
16 dynamometer test of lining. Do you know what that
17 involved?

18 A. Yes, I do.

19 Q. What was that?

20 A. Dynamometer is where you have a large
21 steel wheel that you start turning so it has a lot
22 of inertia and then you use a certain size segment
23 of the lining to stop that wheel and you can
24 measure the coefficient of friction.

1 Q. Which just tells you how well it's going
2 to grab?

3 A. Tells you how well it is going to grab,
4 and also it tells you how much it is going to wear
5 to stop a given amount of energy.

6 Q. And we have two more sets of photos
7 here. If we can again show this for the camera.
8 The bottom two pictures there -- again can you tell
9 if those photos were taken at your Paulding
10 facility or even your Nashville facility?

11 MR. CANONI: The bottom two?

12 BY MR. COON:

13 Q. Any of those photos.

14 A. I can tell you that they were not the
15 Nashville facility. I can tell you that they could
16 be and probably are the Paulding facility, but
17 there's not enough there for me to tell for sure.

18 Q. If we look at the bottom, I take it we
19 have somebody checking the lining inspection
20 process?

21 A. That's correct.

22 Q. That's again a quality control issue?

23 A. That's right.

24 Q. And then there is a gentleman on the

1 right-hand bottom that's called a brake shoe
2 inspector and he's doing the same thing?

3 A. Well, in the photo here the linings have
4 been assembled to the shoe and he is looking at an
5 assembled friction material shoe combination.

6 Q. To make sure all the rivets are in place
7 and that the linings properly adhere to the shoe?

8 A. Whether it's riveted or bonded I can't
9 tell from this photo.

10 Q. Some of both kinds occur?

11 A. That's correct.

12 Q. How were they bonded?

13 A. They were bonded by putting stripes of
14 adhesive on the back of the lining, then the lining
15 was put against a shoe in a device that spread the
16 shoe against a band that would contain the lining
17 so you're clamping the lining to the shoe.

18 It would then go through an oven in a
19 very precise predetermined heat cycle where it
20 would heat up, set the lining and then cool down.

21 Q. And it would essentially bake it onto it?

22 A. That's correct.

23 Q. And another page or two over there, sir,
24 I believe there is a couple more photos.

Page 177

Page 179

1 Again those processes, can you describe
2 for us and identify whether or not they may
3 represent the Paulding facility?

4 A. They could represent the Paulding
5 facility. This shows riveting.

6 Q. If we can show the camera, sir.

7 A. This shows bonding, and this shows the
8 stripes of adhesive being extruded onto the back
9 side of the lining.

10 Q. The top photos, did that show the two
11 different ways that the friction material or the
12 lining can be adhered to the brake shoe?

13 A. Yes, it does.

14 Q. And so the one on the top left would be
15 the process of riveting -- that would be a metal
16 rivet of some sort?

17 A. A brass rivet.

18 Q. A brass rivet where you'd actually use
19 brass rivets to adhere the friction material lining
20 to the brake shoe?

21 A. That's correct.

22 Q. And then the top picture on the right
23 showed that alternative method you just described
24 which was putting the adhesive on and clamping them

Page 178

1 together and putting them in the oven?

2 A. That's correct.

3 Q. And then the bottom it says applying
4 epoxy to lining. And if we look here, are these
5 the individual brake linings?

6 A. Those are the individual friction
7 material segments and you can see the little black
8 stripes of adhesive on here.

9 Q. So that's a picture of the epoxy being
10 applied to the underside of the brake lining when
11 it's going to be attached to the brake shoe?

12 A. The only thing that I'm hesitating on is
13 I'm not sure epoxy is the correct word, even though
14 that's what it says. I'm not sure it was an epoxy
15 adhesive.

16 Q. Maybe a misnomer for the type of adhesive
17 actually used?

18 A. Could be.

19 Q. Does that fairly accurately represent the
20 way the process took place at Paulding?

21 A. Again I did not look at the entire
22 document, but those pictures you and I just
23 discussed are very typical of the Paulding
24 operation.

1 Q. Do you know whether or not Maremont or
2 Nuturn made any kind of little catalogues, sales
3 brochures or pamphlets like these?

4 A. I don't know.

5 Q. Next we have -- this is, Counsel, 4693
6 sequential -- some additional documents that were
7 provided. These are called Grizzly rotary brake
8 blocks. It says Bear For Wear. Was that just a
9 little jingle for the Grizzly product lines, Bear
10 For Wear?

11 A. Not that I'm aware of, but it could be.
12 I would like to see the document.

13 Q. I'll be happy to show it to you. It has
14 E.M. Smith Company in Los Angeles, California. Do
15 you know anything about the E.M. Smith Company?

16 A. I believe E.M. Smith was the forerunner
17 of Grizzly.

18 Q. Okay. You told us earlier you thought
19 there might have been a predecessor to Grizzly. Do
20 you think that might be them?

21 A. I think that might be them.

22 Q. Do you know how long E.M. Smith was in
23 business with the Grizzly product line of brake
24 shoes?

Page 180

1 A. No, I don't.

2 Q. But we do know at some point in time,
3 assuming it was E.M. Smith, it became Grizzly, and
4 later Grizzly was acquired by Maremont?

5 A. I'm presuming E.M. Smith is the
6 predecessor company. I'm not personally aware.

7 Q. Now the acquisition of Grizzly by
8 Maremont, that occurred when? Was that in
9 the '50s?

10 A. To the best of my knowledge that was
11 about 1942.

12 Q. You believe that Maremont acquired
13 Grizzly in the '40s, during World War II?

14 A. No. I believe that in 1942 is when
15 Grizzly moved to Paulding, Ohio.

16 Excuse me, ask your question again.

17 Q. You think that Grizzly relocated their
18 California offices and manufacturing facility to
19 Ohio around '42?

20 A. That's correct.

21 Q. Do you know about what year that Maremont
22 acquired Grizzly?

23 A. I think it was in the 1950s.

24 Q. Have you seen brochures like this before?

Page 181

Page 183

1 A. No, I have not.
 2 MR. CANONI: You mean brochures from the E.M.
 3 Smith Company?
 4 BY MR. COON:
 5 Q. Yes, one like this before.
 6 A. I have not seen that brochure or anything
 7 similar.
 8 Q. It has a picture here, let me just show
 9 you page 2, called the Grizzly rotary brake block.
 10 Is that somewhat representative of the brake blocks
 11 that you've been describing for us today?
 12 A. I'm not personally aware of this
 13 product. I'm looking at it to see if it's used on
 14 truck and automotive or perhaps it could be used in
 15 some industrial application.
 16 Here's one that says for well pulling
 17 machines.
 18 Q. That was another question I was going to
 19 ask you. Were you aware of at any time after
 20 Maremont's acquisition of Grizzly if Maremont, or
 21 later Nuturn, was involved in manufacturing or
 22 assembling any asbestos friction materials for
 23 industries other than automotive? And by
 24 automotive meaning even heavy trucks.

Page 182

1 A. No, I'm not.
 2 Q. Are you aware of them doing so for
 3 tractors or cranes or other type of equipment that
 4 involve the usage of clutches or brakes?
 5 A. I'm not personally aware of it.
 6 Q. In looking over the discovery responses I
 7 talked to you about earlier there is a preliminary
 8 statement given by Maremont that states that
 9 Maremont purchased assets from a company known as
 10 Grizzly Manufacturing in December of 1953. So
 11 maybe that answers the question.
 12 Does that sound pretty consistent with
 13 your memory --
 14 A. Yes, it does.
 15 Q. -- of what you've heard about the
 16 company?
 17 A. What I've heard.
 18 Q. Do you know anything about these blocks
 19 that they are talking about being used in any of
 20 these, what they call these Drawworks? I'm trying
 21 to --
 22 MR. CANONI: Brent, let me just object here.
 23 I mean it's clear from the document that it's not
 24 Maremont. I think the witness has already

1 testified about that.
 2 This would have been years before
 3 Maremont took over the company. I know in the
 4 production there are Maremont Grizzly catalogues
 5 that you can ask him about, but he's not here today
 6 to talk about E.M. Smith Company products.
 7 MR. COON: Okay. I don't have any of those
 8 other ones on me. So if you don't mind, give me
 9 the liberty of just asking him a few questions
 10 here.
 11 MR. CANONI: I just want to make sure that
 12 everybody understands these products were not
 13 necessarily manufactured by Maremont.
 14 MR. COON: Right. We haven't established
 15 whether this witness knows whether or not any of
 16 these product lines continued with Maremont after
 17 their acquisition of Grizzly.
 18 MR. CANONI: No. I think he said he was
 19 familiar that they did not.
 20 MR. COON: Okay. Well, let me ask you --
 21 MR. CANONI: Whatever.
 22 BY MR. COON:
 23 Q. Maybe I didn't understand. With respect
 24 to these, let me first ask you about these blocks.

Page 184

1 Do you know what any of this stuff means over here,
 2 the name of Drawbacks, what those are?
 3 MR. CANONI: Drawworks?
 4 BY MR. COON:
 5 Q. Is it Drawworks? What are Drawworks?
 6 A. I don't know what Drawworks are.
 7 Q. Do you have any understanding of what any
 8 of that information relates to?
 9 A. Here's something that mentions a 46 inch
 10 diameter brake rim and a 54 inch diameter brake
 11 rim. There's no automotive or truck application
 12 that I'm aware of that would even begin to approach
 13 that.
 14 So I don't think it's automotive and I
 15 don't know what that is.
 16 Q. What are the largest typical applications
 17 for these brakes in a passenger or a commercial
 18 vehicle application?
 19 A. 18 to 20 inches.
 20 Q. With these 54 inch diameter brake rims
 21 are we talking about something that could be maybe
 22 extra heavy duty industrial type trucks that are
 23 like in mining operations or anything like that?
 24 A. I don't know what it could be.

Page 185

Page 187

1 Q. Do you know anything about what it
 2 indicates here for these names, what this means,
 3 Acme or America or Beaumont Ironworks?
 4 Does any of that mean anything to you?
 5 A. No, it does not.
 6 Q. Do you know if this means locations or
 7 names of companies or --
 8 A. I truly don't know. I believe that was
 9 probably before I was born.
 10 MR. CANONI: I think there's a column heading
 11 there.
 12 BY MR. COON:
 13 Q. It just says name of Drawworks, but I
 14 don't know what Drawworks is. Do you know if
 15 Drawworks indicates a facility?
 16 A. I don't know.
 17 Q. Do you know what a Drawwork is?
 18 A. No, I don't.
 19 Q. Do you know if Maremont had anything that
 20 they called a Drawwork after they acquired Grizzly?
 21 A. No, I don't.
 22 Q. Was there anything such as a Drawwork in
 23 existence to your knowledge with Maremont or
 24 Nuturn?

Page 186

1 A. I don't know what it means.
 2 MR. COON: John, do you have any clue?
 3 MR. CANONI: I will say that we provided you
 4 with the catalogues that we had and it went back to
 5 the '30s when it was, you know, well prior to
 6 Maremont.
 7 MR. COON: Which I think one of those is.
 8 MR. CANONI: I think it's probably an oil
 9 drilling apparatus, well pulling machines they
 10 have, things like that.
 11 BY MR. COON:
 12 Q. Do you know what a well pulling machine
 13 is?
 14 A. No.
 15 Q. Do you know if they have brakes or
 16 clutches on them?
 17 A. No, I don't.
 18 MR. CANONI: I don't believe that that product
 19 line went with the acquisition, but you have all
 20 the documents that we have.
 21 BY MR. COON:
 22 Q. There's some stuff here, Allis-Chalmers.
 23 Have you heard of them?
 24 A. Yes, I have.

1 Q. How do you know Allis-Chalmers?
 2 A. It's an industrial manufacturing company.
 3 Q. Look at the last page here. Maybe this
 4 will help you a little bit. This is called Grizzly
 5 oil field products, Grizzly rotary brake blocks,
 6 Grizzly full molded brake block linings.
 7 Do you know whether or not those were
 8 made by Maremont?
 9 A. I'm not aware of them supplying anything
 10 to the oil field industry.
 11 Q. Then we have the X-T Woven rotary brake
 12 linings. I think earlier we talked about some type
 13 of X-T brake lining. Is that the same one, do you
 14 know?
 15 MR. CANONI: Objection as to form. He said
 16 clutches.
 17 BY MR. COON:
 18 Q. Was that an X-T clutch earlier?
 19 A. I thought the X-T Woven applied to the
 20 clutch facings.
 21 Q. Do you know whether or not Maremont was
 22 involved in manufacturing any X-T Woven rotary
 23 brake linings at any point, or brake blocks?
 24 A. I'm not familiar with that.

Page 188

1 Q. Do you know if any of these lines were
 2 retained after Maremont acquired Grizzly, the No
 3 Whip Line Savers?
 4 A. No.
 5 Q. Power Flex Rotary Hoses?
 6 A. I don't know.
 7 Q. Red Line Rotary Hoses?
 8 A. I don't know.
 9 Q. Drill pipe protectors or raw edge
 10 beltings?
 11 A. I don't know.
 12 MR. CANONI: Brent, I will say that the E.M.
 13 Smith Company had lines other than friction
 14 products that may have been retained by it after
 15 the transaction.
 16 BY MR. COON:
 17 Q. That was the next question. Do you know
 18 if Maremont acquired all of the assets of Grizzly
 19 or just certain assets?
 20 A. I don't know that.
 21 Q. Next there were a series of photographs
 22 that we were also provided. These are dated --
 23 Bates 7053 I think through 7102, Counsel.
 24 And it looks like it's some kind of slide

Page 189

Page 191

1 show or something. Have you seen that set of
 2 documents before?
 3 A. No, I have not.
 4 MR. CANONI: Do you want him to look through
 5 it?
 6 BY MR. COON:
 7 Q. Just briefly. Do any of the photos look
 8 familiar to you?
 9 A. Yes, they do.
 10 Q. Can you tell us what they represent?
 11 A. There is a photo here of the Grizzly
 12 plant in Paulding, Ohio.
 13 Q. This is one that Maremont acquired in
 14 '53?
 15 MR. CANONI: Yeah. It's on page 7055.
 16 BY MR. COON:
 17 Q. Okay. And then what's on the bottom of
 18 that page, worker in a plant?
 19 A. It's a picture of a laboratory, and I
 20 don't know either of the two people and I don't
 21 recall seeing that laboratory.
 22 Q. Well, that's the next question, if you
 23 knew that facility pertained to a laboratory after
 24 it was acquired by Maremont?

Page 190

1 A. Yes, it did.
 2 Q. And what was the purpose of the
 3 laboratory?
 4 A. To test raw materials and to test
 5 production products that were made in the plant.
 6 Q. Would that be for quality control?
 7 A. Yes, it would.
 8 Q. Do you know whether or not any testing
 9 was done of any of the products with respect to the
 10 release of asbestos fibers?
 11 A. No, I don't think it was.
 12 Q. Do you know whether or not there were any
 13 tests ever done with respect to any of the
 14 materials that were used for the friction material
 15 products to see whether or not they pose any kind
 16 of health risk?
 17 A. Help me understand your question.
 18 Q. Yes, sir. You told us earlier about a
 19 number of the different products or the different
 20 ingredients or materials that were used in the
 21 friction materials, correct?
 22 A. Right.
 23 Q. Included asbestos and some resins and
 24 some other binders?

1 A. And friction modifiers.
 2 Q. And friction modifiers. Do you know
 3 whether or not Maremont or later Nuturn tested any
 4 of the friction modifiers, resins or asbestos to
 5 determine for themselves whether or not any of them
 6 appeared to pose some sort of health risk to the
 7 workers or end users?
 8 A. To the best of my knowledge they did
 9 not. And let me add that again Grizzly was a very
 10 small company, not very sophisticated. I don't
 11 believe they would have had the capacity to do that
 12 type of testing.
 13 Q. Do you know whether or not Maremont did
 14 any such activities after their acquisition of the
 15 Grizzly product line up to the time of their sale
 16 to Nuturn?
 17 MR. CANONI: I think that's what he was
 18 referring to.
 19 THE WITNESS: That is what I was referring
 20 to.
 21 MR. CANONI: People will use Grizzly and
 22 Maremont interchangeably because that was the
 23 plant. But his answer previously with this lack of
 24 sophistication and resources was Maremont.

Page 192

1 BY MR. COON:
 2 Q. In looking at this, sir, was there
 3 anything about it that you can tell us what the
 4 intended purpose would have been?
 5 A. Excuse me, I just looked at the first two
 6 or three pages.
 7 Q. Sure. Just thumb through it. We don't
 8 need to spend much time on it.
 9 A. It appears to be talking about how brakes
 10 are made, what brakes do as far as friction.
 11 MR. CANONI: I don't think he wants you to
 12 read the document. He just wants you to tell him
 13 if you know what it was used for.
 14 BY MR. COON:
 15 Q. Do you know if this was a sales aid or an
 16 instructional aid for mechanics or anything about
 17 who put it together or why they put it together?
 18 A. I don't know anything about who put it
 19 together, I don't know why it was put together. It
 20 certainly looks like it would be a good sales
 21 training aid for a brake mechanic.
 22 Q. Pretty much walks you through how you
 23 remove and repair and replace disc brakes?
 24 A. What the components are and how to

Page 193

Page 195

1 inspect them and what they do.

2 Q. Did Maremont ever have a training program
3 for any of the field mechanics to show them how to
4 apply products?

5 A. What are you calling field mechanics?

6 Q. Just anybody outside their own company,
7 people that worked at Sears or elsewhere that would
8 have applied their products.

9 A. Maremont did have a training program for
10 Sears mechanics.

11 Q. How did that work?

12 A. Maremont had field sales representatives
13 that traveled to the different Sears stores and
14 would train them on how to do brake jobs.

15 Q. Was this part of the contractual
16 agreement between Sears and Maremont to be the
17 exclusive provider of the friction -- or the brake
18 shoes for those facilities?

19 MR. CANONI: Objection as to form.

20 THE WITNESS: I think it probably was.

21 BY MR. COON:

22 Q. Was there anything else that you know was
23 involved in the relationship other than the initial
24 training and then the stocking and sale of the

Page 194

1 product lines you've described for us?

2 A. Can you give me some for instance?

3 Q. Joint advertising or cost sharing of
4 advertising, cost sharing or joint activities in
5 the marketing of their products for use in Sears
6 stores or anything like that?

7 A. I'm not aware of that.

8 Q. There was another set of photographs that
9 were provided to us. These are 7103, et cetera.

10 Do you know anything about that series of
11 photographs, sir?

12 Can you tell if those represent
13 photographs of one or more of the Maremont
14 facilities?

15 A. These appear to be photographs of the
16 Paulding, Ohio, manufacturing facility.

17 Q. And in looking at those does it represent
18 the various different sections of the plant and
19 what's entailed in the manufacturing process of the
20 friction materials?

21 A. Yes, it does.

22 Q. Do you know anything about who took the
23 photographs or the purpose of that series of
24 photographs?

1 A. I don't know who took them and I don't

2 know what the purpose would be.

3 Q. They seem to relatively accurately depict
4 the circumstances and conditions of the facility as
5 you observed them in the '70s?

6 A. Yes, they do.

7 Q. At the Paulding facility was there one
8 big building that everyone operated under or were
9 there multiple buildings?

10 A. There were multiple buildings, but they
11 were I believe all connected.

12 Q. In terms of hallways to each one or just
13 extensions or expansions of the existing facility
14 or what?

15 A. That's correct, expansions of existing
16 facilities.

17 Q. Were most of these opened to one another,
18 shared interior wall space?

19 A. The offices were outside the
20 manufacturing facility but connected by halls and
21 doorways. There were test garages and some other
22 disconnected facilities that were all in close
23 proximity to each other.

24 Q. Would it be fair to state that most of

Page 196

1 the manufacturing processes occurred in areas that
2 were contiguous to each other and not separated by
3 complete walls?

4 A. That's correct.

5 Q. And there was just internally I guess
6 some kind of floor planning based on the type of
7 equipment and the stage of process of the assembly
8 or manufacturing?

9 A. That's correct.

10 Q. Again I don't want to spend a lot of
11 time, but could you walk us through just a few of
12 these photographs. If we can have the camera show
13 us here.

14 If you can just kind of hold those up for
15 the camera and look at them maybe upside down and
16 tell us what they appear to be.

17 A. This would look like a truck block that's
18 being inspected.

19 Q. Okay.

20 MR. CANONI: Any particular ones you want him
21 to look at?

22 BY MR. COON:

23 Q. No. Just kind of go through them.

24 What's the second one here?

Page 197

Page 199

1 A. These are brake linings.
 2 Q. Again if we can get it for the camera to
 3 see.
 4 A. And it looks like they're having an arc
 5 put on the outside surface.
 6 Q. Arc being a curve?
 7 A. A grinding of the outside.
 8 Q. And so the gentleman there at the end of
 9 the line is grinding the surface to get a proper
 10 arc?
 11 A. That's what I would presume. I can't
 12 tell for sure.
 13 Q. That's to get the final fit or shape?
 14 A. That's correct.
 15 Q. Is he grinding on the lining of the shoe?
 16 A. Yes, he is.
 17 Q. Okay. Next page, sir?
 18 A. I can't tell what this gentleman is
 19 doing.
 20 Q. Okay.
 21 A. I can't tell what this operation is.
 22 This operation is where a lining is being
 23 drilled for riveted application.
 24 Q. Okay. He's got a large stack. If we can

1 just the opposite side of the rivet.
 2 Q. Okay.
 3 A. That appears to be a disc brake rotor
 4 that's scored.
 5 Q. And what does scored mean?
 6 A. Scored means it's scratched and needs to
 7 be turned.
 8 Q. Okay. You have those machines, machines
 9 have -- mechanics have machines that machine that
 10 back out to a smooth finish?
 11 MR. CANONI: Objection as to form.
 12 THE WITNESS: Yes. Service centers would have
 13 a lathe that would turn that.
 14 BY MR. COON:
 15 Q. And then we have the brake pad at the top
 16 left?
 17 A. That's the disc pad caliper with the disc
 18 pad installed.
 19 Q. And the bolts there would show where the
 20 drum would go back on and affix a tire to the
 21 assembly?
 22 MR. CANONI: Objection as to form.
 23 THE WITNESS: Where the disc would fasten to
 24 the hub, or the rotor would fasten to the hub.

Page 198

Page 200

1 hold it a little more square for the camera. He
 2 has a large stack of the brake linings, several
 3 stacks of them?
 4 A. And he picks up one at a time and puts it
 5 on a fixture with a band that comes around the top
 6 to hold it tight to the fixture and then has a
 7 drill that's drilling two holes at a time.
 8 Q. And how many holes would you drill on
 9 each lining?
 10 A. I don't recall, but probably 4 to 10.
 11 Q. And would the purpose of drilling these
 12 be so that the rivets could then apply the lining
 13 to the brake shoe?
 14 A. Well, the brake shoe has holes for the
 15 rivets so you would want holes in the lining to be
 16 at the same place as the holes in the brake shoes.
 17 Q. That matches them up. And then does a
 18 rivet hold that together?
 19 A. Yes, it does.
 20 Q. And I take it that if you tried to punch
 21 the rivets through without the hole then it would
 22 damage the lining?
 23 A. Well, you couldn't put the rivet through
 24 because you put the rivet through and then form

1 BY MR. COON:
 2 Q. And next page.
 3 A. Shows a drum brake assembled.
 4 Q. Okay. And then we can see the actual --
 5 can you point out the brake shoe and the springs
 6 and how those springs hold that in place?
 7 A. Shoe is out here, this is the wheel
 8 cylinder.
 9 Q. If you can hold that a little more square
 10 for the camera. There we go.
 11 A. Those are return springs and these are
 12 hold-down springs. This is an adjuster to
 13 compensate for wear --
 14 Q. Now the adjuster was something --
 15 A. -- you have to anchor on.
 16 Q. If you point at the bottom, the adjuster
 17 on the bottom had a little wheel and you actually
 18 had a little -- or a little tool that you could
 19 reach in from the inside of the wheel and turn this
 20 to adjust the fit?
 21 A. Or some adjusted automatically.
 22 Q. Okay.
 23 A. This would be a test car that they would
 24 install brakes on and then go out and drive up and

Page 201

Page 203

1 down the road putting on the brakes at certain
2 speeds with a decelerometer in the car to measure
3 the rate of stop and see how long it took to bring
4 the car to a halt.

5 Q. Would you be able to compare those with
6 the original equipment specifications on the
7 deceleration of a vehicle?

8 A. You would be.

9 Q. Okay.

10 A. This shows some of the instrumentation
11 inside the test car.

12 Q. Okay.

13 A. This shows a test car and a test truck.

14 Q. Okay. Again is that at the Paulding
15 facility?

16 A. Yes, it is. I can't tell what this
17 picture is.

18 Q. Okay.

19 A. This is a picture of the area where this
20 is a multiple spindle drill that could be drilling
21 lining or truck block for riveted applications.

22 These are large slabs of truck block
23 before they're cut into individual pieces.

24 Q. Is this where -- is this what the product

Page 202

1 looks like after going through the extruding
2 system?

3 A. These were not extruded, these were
4 molded in a large press.

5 Q. Okay.

6 A. This is another picture of truck block
7 slabs before they're cut into individual pieces.

8 Q. How were they cut? Was there band saws
9 that were used for that?

10 A. There were saws, they weren't band saws.

11 Q. What kind of saws?

12 A. Just a --

13 Q. Circular?

14 A. -- circular saw.

15 Q. Okay.

16 A. This is clutch facing yarn being coated
17 with the friction modifiers and resins.

18 Q. And you told us I think there was an
19 outside supplier. Was that the Amatex?

20 A. This is the Amatex yarn.

21 Q. If we can see that on the photos a little
22 better. That's just the spools of the yarn that
23 came in from Amatex?

24 A. That's correct.

1 Q. And these would have had an asbestos
2 composition?

3 A. It would have been a brass wire with
4 asbestos fibers spun around it.

5 Q. Okay.

6 A. That's just a picture of the factory, and
7 I can't tell what's going on there.

8 This picture is so dark I can't tell
9 what's going on.

10 Q. Okay.

11 A. These are racks of lining, but I can't,
12 due to the quality of the picture, tell what's
13 going on.

14 Another picture of racks of lining that I
15 can't tell what's occurring.

16 Q. That's pages 20 and 21.

17 How many linings would the Paulding
18 facility have made in a given year?

19 A. I'm not sure I could guesstimate.

20 Q. Would it be in the millions?

21 A. Probably in the hundreds of thousands.

22 This is one of the extruding machines
23 that extruded the oil-based linings.

24 Q. Okay.

Page 204

1 A. This is a large rivet machine that's
2 riveting the truck block to a truck shoe.

3 This is another extruding machine that
4 extrudes either the oil- or resin-based linings.

5 Q. How big was the facility in Paulding?
6 Was there a square footage associated with it?

7 A. There was, and I can't recall that right
8 now.

9 Q. Would it have been in the tens of
10 thousands of square feet?

11 A. If you want me to give you a wild guess,
12 speculation on my part I would say close to 100,000
13 square feet.

14 These are linings it looks like in the
15 area where the adhesive would be applied to the
16 back side.

17 Q. And this is part of the procedure you
18 showed us earlier where you had what Sears had
19 called an epoxy but it wasn't an epoxy?

20 A. I don't remember that it was an epoxy.
21 It may have been.

22 Q. But that's that process from the other
23 photo?

24 A. This is the same thing where the adhesive

Page 205

Page 207

1 is being put on the lining and then it's dried so
 2 they won't stick together.
 3 Q. What is the round pipe holding that
 4 assembly for?
 5 A. Well, the adhesive is wet when it goes on
 6 and it has a solvent to it. As you dry the solvent
 7 off that was taking the fumes away.
 8 Q. Okay. That gives us a pretty good idea.
 9 A. Okay.
 10 Q. We next had 1558 sequentially. This is
 11 distributors by state. Have you seen that set of
 12 documents before?
 13 A. No, I have not.
 14 Q. It has dates in the top right I believe
 15 '75, 9-11-75. That was during your tenure there,
 16 was it not?
 17 A. Yes, it was.
 18 Q. Do any of the names there look familiar?
 19 A. Let me look.
 20 Q. It seems to be somewhat of a state by
 21 state breakdown of vendors or retailers or
 22 something.
 23 A. Yes, it does.
 24 Q. Any of that ring a bell?

Page 206

1 A. Nothing yet.
 2 Q. Okay. Are you familiar with any
 3 particular state? I think you can probably just go
 4 to one state there, maybe Tennessee.
 5 A. I'm not sure I would be any more familiar
 6 with Tennessee as far as the customers.
 7 MR. CANONI: John, to speed up, do you have
 8 any idea what that Sears business entities?
 9 MR. CANONI: I think it's probably a list of
 10 Maremont's customers by state. It's probably a
 11 list of the rebuilders.
 12 THE WITNESS: Strictly from reading the names
 13 it might be heavy duty rebuilders. It may not be,
 14 but it just -- there's an awful large number of
 15 trailer and heavy duty looking truck parts.
 16 BY MR. COON:
 17 Q. With respect to the rebuilders you
 18 described for us earlier, is the total number of
 19 names reflected there consistent with the number of
 20 folks you all might have been dealing with back
 21 during that time frame?
 22 A. Let me look here at something. Leland/
 23 Grizzly distributors. So that would be the heavy
 24 duty.

1 I don't recall any of these as being the
 2 major rebuilders.
 3 Q. That listed, at least from that page
 4 forward it may be two different sets of
 5 identifiers. One there midway through the package
 6 says Leland/Grizzly distributors at the top, does
 7 it not?
 8 A. One appears to be alphabetical and the
 9 other appears to be by state.
 10 Q. So you think they may both be the same
 11 thing, just two different ways of cross-
 12 referencing?
 13 A. It would be easy to determine if we
 14 looked at both lists.
 15 MR. CANONI: If you know, you know.
 16 THE WITNESS: I don't know.
 17 BY MR. COON:
 18 Q. Mr. Liggett, we've covered a lot of
 19 different property lines and activities of the
 20 company. I think we have a pretty good
 21 understanding of what Maremont and Nuturn were
 22 involved in that's relevant to these proceedings.
 23 I next want to turn our attention, sir,
 24 to issues specific to the asbestos. In that regard

Page 208

1 you first went to work there in '73, correct?
 2 A. That's correct.
 3 Q. Had you heard prior to your employment at
 4 Maremont anything with respect to any hazards
 5 associated to working around asbestos?
 6 MR. CANONI: Objection as to form.
 7 THE WITNESS: I had heard of potential or
 8 alleged hazards working with asbestos.
 9 BY MR. COON:
 10 Q. When and under what circumstances?
 11 A. Just from the general news media.
 12 Q. Do you recall about what year or with any
 13 more specificity how it was that you first became
 14 aware of these potential health hazards?
 15 A. I apologize, that was a long time ago.
 16 Q. Do you know if it was several years
 17 before you went to work at Maremont, if it was
 18 during the time you were in the military or back
 19 when you were in college or any way of better
 20 defining that?
 21 A. I don't recall.
 22 Q. Where were you in 1972? We've got a
 23 summary of all that here, but between the military
 24 and -- weren't you at Procter & Gamble?

Page 209

Page 211

1 A. Procter & Gamble.

2 Q. Do you know if the Procter & Gamble
3 facility you worked at had any asbestos in it?

4 A. You know, at that time asbestos was a
5 very widely-used commodity, so there could have
6 been some gaskets, there could have been some high
7 temperature applications that had it.

8 I don't think I specifically recall
9 whether or not they did.

10 Q. At the facility you were at I take it
11 that there was no involvement with OSHA with
12 respect to the guidelines and regulations that came
13 into being in 1972, was there?

14 A. I was certainly involved with OSHA
15 regulations at the Procter & Gamble facility.

16 MR. CANONI: He is asking for OSHA asbestos-
17 related regulations.

18 THE WITNESS: No.

19 BY MR. COON:

20 Q. To your knowledge you didn't have any
21 involvement with OSHA with respect to asbestos
22 issues in '72 when those regulations came into
23 being?

24 A. I don't know when those regulations came

Page 210

1 into being.

2 Q. We'll assume that they came in about
3 1972, okay?

4 A. Okay. I had no involvement with OSHA
5 regarding asbestos when I was at Procter & Gamble.

6 Q. Okay. Now when you went to work at
7 Maremont your company was involved in assembling or
8 manufacturing some asbestos products or materials,
9 correct?

10 A. That's correct.

11 Q. And that's the things we've talked about
12 here today?

13 A. That's correct.

14 Q. Did you have any involvement with OSHA
15 with respect to regulations concerning the asbestos
16 issues as it related to Maremont?

17 A. Yes, I did.

18 Q. Could you tell me how you were first
19 introduced into those issues?

20 A. I don't think I can tell you how I was
21 first introduced. I just knew that OSHA was
22 beginning to investigate the potential health
23 hazards from asbestos, that they were beginning to
24 implement air sampling programs, and that we were

1 doing everything to comply with any OSHA regulation
2 that came out.

3 Q. In 1973 you were in a management position
4 at Maremont at the Nashville facility, correct?

5 A. That's correct.

6 Q. Did you, from time to time, meet with
7 other executives or management folks with the
8 Nashville facility or with Maremont at their other
9 facilities concerning the implementation of these
10 regulations?

11 MR. CANONI: Objection as to form.

12 THE WITNESS: I don't know if meeting with
13 other executives would be the appropriate way to
14 express it. We were aware at some point, I don't
15 remember the exact year, that these OSHA
16 regulations were coming out. And as they came out,
17 you know, we were sent copies of the Federal
18 Register, whatever, that made us aware of what we
19 had to do and how we had to do it.

20 BY MR. COON:

21 Q. Was there a point person at Maremont that
22 dealt with OSHA on these issues?

23 A. Not to my knowledge.

24 Q. Did Maremont have an industrial hygiene

Page 212

1 department?

2 A. No.

3 Q. Did it have a safety and health
4 department?

5 A. No.

6 Q. Did it have an in-house doctor?

7 A. If you mean a doctor that worked for
8 Maremont, the answer would be no. There may have
9 been some doctors that we sent all our people to
10 for physicals that would occasionally come out and
11 walk through the plant and look for things, whether
12 they were heat, asbestos, lifting, any type of
13 problems and give us their advice.

14 Q. Do you know who the worker's compensation
15 carriers were for Maremont in the early and mid
16 '70s?

17 A. No, I don't.

18 Q. Did you have any involvement with any of
19 the insurance carriers with respect to asbestos
20 issues at any of the Maremont facilities?

21 A. Yes, I did.

22 Q. Could you tell me briefly about those
23 please, sir?

24 A. When we became aware of OSHA regulations

Page 213

1 we used our insurance carriers as one source of
2 information and technical expertise on testing our
3 facility.

4 Q. Were these your worker's compensation
5 carriers or health insurance carriers or were they
6 one in the same, if you know?

7 A. I believe they'd be one in the same.

8 Q. Any recollection as to the names of those
9 carriers?

10 A. No.

11 Q. Who was it that would meet with them?

12 A. For the Nashville facility I would be the
13 primary contact.

14 Q. And with whom did you contact?

15 A. The insurance companies.

16 Q. But was there an office there in
17 Nashville that you dealt with, agents or
18 representatives?

19 A. You know, I don't know if they came from
20 Nashville or if they were sent from some other
21 city.

22 Q. And when you met with them what was
23 generally discussed and done?

24 A. The air sampling that needed to be done.

Page 214

1 Q. And this was to monitor the working
2 environment, the air and the area around where the
3 workers were handling asbestos products,
4 manufacturing asbestos products in the Nashville or
5 Paulding facilities?

6 A. Yes, it was.

7 Q. Do you know whether or not any air
8 sampling had been conducted at any of those
9 facilities before the OSHA regulations came into
10 effect?

11 A. I'm pretty sure it had been.

12 Q. Had you ever been provided with any of
13 the test studies or findings of any industrial
14 hygiene studies or air sampling that were conducted
15 prior to the implementation of the OSHA
16 regulations?

17 A. Yes.

18 Q. Do you recall how far back they dated?

19 A. No, I don't.

20 Q. Do you recall whether or not they dated
21 into the '60s or earlier?

22 A. I think they were in the late '60s.

23 Q. We had in the discovery responses from

24 Maremont some information indicating that Maremont

Page 215

1 was first made aware of potential health hazards
2 associated with asbestos back in the 1950s.

3 Counsel, that's Interrogatory 39.

4 Do you know anything about how it was
5 that Maremont first became aware of potential
6 health hazards associated with exposure to raw
7 asbestos fibers in the 1950s?

8 A. No, I don't.

9 MR. CANONI: Do you want his personal
10 knowledge or his status as company representative?

11 MR. COON: Either one. I mean if he knows
12 from --

13 MR. CANONI: Well, you've been sort of
14 interchangeably going throughout, so that's why I
15 ask. Clearly he doesn't have any personal
16 knowledge of what happened before he got to the
17 company, but as the company representative he
18 might.

19 BY MR. COON:

20 Q. That's true too. You weren't there in
21 the '50s to have personal knowledge of how Maremont
22 found out, correct?

23 A. That's correct.

24 Q. But you were an executive for Maremont

Page 216

1 and then later Nuturn for a number of years,
2 correct?

3 A. That's correct.

4 Q. And you were personally involved in
5 addressing some of the OSHA issues as it related to
6 asbestos in the early and mid '70s?

7 A. That's correct.

8 Q. And from that standpoint were you ever
9 eventually apprised of some degree of information
10 with respect to how long Maremont had been aware of
11 any potential health effects of working around
12 asbestos?

13 A. I don't know how long they had been
14 advised.

15 Q. Did you have an understanding that they
16 had some level of information that preexisted your
17 first employment with them?

18 A. I was made aware that some testing was
19 done, that it was slightly above the suggested
20 limits at that time, and that Maremont made changes
21 to certain processes to collect the dust better and
22 they then came within the recommended proposed
23 limits, and I think were even told they had done a
24 good job.

Page 217

Page 219

1 Q. Do you know what years that would have
2 involved and what the suggested limits were at that
3 time?
4 A. No, I don't.
5 Q. Do you know, or did you ever learn what
6 suggested levels of exposure were, or permissible
7 exposure levels were that were regulated by OSHA?
8 A. Yes, I do.
9 Q. What was your understanding of the levels
10 of exposure that were set as thresholds by OSHA?
11 A. 5 fibers per cc on an 8 hour time
12 weighted average.
13 MR. COON: Guys, is this gentleman going to be
14 offered for any hygiene purposes in any of these
15 cases?
16 MR. CANONI: I don't understand what you
17 mean.
18 MR. COON: Would he be offered as an expert in
19 any industrial hygiene or safety practices or
20 industry customs?
21 MR. CANONI: As an expert?
22 MR. COON: Yeah.
23 MR. CANONI: I don't believe so.
24 BY MR. COON:

Page 218

1 Q. I just need to ask you a few questions
2 along this line, sir. Do you know anything about
3 how you sample for asbestos fibers?
4 A. A little bit.
5 Q. Do you know what a Midget Impinger is?
6 A. No, I don't.
7 Q. What's your understanding generally of
8 how the sampling is done?
9 A. You take a personal air pump, which is a
10 battery-operated device, put that around your
11 waist, you run a little tube up to a filter that's
12 in the breathing zone area, you wear that for a
13 measured amount of time and then you take the
14 filter, either send it to a NIOSH certified lab
15 that can do the counting or you have a NIOSH
16 certified employee and they prepare the filter and
17 put it under a phase contrast microscope and count
18 the fibers. And the number of fibers on the amount
19 of time they wore the filter can give you an 8 hour
20 time weighted average.
21 Q. Did you personally observe these types of
22 tests being conducted on your employees at the
23 Paulding or Nashville facilities?
24 A. Yes, I did.

1 Q. And was this done to attempt to maintain
2 compliance with OSHA regulations over the time
3 frames that you were employed there?
4 A. Yes, it was.
5 Q. Was this an ongoing process?
6 A. Yes, it was.
7 Q. Were there times in which these tests
8 showed various areas of the facility to not be in
9 compliance with OSHA regulations at any given time?
10 A. I think there were areas that were
11 occasionally out of compliance that had to be
12 modified to come in compliance.
13 Q. Do you know whether or not OSHA ever
14 precipitated or initiated their own air sampling in
15 the facilities?
16 A. Yes, I do.
17 Q. Did your insurance carriers also initiate
18 their own air sampling?
19 A. Yes, they did.
20 Q. And did your company initiate its own
21 independent air sampling?
22 A. Yes, it did.
23 Q. Do you know the engineering firms that
24 were retained for purposes of either the carrier's

Page 220

1 or Maremont's air sampling?
2 MR. CANONI: Objection as to form.
3 THE WITNESS: No, I don't.
4 BY MR. COON:
5 Q. Did you have any involvement with the air
6 sampling folks that came out, industrial hygiene
7 folks?
8 A. Help me understand what you're referring
9 to.
10 Q. Yes, sir. When your company or the
11 insurance carrier sent hygienists or qualified
12 people in to do the air sampling, did you ever meet
13 with them, discuss what was being done, supervise
14 or observe their activities?
15 A. Yes, I did.
16 Q. Would you be provided with the reports or
17 findings of those air samplings?
18 A. Yes, I would.
19 Q. Who would you report to at Maremont with
20 respect to your involvement with OSHA or these
21 hygienists that would come out for air sampling?
22 MR. CANONI: I don't know that the witness has
23 said that hygienists came out to do the sampling.
24 That's my problem with the question. People

Page 221

Page 223

1 definitely sampled. I just don't want to --
 2 BY MR. COON:
 3 Q. You don't know if the people who came out
 4 were hygienists by background or who they were from
 5 a qualification standpoint?
 6 A. I know that some of the internal people
 7 doing the testing were not hygienists. They would
 8 put the pumps on people but they would send them
 9 out to a lab where a hygienist or someone certified
 10 would do the counting.
 11 Q. To get the analysis?
 12 A. That's correct.
 13 Q. When, to your knowledge, was the first
 14 air sampling conducted at any of the Maremont
 15 facilities?
 16 MR. CANONI: When to his personal knowledge?
 17 BY MR. COON:
 18 Q. Yeah.
 19 A. I don't recall.
 20 Q. Did you ever get to see any of the actual
 21 documents reflecting the air sampling that was
 22 being conducted at any facilities before you went
 23 to work there?
 24 MR. CANONI: Other than what he's already

1 condition?
 2 A. I don't know for sure when the annual
 3 physicals started.
 4 Q. Do you know that OSHA regulations
 5 required annual chest x-rays and pulmonary
 6 functions of certain individuals in high risk
 7 areas?
 8 A. Yes, I do.
 9 Q. Are you aware of any efforts by Maremont
 10 to initiate chest x-rays or pulmonary function
 11 studies of their employees before the
 12 implementation of OSHA regulations?
 13 A. I don't know the answer to that.
 14 Q. To your knowledge there were none?
 15 A. I don't recall there being any.
 16 Q. From the time that OSHA had initiated
 17 these regulations and -- let me backup. I take it
 18 that once OSHA initiated regulations requiring
 19 annual physicals that Maremont complied?
 20 A. That's correct.
 21 Q. And during that compliance period through
 22 the duration of your employment with Maremont, and
 23 later Nuturn, were you ever aware of any diagnosis
 24 of pulmonary abnormalities in any of the employees?

Page 222

Page 224

1 testified to?
 2 BY MR. COON:
 3 Q. You said you were aware of something in
 4 the '60s?
 5 A. I thought it was in the '60s.
 6 Q. Do you know if it could have been in the
 7 '50s?
 8 A. It could have been.
 9 Q. Do you know what had precipitated any of
 10 those air samplings in the '50s or '60s?
 11 A. To the best of my knowledge it was
 12 general information only. As people began to be
 13 aware of the potential hazards they wanted to
 14 establish some baseline information.
 15 I would just say that again there had
 16 been people working at that Grizzly facility for
 17 many years and there had been no recorded cases of
 18 asbestos sickness, so it was treated as a potential
 19 hazard.
 20 Q. During the years prior to your employment
 21 do you know whether or not there was any type of
 22 annual physical conducted of any of the employees
 23 to determine whether or not any of them were
 24 developing signs of an asbestos-related health

1 A. None.
 2 Q. You're not aware of any?
 3 A. I'm not aware of any.
 4 MR. CANONI: Brent, I think there is an
 5 Interrogatory response talking about some medical
 6 exams and when they may have been done.
 7 BY MR. COON:
 8 Q. You had stated some degree of familiarity
 9 with the company called the Friction Materials
 10 Standards Institute?
 11 A. Yes.
 12 Q. Were you ever a personal member of that
 13 --
 14 A. No, I wasn't.
 15 Q. -- or as agent?
 16 Did you ever correspond with them on
 17 behalf of Maremont or Nuturn?
 18 A. No, I did not.
 19 Q. Do you know any employees or
 20 representatives of Maremont or Nuturn that did
 21 correspond with the Friction Materials Standards
 22 Institute?
 23 A. Yes, I do.
 24 Q. Who would that have been?

Page 225

Page 227

1 A. Frank Skelton.
 2 Q. What was Mr. Skelton's role?
 3 A. He was the head of the testing.
 4 Q. That's the air sampling testing?
 5 A. No, no, the friction testing. The cars
 6 and trucks and dynamometer testing.
 7 Q. Okay.
 8 A. And Jim Mellow, M-e-l-l-o-w. He was the
 9 sales and marketing manager.
 10 Q. Was he in Nashville?
 11 A. Jim Mellow was in Nashville and Frank
 12 Skelton was in Paulding, Ohio.
 13 Q. Now, you also understood that when OSHA's
 14 regulations came out in 1972 there was a
 15 requirement for the application of a cautionary
 16 label on materials that contained asbestos?
 17 A. That's correct.
 18 Q. And that admonishment was basically that
 19 there was a caution admonishment that the product
 20 contained asbestos fibers and to avoid creating
 21 dust?
 22 A. That's correct.
 23 Q. To your knowledge was there any such type
 24 of label on any of the products that were

1 A. I think we're talking a matter of weeks
 2 or months.
 3 Q. Any warnings or any labeling that went on
 4 in compliance with OSHA or in conformance with OSHA
 5 regulations was done in anticipation of the
 6 regulations going into effect and Maremont's desire
 7 to comply with it?
 8 A. That's my recollection.
 9 Q. To your knowledge was there any such
 10 similar information that had been in the boxes or
 11 packaging in the years prior to the OSHA
 12 regulations?
 13 A. I don't recall whether there was or not.
 14 Q. You're not aware of any packaging or
 15 labeling programs at Maremont that would have
 16 entailed notifying the purchasers or users of the
 17 product that the materials contained asbestos?
 18 A. That's something I do not know.
 19 Q. And you're not aware, personally aware of
 20 any efforts by Maremont to provide information on
 21 any of the boxes or labeling in the years prior to
 22 those regulations to advise the user to avoid
 23 breathing the dust emanating from any of the
 24 products?

Page 226

Page 228

1 manufactured or assembled by Maremont that
 2 contained asbestos that first notified the user or
 3 purchaser that the product did contain asbestos
 4 fibers?
 5 A. It's my recollection that by the time
 6 that regulation came out Maremont was complying
 7 with it and had that warning printed on all of its
 8 boxes.
 9 Q. Okay. It's your understanding that at
 10 the time the regulation went into effect that
 11 Maremont was in compliance with the requirements --
 12 A. That's correct.
 13 Q. -- is that what I understood you to have
 14 said?
 15 The question I would have then is do you
 16 know whether they first started putting the OSHA
 17 information on their boxes?
 18 A. No, I don't.
 19 MR. CANONI: He just said they put it on when
 20 the regulations required them to put it on.
 21 BY MR. COON:
 22 Q. Maybe I misunderstood you. I thought you
 23 just said at the time the regulations went into
 24 effect they were already complying. So maybe I --

1 A. I don't recall.
 2 Q. Are you aware of any?
 3 A. I'm not aware.
 4 Q. Are you aware of any labeling or
 5 admonishments on any of the boxes or packaging of
 6 any of these products in the years prior to the
 7 OSHA regulations with respect to avoid breathing
 8 the dust or that it can create serious bodily harm?
 9 A. That's just an area that I don't know
 10 about.
 11 Q. Again you have no personal knowledge of
 12 any of those things having occurred?
 13 A. That's correct.
 14 MR. COON: Is this a good place to change
 15 tape?
 16 THE VIDEOGRAPHER: End of tape 2. Off the
 17 record, 4:28.
 18 (Whereupon, a break was taken
 19 from 4:28 until 4:38 p.m.)
 20 THE VIDEOGRAPHER: This is tape 3, continuing
 21 deposition of Carl Liggett. The time is 4:38, on
 22 the record.
 23 BY MR. COON:
 24 Q. Mr. Liggett, have you been privy to the

Page 229

Page 231

1 documents at Maremont that related to exchanges of
2 communications between various individuals
3 concerning the implementation of the OSHA
4 regulations and warnings that may need to be placed
5 on the packaging of products made by Maremont?

6 A. Help me with that question please.

7 Q. Yes, sir. We've been provided with a
8 number of documents that reflect exemplars of
9 cautionary labels that could go on products,
10 internal memorandum or memos between various
11 individuals at Maremont discussing the asbestos
12 issues and OSHA regulations.

13 I'm just first trying to find out if
14 you've been privy to some of those types of
15 documents?

16 A. I may have been a party to some of them
17 when they occurred. Are you asking if I've
18 reviewed them recently?

19 Q. I guess have you reviewed any of them
20 recently?

21 A. No, I have not.

22 Q. Have you reviewed some of them in the
23 past?

24 A. Not that I recall.

Page 230

Page 232

1 Q. Do you recall seeing some correspondence
2 that was either addressed to you or from you?

3 A. No.

4 Q. Do you remember what month you came to
5 work at Maremont?

6 A. I believe it was November.

7 Q. Of '73?

8 A. That's correct.

9 Q. Did you know a Mr. Sherr, S-h-e-r-r?

10 MR. CANONI: Sherr.

11 BY MR. COON:

12 Q. Sherr.

13 A. Yes, I did.

14 Q. Who was he?

15 A. He was in the corporate legal department.

16 Q. What about Mr. Hall, J.W. Hall?

17 A. I don't recall that name.

18 Q. What is an AIO kit?

19 A. All-In-One.

20 Q. That's the ones we talked about earlier?

21 A. That's correct.

22 Q. These are the ones for the Sears stores?

23 A. That's right.

24 Q. Have you seen any of the correspondence

1 between Maremont and Sears representatives
2 concerning Sears questions about the OSHA
3 regulations and asbestos cautionary labels, things
4 like that?

5 A. Yes, I have.

6 Q. Did you have any personal dealings with
7 any of the Sears representatives or management
8 concerning the OSHA regulations?

9 A. No, I did not.

10 Q. Did you have any discussions with any of
11 the Sears management with respect to the cautionary
12 labels or warnings that would be contained on any
13 of the boxes on the AIO shipments to any of the
14 Sears stores?

15 A. No, I did not.

16 Q. Do you know anyone at Maremont that was
17 involved in that discussion?

18 A. Yes, I do.

19 Q. Who would have been the key persons in
20 those roles?

21 A. Bob Rogers and Dick Sealy.

22 Q. Mr. Rogers being the president or officer
23 -- he was your supervisor at the Nashville
24 facility at that time?

1 A. That's correct.

2 Q. But you don't recall his title at that
3 time?

4 A. No, I don't.

5 Q. And who was the other gentleman?

6 A. Dick Sealy.

7 Q. And who is Mr. Sealy?

8 A. Mr. Sealy was in the sales and marketing
9 department and he was responsible for Sears.

10 Q. And did you talk to him from time to time
11 concerning any of these issues?

12 A. No, I did not.

13 Q. Were you familiar with the parallel work
14 done or being done by NIOSH as it related to these
15 same issues?

16 A. Can you be more specific?

17 Q. Yes, sir. You were aware of OSHA coming
18 in and formulating certain regulations regarding
19 the time weight averages and permissible exposure
20 levels of asbestos in the workplace effective in
21 '72, correct?

22 A. Correct.

23 Q. As well as cautionary labels that were
24 going to be required to be placed on certain

Page 233

Page 235

1 products and notices that would go into buildings
 2 where workers could be affected, correct?
 3 A. Correct.
 4 Q. Were you aware of any of the parallel
 5 activities of another organization being NIOSH with
 6 respect to some of these same issues?
 7 A. Perhaps I'm confused, but I thought NIOSH
 8 was the organization that developed the technical
 9 standards that OSHA implemented.
 10 Q. And you understood NIOSH to be the
 11 Institute for Occupational Safety and Health?
 12 A. That's correct.
 13 Q. And did you ever work directly with any
 14 of those individuals?
 15 A. No, I did not.
 16 Q. Do you know whether or not Maremont was
 17 involved informally or formally in any of the
 18 lobbying activities as it related to government's
 19 involvement in regulating asbestos exposure?
 20 A. I don't recall.
 21 Q. Do you know whether or not they were a
 22 member or participant in an organization called the
 23 AIA?
 24 A. Yes, we were.

Page 234

1 Q. That's the Asbestos Information
 2 Association?
 3 A. That's correct.
 4 Q. Was Maremont a member of that?
 5 A. Yes, it was.
 6 Q. Do you know of any other lobbying
 7 organizations that Maremont was a member of?
 8 A. No, I do not.
 9 Q. What was your understanding of the
 10 purposes of the AIA?
 11 A. It was my understanding that AIA tried to
 12 gather factual information, present it to the
 13 companies that were involved in using asbestos, and
 14 to try and present reasoned factual sets of data to
 15 government organizations to counter some of the
 16 hysterical data that was being presented.
 17 Q. Was that historical data or hysterical
 18 data?
 19 A. Hysterical data.
 20 Q. And what do you mean by that?
 21 A. I think some of the information that was
 22 being presented was very similar to the Alar on
 23 apple scare where the media can get a hold of
 24 something and blow it out of all proportion to its

1 effect and impact on human beings.
 2 Q. And in what respects did you believe that
 3 the asbestos issues as they related to workplace
 4 exposure to certain levels to be descriptive in
 5 that manner?
 6 MR. CANONI: Objection as to form.
 7 THE WITNESS: It was my understanding at the
 8 time that there were no studies that showed that
 9 nonsmokers exposed to asbestos fibers had any
 10 greater risk of any asbestos-related sickness than
 11 nonsmokers that were never exposed to asbestos
 12 fibers. And I believe that's true to this day.
 13 BY MR. COON:
 14 Q. And what was that based on, independent
 15 research that you conducted or what you were told
 16 by other individuals or organizations?
 17 A. That is based on research data that was
 18 presented at AIA meetings.
 19 Q. So this would be based on information
 20 that was provided by the lobbying organization for
 21 various asbestos manufacturers?
 22 MR. CANONI: Objection as to form.
 23 THE WITNESS: AIA presented that information.
 24 I think certain epidemiologists that maybe were

Page 236

1 working independently did some of the studies.
 2 BY MR. COON:
 3 Q. But you understood that the AIA was an
 4 organization formed and sponsored by manufacturers
 5 of asbestos-containing products?
 6 A. That's correct.
 7 Q. And wholly subsidized and financed by
 8 asbestos manufacturers?
 9 A. That's correct.
 10 Q. And their principal efforts were to
 11 modify any government regulations on exposure
 12 levels to products both in the work environment and
 13 in use and application?
 14 A. I believe they also would have made an
 15 equal effort to inform the member organizations of
 16 any hazards that they thought were significant or
 17 real.
 18 Q. Based on your -- did you personally
 19 attend AIA meetings?
 20 A. Yes, I did.
 21 Q. Do you remember any of the speakers that
 22 were involved?
 23 A. I think I remember hearing Dr. Hans Weill
 24 of Tulane University.

Page 237

Page 239

1 Q. Did you ever have a position with AIA?

2 A. No, I did not.

3 Q. Were you a liaison for Maremont with
4 respect to AIA activities?

5 A. Yes, I was.

6 Q. Was there anyone else at Maremont that
7 had a similar title as a liaison with AIA?

8 A. Not to my knowledge.

9 Q. Did you ever participate with the AIA in
10 their efforts to lobby against regulations
11 affecting workplace exposure to asbestos?

12 A. No, I did not.

13 Q. Did you ever participate with the AIA
14 directly in their lobbying efforts to avoid the
15 implementation of any types of warnings on any of
16 the products that contained asbestos?

17 A. No, I did not.

18 Q. Did you ever initiate any independent
19 investigation in terms of the medical literature,
20 any medical literature or scientific or research
21 literature concerning the health affects of
22 asbestos?

23 A. No, I did not.

24 Q. Did you request Maremont to conduct any

Page 238

1 independent investigations into the historical
2 information from a medical and/or scientific
3 standpoint concerning the health affects of
4 asbestos?

5 A. No, I did not.

6 Q. Were you even aware of the history of the
7 diagnosis of asbestosis, who diagnosed it and what
8 the circumstances were?

9 A. I don't believe so.

10 Q. Did you ever hear the story about Turner
11 & Newall -- you knew Turner & Newall as being
12 involved in setting up the company to acquire
13 Nuturn that you worked for, correct?

14 A. When I first became a member of the
15 Asbestos Information Association as an employee of
16 Maremont I would have had no significant knowledge
17 of Turner & Newall.

18 Q. But at some point after that did you find
19 out more about Turner & Newall and their historical
20 involvement in asbestos matters?

21 A. I knew that Turner & Newall owned
22 Ferodo. I knew that Ferodo was the first friction
23 material company to put asbestos in friction
24 products.

1 I'm not sure I know of any other

2 involvement by Turner & Newall.

3 Q. Did you know that they had their own
4 textile -- asbestos textile factories in London or
5 England?

6 A. I was not aware of that.

7 Q. Were you ever made aware of the first
8 clinically diagnosed cases that were confirmed
9 pathologically of asbestosis arising out of
10 employees of the Turner & Newall facilities in
11 England?

12 MR. CANONI: Objection as to form.

13 THE WITNESS: No, I'm not.

14 BY MR. COOK:

15 Q. Have you ever heard of a guy named
16 Dr. Cook who actually diagnosed or coined the term
17 asbestosis?

18 A. No.

19 Q. Do you know that that involved his
20 pathological confirmation of a lady with asbestos
21 disease that died of asbestosis in her 30s who was
22 an employee of Turner & Newall --

23 MR. CANONI: Objection as to --

24 MR. COON: -- in their asbestos textile

Page 240

1 factory?

2 MR. CANONI: Objection as to form.

3 THE WITNESS: I'm not aware of that.

4 BY MR. COON:

5 Q. Did you get an understanding of some of
6 the information that was being developed in
7 the '60s from Dr. Selikoff?

8 A. Yes, I did.

9 Q. What was your understanding of the type
10 of work Dr. Selikoff was conducting?

11 A. He was conducting studies on exposure to
12 asbestos and what sickness could relate.

13 Q. Are you aware of any of his findings or
14 the findings of predecessor or successor
15 investigators, epidemiologists who determined that
16 there was significant correlations between the
17 development of asbestos-related diseases and
18 exposure to asbestos in those that were
19 nonsmokers?

20 MR. CANONI: Objection as to form.

21 THE WITNESS: No, I'm not.

22 BY MR. COON:

23 Q. To this day are you aware of any such
24 literature that draws correlations between

Page 241

Page 243

1 asbestos-related diseases in nonsmokers?

2 A. Are you relating to all types of
3 asbestos?

4 Q. Sure.

5 A. Or just to specific types?

6 Q. Are you talking about fiber types?

7 A. There's vastly different medical
8 problems, I believe, depending on the type of
9 asbestos that you're exposed to.

10 Q. Okay. And again to try to get better
11 parameters on the areas that you would be prepared
12 to testify, I presume that you're not of the
13 opinion that you're an expert in medical issues as
14 it relates to asbestos?

15 A. I am not an expert.

16 Q. And you would not anticipate being called
17 upon to render any expert opinions as they relate
18 to asbestos fibers and the potency of different
19 asbestos fibers as they relate to asbestos
20 diseases?

21 A. I wouldn't anticipate being called on to
22 testify something beyond my field of expertise.

23 Q. And in that regard as part of your field
24 of expertise the causal association between

Page 242

1 different fiber types and different disease
2 processes?

3 A. I'm not an expert in that arena.

4 Q. I take it you just generally have a
5 personal opinion that some asbestos fiber types may
6 have more carcinogenic propensities than others?

7 A. Most of my interest was in the types of
8 asbestos we used, which was the chrysotile that
9 seemed to be much more benign than some of the
10 others.

11 Q. Are you aware of any of the literature
12 studies, epidemiological studies that reflect that
13 workers that were exposed, only known to be exposed
14 to chrysotile had statistically significant
15 diagnoses of asbestosis, lung cancer, and
16 mesothelioma?

17 MR. CANONI: Objection as to form. What kind
18 of workers?

19 BY MR. COON:

20 Q. Any kind of workers.

21 A. What's the question?

22 Q. Yes, sir. Are you aware of any articles
23 or literature that shows a correlation between
24 increased risk of developing asbestosis, lung

1 cancer, mesothelioma or other asbestos-induced
2 diseases and chrysotile fiber exposure?

3 A. No, I'm not.

4 Q. Have you ever asked for such information
5 to be provided to you?

6 A. No, I have not.

7 Q. Did you ever ask the AIA to provide you
8 additional information to assist you in formulating
9 independent opinions about the risk factors
10 associated with the products that your company
11 manufactured?

12 A. State the question again.

13 Q. Yes, sir. While you were working with
14 AIA you understood them to be knowledgeable
15 concerning various health issues as they related to
16 asbestos exposure, correct?

17 A. Correct.

18 Q. Did you ever initiate any request of them
19 to provide you with either additional information
20 or independent sources that you could go to to
21 obtain additional information so that you could
22 better educate yourself on the issues of asbestos
23 and health effects?

24 A. I didn't feel the need for any studies

Page 244

1 beyond what they did provide.

2 Q. Did you know whether or not they were
3 providing you a complete and unbiased perception of
4 the medical literature as it related to the health
5 impact of asbestos?

6 A. I was satisfied with the quality of the
7 information they were providing.

8 Q. And in addition to that I guess my
9 question, sir, would be is what did you do to
10 determine for yourself on behalf of your company
11 whether or not what representatives of AIA were
12 telling you at these meetings was factually true or
13 not?

14 A. I did no independent research on my own.

15 Q. Did you get information from other
16 organizations that would have been consistent with
17 what AIA was telling you?

18 A. We joined AIA to get information on
19 asbestos and we were satisfied with the information
20 we got from them.

21 Q. Did you ever go back to OSHA and ask them
22 for their information, or with NIOSH and ask them
23 for their information concerning the health
24 effects?

Page 245

Page 247

1 A. No, I did not.

2 Q. You mentioned the Federal Register. Are
3 you familiar with that?

4 A. Yes, I am.

5 Q. Did you ever have an opportunity to go
6 back and read the Federal Register monographs
7 concerning asbestos that were published in 1986 or
8 1989?

9 A. No, I did not.

10 MR. CANONI: Objection as to form.

11 BY MR. COON:

12 Q. Are you aware of any of the present OSHA
13 or EPA opinions concerning the risk factors
14 associated with the different fiber types of
15 asbestos?

16 MR. CANONI: Objection as to form.

17 THE WITNESS: I don't recall.

18 BY MR. COON:

19 Q. Are you aware that the Federal Register
20 reflects that OSHA's determinations are that all
21 asbestos fiber types have carcinogenic
22 propensities?

23 MR. CANONI: Objection as to form.

24 THE WITNESS: I don't recall that.

Page 246

1 BY MR. COON:

2 Q. That all fiber types, including
3 chrysotile, caused mesothelioma?

4 MR. CANONI: Objection as to form.

5 THE WITNESS: I don't recall.

6 BY MR. COON:

7 Q. Are you aware of any number of
8 individuals that worked in industries involving
9 encapsulated products such as brake shoes or
10 gaskets that have developed the disease
11 mesothelioma?

12 MR. CANONI: Objection as to form.

13 THE WITNESS: I'm not aware.

14 BY MR. COON:

15 Q. Would that type of information influence
16 your present opinions regarding the carcinogenic
17 effects of the types of fibers that were used by
18 Maremont?

19 A. If I thought it was my responsibility to
20 form an opinion at this time on that, I would go
21 look for several sources. Right now I don't feel
22 that's an arena of interest or concern to me.

23 Q. You're no longer employed by a business
24 that's engaged in the use of any asbestos products?

1 A. That's correct.

2 Q. And your role here today with Maremont is
3 one where as somebody that used to work for them
4 knowledgeable about the issues you have arranged
5 for a system in which you get paid for your time in
6 testifying about historical information concerning
7 Maremont as it concerns asbestos-related matters?

8 MR. CANONI: Let me just -- the witness is
9 being proffered in response to your notice for a
10 corporate representative.

11 I don't know that the witness is fully
12 cognizant of whatever legal responsibilities he has
13 in that regard.

14 MR. COON: Okay.

15 MR. CANONI: If you want to get from him his
16 personal opinion, that's okay.

17 MR. COON: No, that's a good point.

18 MR. CANONI: Just so you understand.

19 MR. COON: He's your corporate rep?

20 MR. CANONI: Yes.

21 BY MR. COON:

22 Q. Right. And I should clarify that too.

23 You do understand today, sir, that you're here on
24 behalf of Maremont as a corporate representative

Page 248

1 for them even though you're no longer employed with
2 them?

3 A. I do understand that.

4 Q. And that's why you have this arrangement
5 with them and the consideration is made for your
6 time by Maremont by paying you for your services to
7 come in here and talk to us today and to testify
8 concerning your knowledge as well as Maremont's
9 activities over relevant time frames?

10 A. That's correct.

11 Q. Mr. Liggett, as a corporate
12 representative, do you have any opinions today,
13 sir, with respect to the diseases that asbestos
14 causes?

15 MR. CANONI: Let me just object. I don't
16 think that was called for by the notice as his
17 opinions today. And I don't think he is being
18 proffered for any knowledge he has today.

19 You can ask him if the company knew about
20 any of this during the time they manufactured the
21 products.

22 BY MR. COON:

23 Q. Okay. And I'll do that. Do you have any
24 personal knowledge with respect to the diseases

Page 249

Page 251

1 that asbestos is associated with?
 2 MR. CANONI: As he sits here today?
 3 MR. COON: Yeah.
 4 MR. CANONI: Okay.
 5 THE WITNESS: Ask the question again please.
 6 BY MR. COON:
 7 Q. Yes, sir. Are you aware of any of the
 8 diseases, the health implications of exposure to
 9 asbestos?
 10 A. Yes, I am.
 11 Q. What is your understanding of some of the
 12 disease processes associated with exposure to
 13 asbestos?
 14 A. If you breathe a high level of asbestos
 15 fibers over a prolonged period of time and you're a
 16 smoker you can develop asbestosis.
 17 If you're exposed to crocidolite or
 18 amosite I believe that in certain conditions there
 19 is an increased risk of mesothelioma.
 20 That's about the extent of my knowledge
 21 of the diseases.
 22 Q. Is it your understanding that to develop
 23 asbestosis there is some joint causative
 24 requirement of a smoking history as well as

Page 250

1 exposure to asbestos at certain levels?
 2 A. I think there is a very strong
 3 synergistic effect.
 4 Q. Between smoking and asbestos exposure and
 5 the development of asbestosis?
 6 A. That's correct.
 7 Q. Do you have any recollection as to where
 8 you derived that information?
 9 A. From the AIA and from other medical
 10 personnel.
 11 Q. What about smoking as it relates to --
 12 strike that.
 13 You mentioned lung cancer. Do you know
 14 of any associations between the development of lung
 15 cancer in nonsmokers who are exposed to asbestos?
 16 A. I don't recall mentioning lung cancer.
 17 Q. I'm just asking you with respect to lung
 18 cancer, are you aware -- or do you have any
 19 opinions with respect to the development of lung
 20 cancer from exposure to asbestos, with or without a
 21 smoking history?
 22 A. No, I don't have an opinion.
 23 Q. With respect to mesothelioma, you
 24 mentioned it. What's your understanding of what

1 that disease is?
 2 A. It's my understanding that it's a disease
 3 where the lungs lose their capacity to pass oxygen
 4 through the membranes to the blood so it becomes
 5 more difficult to oxygenate the blood.
 6 Q. And what happens then?
 7 A. You have less energy, you become more
 8 tired.
 9 Q. Do you know whether or not that's a
 10 cancer?
 11 A. I don't believe that's a cancer.
 12 Q. With respect to chrysotile, do you have
 13 any information or do you have an opinion as to
 14 whether or not chrysotile has any implications in
 15 the development of mesothelioma?
 16 A. It was my opinion when I was with
 17 Maremont, and my opinion today, that chrysotile is
 18 not significant in causing mesothelioma.
 19 Q. And why is that?
 20 A. Because of the configuration of the
 21 asbestos fiber.
 22 Q. What's different about it?
 23 A. I'm not an expert on that.
 24 Q. Do you know of any differences that

Page 252

1 would, from a scientific standpoint, increase or
 2 decrease the causal relationship between that fiber
 3 type and other fiber types?
 4 MR. CANONI: Objection as to form.
 5 THE WITNESS: Give me the question again.
 6 BY MR. COON:
 7 Q. Yes, sir. Do you know any physical
 8 characteristics of that fiber type that would
 9 differentiate it from the other fiber types that
 10 you believe are more causally associated with
 11 mesothelioma?
 12 A. I just know that there are different
 13 fiber types. They do have different
 14 configurations.
 15 I'm not an expert on what those
 16 differences are and how that relates to the
 17 causation of disease.
 18 Q. And again with respect to that disease,
 19 did you have a belief that smoking was a
 20 contributing factor?
 21 A. To mesothelioma?
 22 Q. Yes, sir.
 23 A. I did not think that it was.
 24 Q. No synergistic issues with respect to

Page 253

1 mesothelioma?

2 A. I was not aware of any.

3 Q. With respect to the Sears and Roebuck
4 issues, it's my understanding in looking at these
5 documents -- and for brevity I'm not going to walk
6 us through every one of them, but in looking at
7 them there were a number of documents from Sears
8 that were talking about whether or not to put one
9 of these OSHA labels on the product.

10 Do you recall the line of communications
11 between Maremont and Sears back in the early '70s
12 on those issues?

13 A. Let me just state that my personal
14 responsibilities at the time were operational. I
15 was not in the sales and marketing group, so I
16 would have had no direct involvement in that.

17 Q. Did you have an understanding of what
18 Sears' concerns were, if any?

19 A. I don't recall.

20 Q. Were you aware that there was a
21 determination made that the OSHA caution labels
22 concerning asbestos did need to go on the kits that
23 were being used at Sears?

24 A. Yes, I was.

Page 254

1 Q. And also it indicated here that when the
2 brakes got over to Sears that the Sears mechanics
3 would frequently have to grind your brake shoes in
4 their back shops prior to installation which
5 created dust.

6 Do you know anything about that?

7 A. Yes, I do.

8 Q. What was involved in that process, again
9 briefly, sir?

10 A. The All-In-One kit linings were a resin-
11 based lining. It was an oversized lining, meaning
12 that it had to be ground at the point of
13 installation.

14 They would determine whether the brake
15 drums had been turned once, twice, three times.
16 They would measure the diameter and then they would
17 set the grinder for that diameter.

18 You put the brake shoe in a fixture, it
19 would rotate through a grinder very quickly. That
20 grinder had an integral dust collection unit so
21 there would be very minimal exposure to anyone.

22 Q. Was that dust ever measured? Do you have
23 any idea how much dust would be released from an
24 air sampling standpoint?

Page 255

1 MR. CANONI: Did Maremont do it?

2 BY MR. COON:

3 Q. Yes, sir. Did Maremont ever do that?

4 A. Maremont measured the dust released at
5 our own grinding machines. We had identical
6 equipment to what Sears had.

7 MR. CANONI: Brent, I'll tell you, there is a
8 document in there that Sears had testing done at
9 one of its facilities.

10 MR. COON: Okay. I'm sure we've got it
11 somewhere. Again we have a lot of documents to
12 look at. I'm trying to speed through the rest of
13 them to save everybody some time.

14 BY MR. COON:

15 Q. We were talking about this document
16 awhile ago and we digressed. But it was the Hall
17 to Sherr document, and there was -- this is again
18 dated March 29.

19 Counsel, this is document 1402.

20 MR. CANONI: What's the year of it?

21 MR. COON: March of '73.

22 MR. CANONI: Okay.

23 BY MR. COON:

24 Q. Within it Mr. Hall is writing to

Page 256

1 Mr. Sherr and apparently Sears was not wanting this
2 label on their AIO kits and they wanted to,
3 according to Mr. Hall, that they were looking at
4 considering a revised label that omitted "avoid
5 creating dust."

6 And again he is stating it's because
7 Sears created -- there was dust created in the
8 grinding process and they wanted to know if they
9 could -- you all could provide them a label that
10 did not have the "avoid creating dust" on it.

11 Are you familiar with any of that
12 dialogue that went back and forth between Maremont
13 and Sears?

14 A. No.

15 Q. At the end of the day are you aware of
16 any capitulations by Maremont that modified the
17 label as it related to Sears in response to their
18 concerns?

19 A. I don't recall the negotiations. I know
20 that eventually the label was put on the box.

21 Q. And you understood that the label as it
22 related to the Sears boxes apparently did not go on
23 for some period -- for some period until after the
24 regulations were in effect?

Page 257

Page 259

1 A. That's correct.

2 Q. Do you know how much time passed between
3 the implementation of the regulations and the time
4 that Maremont started providing the AIO kits for
5 Sears with the appropriate OSHA labels?

6 A. I don't recall.

7 Q. Do you understand that that was a source
8 of frustration for Mr. Rogers at your company?

9 A. Yes, I do.

10 Q. In fact Mr. Rogers sent a letter to
11 Mr. Hall in May that stated "I cannot continue
12 violating OSHA regulations. If Sears does not
13 approval labeling procedure, we will proceed with
14 our best judgment."

15 Had you ever seen that document before?

16 Counsel, this is 949.

17 A. Yes, I have.

18 Q. Did you ever discuss that issue with
19 Mr. Rogers?

20 A. No, I did not.

21 Q. Did you understand his level of
22 frustration in being hung out on those issues?

23 MR. CANONI: Objection as to form.

24 THE WITNESS: Mr. Rogers was a very

Page 258

1 opinionated person. If he had an opinion he wanted
2 everyone to share it.

3 BY MR. COON:

4 Q. But we all agree that OSHA was requiring
5 in 1972 for these boxes to have a cautionary label
6 that they had provided for people to use?

7 MR. CANONI: Objection as to form. Are you
8 asking for his legal interpretation of the
9 regulations?

10 I mean I think there are documents that
11 reflect that I don't know that Maremont agreed it
12 was required to put the label on. But that's
13 beyond what this witness is here for.

14 MR. COON: Okay.

15 BY MR. COON:

16 Q. Did you have an understanding of the
17 cautionary labels as applied to materials that were
18 being sold that contained asbestos?

19 I mean you've seen it, haven't you, sir?

20 A. Have I seen what?

21 Q. The OSHA label, the labels, the OSHA
22 label.

23 A. The label that we put on the packages
24 that we shipped out of Paulding, Ohio?

1 Q. Yes, sir.

2 A. Yes, I have.

3 Q. And the label that you all provided on
4 your boxes was pretty much verbatim of the one that
5 OSHA sent out, was it not?

6 A. Yes, it was.

7 Q. And you were aware that Sears was
8 expressing concern about putting such a label on
9 the boxes that were being sent to them for use by
10 their mechanics in the stores that we talked about
11 earlier?

12 A. I know there was controversy on that
13 issue. I was not directly involved in it.

14 Q. And in fact Sears as of May of 1973 still
15 had not agreed to the language to use for their
16 boxes and it appears that that was frustrating
17 Mr. Rogers by this letter we just looked at?

18 MR. CANONI: Objection as to form.

19 THE WITNESS: It appears so.

20 BY MR. COON:

21 Q. And at least as far as Mr. Rogers was
22 concerned based on his statement "I cannot continue
23 violating OSHA regulations," he was at least of the
24 belief that he had some kind of legal obligation to

Page 260

1 provide those types of warnings on the boxes being
2 sent to Sears?

3 MR. CANONI: Objection as to form.

4 THE WITNESS: I can't comment on what the
5 document says.

6 BY MR. COON:

7 Q. You would agree that a fair
8 interpretation of "I cannot continue violating OSHA
9 regulations" means that he believes that the
10 failure to put a label on there was violating that
11 regulation?

12 MR. CANONI: I don't see how he can testify as
13 to what Mr. Rogers understood when he wrote the
14 memo.

15 MS. BLAZEK: It says what it says.

16 MR. COON: Okay. We'll move on.

17 MR. CANONI: And there is an Interrogatory
18 response that addresses when the box that was sold
19 to Sears contained the label.

20 MR. COON: Okay. When was that, John?

21 MR. CANONI: I think it was late 1973.

22 BY MR. COON:

23 Q. Okay. Well, that was the next question I
24 had for you, if you knew when the labeling took

Page 261

1 place?

2 A. No, I don't.

3 Q. If the Interrogatories Answers provided
4 by Maremont indicated some time in late 1973, you
5 wouldn't disagree with that?

6 A. No, I would not.

7 MR. CANONI: You can ask him what he observed
8 when he started with the company, which is a
9 different question. The question you just asked
10 him was his company representative answer.

11 BY MR. COON:

12 Q. Yeah, okay. You went to work there in
13 November of '73, correct?

14 A. That's correct.

15 Q. And by that time that seems to be in
16 close approximation to the time that any warnings
17 -- or any cautionary labels started going on the
18 boxes that were being shipped to Sears, correct?

19 A. That appears to be so.

20 Q. Okay. Were there any of the boxes that
21 were going out at the time you first went to work
22 there that did not contain such a cautionary label?

23 A. I don't recall.

24 Q. Did Maremont ever consider providing

Page 262

1 stronger language that was more consistent to the
2 original NIOSH recommendations?

3 MR. CANONI: Objection as to form.

4 BY MR. COON:

5 Q. Do you know what the -- let me backup.
6 Do you know what the NIOSH recommendations were
7 with respect to labeling?

8 A. No, I don't.

9 Q. Were you aware that their recommendations
10 included that exposure to asbestos caused lung
11 cancer and asbestosis?

12 A. No, I'm not aware of that.

13 Q. Did Maremont ever consider providing a
14 stronger more specific cautionary label or warning
15 other than the one that they used that was in
16 conformance with the OSHA mandate?

17 A. I don't recall.

18 Q. Was there ever consideration to putting
19 bigger lettering or more readily noticeable
20 labeling such as red lettering or something that
21 would stand out more and be more readily observable
22 by the user?

23 A. Not that I recall.

24 Q. Do you know if there were ever

Page 263

1 discussions with respect to better educating the
2 mechanics that were using these products with
3 respect to their exposure to asbestos in the
4 assembly and removal processes?

5 MR. CANONI: Objection as to form.

6 THE WITNESS: I do believe they were
7 educated.

8 BY MR. COON:

9 Q. And in what regard, sir?

10 A. The Maremont field service
11 representatives that visited all the Sears Service
12 Centers at some point did educate all the mechanics
13 on the need to use caution in the handling of
14 asbestos products.

15 Q. Okay. Mr. Liggett, one of the
16 admonishments under the OSHA labeling was to avoid
17 creating dust.

18 As I understand by the process of these
19 mechanics you really can't help but create dust
20 when you're grinding the brake shoe, can you?

21 A. Well, if you capture that dust
22 immediately perhaps they would consider that not
23 creating dust.

24 Q. Or if it's creating it at least it's

Page 264

1 keeping it from getting into the ambient
2 atmosphere?

3 A. That's correct.

4 Q. Do you know what types of collection
5 systems were in place at the various Sears
6 facilities at the time the OSHA regulations went
7 into effect?

8 A. I know that --

9 MR. CANONI: Other than what he's already
10 testified to?

11 He talked about the grinder and the dust
12 collector.

13 BY MR. COON:

14 Q. There were dust collectors on the
15 grinding equipment at the Sears facilities in '72?

16 A. The Ampco grinder had its own integral
17 dust collection unit.

18 Q. Do you know how well it worked with
19 respect to collecting the asbestos dust emanating
20 from the grinding process?

21 MR. CANONI: He's already testified to that at
22 the Nashville facility.

23 BY MR. COON:

24 Q. And what was it? Was it one test that

Page 265

Page 267

1 did that?

2 A. We had identical machines and they did

3 comply with the OSHA regulations.

4 Q. The 1972 regulations?

5 A. Whatever regulation was in effect at

6 whatever time they complied with.

7 Q. And you understand that over time that

8 the OSHA regulations became more severe with

9 respect to the permissible exposure levels of

10 asbestos in the workplace?

11 A. Yes, I am.

12 Q. And did Maremont in response to the, and

13 Nuturn as well in response to those regulations

14 need to provide additional equipment or processes

15 to further reduce the amount of dust in certain

16 areas of the workplace?

17 A. Yes, they did.

18 Q. Was Maremont or Nuturn in a position of

19 having to spend any kind of capital for

20 improvements to the facilities to get them into

21 compliance with these regulations?

22 MR. CANONI: Just restrict your answer to

23 Maremont for that question because it's too

24 convoluted.

Page 266

1 BY MR. COON:

2 Q. Okay. First with Maremont. Were capital

3 expenditures necessary to get them within

4 compliance to the OSHA regulations?

5 A. Yes, they were.

6 Q. Were capital expenditures also necessary

7 when you were working at Nuturn to maintain

8 compliance with OSHA regulations as they related to

9 atmospheric release of asbestos?

10 A. Yes, they were.

11 Q. Did this involve improved dust collection

12 procedures?

13 A. Yes, it did.

14 Q. Did it involve providing other types of

15 respiratory protection to workers in certain areas?

16 A. Yes, it did.

17 Q. Were workers in any of the areas mandated

18 to wear respiratory protection before the

19 regulations went into effect in '72?

20 A. I don't recall.

21 Q. Do you know whether or not Maremont

22 received any information from any of the asbestos

23 fiber manufacturers or suppliers concerning the

24 health effects of asbestos?

1 A. Yes, I do.

2 Q. What's your understanding of what

3 information was conveyed to Maremont in that

4 regard?

5 A. There were warning labels on the

6 packages, and I believe there were certain

7 informational newsletters sent.

8 Q. Beginning what year, sir?

9 A. I can only speak to when I joined the

10 company right now, and at that time they were

11 printing warning labels on the packages.

12 Q. And that was in '72?

13 A. '73.

14 Q. '73. What about prior to that time,

15 before the OSHA regulations?

16 A. I don't recall.

17 Q. Any information disseminated in that

18 manner to your knowledge prior to the OSHA

19 regulations?

20 A. Again I don't recall.

21 Q. Were you aware of National Institute for

22 Occupational Safety and Health studies going back

23 to the early and mid '70s where they issued public

24 findings that workers engaged in the maintenance

Page 268

1 and repair of automotive and truck clutches and

2 brake linings were exposed to potentially hazardous

3 levels of airborne asbestos dust?

4 A. Excuse me, say that again.

5 Q. Yes, sir. Were you aware of any studies

6 or reports by NIOSH in the early to mid 1970s that

7 reflected that in their opinion workers engaged in

8 the maintenance and repair of automotive and truck

9 clutches and brake linings are exposed to

10 potentially hazardous levels of airborne asbestos

11 dust?

12 A. I don't recall.

13 Q. Based on your position at the facility at

14 that time and your involvement in organizations

15 that were investigating these issues would you tend

16 to agree or disagree with such statements if they

17 were made by NIOSH?

18 A. I recall at some point in time there was

19 controversy about the dust residue that was present

20 when you did a brake job and whether that was free

21 asbestos fibers or whether the asbestos had been

22 converted to fosterite, which was a nonhazardous

23 form of asbestos due to the heat and pressure of

24 the braking application.

Page 269

1 That was relevant to the dust that a
2 brake mechanic would be exposed to.

3 Q. And to your knowledge what conclusions
4 were eventually derived with respect to the
5 fosterite defense?

6 MR. CANONI: Objection as to form.

7 THE WITNESS: My conclusion is that it was
8 determined that the majority of the dust was
9 fosterite but it would be wise to be as cautious as
10 possible and use care, to wipe down with a liquid
11 the drums and brake components, and to use dust
12 collection when you're grinding.

13 And you did that to not only avoid
14 exposure to asbestos fibers, but to do a clean,
15 high quality brake job.

16 BY MR. COON:

17 Q. You are familiar with typical brake shoe
18 repairs at most retail facilities in the '60s
19 and '70s in terms of how they changed out brakes,
20 weren't you, sir?

21 A. No, I was not.

22 Q. Let's go to when you worked at Maremont,
23 '73 all the way to the '81 time frame. Were you
24 familiar with how garages, service stations and

Page 270

1 brake shoe shops typically changed out brake shoes?

2 A. No, I was not.

3 Q. Had you ever been in what I called any of
4 these field environments where mechanics were
5 changing out brake shoes?

6 A. Never for the purpose of observing what
7 and how they did it.

8 Q. Were you aware that in many of these
9 shops they had pneumatic tools and used air hoses
10 in the removal of the tires and some of the work
11 processes?

12 A. Yes, I am.

13 Q. Were you familiar of a common practice of
14 mechanics using the air hoses, these pneumatic air
15 hoses to blow out all the residue, the brake
16 residue around the drums when they pulled the tires
17 off and pulled the drum out before they put the new
18 brake shoes on?

19 MR. CANONI: Objection as to form.

20 THE WITNESS: No, I'm not aware of it.

21 BY MR. COON:

22 Q. Is it something that's news to you today
23 that that was a practice engaged in by mechanics in
24 that industry?

Page 271

1 A. I'm aware that the field service
2 representatives made a point of cautioning the
3 Sears mechanics not to do that and to use other
4 means of cleaning up the brake assembly.

5 Q. Okay. And for them to tell the Sears
6 mechanics not to do that would tell you that at
7 some point in time they were doing that?

8 I mean they wouldn't be going out there
9 and telling them not to do something they weren't
10 doing?

11 A. Well, they would tell them to do
12 something that could be a potential hazard.

13 Q. Okay. So did you have an understanding
14 that any of those mechanics were in fact using air
15 hoses in that way?

16 A. That's something again that I just did
17 not personally get involved. I've never changed my
18 own brakes, I didn't have anything to do with
19 selling to the Sears Auto Centers.

20 Q. Fair enough.

21 Did you have any involvement with
22 Maremont on the changes in the law in California
23 which were somewhat more restrictive than the
24 federal laws as it related to brake shoes and their

Page 272

1 disposal?

2 A. No, I did not.

3 Q. Do you know anything about the
4 regulations in California that required certain
5 efforts to be made in the removal and disposal of
6 asbestos brake material back in the late '70s?

7 A. No, I'm not.

8 MR. CANONI: Objection as to form.

9 You okay?

10 THE WITNESS: I'm fine.

11 BY MR. COON:

12 Q. Give me a couple more minutes. I'm
13 wading through the rest of these and I've got a few
14 more of those and we'll be done.

15 You want to stretch your legs just a
16 minute?

17 A. I'm fine, thank you.

18 MR. COON: Off the record.

19 (Discussion had off the record).

20 BY MR. COON:

21 Q. Do you know what type of information or
22 opinion Maremont put in its packaging as advisory
23 to the Sears mechanics with respect to limiting
24 their exposure to asbestos dust?

Page 273

Page 275

1 A. I don't recall.

2 Q. Do you know if any such additional
3 information was put into any of the boxes of any of
4 the products that were shipped to the Sears
5 facilities?

6 MR. CANONI: During the time Maremont made the
7 product?

8 BY MR. COON:

9 Q. During the time that you worked for
10 Maremont or Nuturn. I'm sorry again I forgot the
11 --

12 MR. CANONI: Because he switched --

13 MR. COON: Right. It's a weird deal. I
14 understand.

15 BY MR. COON:

16 Q. For the years you worked at Maremont,
17 sir, '73 to '77, any information provided in the
18 boxes that were shipped to the Sears stores for
19 their mechanics to provide them with additional
20 admonishments on limiting their exposure to
21 asbestos dust?

22 A. I don't recall specifically, but I think
23 the installation instructions were modified to put
24 advice about avoiding dust.

Page 274

1 Q. Do you recall who would have been
2 involved in the language that would have been used
3 in that and when that was done?

4 A. Bob Rogers.

5 Q. And do you recall --

6 A. And Dick Sealy.

7 Q. Thank you, sir. And about what years
8 would that have been?

9 A. I'm guessing that would have been '73,
10 '74.

11 Q. What type of information, if any, was
12 passed along to the employees in '72 when OSHA
13 regulations came into effect to regulate the
14 asbestos in the various Maremont facilities?

15 A. Employee meetings were held to make them
16 aware of the OSHA regulations.

17 Q. And I guess there was some explanation
18 for the necessity of implementing annual physicals?

19 A. That's correct.

20 Q. Was there a preemployment physical that
21 was typically given to employees before they went
22 to work at Maremont?

23 A. At some point that was implemented.

24 Q. Do you know whether or not there was an

1 annual examination of employees after they came to
2 work there before the OSHA regulations went into
3 effect?

4 A. I don't recall.

5 MR. CANONI: Brent, there is a response on
6 that.

7 MR. COON: I did see one thing in there that
8 indicated in 1969 something took place. Would that
9 be it?

10 MR. CANONI: I think it's Interrogatory
11 response number 22.

12 BY MR. COON:

13 Q. Do you know anything about an examination
14 of the employees in 1969?

15 A. No, I do not.

16 Q. Do you know what precipitated that?

17 A. No, I don't.

18 Q. Do you know if it had anything to do with
19 concerns over asbestos?

20 MR. CANONI: Objection as to form.

21 THE WITNESS: I don't know about it, so I
22 can't tell you what caused it.

23 BY MR. COON:

24 Q. What type of information would be relayed

Page 276

1 to you from the Friction Materials Standards
2 Institute?

3 A. Information about edge codes, edge
4 brands, information about new vehicles.

5 Q. Who is your understanding of the
6 companies that comprised membership in that
7 institute?

8 A. I'm not sure. I was never a member, I
9 never went to a meeting. I believe it was
10 everybody that made or used friction materials.

11 Q. Did you ever have any dealings with Mr.,
12 I believe it was a Mr. Hyde who is a buyer at Sears
13 and Roebuck?

14 A. No, I did not.

15 Q. And again a Mr. Sealy?

16 A. Yes, I knew Mr. Sealy.

17 Q. He was the vice president of what
18 division in '73?

19 A. His primary responsibility was Sears.

20 Q. Which office did he work out of?

21 A. Chicago.

22 Q. Had you ever seen a copy of this letter?
23 This is dated May 25, '73.

24 And Counsel, it is document 944 of your

Page 277

Page 279

1 Bates.

2 Have you seen copies of that letter
3 before, sir?

4 I think it deals again with that same
5 issue of labels as they related to the boxes that
6 were going to the Sears stores.

7 A. I don't recall seeing that document
8 before.

9 Q. Basically what Mr. Sealy is advising
10 Mr. Hyde at Sears was as of May '73 he's giving
11 them another copy of the OSHA regulations
12 pertaining to asbestos dust exposure, correct?

13 A. That's correct.

14 Q. Talks about the caution label that has to
15 go on the boxes, right?

16 A. It appears to.

17 Q. Ones that we've talked about. And then
18 he talked about products that they would have to
19 have the labels on and others that they would not
20 as well as the reasons, correct?

21 A. I think the document speaks to that.

22 Q. Okay. And one of them is that Mr. Sealy
23 noted that the grinding -- he's talking about
24 grinding brake shoes at the Sears stores, right?

Page 278

1 A. That's my understanding.

2 Q. He says "The grinding will release
3 asbestos particles in the air," correct?

4 That was something Mr. Sealy observed or
5 knew?

6 MR. CANONI: The document speaks for itself.
7 I don't see how he can tell you what Mr. Sealy knew
8 or understood at the time.

9 BY MR. COON:

10 Q. Okay. Well, it says here though that
11 Mr. Sealy in his letter says "The grinding will
12 release asbestos particles in the air."

13 I think that's his last sentence, isn't
14 it?

15 MR. CANONI: If that's what the document says
16 --

17 THE WITNESS: That's what the document says.

18 MR. CANONI: -- that's what the document says.

19 BY MR. COON:

20 Q. Do you know how Mr. Sealy arrived at that
21 opinion?

22 MR. CANONI: Objection as to form.

23 THE WITNESS: No, I don't.

24 BY MR. COON:

1 Q. And it indicates on here that he said

2 "Would you please approve of fixing the labels as
3 required by OSHA regulations."

4 And in that regard do you know why

5 Mr. Sealy would wait for Sears to approve the
6 labels?

7 Do you know what was involved in that
8 process?

9 A. I can't speak to what was on Mr. Sealy's
10 mind.

11 Q. Do you know whether or not the contract
12 that was in place between Sears and Maremont was
13 specific with respect to the type of packaging that
14 would be contained on the boxes shipped to the
15 Sears stores?

16 A. I don't recall.

17 Q. What did these boxes that were coming
18 from Maremont to the Sears stores look like?

19 MR. CANONI: Brent, we did go through that in
20 detail actually.

21 MR. COON: Yeah, we went over the label but --

22 MR. CANONI: No, we went over the actual box.

23 BY MR. COON:

24 Q. Okay. What was the color?

Page 280

1 A. The box for the All-In-One was white with
2 a label, rectangular label on one end that had
3 printed in black and red.

4 Q. And the labeling was in black and red?

5 A. The label was black and red.

6 Q. Or the logo-ing? The logo-ing or --

7 A. There's no logo-ing.

8 Q. It had Sears on it, right?

9 A. Right.

10 Q. Was that in black and red or black or
11 red?

12 A. The two colors were black and red on a
13 white piece of paper.

14 Q. What about the other one that was just
15 the brake -- was it the brake linings or brake
16 pads?

17 A. It was a box that was printed to show a
18 car in a driveway with people doing -- working on
19 their car.

20 MR. CANONI: That was the Over-The-Counter?

21 THE WITNESS: Yes.

22 BY MR. COON:

23 Q. There's another document, Counsel, this

24 is 1279. It's called Asbestos Exposure Versus Back

Page 281

Page 283

1 Shop Brake Shoe Grinding as prepared for
 2 Mr. Badagowski who's a buyer at Sears and Roebuck
 3 Chicago and it was prepared by a W.N. Bockay. Am I
 4 saying it right? B-o-c-k-a-y.
 5 A. Bockay.
 6 Q. Bockay. Who's a manager of technical
 7 services at Maremont Brake Products. Do you know
 8 why this report was generated?
 9 A. No, I don't.
 10 Q. Have you ever seen the report before?
 11 A. No, I haven't.
 12 Q. Do you know what year it was prepared?
 13 A. No, I don't.
 14 Q. Do you know whether or not Mr. Bockay was
 15 asked by anyone in particular to provide this
 16 information to Sears?
 17 A. No, I don't.
 18 Q. Were you aware that Mr. Bockay included
 19 in his report a number of comments regarding the
 20 release of asbestos dust --
 21 MR. CANONI: Brent, he said he hasn't seen it
 22 before and he's not aware of it.
 23 BY MR. COON:
 24 Q. Okay. Let me just ask you this. Were

1 the testing going on there.
 2 MR. COON: Okay.
 3 BY MR. COON:
 4 Q. Counsel, this is document 466, it's a
 5 letter dated August 20, '75, from Raybestos
 6 Manhattan with a separate cover dated August 26,
 7 '75, from E.W. Drislane as an executive director
 8 to an asbestos study committee.
 9 Do you know anything about a Mr. Drislane
 10 with Friction Materials Standards Institute, what
 11 his role was in the mid '70s?
 12 A. No, I don't.
 13 Q. Were you aware of any activities by the
 14 United Auto Workers to implement their own asbestos
 15 safety information to their workers by the mid
 16 '70s?
 17 A. No, I'm not.
 18 Q. Do you know of any persons at Maremont
 19 that would have been representatives of an asbestos
 20 study committee at Maremont?
 21 A. None that I recall.
 22 Q. This being --
 23 MR. CANONI: You mean at Maremont or as part
 24 of the FMSI?

Page 282

Page 284

1 you aware of any findings by any Maremont employees
 2 reflecting that grinding brake shoes generates
 3 asbestos dust in quantities that present OSHA
 4 control problems?
 5 A. No, I'm not aware of that.
 6 Q. Was that something that was never relayed
 7 to you that you recall?
 8 A. I just don't recall.
 9 Q. Would you have any personal ability to
 10 agree or disagree with comments of that nature?
 11 A. Other than to remind you again that I was
 12 in Nashville, Tennessee, making the product.
 13 Mr. Bockay and Mr. Sealy were in Chicago dealing
 14 with Sears.
 15 So it's not something that I would see
 16 them daily around the water cooler or go to lunch
 17 and discuss with them.
 18 Q. Okay.
 19 MR. CANONI: Carl, his question was do you
 20 have any reason or knowledge to agree or disagree
 21 with the grinding operation presenting OSHA control
 22 problems?
 23 And I think he's testified before twice
 24 now about the grinding that Nashville was doing and

1 BY MR. COON:
 2 Q. It's hard for me to tell, sir. It
 3 appears that there's a Friction Materials Standards
 4 Institute. And what I'm trying to decipher from
 5 multiple layers of correspondence here is if there
 6 is an asbestos study committee contained within the
 7 Friction Materials Standards Institute.
 8 So let me ask you that first. Do you
 9 know whether or not there was such a committee?
 10 A. I do not know.
 11 Q. And I guess corollary to that is do you
 12 know whether or not Maremont had any
 13 representatives of such committee, whether or not
 14 it was contained within the Friction Materials
 15 Standards Institute?
 16 A. I don't know.
 17 Q. I take it you were not a member?
 18 A. I was not a member.
 19 Q. I wanted to ask you questions about this
 20 document, too, sir. This is a Sears, Roebuck
 21 document. It is to Mr. Sealy at Maremont, Chicago,
 22 from a gentleman named -- it's kind of hard to
 23 read. It looks like J. Badagowski again maybe.
 24 A. There was a Mr. Badagowski that was a

Page 285

1 Sears employee.

2 Q. It appears that he is a Sears
3 representative. This is dated March 23, 1976. And
4 I don't want us to spend a lot of time on this
5 because I'm still trying to cover a few documents
6 with you.

7 But the gist of it is he's talking -- he
8 expresses concern over their brake program, doesn't
9 really get specific.

10 MR. CANONI: Brent, the document will speak
11 for itself. You can ask him whether he's seen it
12 before and if he has any knowledge of it.

13 BY MR. COON:

14 Q. Okay. If you just read this second
15 paragraph. We don't need to read the contents of
16 it again, but the impression I got is that he's got
17 a problem with arc grinding.

18 Is that reflected from the letter --

19 MR. CANONI: Objection as to form.

20 BY MR. COON:

21 Q. -- can you tell? Or concerns about it?

22 A. I really don't think I can add anything
23 to what the documents says.

24 Q. Okay. Well, the question I had was he

Page 286

1 talks about issues -- experiences, and he doesn't
2 get into specifics. He says their experience
3 involving some of their finest facilities and their
4 finest people and it's cause for concern.

5 Do you know what those experiences were
6 with those employees?

7 A. No, I don't.

8 MR. CANONI: Other than what the document
9 says?

10 BY MR. COON:

11 Q. Yeah. Do you know anything -- do you
12 know if any of those employees had been diagnosed
13 with asbestos-related health problems or anything
14 else?

15 MR. CANONI: Objection as to form.

16 THE WITNESS: No, I don't know.

17 BY MR. COON:

18 Q. Do you know whether or not any Sears
19 employees were ever diagnosed with any asbestos-
20 related health problems, the employees being the
21 ones that worked around any of the Maremont brake
22 products?

23 A. When I worked there?

24 Q. Yes, sir.

Page 287

1 A. I'm not aware of any.

2 Q. Were you aware of any after you worked
3 there?

4 A. Yes, I am.

5 Q. And could you just explain what it is
6 that you know about Sears employees that have had
7 such problems.

8 A. I'm aware of one case where a Sears
9 salesman alleges that he got asbestos-related
10 sickness from the time he worked at a Sears Service
11 Center.

12 Q. How was it you were imputed with that
13 knowledge?

14 A. Because it involved litigation with
15 Maremont.

16 Q. So one of the cases -- we talked about
17 cases involving Maremont before. There was one
18 that you understood involved a claim by a Sears
19 salesman against Maremont for his allegations of
20 suffering an asbestos-related health problem from
21 being exposed to asbestos-containing Maremont
22 products?

23 A. Right.

24 Q. Do you know what the disposition of that

Page 288

1 claim was or when that was filed?

2 A. No, I don't know the disposition.

3 Q. Do you know what kind of disease process
4 this gentleman was purportedly diagnosed with?

5 A. I don't recall.

6 Q. Were you asked to review the circumstance
7 of that case on behalf of Maremont?

8 MR. CANONI: Objection as to form.

9 THE WITNESS: I'm not sure what that question
10 means.

11 BY MR. COON:

12 Q. Yes, sir. Were you asked to look into
13 the case, provide any opinions or expertise in that
14 case on behalf of Maremont?

15 A. I was deposed in that case.

16 Q. Okay. I'm sorry. That was one of the
17 cases you told us about this morning?

18 A. Yes, that's correct.

19 MR. CANONI: Brent, I will tell you the
20 Friction Materials -- the FMSI documents, for ease
21 of reference, were documents that we included in
22 our production but that were not necessarily in
23 Maremont's files.

24 It's just a wholesale production of what

Page 289

Page 291

1 we got from somebody else.
 2 BY MR. COON:
 3 Q. Well, I'm skipping over most of the rest
 4 of it too. You apparently didn't have much
 5 knowledge about this subject matter.
 6 Have you seen any articles, research
 7 literature that associates, or even disassociates
 8 asbestos-related health problems from people that
 9 work in the grinding processes on friction
 10 materials?
 11 A. No, I have not.
 12 Q. Do you know when or if Maremont initiated
 13 any efforts to remove asbestos from their brake
 14 shoes?
 15 MR. CANONI: I'm sorry, the question was as to
 16 Maremont?
 17 BY MR. COON:
 18 Q. Yes, sir, first as to Maremont.
 19 A. I think they initiated those efforts
 20 about 1974 or '5.
 21 Q. Was that as a result of the problems
 22 associated with asbestos?
 23 A. Yes, it was.
 24 Q. And do you know whether or not they were

Page 290

1 successful to any degree in finding substitutes for
 2 asbestos?
 3 A. They were not.
 4 Q. With respect to Nuturn, do you know
 5 whether or not they were initiating any such
 6 efforts?
 7 A. At what time?
 8 Q. During the time frames that you worked
 9 for them, sir.
 10 A. Yes, they did.
 11 Q. This would be '77 to '81?
 12 A. That's right.
 13 Q. And do you know whether or not they were
 14 having any success in finding substitutes for
 15 asbestos in their asbestos-containing friction
 16 materials?
 17 A. They were having some success.
 18 Q. Do you know what the problems were, if
 19 any, with achieving full success for substitutes?
 20 A. Finding products that had the right
 21 friction coefficient, products that wouldn't wear
 22 out quickly or wear out the brake drum or disc pad
 23 quickly, products that wouldn't fade in high heat
 24 or recover quickly after getting wet.

1 All those problems existed.
 2 Q. Did you know Mr. I.H. Weaver? I think he
 3 might have been a corporate director at Raybestos
 4 Manhattan.
 5 A. No, I did not.
 6 Q. He had written to Mr. Drislane at
 7 Friction Materials. And I think I asked you
 8 before, did you know Mr. Drislane?
 9 A. I did not.
 10 Q. Were you ever privy to information that
 11 they circulated concerning asbestos hazards in
 12 1975?
 13 MR. CANONI: Objection as to form.
 14 THE WITNESS: Not necessarily.
 15 BY MR. COON:
 16 Q. Do you know whether or not you were
 17 personally able to observe a program that might
 18 have been disseminated through them called Asbestos
 19 Killer Dust?
 20 A. I don't recall that.
 21 Q. Do you recall seeing any other films or
 22 programs dealing with asbestos that was circulated
 23 from AIA or the Friction Materials Standards
 24 Institute or within Maremont concerning asbestos

Page 292

1 hazards?
 2 MR. CANONI: Objection as to form.
 3 THE WITNESS: Yes, I did see some -- at least
 4 one film.
 5 BY MR. COON:
 6 Q. Do you recall what that was?
 7 A. No, I don't.
 8 Q. Was it a copy of something that was on
 9 television or syndication or was it something that
 10 was prepared in-house, or do you recall?
 11 A. It was a film that was purchased. I
 12 don't know the origin of it. I don't recall.
 13 MR. CANONI: Do you know whether that was with
 14 Maremont or Nuturn?
 15 THE WITNESS: Yes, I do. That was with
 16 Nuturn, excuse me.
 17 MR. CANONI: That's understandable.
 18 BY MR. COON:
 19 Q. Do you know if that was a Nuturn prepared
 20 videotape?
 21 A. No, it was not.
 22 Q. Do you know who it was prepared by?
 23 A. I don't recall.
 24 Q. Do you know of any of the efforts by AIA

Page 293

1 to oppose the additional restrictions on workplace
 2 exposure to asbestos in the 1976 and 1980
 3 standards?
 4 MR. CANONI: Objection as to form.
 5 THE WITNESS: I'm aware that that was
 6 discussed extensively at AIA meetings.
 7 BY MR. COON:
 8 Q. And one of the problems with restricting,
 9 further restricting the workplace exposure lower
 10 than the '72 standards was going to be the cost
 11 associated within the companies with maintaining --
 12 reaching and maintaining compliance, correct?
 13 A. That is one issue.
 14 Q. And in some areas there was probably a
 15 concern with respect to even being able to achieve
 16 compliance, is that correct?
 17 A. That's correct.
 18 Q. Did you have any dealings with
 19 Mr. Mereness, M-e-r-e-n-e-s-s who was an executive
 20 director for AIA for some period of time in the
 21 '70s?
 22 A. No, I didn't.
 23 Q. Did you have any involvement with
 24 representatives of any of the other companies that

Page 294

1 were members of the AIA or the Frictions Materials
 2 Institute?
 3 A. Nothing beyond sitting at tables with
 4 them for lunch and dinner.
 5 Q. Never independently consulted with
 6 representatives of Bendix or other friction
 7 material suppliers or manufacturers concerning
 8 their own problems with OSHA or meeting compliance
 9 or health issues?
 10 A. No, I did not.
 11 Q. Do you know if anyone else within
 12 Maremont did so?
 13 A. Not to my knowledge.
 14 MR. COON: If I can have about two minutes off
 15 the record, I think we're about to conclude.
 16 THE VIDEOGRAPHER: Off the record, 5:48.
 17 (Whereupon, a break was taken
 18 from 5:48 until 5:51 p.m.)
 19 THE VIDEOGRAPHER: On the record, 5:51.
 20 BY MR. COON:
 21 Q. Mr. Liggett, we've covered a lot of
 22 ground today, and I appreciate your patience in
 23 answering the questions that we've had for you.
 24 In retrospect I'd like to ask you, sir,

Page 295

1 since we've covered a lot of area, are there things
 2 now that having discussed them that you now feel
 3 this sudden urge to say oh, I need to tell him
 4 something else about this or that to clarify
 5 something you said earlier?
 6 A. No. I think you've covered it very
 7 thoroughly.
 8 Q. To the best of your knowledge did you
 9 understand the questions that we asked that
 10 elicited an answer?
 11 A. Say that again, please.
 12 Q. Of all questions for him to ask me that
 13 now.
 14 Have you been able to understand the
 15 questions that we asked of you today that resulted
 16 in you giving us an answer?
 17 A. Yes, I think so.
 18 Q. Any time you did not understand the
 19 question thoroughly you did just as you did there,
 20 which is ask me to rephrase or repeat?
 21 A. I think I did.
 22 MR. COON: Okay. We have no further questions
 23 of you today.
 24 Thank you, sir.

Page 296

1 MS. BLACKWELL: Jennifer Blackwell on behalf
 2 of Borg-Warner. We have no questions.
 3 MR. ZAENGLE: Ed Zaengle on behalf of Dresser
 4 Industries has no questions.
 5 MR. CANONI: I have no questions.
 6 Thank you.
 7 THE VIDEOGRAPHER: This concludes the
 8 deposition of Carl Liggett.
 9 The time is 5:52. End of tape 3.
 10 (FURTHER DEPONENT SAITH NOT AT 5:52 P.M.)
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 297

Page 299

1 IN THE DISTRICT COURT OF
 2 JEFFERSON COUNTY, TEXAS
 3 60TH JUDICIAL DISTRICT
 4 WILLIAM L. COTTON, et al.,)
 5 Plaintiffs,)
 6 vs.) Cause No.
 7 A.P. GREEN REFRACTORIES CO.,) B-150, 374-AK
 8 et al.,)
 9 Defendants.)

10 This is to certify that I have read the
 11 transcript of my deposition taken on August 15,
 12 2002,, 2002 in the above-entitled cause by Roselind
 13 C. Benuska, CSR, consisting of Pages 1-299,
 14 inclusive, and that the foregoing transcript
 15 accurately states the questions asked and the
 16 answers given by me, with corrections, if any,
 17 appearing on the attached correction sheet(s).
 18 correction sheet(s) attached.

21 CARL LIGGETT
 22 SUBSCRIBED AND SWORN TO
 before me this day
 23 of , 20 .
 24

1 said witness as aforesaid.

2 I further certify that the signature of the
 3 witness to the foregoing deposition was not
 4 waived.

5 I further certify that my certificate annexed
 6 hereto applies only to the transcript signed and
 7 notarized by me and produced by me personally or
 8 under my direction and control. The undersigned
 9 assumes no responsibility for the accuracy of any
 10 reproduced copies not made under my control or
 11 direction.

12 I further certify that I am not counsel for
 13 nor in any way related to the parties to this suit,
 14 nor am I in any way interested in the outcome
 15 thereof.

16 IN TESTIMONY WHEREOF: I have hereunto set my
 17 hand and affixed my notarial seal this 3rd day
 18 of September, 2002.

21 *Roselind C. Benuska*

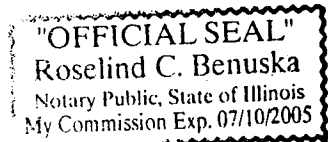
22 ROSELIND C. BENUSKA
 23 Notary Public, DuPage County, Illinois
 Certified Shorthand Reporter

24 License No. 084-002031

Page 298

1 STATE OF ILLINOIS)
 2) SS:
 3 COUNTY OF DU PAGE)
 4 I, Roselind C. Benuska, a Certified Shorthand
 5 Reporter and Notary Public within and for the
 6 County of DuPage and State of Illinois, do hereby
 7 certify that heretofore, to-wit, on the 15th day of
 8 August 2002, personally appeared before me at 8000
 9 Joliet Road, McCook, Illinois, CARL LIGGETT, in a
 10 cause now pending and undetermined in the 60th
 11 Judicial District, Jefferson County, Texas, wherein
 12 WILLIAM L. COTTON, et al. are the Plaintiffs, and
 13 A.P. GREEN REFRACTORIES CO., et al. are the
 14 Defendants.

15 I further certify that the taking of this
 16 deposition was pursuant to Notice and that said
 17 witness was first duly sworn to testify the truth,
 18 the whole truth and nothing but the truth in the
 19 cause aforesaid; that the testimony then given by
 20 said witness was reported stenographically by me in
 21 the presence of the said witness, and afterwards
 22 reduced to typewriting by Computer-Aided
 23 Transcription, and the foregoing is a true and
 24 correct transcript of the testimony so given by



-\$- \$175 [1] 13:12 -'- '30s [3] 49:17 50:3 186:5 '4 [1] 23:15 '40s [1] 180:13 '42 [1] 180:19 '5 [1] 289:20 '50s [7] 49:19 49:22 50:17 180:9 215:21 222:7 222:10 '53 [1] 189:14 '60s [9] 81:14 82:11 214:21 214:22 222:4 222:5 222:10 240:7 269:18 '67 [1] 82:17 '68 [1] 82:17 '70 [2] 23:15 38:10 '70s [12] 35:6 75:21 195:5 212:16 216:6 253:11 267:23 269:19 272:6 283:11 283:16 293:21 '72 [7] 209:22 232:21 264:15 266:19 267:12 274:12 293:10 '73 [33] 23:15 24:20 24:21 35:9 38:20 39:6 41:19 44:4 81:17 82:13 87:21 99:23 101:20 101:22 104:17 104:23 126:16 127:7 127:11 127:12 132:14 208:1 230:7 255:21 261:13 267:13 267:14 269:23 273:17 274:9 276:18 276:23 277:10 '74 [1] 274:10 '75 [3] 205:15 283:5 283:7 '76 [1] 26:4 '77 [21] 26:6 26:9 39:6 39:14 40:7 44:4 87:21 88:1 94:11 100:18 101:6 101:13 101:16 104:23 126:16 126:20 127:9 132:14 132:22 273:17 290:11 '80s [1] 88:1 '81 [12] 26:10 26:19 27:17 28:11 39:2 39:14 88:3 109:8 112:18 126:24 269:23 290:11 '86 [3] 28:8 28:11 28:15 '89 [1] 30:2 '90 [1] 30:2	'90s [1] 32:4 '93 [1] 31:7 '95 [1] 32:9 --- -and [1] 2:15 -vs [1] 1:7 -0- 084-002031 [2] 1:17 299:24 -1- 1 [1] 115:2 1-299 [1] 297:13 10 [3] 81:22 141:19 198:10 100,000 [1] 204:12 10019-6799 [1] 2:13 1025 [1] 2:18 10:58 [2] 1:21 5:5 11:09 [1] 16:9 11:11 [1] 16:11 12 [5] 67:10 145:3 146:1 146:3 146:7 1279 [1] 280:24 12:32 [2] 87:6 87:8 14 [1] 146:8 1402 [1] 255:19 1436 [1] 168:6 1439 [1] 172:24 15 [2] 5:4 297:11 1558 [1] 205:10 15th [2] 1:20 298:7 1633 [1] 2:12 18 [2] 56:1 184:19 1930s [1] 49:3 1942 [2] 180:11 180:14 1950s [3] 180:23 215:2 215:7 1953 [1] 182:10 1965 [1] 21:12 1966 [1] 22:8 1969 [2] 275:8 275:14 1970 [1] 22:8 1970s [1] 268:6 1972 [6] 208:22 209:13 210:3 225:14 258:5 265:4 1973 [7] 39:1 41:9 41:22 211:3 259:14 260:21 261:4 1974 [2] 24:19 289:20 1975 [2] 26:4 291:12 1976 [2] 285:3 293:2 1977 [4] 26:5 95:8	96:17 97:7 1980 [1] 293:2 1981 [1] 26:8 1986 [1] 245:7 1989 [1] 245:8 1:40 [2] 87:8 87:10 -2- 2 [5] 115:6 146:1 146:3 181:9 228:16 20 [5] 8:18 184:19 203:16 283:5 297:23 200 [1] 86:10 2002 [6] 1:20 5:4 297:12 297:12 298:8 299:18 21 [1] 203:16 2182 [1] 8:14 22 [1] 275:11 23 [1] 285:3 24 [1] 23:21 25 [2] 144:22 276:23 167:22 25,000 [2] 167:7 26 [1] 283:6 29 [1] 255:18 2:08 [2] 115:3 115:5 2:11 [2] 115:5 115:7 2:44 [2] 148:8 148:10 -3- 3 [3] 146:6 228:20 296:9 30 [1] 68:2 30s [1] 239:21 3162 [1] 150:9 32 [1] 139:14 3550 [1] 2:4 374-AK [2] 1:8 297:7 39 [1] 215:3 3:02 [2] 148:10 148:13 -4- 4 [1] 198:10 40,000 [3] 167:8 167:20 168:1 400 [1] 3:19 4200 [1] 3:11 46 [1] 184:9 46260 [1] 3:20 466 [1] 283:4 4693 [1] 179:5 4:28 [2] 228:17 228:19 4:38 [2] 228:19 228:21 -5- 5 [2] 75:24 217:11	50 [4] 60:17 62:16 68:2 141:19 53 [1] 5:2 54 [2] 184:10 184:20 550 [1] 2:17 5:48 [2] 294:16 294:18 5:51 [2] 294:18 294:19 5:52 [2] 296:9 296:10 5R [1] 139:20 -6- 6 [2] 145:2 146:7 600 [1] 3:10 60611-7602 [1] 3:5 60TH [2] 1:3 297:3 60th [2] 5:10 298:10 65 [1] 139:15 6D [1] 139:20 -7- 7 [1] 23:21 7053 [1] 188:23 7055 [1] 189:15 7102 [1] 188:23 7103 [1] 194:9 77002 [1] 3:12 77701 [2] 2:5 2:19 7D [1] 139:20 7M [1] 139:20 -8- 8 [3] 4:4 217:11 218:19 8000 [3] 1:19 5:6 298:8 8T [1] 139:21 -9- 9-11-75 [1] 205:15 9102 [1] 3:18 944 [1] 276:24 949 [1] 257:16 -A- A-r-v-i-n [1] 133:5 a.m [2] 1:21 5:5 A.P [4] 1:8 5:8 297:7 298:13 Abex [3] 94:3 94:4 94:8 ability [3] 84:24 147:3 282:9 able [17] 7:6 13:19 29:11 110:24 113:23 115:11 115:14 131:21 132:17 142:11 155:14	166:9 166:15 201:5 291:17 293:15 295:14 abnormalities [1] 223:24 above [1] 216:19 above-entitled [1] 297:12 abroad [1] 148:22 absolutely [1] 57:6 absorber [4] 42:21 94:22 111:6 135:21 absorbers [8] 42:4 42:9 43:6 45:11 83:7 84:11 110:15 111:13 AC&L [2] 63:24 64:2 accommodate [1] 83:1 according [1] 256:3 accounts [7] 37:7 47:24 71:13 102:13 125:18 130:17 158:13 accuracy [1] 299:9 Accurate [7] 9:6 9:7 19:21 20:2 32:7 32:9 32:12 accurately [3] 178:19 195:3 297:15 achieve [1] 293:15 achieving [1] 290:19 Acme [1] 185:3 acquire [5] 74:5 95:22 113:18 129:10 238:12 acquired [31] 37:12 39:8 50:15 50:17 51:7 52:3 63:2 74:10 95:2 95:3 108:22 113:3 114:8 119:18 119:23 122:11 126:20 132:24 140:18 150:21 150:23 150:24 151:18 180:4 180:12 180:22 185:20 188:2 188:18 189:13 189:24 acquirers [1] 53:20 acquiring [3] 64:5 89:1 133:18 acquisition [14] 37:7 52:23 63:17 64:17 89:5 97:18 98:12 98:20 120:5 180:7 181:20 183:17 186:19 191:14 acquisitions [1] 64:11 active [1] 22:11 actively [2] 31:16 34:2 activities [18] 38:24 42:1 95:2 95:9 131:4 132:2 132:15 132:19 149:10 191:14 194:4 207:19 220:14
--	--	---	--	--

233:5 233:18 237:4 248:9 283:13 activity [1] 64:21 actual [7] 62:21 146:13 159:3 160:19 200:4 221:20 279:22 add [2] 191:9 285:22 addition [3] 121:7 123:3 244:8 additional [10] 169:18 169:20 179:6 243:8 243:19 243:21 265:14 273:2 273:19 293:1 address [6] 8:12 97:15 131:23 131:23 132:4 132:6 addressed [1] 230:2 addresses [1] 260:18 addressing [1] 216:5 adhere [2] 176:7 177:19 adhered [1] 177:12 adhesive [12] 145:5 145:7 145:22 176:14 177:8 177:24 178:8 178:15 178:16 204:15 204:24 205:5 adjust [1] 200:20 adjusted [1] 200:21 adjuster [3] 200:12 200:14 200:16 admonishment [2] 225:18 225:19 admonishments [3] 228:5 263:16 273:20 adversely [1] 130:15 advertising [2] 194:3 194:4 advice [2] 212:13 273:24 advise [1] 227:22 advised [1] 216:14 advising [1] 277:9 advisory [1] 272:22 affected [1] 233:2 affecting [1] 237:11 affects [2] 237:21 238:3 affidavits [2] 118:6 118:8 affix [1] 199:20 affixed [1] 299:17 aforesaid [2] 298:19 299:1 aftermarket [10] 43:17 43:19 45:12 45:14 48:1 48:3 56:11 71:14 71:15 72:20 afterwards [1] 298:21 Again [22] 19:17 23:22 30:19 37:18 46:10 56:6 56:11	67:3 83:21 129:16 137:4 137:20 138:6 138:8 177:1 178:21 196:10 197:2 201:14 228:11 255:11 267:20 again [44] 32:1 53:23 57:21 64:1 67:1 67:14 76:19 89:12 103:15 103:24 104:16 124:24 125:10 127:16 136:17 139:22 152:6 152:21 168:17 168:21 173:21 175:7 175:8 175:22 180:16 191:9 222:15 241:10 243:12 249:5 252:5 252:18 254:8 255:17 256:6 268:4 271:16 273:10 276:15 277:4 282:11 284:23 285:16 295:11 against [9] 47:7 47:11 47:20 60:5 141:17 176:15 176:16 237:10 287:19 agent [1] 224:15 agents [1] 213:17 ago [4] 10:11 67:15 208:15 255:16 agree [5] 258:4 260:7 268:16 282:10 282:20 agreed [3] 12:5 258:11 259:15 agreeing [1] 114:19 agreement [7] 6:22 7:9 12:17 153:8 157:13 159:21 193:16 agreements [1] 153:3 AIA [23] 233:23 234:10 234:11 235:18 235:23 236:3 236:19 237:1 237:4 237:7 237:9 237:13 243:7 243:14 244:11 244:17 244:18 250:9 291:23 292:24 293:6 293:20 294:1 aid [3] 192:15 192:16 192:21 aim [1] 173:4 AIO [4] 230:18 231:13 256:2 257:4 Air [10] 21:22 22:1 22:14 22:15 22:16 22:16 22:18 24:7 37:20 38:10 air [27] 37:21 131:15 210:24 213:24 214:2 214:7 214:14 218:9 219:14 219:18 219:21 220:1 220:5 220:12 220:17 220:21 221:14 221:21 222:10 225:4 254:24 270:9 270:14 270:14 271:14 278:3 278:12 airborne [2] 268:3 268:10	aircraft [3] 22:3 22:19 37:23 airplanes [1] 38:3 Airways [19] 85:16 85:17 85:20 86:2 86:8 97:12 107:14 108:9 108:15 108:19 109:19 109:23 110:9 110:10 110:19 111:8 111:11 111:11 111:22 al [8] 1:5 1:9 5:8 5:9 297:4 297:8 298:12 298:13 Alar [1] 234:22 alive [1] 91:12 All-In-One [17] 120:14 123:13 124:4 124:23 125:4 125:5 125:7 125:13 126:7 127:13 128:11 128:17 129:11 136:22 230:19 254:10 280:1 All-In-Ones [4] 122:10 126:13 126:14 128:5 allegations [1] 287:19 alleged [2] 11:6 208:8 alleges [1] 287:9 Alliance [6] 19:10 19:16 26:17 28:24 29:5 29:15 Allied [13] 69:12 69:14 69:15 69:24 94:16 97:11 100:10 100:18 122:15 124:8 125:1 147:11 171:18 Allis-Chalmers [2] 186:22 187:1 allow [2] 90:9 152:18 allowed [3] 153:1 153:8 153:11 almost [2] 72:19 130:21 along [4] 113:10 114:12 218:2 274:12 alphabetical [1] 207:8 alternative [1] 177:23 always [4] 32:14 70:7 86:22 174:10 Amatex [5] 66:18 66:21 202:19 202:20 202:23 ambient [1] 264:1 America [3] 78:14 148:22 185:3 American [2] 94:6 95:18 Amoco [2] 3:15 6:5 amosite [1] 249:18 amount [6] 13:3 77:15 175:5 218:13	218:18 265:15 Ampco [1] 264:16 analysis [1] 221:11 anchor [1] 200:15 ANDREWS [1] 3:9 anecdotal [1] 51:16 Angeles [1] 179:14 annexed [1] 299:5 annual [6] 222:22 223:2 223:5 223:19 274:18 275:1 answer [13] 35:10 67:21 81:13 89:3 99:12 158:6 191:23 212:8 223:13 261:10 265:22 295:10 295:16 answered [2] 44:16 99:18 answering [1] 294:23 Answers [1] 261:3 answers [3] 135:13 182:11 297:16 anticipate [2] 241:16 241:21 anticipation [1] 227:5 apologize [1] 208:15 apparatus [2] 142:23 186:9 appear [4] 168:13 170:15 194:15 196:16 APPEARANCES [2] 2:1 3:1 appeared [2] 191:6 298:8 appearing [1] 297:17 apple [1] 234:23 applicable [2] 62:9 62:11 application [14] 35:14 43:17 46:3 61:17 62:12 148:19 164:11 181:15 184:11 184:18 197:23 225:15 236:13 268:24 applications [5] 43:19 74:11 184:16 201:21 209:7 applied [5] 178:10 187:19 193:8 204:15 258:17 applies [1] 299:6 apply [3] 162:19 193:4 198:12 applying [1] 178:3 appreciate [1] 294:22 apprised [1] 216:9 approach [1] 184:12 appropriate [3] 7:20 211:13 257:5 approval [1] 257:13 approve [2] 279:2	279:5 approximate [1] 142:15 approximation [1] 261:16 Arc [1] 197:6 arc [6] 142:14 142:15 142:18 197:4 197:10 285:17 architectural [1] 27:22 area [8] 17:13 34:17 201:19 204:15 214:2 218:12 228:9 295:1 areas [9] 196:1 219:8 219:10 223:7 241:11 265:16 266:15 266:17 293:14 arena [2] 242:3 246:22 arising [1] 239:9 arranged [4] 12:10 12:13 29:14 247:4 arrangement [2] 161:1 248:4 arrangements [2] 152:24 160:17 arrival [3] 81:23 82:8 127:7 arrived [2] 81:17 278:20 arrogant [1] 113:6 articles [2] 242:22 289:6 Arvin [5] 132:10 133:1 133:2 133:3 133:6 Asbestos [6] 57:1 63:5 234:1 238:15 280:24 291:18 asbestos [175] 11:6 18:10 35:1 36:17 37:3 37:17 38:5 43:5 44:2 44:7 44:12 44:13 44:19 45:7 46:11 53:18 60:9 60:12 60:13 60:18 60:21 60:23 61:4 62:17 62:24 63:1 63:2 63:18 64:5 64:23 65:9 65:15 66:13 66:15 66:19 67:16 67:22 68:4 68:12 68:12 68:18 68:20 69:2 89:20 89:24 90:4 134:1 135:11 135:15 139:13 139:20 140:7 140:7 140:10 143:11 149:8 166:23 181:22 190:10 190:23 191:4 203:1 203:4 207:24 208:5 208:8 209:3 209:4 209:16 209:21 210:5 210:8 210:15 210:23 212:12 212:19 214:3 214:4 215:2
---	---	--	--	---

215:7	216:6	216:12	69:10	70:2	73:3	auto [3]	52:17	59:1	B-y-r-o-n [1]	99:15	Beginning [1]	267:8
218:3	222:18	225:16	73:4	73:22	73:24	110:5			B.P [1]	6:5	beginning [2]	210:22
225:20	226:2	226:3	74:24	76:6	78:4	automatic [4]	80:23		background [2]	20:23	210:23	
227:17	229:11	231:3	82:6	82:21	83:4	81:6	81:8	83:21	221:4		behalf [10]	11:13
232:20	233:19	234:13	86:4	98:5	111:7	automatically [2]	84:12	200:21	backing [3]	47:9	19:6	19:7
235:3	235:9	235:11	149:1	159:3	171:22	84:12	200:21		47:14	123:7	244:10	247:24
235:21	236:8	237:11	172:5	196:7	199:21	automobile [1]	72:6		backup [8]	45:10	288:14	296:1
237:16	237:22	238:4	205:4	263:4	271:4	automobiles [1]	48:6		49:5	89:16	296:3	
238:20	238:23	239:4	assets [5]	91:21					103:11	141:10	235:1	
239:20	239:24	240:12	94:10	182:9	188:18				262:5		belief [2]	252:19
240:18	241:3	241:9	188:19			Automotive [1]	133:7		bad [1]	114:10	259:24	
241:14	241:18	241:19	assist [3]	14:9		automotive [7]	181:14		Badagowski [3]		believes [2]	8:22
241:19	242:5	242:8	116:8	243:8		181:23	181:24	184:11	281:2	284:23	260:9	
243:16	243:22	244:5	assisted [2]	117:6		184:14	268:1	268:8	bake [1]	176:21	bell [1]	205:24
244:19	245:7	245:15	170:12			availability [1]	7:4		bales [2]	60:17	beltings [1]	188:10
245:21	246:24	248:13	assisting [1]	15:3		available [12]	11:11		Ballpark [1]	23:14	Bendix [10]	75:17
249:1	249:9	249:13	associated [16]	91:13		11:17	11:24	12:3	ballpark [1]	82:16	76:4	152:22
249:14	250:1	250:4	93:3	96:3	118:17	12:6	12:8	12:18	band [4]	176:16	152:23	153:1
250:15	250:20	251:21	121:22	204:6	208:5	13:1	13:4	13:11	202:8	202:10	153:6	161:20
253:22	258:18	262:10	215:2	215:6	243:10	13:22	20:17		202:8	202:10	294:6	
263:3	263:14	264:19	245:14	249:1	249:12	average [2]	217:12		bankruptcy [1]	30:22	benign [1]	242:9
265:10	266:9	266:22	252:10	289:22	293:11	218:20			Base [3]	22:16	BENSON [1]	2:11
266:24	268:3	268:10	ASSOCIATES [1]	2:3		averages [1]	232:19		22:18		BENUSKA [1]	299:22
268:21	268:21	268:23	associates [1]	289:7		avoid [8]	225:20		base [1]	22:17	Benuska [5]	1:16
269:14	272:6	272:24	Association [2]	234:2		227:22	228:7	237:14	Based [2]	236:18	5:17	5:17
273:21	274:14	275:19	238:15			256:4	256:10	263:16	268:13		298:4	297:13
277:12	278:3	278:12	association [1]	241:24		269:13			based [12]	62:5	BERNSEN [1]	2:16
281:20	282:3	283:8	associations [1]	250:14		avoiding [1]	273:24		85:10	85:11	best [21]	35:2
283:14	283:19	284:6	assume [3]	120:11		aware [77]	17:10		148:3	167:21	48:2	51:11
286:19	289:13	289:22	155:22	210:2		40:15	44:17	65:5	235:14	235:17	56:10	69:4
290:2	290:15	291:11	assumes [1]	299:9		93:6	95:15	149:9	254:11	259:22	105:21	117:11
291:22	291:24	293:2	assuming [1]	180:3		150:5	153:4	153:5	baseline [1]	222:14	127:21	131:14
			assumption [1]	27:6		153:13	179:11	180:6	basic [1]	142:18	151:21	170:20
			atmosphere [1]	264:2		181:12	181:19	182:2	basis [3]	83:24	191:8	222:11
			atmospheric [1]	266:9		182:5	184:12	187:9	132:24	104:9	295:8	257:14
			attached [5]	72:7		194:7	208:14	211:14	batches [1]	172:21	better [15]	14:1
			118:18	178:11	297:17	211:18	212:24	215:1	Bates [5]	7:12	24:17	72:1
			297:18			215:5	216:10	216:18	7:13	7:16	95:6	115:23
			attaching [1]	22:4		222:3	222:13	223:9	277:1	188:23	124:6	144:7
			attaining [1]	22:4		223:23	224:2	224:3	batteries [4]	131:1	208:19	216:21
			attempt [2]	130:2		227:14	227:19	227:19	163:23	163:24	243:22	263:1
			219:1			228:2	228:3	228:4	163:8	163:9	Between [1]	250:4
			attend [1]	236:19		232:17	233:4	238:6	163:21	163:22	between [24]	26:9
			attention [2]	87:16		239:6	239:7	240:3	battery [6]	163:7	33:3	48:16
			attorney [2]	12:20		240:13	240:23	242:11	163:8	163:9	92:1	96:8
			29:13			242:22	245:12	245:19	163:21	163:22	106:24	160:17
			attorneys [4]	12:11		246:7	246:13	249:7	battery-operated [1]	218:10	208:23	229:2
			12:13	13:20	117:10	250:18	253:2	253:20	beam [1]	146:1	231:1	240:16
			atypical [1]	129:20		256:15	259:7	262:9	Bear [2]	179:8	241:24	242:23
			audiovisual [1]	5:13		262:12	267:21	268:5	Beaumont [3]	2:5	242:23	250:14
			audiovisual [1]	5:13		270:8	270:20	271:1	2:19	185:3	252:2	253:11
			auger [2]	144:13		274:16	281:18	281:22	became [10]	17:9	257:2	279:12
			144:20			282:1	282:5	283:13	26:11	92:21	beyond [4]	241:22
			August [6]	1:20		287:1	287:2	287:8	180:3	208:13	244:1	258:13
			5:4	283:5	283:6	293:5			215:5	238:14	big [9]	47:17
			297:11	298:8		away [1]	205:7		Bechtel [2]	3:14	47:21	55:24
			authentication [2]	7:10	7:17	awful [1]	206:14		6:6		143:19	146:21
			authoritatively [1]	129:22		awhile [2]	67:15		become [2]	105:7	204:5	195:8
			Auto [3]	72:8	271:19	axles [1]	150:14		251:7		bigger [1]	262:19
			283:14						becomes [2]	7:1	biggest [1]	76:2
									251:4		billing [1]	64:10
									becoming [2]	92:24	billings [1]	97:22
									105:17		bills [1]	64:20
									began [1]	222:12	binders [2]	143:13
									begin [1]	184:12	190:24	
											binding [2]	90:16
											90:19	
											bit [7]	53:4
											53:5	

88:13 90:13 151:16 187:4 218:4 Black [6] 100:3 102:11 102:23 104:20 105:8 113:12 black [7] 178:7 280:3 280:4 280:5 280:10 280:10 280:12 BLACKWELL [4] 3:17 3:21 6:3 296:1 Blackwell [2] 6:3 296:1 BLAZEK [11] 2:20 6:7 6:13 6:17 7:5 7:18 7:22 7:24 8:5 38:15 260:15 Blazek [1] 6:7 blend [1] 143:9 blending [1] 143:8 BLOCK [1] 3:3 block [13] 46:24 47:16 47:19 119:12 136:20 145:12 181:9 187:6 196:17 201:21 201:22 202:6 204:2 blocks [15] 55:17 56:6 70:9 70:13 72:23 73:8 73:9 121:14 122:4 179:8 181:10 182:18 183:24 187:5 187:23 blood [2] 251:4 251:5 blow [2] 234:24 270:15 board [1] 145:24 boards [1] 172:13 Bob [15] 15:10 27:10 92:9 92:12 99:5 99:7 99:9 100:4 100:21 101:12 102:15 106:15 114:10 231:21 274:4 Bob's [1] 15:11 Bockay [6] 281:3 281:5 281:6 281:14 281:18 282:13 bodily [1] 228:8 Body [2] 36:5 36:6 body [1] 72:14 bolts [1] 199:19 Bomb [2] 43:15 139:2 Bombs [1] 140:16 bonded [3] 176:8 176:12 176:13 bonding [1] 177:7 book [1] 54:12 Borg-Warner [3] 3:22 6:4 296:2 born [2] 21:3 185:9 boss [3] 100:17 104:8	113:4 bosses [1] 113:11 bottom [11] 172:23 173:9 173:20 175:8 175:11 175:18 176:1 178:3 189:17 200:16 200:17 bought [6] 28:24 59:9 62:19 120:17 136:5 151:14 Boulevard [1] 5:3 Box [2] 138:23 138:24 box [19] 116:3 129:5 141:17 141:19 141:20 141:20 145:8 159:16 159:24 160:4 160:16 160:18 165:14 165:17 256:20 260:18 279:22 280:1 280:17 boxes [24] 124:22 159:18 165:6 167:10 226:8 226:17 227:10 227:21 228:5 231:13 256:22 258:5 259:4 259:9 259:16 260:1 261:18 261:20 273:3 273:18 277:5 277:15 279:14 279:17 brain [1] 79:19 Brake [5] 60:1 94:6 167:14 281:1 281:7 brake [147] 9:1 36:11 36:16 41:8 46:23 46:24 47:9 47:11 47:17 47:20 52:7 52:8 52:10 52:19 52:22 52:23 52:24 53:3 58:7 58:15 59:2 59:6 60:3 61:10 61:21 62:9 67:15 69:11 69:12 70:8 74:24 77:8 77:16 77:16 83:19 84:11 85:22 109:12 109:15 110:9 111:7 111:18 119:11 121:3 121:13 122:3 122:20 122:22 123:13 124:2 124:2 128:21 128:22 128:24 134:9 136:10 137:11 139:10 141:12 142:2 142:16 146:13 146:19 152:4 156:1 156:7 156:17 157:9 157:24 159:6 160:15 161:9 162:21 164:2 164:4 164:5 164:10 164:17 167:22 169:11 169:15 170:16 171:8 171:9 171:10 171:11 173:23 176:1 177:12 177:20 178:5 178:10 178:11 179:7 179:23 181:9 181:10 184:10 184:10 184:20 187:5 187:6 187:11 187:13 187:23 187:23 192:21 193:14 193:17	197:1 198:2 198:13 198:14 198:16 199:3 199:15 200:3 200:5 246:9 254:3 254:14 254:18 263:20 268:2 268:9 268:20 269:2 269:11 269:15 269:17 270:1 270:1 270:5 270:15 270:18 271:4 271:24 272:6 277:24 280:15 280:15 280:15 282:2 285:8 286:21 289:13 290:22 Brake-In-A-Box [11] 120:10 120:13 122:9 123:12 123:15 123:18 124:23 125:4 125:9 125:15 139:1 brakes [57] 35:10 35:12 35:15 36:21 37:7 37:11 47:5 47:17 54:20 54:21 55:4 55:6 55:6 55:19 55:20 57:5 57:11 57:19 58:3 59:10 59:10 59:13 59:23 61:3 62:13 70:5 70:22 71:3 72:10 72:22 73:4 73:24 76:9 76:16 76:24 129:5 131:10 135:21 150:14 153:24 161:20 161:22 162:2 163:5 163:13 165:1 182:4 184:17 186:15 192:9 192:10 192:23 200:24 201:1 254:2 269:19 271:18 braking [2] 57:14 268:24 brand [19] 42:14 42:16 42:17 52:23 59:17 121:24 121:24 122:1 134:9 136:13 137:1 137:11 138:13 138:17 138:21 151:22 154:5 154:10 154:11 brands [5] 121:6 134:24 135:1 164:22 276:4 brass [8] 66:19 67:18 67:19 67:20 177:17 177:18 177:19 203:3 break [11] 20:21 41:17 87:7 87:12 115:1 115:4 128:4 148:7 148:9 228:18 294:17 breakdown [1] 205:21 breathe [1] 249:14 breathing [3] 218:12 227:23 228:7 BRENT [2] 2:3 2:6 Brent [11] 5:23 90:7 182:22 188:12 224:4 255:7 275:5 279:19 281:21 285:10 288:19	brevery [1] 253:5 Brian [1] 99:13 brief [1] 17:17 Briefly [1] 148:1 briefly [29] 8:20 9:22 9:24 12:2 12:23 16:8 16:24 18:12 18:24 19:22 20:21 20:24 34:20 45:11 45:21 47:1 47:3 49:5 51:17 56:14 61:7 106:1 132:13 132:21 143:1 168:4 189:7 212:22 254:9 bring [1] 201:3 bringing [1] 173:22 British [2] 89:17 89:18 broad [2] 67:9 150:16 Broadway [1] 2:12 brochure [6] 167:13 168:8 168:13 169:7 170:9 181:6 brochures [4] 150:8 179:3 180:24 181:2 brought [3] 39:23 82:23 151:23 BROWN [2] 3:13 6:5 Brown [2] 6:5 148:11 BS [1] 21:10 build [1] 21:18 building [3] 20:19 70:11 195:8 buildings [3] 195:9 195:10 233:1 Burkett [7] 15:10 15:23 15:24 16:17 16:18 16:19 17:15 Burnett [1] 16:17 buses [2] 56:1 150:16 business [21] 27:2 31:2 42:1 50:16 81:10 82:7 89:5 95:9 101:18 108:12 110:5 127:14 130:11 130:13 150:20 150:24 153:7 172:4 179:23 206:8 246:23 buy [11] 52:19 53:1 59:5 59:17 59:17 61:21 62:21 62:23 128:22 129:17 163:7 buyer [3] 88:19 276:12 281:2 buying [2] 71:17 169:12 bypassed [1] 105:9 Byron [9] 91:10 92:9 99:15 99:16 102:12 103:16 103:17	103:21 104:8 -C- C [5] 1:16 2:14 297:13 298:4 299:22 C-r-e-t-e [1] 80:5 C.S.R [1] 1:17 California [10] 23:9 23:16 50:1 50:20 51:3 51:12 179:14 180:18 271:22 272:4 caliper [1] 199:17 cam [1] 135:22 camera [9] 173:4 173:21 175:7 177:6 196:12 196:15 197:2 198:1 200:10 Canada [1] 63:13 cancer [10] 242:15 243:1 250:13 250:15 250:16 250:18 250:20 251:10 251:11 262:11 cannot [3] 257:11 259:22 260:8 CANONI [157] 2:14 6:9 7:23 15:13 15:15 15:18 15:20 18:14 39:3 40:8 41:12 44:11 50:23 51:8 53:9 70:24 75:22 81:6 83:13 87:3 88:11 89:7 90:7 90:15 90:18 98:2 98:13 101:11 101:15 122:7 123:18 125:5 127:9 127:24 131:6 135:16 143:5 151:11 152:5 153:14 153:18 154:12 157:3 160:8 161:4 162:10 168:16 169:1 171:13 175:11 181:2 182:22 183:11 183:18 183:21 184:3 185:10 186:3 186:8 186:18 187:15 188:12 189:4 189:15 191:17 191:21 192:11 193:19 196:20 199:11 199:22 206:7 206:9 207:15 208:6 209:16 211:11 215:9 215:13 217:16 217:21 217:23 220:2 220:22 221:16 221:24 224:4 226:19 230:10 235:6 235:22 239:12 239:23 240:2 240:20 242:17 245:10 245:16 245:23 246:4 246:12 247:8 247:15 247:18 247:20 248:15 249:2 249:4 252:4 255:1 255:7 255:20 255:22 257:23 258:7 259:18 260:3 260:12 260:17 260:21 261:7 262:3 263:5 264:9 264:21 265:22 269:6 270:19 272:8 273:6
---	---	--	--	--

273:12 275:5 275:10	catalogues [4] 157:7	chains [1] 130:4	208:10 238:8	coil [1] 146:23
275:20 278:6 278:15	179:2 183:4 186:4	challenging [1] 113:4	cities [1] 31:17	coiled [1] 146:21
278:18 278:22 279:19	categories [2] 139:20	change [7] 35:10	city [2] 23:1 213:21	coils [1] 146:22
279:22 280:20 281:21	150:16	99:4 105:24 107:18	Civil [1] 1:14	coined [1] 239:16
282:19 283:23 285:10	categorized [1] 131:12	129:7 154:1 228:14	claim [4] 11:2	Colidgria [1] 63:22
285:19 286:8 286:15	causal [2] 241:24	changed [6] 99:2	19:23 287:18 288:1	collect [1] 216:21
288:8 288:19 289:15	252:2	132:8 132:10 269:19	claims [2] 9:24	collecting [1] 264:19
291:13 292:2 292:13	causally [1] 252:10	270:1 271:17	11:8	collection [5] 254:20
292:17 293:4 296:5	causation [1] 252:17	changes [3] 26:9	clamping [2] 176:17	264:4 264:17 266:11
Canoni [2] 6:9	causative [1] 249:23	216:20 271:22	177:24	269:12
117:9	caused [3] 246:3	changing [3] 72:10	clarification [1] 17:19	collector [1] 264:12
CANSLER [1] 2:7	262:10 275:22	105:20 270:5	clarify [3] 71:20	collectors [1] 264:14
Cansler [1] 5:23	causes [1] 248:14	channels [1] 88:19	247:22 295:4	college [3] 21:7
capabilities [1] 95:12	causing [1] 251:18	characteristics [17] 57:14 62:7 65:14	clean [3] 52:24	36:19 208:19
capacity [4] 93:4	caution [4] 225:19	65:22 69:5 137:4	53:7 269:14	color [2] 159:24 279:24
100:4 191:11 251:3	253:21 263:13 277:14	137:12 154:20 156:2	cleaning [1] 271:4	colors [1] 280:12
capital [4] 75:12	cautionary [10] 225:15	156:12 157:8 157:10	cleanup [1] 52:14	Columbus [4] 131:24
265:19 266:2 266:6	229:9 231:3 231:11	157:11 160:4 163:16	clear [3] 101:12 131:21	132:2 132:11 133:10
capitulations [1] 256:16	232:23 258:5 258:17	165:7 252:8	182:23	column [1] 185:10
captain [1] 22:4	261:17 261:22 262:14	charge [2] 101:23	Clearly [1] 215:15	combination [3] 57:7 170:6 176:5
capture [1] 263:21	cautioning [1] 271:2	104:7	clinically [1] 239:8	combine [2] 77:7
Car [1] 100:7	cautious [1] 269:9	Charles [1] 15:24	clips [2] 123:6 128:12	83:4
car [26] 37:2 47:11	cc [1] 217:11	chartered [1] 97:1	close [6] 31:2 157:1	coming [6] 32:12
47:13 55:18 57:6	Center [2] 72:8	Chassis [2] 36:5	172:6 195:22 204:12	99:5 143:7 211:16
59:6 60:7 62:6	287:11	36:7	261:16	232:17 279:17
62:6 62:13 62:14	center [7] 70:11	cheaper [1] 52:24	closed [3] 30:21	command [2] 101:3
62:14 70:12 128:21	78:6 107:13 124:5	checking [1] 175:19	31:23 50:20	102:20
155:18 161:3 161:20	130:6 161:2 167:21	Cherry [3] 43:15	closer [2] 24:11	comment [1] 260:4
162:24 163:13 200:23	Centers [5] 110:7	139:2 140:16	82:1	comments [2] 281:19
201:2 201:4 201:11	110:8 159:9 263:12	chest [2] 223:5 223:10	club [2] 20:1 20:2	282:10
201:13 280:18 280:19	271:19	Chevrolet [1] 157:16	cluc [4] 162:1 165:4	commercial [2] 55:23
Carbide [1] 63:21	centers [3] 128:10	Chevy [3] 157:15	169:6 186:2	184:17
carcinogenic [3] 242:6 245:21 246:16	159:21 199:12	157:15 159:10	Clutch [1] 137:23	commissions [1] 170:5
care [1] 269:10	central [9] 64:9	Chicago [23] 3:5	clutch [17] 46:24	committee [5] 283:8
CARL [5] 1:12	64:14 65:2 65:3	5:3 8:17 17:12	47:12 47:13 47:15	283:20 284:6 284:9
4:3 8:6 297:21	65:4 83:10 84:3	41:20 86:23 96:21	55:7 55:16 66:20	284:13
298:9	85:2 85:7	98:1 98:10 102:17	67:1 67:3 67:7	commodity [1] 209:5
Carl [6] 5:12 8:14	certain [27] 27:5	102:21 103:19 104:2	67:9 70:16 137:17	common [3] 68:9
115:7 228:21 282:19	53:24 68:18 80:19	104:19 105:11 105:13	138:2 187:18 187:20	79:6 270:13
296:8	91:21 108:11 110:10	106:24 132:7 133:20	202:16	communications [2] 229:2 253:10
Carrier [1] 80:4	132:15 137:13 140:9	276:21 281:3 282:13	clutches [17] 35:15	companies [16] 34:23
carrier [3] 79:6	159:23 165:22 174:22	284:21	36:12 36:16 37:8	53:21 55:14 58:19
80:3 220:11	188:19 201:1 216:21	child [1] 24:10	37:11 55:14 70:9	72:20 130:21 141:11
carrier's [1] 219:24	223:6 232:18 232:24	choice [1] 162:4	70:14 70:18 72:22	149:24 158:10 163:10
carriers [9] 80:1	235:4 235:24 249:18	chronology [1] 38:8	119:13 136:18 182:4	185:7 213:15 234:13
80:2 212:15 212:19	250:1 265:15 266:15	Chrysler [1] 157:18	186:16 187:16 268:1	276:6 293:11 293:24
213:1 213:5 213:5	267:6 272:4	chrysotile [9] 68:23	268:9	Company [9] 5:9
213:9 219:17	Certainly [2] 8:3	69:1 242:8 242:14	CO [3] 1:9 297:7	21:15 120:23 121:1
cars [10] 21:18 21:19	54:17	243:2 246:3 251:12	298:13	179:14 179:15 181:3
55:3 74:16 76:18	certainly [5] 64:6	251:14 251:17	Coast [2] 78:7	183:6 188:13
77:6 136:21 138:1	129:24 132:23 192:20	Chuck [2] 15:10	coated [1] 202:16	company [59] 8:21
138:3 225:5	209:14	15:23	code [9] 154:12 154:13	19:7 19:9 27:24
Case [1] 5:11	certificate [1] 299:5	Circular [1] 202:13	154:15 155:3 155:4	30:21 33:15 34:3
case [6] 5:7 287:8	Certified [3] 1:17	circular [1] 202:14	155:7 155:10 166:1	49:14 50:14 63:18
288:7 288:13 288:14	298:4 299:23	circulated [2] 291:11	166:2	63:21 63:24 66:18
288:15	certified [3] 218:14	291:22	codes [1] 276:3	87:16 88:9 89:18
cases [10] 10:22	218:16 221:9	circumstance [1] 288:6	coding [1] 155:24	90:14 90:19 90:24
11:1 11:15 118:2	certify [6] 297:10	circumstances [14] 9:23 10:9 12:3	coding's [1] 156:18	94:8 96:24 114:8
217:15 222:17 239:8	298:7 298:15 299:2	13:5 16:24 17:23	coefficient [2] 174:24	114:9 115:24 116:12
287:16 287:17 288:17	299:5 299:12	19:1 19:22 49:9	290:21	119:20 119:24 148:17
casual [1] 132:23	cetera [4] 52:19	153:6 162:14 195:4	cognizant [1] 247:12	151:23 152:18 153:6
catalogue [2] 136:6	58:4 79:13 194:9			
168:20	chain [2] 102:19			
	105:5			

153:10 163:10 170:22	concerned [1] 259:22	consulted [1] 294:5	2:6 5:21 6:11	90:23 96:4 96:11
171:3 180:6 182:9	concerning [23] 9:19	consulting [2] 40:6	6:14 6:18 7:8	96:14 96:24 97:7
182:16 183:3 187:2	10:7 34:18 36:11	40:14	7:19 8:3 8:10	97:24 100:19 107:4
191:10 193:6 207:20	210:15 211:9 229:3	contact [3] 107:14	15:14 15:17 15:19	132:6 132:7 132:9
210:7 215:10 215:17	231:2 231:8 232:11	213:13 213:14	15:21 15:22 16:8	132:18 230:15 247:10
215:17 219:20 220:10	237:21 238:3 243:15	contacted [1] 12:15	16:12 18:16 38:16	247:19 247:24 248:11
224:9 238:12 238:23	244:23 245:7 245:13	contain [5] 38:4	39:4 40:10 41:13	291:3
243:10 244:10 248:19	247:6 248:8 253:22	135:14 176:16 226:3	44:14 51:1 51:9	corporately [1] 96:7
257:8 261:8 261:10	266:23 291:11 291:24	261:22	53:11 66:21 66:22	Corporation [14]
company's [3] 152:3	concerns [5] 247:7	contained [22] 35:1	71:1 76:1 81:7	6:4 6:8 6:10
155:6 161:16	253:18 256:18 275:19	37:3 37:16 44:7	83:15 87:5 87:11	9:6 9:7 19:10
compare [2] 163:6	285:21	44:12 44:13 135:10	88:12 89:10 90:12	19:16 22:24 24:4
201:5	conclude [1] 294:15	144:10 149:7 165:14	90:17 90:21 98:7	26:17 30:5 31:13
compensate [1] 200:13	concludes [1] 296:7	166:23 225:16 225:20	98:15 101:19 115:1	80:4 131:24
compensation [3]	conclusion [1] 269:7	226:2 227:17 231:12	115:9 122:8 123:22	corporation [1] 97:3
169:24 212:14 213:4	conclusions [1] 269:3	237:16 258:18 260:19	125:8 127:10 128:3	Correct [33] 6:17
compete [1] 93:23	condition [1] 223:1	279:14 284:6 284:14	131:8 135:23 143:6	7:22 7:23 16:16
competitive [1] 130:15	conditions [2] 195:4	containing [1] 36:16	148:7 148:14 151:15	26:23 27:12 28:9
competitor [1] 93:17	249:18	content [1] 130:13	152:7 153:16 153:20	29:10 32:5 38:12
competitor's [1]	conduct [3] 108:12	contents [1] 285:15	154:14 157:5 160:10	39:7 39:10 44:5
152:20	116:12 237:24	context [1] 118:8	161:5 162:11 168:18	59:12 60:6 72:24
competitors [3] 75:14	conducted [7] 214:8	contiguous [1] 196:2	169:2 171:14 175:12	73:5 76:23 78:15
130:18 133:13	214:14 218:22 221:14	continue [8] 107:23	181:4 183:7 183:14	79:21 84:14 86:1
complete [13] 73:3	221:22 222:22 235:15	108:12 109:7 110:14	183:20 183:22 184:4	87:23 99:17 104:21
73:3 123:8 123:14	conducting [2] 240:10	111:2 257:11 259:22	185:12 186:2 186:7	106:4 120:12 134:4
125:13 128:18 128:24	240:11	260:8	186:11 186:21 187:17	137:3 137:19 232:22
160:15 167:22 169:11	conference [1] 43:3	Continued [1] 3:1	188:16 189:6 189:16	233:3 243:17
169:18 196:3 244:3	configuration [1]	196:22 199:14 200:1	192:1 192:14 193:21	correct [234] 7:4
complex [1] 97:20	251:20	206:16 207:17 208:9	196:22 199:14 200:1	7:5 7:17 7:18
compliance [13]	configurations [1]	209:19 211:20 215:11	206:16 207:17 208:9	7:21 9:2 9:3
219:2 219:9 219:11	252:14	215:19 217:13 217:18	209:19 211:20 215:11	9:14 23:23 32:17
219:12 223:21 226:11	confine [1] 90:10	217:22 217:24 220:4	215:19 217:13 217:18	34:12 35:5 35:7
227:4 265:21 266:4	confirmation [1]	221:2 221:17 222:2	217:22 217:24 220:4	35:8 38:11 38:21
266:8 293:12 293:16	239:20	224:7 226:21 228:14	221:2 221:17 222:2	38:22 39:6 39:9
294:8	confirmed [1] 239:8	228:23 230:11 235:13	224:7 226:21 228:14	39:13 39:15 40:19
complied [2] 223:19	conformance [3]	236:2 239:24 240:4	228:23 230:11 235:13	40:20 45:20 46:20
265:6	147:21 227:4 262:16	240:22 242:19 245:11	236:2 239:24 240:4	48:8 50:22 51:4
comply [3] 211:1	confused [5] 103:23	245:18 246:1 246:6	240:22 242:19 245:11	52:4 53:2 53:13
227:7 265:3	108:1 159:17 161:7	246:14 247:14 247:17	245:18 246:1 246:6	53:15 54:22 56:5
complying [2] 226:6	233:7	247:19 247:21 248:22	246:14 247:14 247:17	58:4 58:5 58:11
226:24	confusing [1] 104:12	249:3 249:6 252:6	247:19 247:21 248:22	58:16 58:22 59:11
component [2] 47:12	connected [2] 195:11	255:2 255:10 255:14	249:3 249:6 252:6	59:15 60:8 60:11
73:11	195:20	255:21 255:23 258:3	255:2 255:10 255:14	61:20 62:1 62:4
components [4] 36:2	consider [3] 261:24	258:14 258:15 259:20	255:21 255:23 258:3	69:19 69:20 69:23
38:6 192:24 269:11	262:13 263:22	260:6 260:16 260:20	258:14 258:15 259:20	70:1 70:3 71:10
comport [1] 142:6	considerable [1]	260:22 261:11 262:4	260:6 260:16 260:20	71:19 72:5 72:12
composition [7]	77:15	263:8 264:13 264:23	260:22 261:11 262:4	73:19 73:23 74:4
36:21 67:16 67:22	consideration [4]	266:1 269:16 270:21	263:8 264:13 264:23	74:19 75:2 76:22
139:13 139:15 143:12	13:10 109:1 248:5	272:11 272:18 272:20	266:1 269:16 270:21	77:2 78:14 78:21
203:2	262:18	273:8 273:13 273:15	272:11 272:18 272:20	79:11 80:17 81:18
compression [1]	considered [1] 130:8	275:7 275:12 275:23	273:8 273:13 273:15	82:9 82:14 82:15
60:4	considering [1] 256:4	278:9 278:19 278:24	275:7 275:12 275:23	84:20 84:22 84:23
comprise [1] 44:1	consistent [7] 139:16	279:21 279:23 280:22	278:9 278:19 278:24	85:24 86:7 87:22
comprised [4] 45:7	139:24 173:6 182:12	281:23 283:2 283:3	279:21 279:23 280:22	88:2 88:9 88:10
53:18 124:14 276:6	206:19 244:16 262:1	284:1 285:13 285:20	281:23 283:2 283:3	92:22 94:19 94:20
computer [5] 80:24	consisting [1] 297:13	286:10 286:17 288:11	284:1 285:13 285:20	95:20 96:9 96:13
84:1 84:13 84:22	consolidated [1]	289:2 289:17 291:15	286:10 286:17 288:11	101:5 101:7 101:24
109:20	31:24	292:5 292:18 293:7	289:2 289:17 291:15	102:8 102:22 102:24
Computer-Aided [1]	construction [1]	294:14 294:20 295:22	292:5 292:18 293:7	103:2 103:10 104:15
298:22	97:17	Coon [2] 4:4	294:14 294:20 295:22	105:1 105:12 106:3
computers [1] 28:21	consult [2] 39:23	5:23	copies [3] 211:17	106:12 106:21 107:2
concern [6] 36:20	40:1	copy [4] 115:20 276:22	277:2 299:10	107:4 107:9 107:12
246:22 259:8 285:8	consultant [1] 11:23	277:11 292:8	core [1] 66:20	108:3 108:7 108:9
286:4 293:15		corollary [1] 284:11	corollary [1] 284:11	108:10 108:24 109:13
		corporate [23] 49:6	corporate [23] 49:6	109:22 110:3 110:4
		86:20 86:22 87:2	86:20 86:22 87:2	110:11 110:12 110:17
				111:9 111:15 111:16
				111:21 112:13 112:16
				112:22 113:13 113:20
				114:16 118:14 119:19

123:10	123:17	124:11	297:2	298:3	cycle [2]	174:13	degree [6]	14:11	determinations [1]
124:17	124:20	126:12	County [5]	1:18	176:19		21:10	132:18	245:20
126:18	127:1	127:15	5:10	298:6	cylinder [2]	123:4	224:8	290:1	determine [10]
127:18	128:6	128:14	299:23		200:8		delicate [1]	130:9	65:15
131:2	132:16	134:3	couple [6]	15:5	cylinders [1]	129:2	deliver [2]	77:9	155:15
139:3	139:4	140:5	29:6	118:5			79:14		156:23
143:9	143:10	143:17	176:24	272:12			deliveries [1]	80:15	191:5
146:11	146:15	147:6	COURT [3]	1:1			demand [1]	84:2	207:13
147:18	150:19	152:14	5:17	297:1			demanding [1]	113:7	222:23
156:20	157:4	158:20	Court [2]	5:10			demands [1]	61:5	244:10
160:21	161:17	161:18	5:18				department [15]	23:17	254:14
162:5	162:6	162:12	court [1]	5:15			23:19	35:20	determined [4]
164:13	165:5	165:9	Courts [1]	1:15			65:7	65:13	171:21
165:10	165:12	165:22	cover [2]	283:6			65:20	66:6	240:15
165:23	166:18	166:20	285:5				149:18	212:1	269:8
173:19	174:7	175:21	covered [4]	207:18			230:15	232:9	develop [4]
176:11	176:22	177:21	cranes [1]	182:3			departments [6]	15:7	125:17
178:2	178:13	180:20	create [2]	228:8			15:7	36:4	249:22
190:21	195:15	196:4	263:19				140:22	140:23	developed [3]
196:9	197:14	202:24	created [10]	29:8			departure [1]	40:7	233:8
208:1	208:2	210:9	49:9	88:24			depending [1]	241:8	240:6
210:10	210:13	211:4	120:17	122:10			depict [1]	195:3	246:10
211:5	215:22	215:23	254:5	256:7			DEPONENT [1]	296:10	222:24
216:2	216:3	216:7	creating [7]	95:22			deposed [2]	10:3	242:24
221:12	223:20	225:17	225:20	256:5			288:15		development [6]
225:22	226:12	228:13	263:17	263:23			deposition [24]	1:12	95:12
230:8	230:21	232:1	Crete [3]	80:3			5:14	6:19	240:17
232:21	233:2	233:12	crocidolite [1]	249:17			6:22	7:7	250:5
234:3	236:6	236:9	cross [1]	207:11			8:20	9:10	250:19
248:10	250:6	257:1	CSR [1]	297:13			10:14	11:1	176:15
261:13	261:14	261:18	cure [2]	144:24			17:20	19:3	218:10
264:3	274:19	277:12	cured [5]	145:1			115:7	116:2	devised [1]
277:13	277:20	278:3	146:22	146:22			228:21	296:8	diagnosed [6]
288:18	293:12	293:16	148:6				298:16	299:3	239:8
293:17	298:24		curing [1]	173:11			depositions [22]	1:16	239:16
correction [2]	297:17		current [2]	34:11			1:16	10:10	286:12
297:18			132:3				13:2	13:4	288:4
corrections [1]	297:16		curriculum [1]	20:14			14:4	14:6	diagnoses [1]
correlation [1]	242:23		curve [5]	142:4			15:4	15:6	diagnosis [2]
correlations [2]	240:16		145:17	146:18			17:24	18:4	238:7
240:24			197:6				18:18	18:21	dialogue [1]
correspond [2]	224:16		curving [1]	145:14			19:14	20:11	diameter [7]
224:21			Custom [4]	31:12			118:3		147:24
correspondence [4]			31:19	31:21			Depovision [1]	5:2	184:10
14:18	230:1	230:24	customer [8]	61:5			derived [2]	250:8	254:16
284:5			71:16	72:1			269:4		23:8
cost [7]	52:22	61:19	82:24	161:8			describe [2]	47:3	Dick [3]
64:17	74:20	194:3	163:16				177:1		231:21
194:4	293:10		customer's [3]	161:2			described [9]	48:23	274:6
COTTON [3]	1:5		164:12	165:3			54:21	67:15	Die [6]
297:4	298:12		customers [12]	45:18			134:22	156:12	163:7
Cotton [1]	5:8		54:1	54:8			194:1	206:18	163:14
Counsel [10]	150:9		75:4	76:7			describing [1]	181:11	163:22
168:6	179:5	188:23	79:7	127:23			description [1]	136:4	164:8
215:3	255:19	257:16	206:6	206:10			descriptive [1]	235:4	die [3]
276:24	280:23	283:4	customized [1]	43:16			Design [1]	140:23	144:14
counsel [5]	6:19		customs [1]	217:20			design [1]	140:22	144:22
6:20	14:14	14:14	cut [7]	145:2			designed [1]	141:9	died [1]
299:12			146:10	148:5			desire [2]	95:18	239:21
count [1]	218:17		202:7	202:8			227:6		differed [1]
counter [2]	161:16		cutting [2]	145:13			detail [1]	279:20	144:8
234:15			147:14				determination [2]	109:24	48:15
counting [2]	218:15								68:14
221:10									differences [3]
countries [2]	149:21								251:24
150:3									252:16
COUNTY [3]	1:2								different [43]
									57:13
									60:23
									60:24
									61:4
									61:5
									61:8
									61:19
									62:13
									68:13
									80:15
									105:20
									121:5
									133:24
									139:19
									141:21
									148:4
									152:13
									163:10
									164:15
									164:22
									167:5
									174:1
									177:11
									190:19
									193:13
									194:18
									207:4
									207:11
									207:19
									241:7
									241:18
									242:1
									245:14
									251:22
									252:12
									252:13
									261:9
									differentiate [1]
									252:9
									difficult [2]
									156:22
									251:5
									dig [1]
									116:4

digressed [1] 255:16 dimensions [1] 147:9 dinner [1] 294:4 direct [2] 87:15 253:16 direction [2] 299:8 299:11 directly [12] 27:13 45:15 48:6 73:18 77:9 85:1 102:4 102:7 106:13 233:13 237:14 259:13 director [3] 283:7 291:3 293:20 disagree [5] 114:19 261:5 268:16 282:10 282:20 disagreements [2] 27:4 112:21 disassembled [1] 160:7 disassembles [1] 156:8 disassociates [1] 289:7 Disc [1] 47:9 disc [31] 46:24 47:11 52:7 55:1 55:4 55:5 55:6 58:3 58:14 67:11 69:11 70:5 70:8 70:22 71:7 72:22 73:4 74:1 76:16 77:1 119:12 123:2 124:3 156:1 156:7 192:23 199:3 199:17 199:17 199:23 290:22 discharge [2] 22:5 22:22 disconnected [1] 195:22 discovery [10] 7:16 117:2 117:18 117:20 117:22 118:7 131:20 135:13 182:6 214:23 discuss [5] 13:22 49:6 220:13 257:18 282:17 discussed [4] 178:23 213:23 293:6 295:2 discussing [1] 229:11 Discussion [2] 16:10 272:19 discussion [2] 6:18 231:17 discussions [4] 17:18 36:23 231:10 263:1 disease [10] 11:3 239:21 242:1 246:10 249:12 251:1 251:2 252:17 252:18 288:3 diseases [8] 240:17 241:1 241:20 243:2 248:13 248:24 249:8 249:21	disposable [2] 23:7 23:22 disposal [2] 272:1 272:5 disposition [3] 11:7 287:24 288:2 dispute [3] 19:11 19:15 30:24 disseminated [2] 267:17 291:18 distinction [1] 121:16 distinctions [1] 140:3 distinguish [2] 111:1 155:6 distinguished [2] 123:1 134:21 distinguishing [2] 137:4 137:12 distributed [4] 45:17 70:17 88:18 135:18 distribution [30] 8:24 10:4 48:12 48:13 48:16 52:5 54:20 54:22 54:24 55:11 58:20 64:16 70:10 70:22 73:7 73:12 76:15 78:3 78:6 78:8 79:12 79:23 83:5 83:11 83:14 87:13 107:13 149:2 149:7 159:20 distributor [2] 52:16 62:22 distributors [4] 127:20 205:11 206:23 207:6 DISTRICT [4] 1:1 1:3 297:1 297:3 District [3] 1:15 5:10 298:11 Division [1] 100:7 division [5] 36:1 70:12 100:23 140:11 276:18 divorce [1] 20:10 do-it-yourself [2] 52:18 169:12 do-it-yourselfer [5] 128:2 129:8 129:9 129:10 167:23 doctor [2] 212:6 212:7 doctors [1] 212:9 document [24] 168:10 178:22 179:12 182:23 192:12 255:8 255:15 255:17 255:19 257:15 260:5 276:24 277:7 277:21 278:6 278:15 278:17 278:18 280:23 283:4 284:20 284:21 285:10 286:8 documentation [1] 65:1 documents [29] 7:10 7:14 14:3 14:9	14:12 14:13 14:16 91:22 116:15 116:19 117:1 117:2 148:16 179:6 186:20 189:2 205:12 221:21 229:1 229:8 229:15 253:5 253:7 255:11 258:10 285:5 285:23 288:20 288:21 doesn't [5] 162:1 162:4 215:15 285:8 286:1 done [26] 9:16 12:6 64:22 79:24 142:22 143:19 143:20 147:11 147:19 147:22 190:9 190:13 213:23 213:24 216:19 216:23 218:8 219:1 220:13 224:6 227:5 232:14 232:14 255:8 272:14 274:3 door [3] 19:24 174:12 174:14 doors [2] 31:2 174:5 doorways [1] 195:21 doughnut [1] 67:13 down [8] 41:17 57:10 128:4 174:13 176:20 196:15 201:1 269:10 Dr [4] 236:23 239:16 240:7 240:10 draw [1] 40:12 Drawbacks [1] 184:2 Drawwork [3] 185:17 185:20 185:22 Drawworks [8] 182:20 184:3 184:5 184:5 184:6 185:13 185:14 185:15 draws [1] 240:24 Dresser [3] 3:7 6:1 296:3 dried [1] 205:1 Drill [1] 188:9 drill [3] 198:7 198:8 201:20 drilled [1] 197:23 drilling [4] 186:9 198:7 198:11 201:20 Drislane [4] 283:7 283:9 291:6 291:8 Drive [14] 8:15 69:13 69:14 69:15 69:24 94:16 97:11 100:10 100:18 122:15 124:8 125:2 147:11 171:18 drive [1] 200:24 driveway [1] 280:18 drop [1] 80:14 dropped [1] 59:6 drove [1] 128:20	Drum [1] 70:5 drum [29] 46:23 47:5 47:7 47:16 47:21 52:7 54:21 57:18 58:3 58:7 58:15 59:22 60:5 61:3 70:22 71:3 72:21 73:4 73:24 76:16 76:24 142:6 147:23 147:24 156:8 199:20 200:3 270:17 290:22 drums [5] 38:5 128:24 254:15 269:11 270:16 dry [1] 205:6 DU [1] 298:3 due [2] 203:12 268:23 duly [2] 8:7 298:17 dump [1] 56:1 DuPage [3] 1:19 298:6 299:23 Durability [1] 61:14 durability [2] 61:13 163:18 Duration [1] 134:14 duration [11] 22:13 22:20 28:13 31:4 109:7 126:23 127:16 137:7 137:20 138:8 223:22 During [6] 36:9 134:12 222:20 273:6 273:9 290:8 during [17] 28:10 29:24 36:22 76:2 105:23 113:9 126:16 137:7 138:14 138:18 149:24 180:13 205:15 206:21 208:18 223:21 248:20 Dust [1] 291:19 dust [34] 216:21 225:21 227:23 228:8 254:5 254:20 254:22 254:23 255:4 256:5 256:7 256:10 263:17 263:19 263:21 263:23 264:11 264:14 264:17 264:19 265:15 266:11 268:3 268:11 268:19 269:1 269:8 269:11 272:24 273:21 273:24 277:12 281:20 282:3 duty [17] 22:11 56:12 70:10 70:16 70:18 70:21 71:3 73:7 73:13 73:15 135:9 135:18 138:3 184:22 206:13 206:15 206:24 Dynamometer [1] 174:20 dynamometer [2] 174:16 225:6	-E- E [3] 3:13 4:1 4:8 e [1] 15:20 E-i-n [1] 15:14 e-i-n [1] 15:13 E.M [9] 179:14 179:15 179:16 179:22 180:3 180:5 181:2 183:6 188:12 E.W [1] 283:7 ear [1] 13:8 early [5] 212:15 216:6 253:11 267:23 268:6 case [1] 288:20 East [1] 78:7 easy [1] 207:13 Econoline [3] 21:20 21:21 35:3 economy [1] 121:24 Ed [1] 296:3 Edge [1] 154:13 edge [15] 154:5 154:10 154:11 154:12 154:15 154:18 154:19 154:22 155:24 156:9 156:11 156:23 188:9 276:3 276:3 edification [1] 47:1 educate [3] 14:4 243:22 263:12 educated [1] 263:7 educating [1] 263:1 educational [1] 20:23 EDWARD [1] 3:6 Edward [1] 6:1 effect [12] 214:10 226:10 226:24 227:6 235:1 250:3 256:24 264:7 265:5 266:19 274:13 275:3 effective [1] 232:20 effects [5] 216:11 243:23 244:24 246:17 266:24 effort [1] 236:15 efforts [12] 148:20 149:23 223:9 227:20 236:10 237:10 237:14 272:5 289:13 289:19 290:6 292:24 Either [2] 44:15 215:11 either [21] 14:23 16:5 17:18 17:23 44:19 78:3 79:4 112:4 127:2 127:5 128:20 150:3 153:9 172:11 173:15 189:20 204:4 218:14 219:24 230:2 243:19 elicited [1] 295:10
---	--	---	--	---

elsewhere [5] 32:11 97:12 97:13 98:9 193:7	enterprises [2] 95:13 130:5	exceptions [1] 124:14	217:10 232:19 233:19	69:17 69:18 69:21
emanating [2] 227:23 264:19	entire [1] 178:21	exchange [1] 96:5	235:4 236:11 237:11	70:2 71:21 71:23
employed [6] 9:8 19:8 39:17 219:3 246:23 248:1	entities [4] 93:7 94:19 111:14 206:8	exchanged [1] 87:14	240:11 240:18 243:2	71:24 72:7 72:18
Employee [1] 274:15	entitled [1] 5:8	exchanges [1] 229:1	243:16 249:8 249:12	73:2 73:7 73:14
employee [7] 9:11 92:20 93:1 218:16 238:15 239:22 285:1	entity [5] 88:21 92:1 95:3 96:3 108:13	Exclusive [1] 128:7	250:1 250:4 250:20	73:17 73:21 74:1
employees [20] 13:20 13:20 16:2 41:21 218:22 222:22 223:11 223:24 224:19 239:10 274:12 274:21 275:1 275:14 282:1 286:6 286:12 286:19 286:20 287:6	environment [5] 17:8 29:8 58:23 214:2 236:12	exclusive [3] 80:10 128:5 193:17	254:21 262:10 263:3 265:9 269:14 272:24 273:20 277:12 293:2 293:9	74:3 74:5 74:13 75:16 76:6 76:17 76:21 77:2 77:5 77:14 77:20 77:24 78:24 80:12 80:21 81:12 81:19 82:5 82:7 82:21 82:22 83:17 83:19 83:20 84:4 85:3 85:11 85:14 85:15 86:2 86:9 87:1 87:18 89:17 94:14 94:16 95:22 97:17 100:9 100:10 100:12 100:18 100:20 100:24 101:4 101:23 103:3 104:1 104:5 105:3 106:2 106:5 106:7 106:10 106:14 106:23 107:6 107:8 107:10 107:11 107:14 108:9 108:15 112:2 112:3 112:6 118:16 122:15 122:23 124:8 124:16 124:21 125:2 133:11 133:20 141:23 142:1 142:10 143:2 147:11 147:13 152:12 152:17 152:19 152:24 154:8 158:17 159:20 170:19 171:18 171:23 172:9 172:10 172:12 172:14 175:10 175:10 175:15 175:16 177:3 177:5 180:18 185:15 189:23 194:16 195:4 195:7 195:13 195:20 201:15 203:18 204:5 209:3 209:10 209:15 211:4 211:8 213:3 213:12 219:8 222:16 231:24 264:22 268:13
employment [28] 18:4 18:22 21:1 27:3 28:1 29:12 29:21 31:16 31:21 32:1 32:8 32:11 34:18 34:21 38:13 40:17 44:8 44:10 44:19 109:8 113:23 126:23 137:20 138:8 208:3 216:17 222:20 223:22	epoxy [7] 178:4 178:9 178:13 178:14 204:19 204:19 204:20	exclusively [2] 72:20 127:14	express [2] 88:24 211:14	
employment-wise [1] 34:14	environments [1] 270:4	Excuse [6] 20:7 76:9 123:20 180:16 192:5 268:4	expresses [1] 285:8	
encapsulated [1] 246:9	EPA [1] 245:13	excuse [2] 101:14 292:16	expressing [1] 259:8	
enclosures [1] 28:20	epidemiological [1] 242:12	executive [4] 40:1 215:24 283:7 293:19	extensions [1] 195:13	
End [3] 115:2 228:16 296:9	epidemiologists [2] 235:24 240:15	executives [3] 113:22 211:7 211:13	extensive [1] 95:11	
end [19] 27:2 48:11 58:21 58:23 79:2 104:3 122:4 122:4 122:5 137:13 137:13 144:18 145:10 158:6 169:17 191:7 197:8 256:15 280:2	equal [1] 236:15	exemplars [1] 229:8	extensively [1] 293:6	
ended [1] 151:7	equipment [19] 43:22 45:19 56:8 71:6 71:11 71:22 72:23 74:21 74:22 138:1 157:6 157:21 158:3 182:3 196:7 201:6 255:6 264:15 265:14	exhaust [15] 42:4 43:8 43:9 43:14 43:24 44:7 44:18 77:8 83:7 83:17 94:22 131:10 133:18 139:6 139:8	extent [1] 249:20	
ends [1] 56:18	escapes [1] 102:16	exhausts [2] 83:23 133:7	exterior [1] 35:21	
energy [2] 175:5 251:7	essentially [4] 53:8 53:13 110:12 176:21	EXHIBITS [1] 4:11	extra [1] 184:22	
engage [1] 47:15	establish [1] 222:14	existed [3] 107:24 120:18 291:1	extrude [2] 144:19 154:16	
engaged [6] 42:1 152:9 246:24 267:24 268:7 270:23	established [1] 183:14	existence [6] 66:4 81:4 127:6 151:7 151:7 185:23	extruded [8] 144:11 145:5 145:18 146:20 148:5 177:8 202:3 203:23	
engineering [7] 65:6 65:13 65:20 66:6 140:22 140:23 219:23	estimation [1] 68:1	existing [4] 65:22 97:18 195:13 195:15	extrudes [1] 204:4	
engines [1] 36:2	et [12] 1:5 1:9 5:8 5:9 52:19 58:3 79:13 194:9 297:4 297:8 298:12 298:13	exited [1] 148:12	extruding [4] 144:15 202:1 203:22 204:3	
England [3] 22:17 239:5 239:11	et cetera [1] 121:4	expansions [2] 195:13 195:15		
enhanced [1] 43:21	event [1] 7:1	expenditures [2] 266:3 266:6	-F-	
enjoyed [1] 51:18	eventual [1] 78:8	expensive [2] 144:5 144:6	facilities [51] 33:3 33:18 39:21 41:10 42:22 43:10 46:18 51:3 56:18 64:13 64:24 65:8 76:17 77:6 77:17 83:2 83:6 85:9 86:4 89:6 98:5 98:21 99:3 108:23 110:15 111:20 149:1 149:2 149:2 149:5 193:18 194:14 195:16 195:22 211:9 212:20 214:5 214:9 218:23 219:15 221:15 221:22 239:10 255:9 264:6 264:15 265:20 269:18 273:5 274:14 286:3	
enlarge [1] 41:5	eventually [6] 51:3 58:21 59:13 216:9 256:20 269:4	expert [8] 217:18 217:21 241:13 241:15 241:17 242:3 251:23 252:15	facility [194] 9:8 25:11 25:12 26:15 28:11 32:16 33:2 33:14 34:5 36:24 37:13 39:20 40:19 41:1 41:4 41:6 41:8 43:12 45:24 46:22 47:24 48:5 48:10 48:17 48:17 48:21 49:17 49:18 49:20 49:24 50:2 52:6 56:8 56:16 56:21 57:20 57:24 58:6 58:12 58:17 59:23 60:16 62:18 65:2 65:7 65:18 66:3 66:7 66:9 66:10 66:11 66:17 67:24 69:8 69:16	
entailed [3] 44:24 194:19 227:16	exactly [3] 91:7 96:6 167:16	expertise [4] 213:2 241:22 241:24 288:13		
enter [4] 83:24 88:16 89:14 95:24	EXAMINATION [2] 4:2 8:9	expiration [1] 166:12		
	examination [3] 1:13 275:1 275:13	explain [4] 14:15 37:9 173:5 287:5		
	examined [1] 8:8	explained [1] 162:14		
	examples [2] 153:17 155:23	explanation [1] 274:17		
	exams [1] 224:6	exposed [11] 235:9 235:11 241:9 242:13 242:13 249:17 250:15 268:2 268:9 269:2 287:21		
	except [2] 47:17 127:23	Exposure [1] 280:24		
		exposure [29] 11:4 215:6 217:6 217:7		
				facility's [1] 66:12
				facing [5] 47:12 47:13 67:7 67:9 202:16
				facings [10] 46:24 55:8 55:16 66:20 67:2 67:4 137:17 137:23 138:2 187:20
				fact [6] 29:5 37:2 108:4 257:10 259:14 271:14
				factor [1] 252:20
				factories [1] 239:4
				factors [3] 95:22 243:9 245:13
				factory [4] 36:8 51:21 203:6 240:1
				factual [2] 234:12 234:14
				factually [1] 244:12
				fade [1] 290:23
				failure [1] 260:10

Fair [1] 271:20	filed [1] 288:1	flex [1] 147:4	formula [2] 61:1	95:24 97:23 112:12
fair [4] 27:6 59:21	files [1] 288:23	flexibility [2] 129:17	173:9	112:15 118:12 118:15
195:24 260:7	filled [2] 104:24	145:20	formulas [5] 65:22	119:6 119:7 120:1
fairly [2] 113:7	105:18	flexible [1] 148:6	65:23 65:24 66:3	122:17 124:15 133:14
178:19	film [2] 292:4 292:11	floor [1] 196:6	96:6	135:20 136:13 137:1
familiar [19] 47:2	films [1] 291:21	fluid [1] 60:4	formulating [2] 232:18	138:13 138:17 138:21
93:9 94:2 116:22	filter [4] 218:11 218:14	FMSI [3] 155:8	243:8	139:15 141:1 141:10
117:3 134:6 156:3	218:16 218:19	283:24 288:20	formulation [1] 143:22	142:3 152:3 152:12
183:19 187:24 189:8	filters [2] 131:15	FOB [3] 79:17 79:18	forth [1] 256:12	152:13 153:1 153:7
205:18 206:2 206:5	final [8] 11:7 36:7	79:20	forward [2] 119:24	154:7 154:20 155:6
232:13 245:3 256:11	114:21 143:23 147:4	focus [1] 40:16	207:4	156:2 157:11 157:24
269:17 269:24 270:13	147:16 147:17 197:13	folks [11] 20:15	fosterite [3] 268:22	158:9 158:16 164:16
familiarity [2] 14:18	financed [1] 236:7	36:11 37:1 86:8	269:5 269:9	171:21 174:24 176:5
224:8	financial [4] 12:17	87:1 170:5 170:11	found [4] 27:23	177:11 177:19 178:6
family [4] 24:11	13:10 86:18 87:1	206:20 211:7 220:6	32:1 88:17 215:22	181:22 188:13 190:14
24:13 34:8 62:15	Finding [1] 290:20	follow [3] 20:24	founded [1] 49:13	190:21 191:1 191:2
Fannin [2] 2:4	finding [2] 290:1	89:12 132:13	founding [1] 49:13	191:4 192:10 193:17
2:17	290:14	follow-up [2] 30:13	Four [1] 21:24	194:20 202:17 225:5
far [6] 13:9 165:16	findings [6] 214:13	90:22	four [9] 10:2 31:23	238:22 238:23 276:10
192:10 206:6 214:18	220:17 240:13 240:14	follows [1] 8:8	36:4 57:23 114:13	289:9 290:15 290:21
259:21	267:24 282:1	footage [1] 204:6	123:2 123:2 126:3	294:6
fashion [2] 80:16	fine [2] 272:10 272:17	Force [10] 21:22	frame [6] 36:2	Frictions [1] 294:1
142:13	finest [2] 286:3	22:2 22:14 22:15	39:16 105:23 125:23	Friday [1] 40:23
fasten [2] 199:23	286:4	22:16 22:16 22:18	206:21 269:23	FRIEDMAN [1] 2:11
fastened [2] 47:10	finish [1] 199:10	24:7 37:20 38:10	Frames [4] 31:12	friend [2] 24:7
47:19	finished [2] 21:5	force [1] 144:21	31:19 31:22 32:2	29:13
father [1] 34:10	67:5	forces [1] 144:14	frames [3] 219:3	friends [1] 51:20
FBO [2] 79:16 79:18	finishes [1] 27:21	Ford [8] 21:14 35:3	248:9 290:8	Frisbee [1] 67:10
features [1] 169:22	finishing [2] 142:17	36:9 36:22 37:11	Frank [3] 141:6	front [1] 126:4
Federal [4] 211:17	143:5	45:16 157:18 159:10	225:1 225:11	frustrating [1] 259:16
245:2 245:6 245:19	Firestone [1] 130:20	foregoing [3] 297:14	free [2] 76:12 268:20	frustration [2] 257:8
federal [1] 271:24	firm [4] 6:24 28:2	298:23 299:3	freedom [1] 129:16	257:22
feeling [1] 105:22	32:1 117:10	Foreman [1] 23:5	frequency [1] 17:2	full [2] 187:6 290:19
feet [3] 144:22 204:10	firms [2] 10:16	foreman [1] 21:17	frequently [2] 68:10	fully [2] 36:3 247:11
204:13	219:23	forerunner [1] 179:16	254:3	fumes [1] 205:7
fell [1] 19:24	First [8] 18:17 34:23	forgot [1] 273:10	fresh [1] 116:1	function [1] 223:10
Ferodo [9] 89:13	39:5 41:6 143:7	forklift [2] 173:22	Friction [16] 89:13	functions [1] 223:6
89:14 93:8 95:10	167:9 169:6 266:2	174:3	100:7 107:19 119:5	future [1] 6:23
96:4 96:8 96:15	first [30] 8:7 36:20	form [63] 6:16	138:5 155:9 224:9	
238:22 238:22	38:13 44:16 48:20	51:8 53:9 63:18	224:21 276:1 283:10	-G-
Ferodo's [2] 95:1	78:23 81:8 142:2	70:24 75:22 87:3	284:3 284:7 284:14	Gabriel [1] 42:17
95:9	150:16 171:1 183:24	88:11 89:7 98:2	288:20 291:7 291:23	Gamble [11] 22:24
few [8] 82:8 86:18	192:5 208:1 208:13	98:13 122:7 127:24	friction [128] 10:5	23:10 24:6 38:15
114:13 183:9 196:11	210:18 210:21 215:1	135:16 147:4 151:11	41:12 42:4 46:15	38:17 38:19 208:24
218:1 272:13 285:5	215:5 216:17 221:13	152:5 157:3 160:8	46:15 47:10 47:15	209:1 209:2 209:15
fiber [21] 63:18	226:2 226:16 229:13	161:4 162:10 168:16	52:12 52:15 53:19	210:5
68:13 68:14 68:16	238:14 238:22 239:7	169:1 171:13 187:15	57:3 57:4 57:9	garage [1] 129:6
69:2 69:3 140:4	261:21 284:8 289:18	193:19 198:24 199:11	57:12 57:16 57:17	garages [2] 195:21
241:6 242:1 242:5	298:17	199:22 208:6 211:11	57:18 58:1 58:14	269:24
243:2 245:14 245:21	fit [6] 142:19 146:19	220:2 235:6 235:22	60:10 60:22 60:24	gas [4] 52:18 59:4
246:2 251:21 252:2	147:17 147:24 197:13	239:12 240:2 240:20	61:2 61:22 62:9	59:6 130:21
252:3 252:8 252:9	200:20	242:17 245:10 245:16	63:2 65:10 65:17	gaskets [2] 209:6
252:13 266:23	fitting [1] 165:21	245:23 246:4 246:12	66:13 66:16 67:1	246:10
fibers [22] 65:15	Five [1] 28:7	246:20 252:4 257:23	67:17 67:23 68:21	gather [1] 234:12
68:4 68:12 68:18	five [3] 82:1 82:16	258:7 259:18 260:3	69:6 72:19 73:11	gauge [1] 27:21
166:23 190:10 203:4	82:19	262:3 263:5 268:23	74:2 74:6 74:22	General [3] 28:18
215:7 217:11 218:3	fixing [1] 279:2	269:6 270:19 272:8	74:23 74:23 75:15	30:16 158:4
218:18 218:18 225:20	fixture [3] 198:5	275:20 278:22 285:19	75:20 77:1 77:23	general [14] 30:1
226:4 235:9 235:12	198:6 254:18	286:15 288:8 291:13	78:4 78:22 79:1	31:5 31:20 32:19
241:18 241:19 246:17	flat-salaried [1] 170:4	292:2 293:4	82:24 83:3 83:19	32:21 46:19 90:9
249:15 268:21 269:14	fleet [1] 37:21	formally [1] 233:17	83:23 88:16 88:17	95:17 100:14 100:22
field [10] 187:5	Flex [1] 188:5	formed [1] 236:4	89:1 89:5 89:15	102:3 117:9 208:11
187:10 193:3 193:5		former [2] 13:20	93:6 93:15 93:22	222:12
193:12 241:22 241:23		16:2	93:22 94:18 95:4	
263:10 270:4 271:1			95:11 95:19 95:23	

generalization [1] 67:9	140:1	guy [2] 169:14 239:15	287:20 289:8 294:9	188:7
generally [9] 12:16 18:17 43:2 78:13 146:9 146:12 213:23 218:7 242:4	graduate [1] 21:9	Guys [1] 217:13	hear [2] 150:6 238:10	hoses [4] 270:9 270:14 270:15 271:15
generate [2] 80:23 84:1	great [1] 51:20	guys [3] 33:4 140:21 141:4	heard [9] 51:16 94:4 94:7 182:15 182:17 186:23 208:3 208:7 239:15	hot [1] 174:10
generated [1] 281:8	greater [1] 235:10	-H-		
generates [1] 282:2	GREEN [3] 1:8 297:7 298:13	H [2] 2:20 4:8	hearing [1] 236:23	hour [4] 1:21 13:12 217:11 218:19
generic [1] 34:21	Green [1] 5:9	H-y-p-e-r [1] 136:12	heat [6] 174:12 176:19 176:20 212:12 268:23 290:23	hours [1] 23:21
gentleman [11] 103:19 173:14 173:16 173:21 175:24 197:8 197:18 217:13 232:5 284:22 288:4	grind [1] 254:3	half [1] 24:2	Heavy [1] 71:3	house [2] 59:1 71:17
gentleman's [2] 27:9 103:15	grinder [5] 254:17 254:19 254:20 264:11 264:16	Hall [6] 230:16 230:16 255:16 255:24 256:3 257:11	heavy [18] 56:12 70:10 70:16 70:18 70:21 72:22 73:7 73:13 73:15 96:5 135:9 135:18 138:1 181:24 184:22 206:13 206:15 206:23	housings [1] 38:5
gentlemen [3] 16:6 16:22 17:23	Grinding [1] 281:1	halls [1] 195:20	held [4] 98:4 99:19 154:18 274:15	Houston [1] 3:12
genuine [2] 157:16 157:16	grinding [22] 142:22 147:8 147:16 156:16 197:7 197:9 197:15 255:5 256:8 263:20 264:15 264:20 269:12 277:23 277:24 278:2 278:11 282:2 282:21 282:24 285:17 289:9	hallways [1] 195:12	hello [1] 17:11	hub [2] 199:24 199:24
Georgia [1] 33:19	Grizzly [59] 50:8 50:10 50:15 50:16 50:17 51:7 51:11 51:18 52:1 93:22 119:3 119:15 119:20 120:5 120:21 120:22 120:22 121:1 121:2 121:3 121:7 122:2 122:11 134:3 135:18 135:19 149:20 164:5 164:18 165:2 179:7 179:9 179:17 179:19 179:23 180:3 180:4 180:7 180:13 180:15 180:17 180:22 181:9 181:20 182:10 183:4 183:17 185:20 187:4 187:5 187:6 188:2 188:18 189:11 191:9 191:15 191:21 206:23 222:16	hand [2] 5:19 299:17	Help [6] 13:24 65:11 95:5 190:17 220:8 229:6	hubs [1] 78:8
Germany [1] 22:17	given [14] 14:6 18:9 18:18 18:21 109:2 156:5 175:5 182:8 203:18 219:9 274:21 297:16 298:19 298:24	happy [1] 179:13	help [5] 63:4 115:22 117:17 187:4 263:19	human [1] 235:1
GERMER [1] 2:16	GERTZ [1] 2:16	Hard [6] 163:7 163:8 163:11 163:14 163:22 164:8	helping [1] 117:13	hundreds [1] 203:21
gist [1] 285:7	giving [3] 13:14 277:10 295:16	hard [3] 113:10 284:2 284:22	hereby [1] 298:6	hung [1] 257:22
given [14] 14:6 18:9 18:18 18:21 109:2 156:5 175:5 182:8 203:18 219:9 274:21 297:16 298:19 298:24	GM [2] 157:16 157:17	hardened [1] 147:1	herein [1] 8:7	hunter [1] 51:24
goes [9] 7:5 47:19 161:22 162:7 163:4 165:19 169:3 174:12 205:5	gone [3] 24:8 38:8 148:15	hardheaded [1] 113:6	hereto [1] 299:6	hunting [4] 51:19 51:19 51:22 51:23
Good [1] 8:11	good [16] 8:1 21:19 24:7 51:23 53:8 87:17 115:1 121:6 148:7 163:19 192:20 205:8 207:20 216:24 228:14 247:17	hardware [1] 129:3	heretofore [1] 298:7	Hyde [2] 276:12 277:10
goodies [1] 116:3	GOODIN [1] 3:17	harm [1] 228:8	hereunto [1] 299:16	hydraulic [1] 60:4
Goodyear [1] 130:20	Gotcha [1] 15:21	Harvin [1] 133:4	herself [1] 5:16	hygiene [5] 211:24 214:14 217:14 217:19 220:6
government [4] 37:19 46:5 234:15 236:11	government's [1] 233:18	hats [1] 6:11	hesitating [1] 178:12	hygienist [1] 221:9
grab [2] 175:2 175:3	grade [3] 65:16 140:4 143:12	hazard [2] 222:19 271:12	high [9] 21:6 137:13 144:21 156:4 209:6 223:6 249:14 269:15 290:23	hygienists [5] 220:11 220:21 220:23 221:4 221:7
grades [11] 60:23 61:1 61:4 61:8 61:10 65:9 68:8 68:9 68:12 139:22	growing [1] 24:13	hazardous [2] 268:2 268:10	higher [4] 62:2 62:7 62:8 169:17	Hyper [2] 136:12 136:13
guarantee [1] 167:2	guarantees [1] 167:4	hazards [10] 208:4 208:8 208:14 210:23 215:1 215:6 222:13 236:16 291:11 292:1	hinge [1] 19:24	Hysterical [1] 234:19
guess [16] 6:14 7:24 72:7 72:19 73:3 75:23 86:10 114:6 155:17 165:19 196:5 204:11 229:19 244:8 274:17 284:11	group [3] 63:5 100:8 107:19	head [3] 100:6 102:15 225:3	historical [4] 234:17 238:1 238:19 247:6	hysterical [2] 234:16 234:17
guessing [5] 15:12 75:13 82:12 82:18 274:9	group [7] 77:8 102:15 135:8 135:18 135:19 135:20 253:15	headers [1] 43:21	history [8] 21:1 49:7 89:24 90:4 139:16 238:6 249:24 250:21	I.H [1] 291:2
guesstimate [1] 203:19	guidelines [1] 209:12	headlights [1] 131:11	hit [1] 20:1	IBM [1] 3:4
guns [5] 42:5 45:22 46:1 46:7 46:12	guns [5] 42:5 45:22 46:1 46:7 46:12	headlinings [1] 35:23	hold [10] 25:7 61:22 123:6 196:14 198:1 198:6 198:18 200:6 200:9 234:23	ID [1] 4:9
		headquarters [14] 41:18 86:21 86:22 87:2 96:19 97:7 97:24 98:1 98:10 107:4 112:1 132:7 132:8 132:9	hold-down [3] 123:5 129:3 200:12	idea [9] 14:8 41:21 44:23 45:2 56:15 75:3 205:8 206:8 254:23
		Health [2] 233:11 267:22	holding [1] 205:3	ideas [1] 105:20
		health [25] 19:24 20:2 190:16 191:6 208:14 210:22 212:3 213:5 215:1 215:6 216:11 222:24 237:21 238:3 243:15 243:23 244:4 244:23 249:8 266:24 286:13 286:20	hole [1] 198:21	identical [2] 255:5 265:2
			holes [5] 198:7 198:8 198:14 198:15 198:16	identification [3] 5:22 154:1 160:4
			home [3] 24:10 128:22 129:6	identified [5] 131:22 154:3 154:6 158:2 159:24
			Honorable [1] 22:5	identifiers [1] 207:5
			hoppers [1] 143:19	identify [8] 5:15 14:15 164:22 165:21 166:9 166:16 172:16 177:2
			Hoses [2] 188:5	identifying [6] 154:9 160:23 163:15 164:19 165:7 165:15
				II [1] 180:13
				ILLINOIS [1] 298:1
				Illinois [9] 1:19

1:20 3:5 5:3 5:7 8:15 298:6 298:9 299:23 immediately [1] 263:22 impact [3] 29:4 235:1 244:5 Impinger [1] 218:5 implement [2] 210:24 283:14 implementation [6] 211:9 214:15 223:12 229:3 237:15 257:3 implemented [2] 233:9 274:23 implementing [1] 274:18 implications [2] 249:8 251:14 impression [1] 285:16 imprinted [1] 154:17 improved [1] 266:11 improvements [1] 265:20 imputed [1] 287:12 in-house [2] 212:6 292:10 inch [8] 67:10 67:12 145:3 146:3 146:5 184:9 184:10 184:20 inches [8] 67:11 145:14 146:3 146:3 146:6 146:7 146:8 184:19 incident [2] 114:17 114:20 include [2] 119:9 126:8 Included [1] 190:23 included [5] 123:15 128:24 262:10 281:18 288:21 including [2] 16:22 246:2 inclusive [1] 297:14 incorporated [1] 97:1 increase [2] 172:5 252:1 increased [2] 242:24 249:19 indented [1] 154:17 independent [7] 219:21 235:14 237:18 238:1 243:9 243:20 244:14 independently [2] 236:1 294:5 Indiana [5] 3:20 131:24 132:2 132:11 133:11 Indianapolis [1] 3:20 indicate [2] 109:20	160:18 indicated [5] 139:14 159:14 254:1 261:4 275:8 indicates [4] 167:24 185:2 185:15 279:1 indicating [1] 214:24 individual [8] 45:18 58:18 59:5 78:9 178:5 178:6 201:23 202:7 individually [1] 34:7 individuals [9] 15:9 16:19 92:4 223:6 229:2 229:11 233:14 235:16 246:8 industrial [8] 21:10 181:15 184:22 187:2 211:24 214:13 217:19 220:6 Industries [3] 3:7 6:2 296:4 industries [2] 181:23 246:8 industry [3] 187:10 217:20 270:24 inertia [1] 174:22 inexpensive [2] 61:21 169:15 influence [1] 246:15 inform [1] 236:15 informally [1] 233:17 Information [3] 234:1 238:15 276:3 information [69] 64:15 84:7 84:12 85:1 85:3 85:9 85:18 85:21 86:12 87:14 96:6 110:11 110:16 110:18 111:10 111:14 111:17 117:7 117:13 117:17 117:19 157:8 165:15 165:20 169:19 169:20 170:13 184:8 213:2 214:24 216:9 216:16 222:12 222:14 226:17 227:10 227:20 234:12 234:21 235:19 235:23 238:2 240:6 243:4 243:8 243:19 243:21 244:7 244:15 244:18 244:19 244:22 244:23 246:15 247:6 250:8 251:13 266:22 267:3 267:17 272:21 273:3 273:17 274:11 275:24 276:4 281:16 283:15 291:10 informational [1] 267:7 informed [2] 90:3 115:23 ingredients [3] 36:17 143:21 190:20 initial [5] 24:21	32:18 40:21 98:19 193:23 initiate [5] 219:17 219:20 223:10 237:18 243:18 initiated [5] 219:14 223:16 223:18 289:12 289:19 initiating [1] 290:5 initiative [1] 113:15 inputting [1] 84:3 inside [5] 147:23 160:5 174:9 200:19 201:11 inspect [1] 193:1 inspected [1] 196:18 inspection [1] 175:19 inspector [1] 176:2 instability [1] 29:9 install [1] 200:24 installation [4] 76:18 254:4 254:13 273:23 installed [2] 77:6 199:18 instance [9] 45:16 58:7 59:2 62:6 130:5 152:20 157:14 164:15 194:2 instead [5] 59:17 69:12 105:5 128:17 169:11 Institute [12] 155:9 224:10 224:22 233:11 267:21 276:2 283:10 284:4 284:7 284:15 291:24 294:2 institute [1] 276:7 instructional [1] 192:16 instructions [2] 160:5 273:23 instrument [1] 35:23 instrumentation [1] 201:10 insurance [6] 212:19 213:1 213:5 213:15 219:17 220:11 integral [2] 254:20 264:16 intended [2] 169:7 192:4 intent [1] 129:24 interchangeably [2] 191:22 215:14 interest [8] 12:21 91:4 91:6 91:20 92:19 93:11 242:7 246:22 interested [1] 299:14 interim [1] 104:9 interior [2] 35:22 195:18 internal [2] 221:6 229:10	internally [1] 196:5 interpretation [2] 258:8 260:8 Interrogatories [4] 117:3 117:4 117:14 261:3 Interrogatory [4] 215:3 224:5 260:17 275:10 interruption [1] 16:7 introduced [2] 210:19 210:21 introduction [1] 29:14 inverted [1] 15:20 investigate [1] 210:22 investigating [1] 268:15 investigation [2] 116:13 237:19 investigations [1] 238:1 investigators [1] 240:15 invited [1] 113:14 invoices [2] 64:18 97:22 involve [8] 17:19 26:13 61:9 94:21 169:15 182:4 266:11 266:14 involved [59] 10:17 10:22 11:2 12:16 13:13 13:17 14:22 19:22 22:19 34:2 34:24 35:13 35:14 37:21 37:22 43:20 49:21 54:1 58:1 58:9 62:22 66:23 72:18 89:20 91:24 92:5 94:23 95:18 125:24 131:3 131:11 149:6 157:12 158:22 159:3 159:16 163:1 174:17 181:21 187:22 193:23 207:22 209:14 210:7 216:4 217:2 231:17 233:17 234:13 236:22 238:12 239:19 254:8 259:13 271:17 274:2 279:7 287:14 287:18 involvement [19] 8:23 36:10 39:20 42:20 112:8 209:11 209:21 210:4 210:14 212:18 220:5 220:20 233:19 238:20 239:2 253:16 268:14 271:21 293:23 involving [8] 6:24 14:19 88:7 88:7 90:5 246:8 286:3 287:17 Ironworks [1] 185:3 issue [8] 7:17 19:20 130:9 175:22 257:18	259:13 277:5 293:13 issued [1] 267:23 issues [25] 7:3 166:19 207:24 209:22 210:16 210:19 211:22 212:20 216:5 229:12 232:11 232:15 233:6 235:3 241:13 243:15 243:22 247:4 252:24 253:4 253:12 257:22 268:15 286:1 294:9 items [2] 110:1 111:18 itself [4] 150:20 154:9 278:6 285:11 -J- J [1] 284:23 J.W [1] 230:16 Jackson [1] 5:3 JASON [1] 2:7 Jason [1] 5:23 JEFFERSON [2] 1:2 297:2 Jefferson [2] 5:10 298:11 JENNER [1] 3:3 JENNIFER [1] 3:21 Jennifer [2] 6:3 296:1 jeopardize [1] 130:11 Jim [2] 225:8 225:11 jingle [1] 179:9 job [18] 19:4 23:1 25:22 29:2 36:20 40:13 40:23 59:7 124:2 128:21 128:24 129:4 167:22 169:11 169:15 216:24 268:20 269:15 jobber [2] 52:17 76:13 jobbers [1] 129:18 jobs [1] 193:14 JOHN [1] 2:14 John [6] 6:9 117:9 149:13 186:2 206:7 260:20 Johns [2] 63:9 63:16 joined [4] 22:24 101:17 244:18 267:9 Joint [1] 194:3 joint [3] 91:1 194:4 249:23 Joliet [3] 1:19 5:6 298:9 judgment [1] 257:14 JUDICIAL [2] 1:3 297:3 Judicial [1] 298:11 jurors [1] 47:2 justify [2] 74:13
---	--	--	--	---

74:20	285:12 287:13 289:5	lathe [1] 199:13	liability [1] 19:20	177:12 177:19 178:4
-K-	294:13 295:8	law [3] 6:24 10:16	liaison [2] 237:3	178:10 187:13 197:15
KASOWITZ [1]	knowledgeable [3]	271:22	237:7	197:22 198:9 198:12
2:11	8:23 243:14 247:4	laws [1] 271:24	liberty [1] 183:9	198:15 198:22 201:21
keep [5] 54:7 64:4	known [3] 38:23	lawyer's [1] 9:13	License [1] 299:24	203:11 203:14 205:1
115:17 115:21 132:17	182:9 242:13	lay [1] 155:5	lifting [1] 212:12	254:11 254:11
keeping [2] 64:15	knows [2] 183:15	layers [2] 174:1	LIGGETT [5] 1:12	lining's [1] 156:19
264:1	215:11	284:5	4:3 8:6 297:21	linings [43] 35:15
kept [4] 64:9 98:9	Knoxville [1] 21:8	layoffs [1] 29:3	298:9	46:23 52:7 61:11
115:19 132:23	Kojro [1] 5:1	leader [2] 23:3	Liggett [26] 5:12	67:15 69:11 119:9
key [1] 231:19	KURTH [1] 3:9	23:4	7:1 8:11 8:14	119:11 121:3 121:13
Killer [1] 291:19	-L-	leads [1] 74:9	8:16 16:13 20:14	123:16 136:17 141:16
kind [35]	L [6] 1:5 2:7	Lear [5] 75:5 153:18	30:19 34:16 38:9	142:2 142:14 144:5
39:24 54:11 56:15	3:21 5:8 297:4	153:21 154:1 154:3	49:5 66:12 66:23	144:6 144:11 147:15
56:19 61:8 104:4	298:12	learn [1] 217:5	87:12 90:8 115:7	158:1 170:17 171:8
105:22 109:1 131:19	L-e-a-r [1] 75:12	least [9] 49:18 50:16	115:10 131:18 148:15	171:9 173:10 173:23
135:4 142:6 142:22	L.L.P [1] 3:9	119:17 153:18 207:3	207:18 228:21 228:24	173:24 174:2 176:3
145:24 146:9 150:16	lab [2] 218:14 221:9	259:21 259:23 263:24	248:11 263:15 294:21	176:7 178:5 187:6
151:17 153:2 157:13	label [24] 225:16	292:3	296:8	187:12 187:23 197:1
159:16 165:21 168:8	225:24 256:2 256:4	leave [2] 113:14 128:21	Liggett's [2] 6:20	198:2 203:17 203:23
179:2 188:24 190:15	256:9 256:17 256:20	leaving [4] 24:5	6:22	204:4 204:14 254:10
196:6 196:14 196:23	256:21 258:5 258:12	26:21 26:24 30:19	light [5] 27:21 29:5	268:2 268:9 280:15
202:11 242:17 242:20	258:21 258:22 258:23	led [2] 114:18 114:20	30:7 48:19 138:3	liquid [1] 269:10
259:24 265:19 284:22	259:3 259:8 260:10	left [27] 17:5 28:5	30:9 30:9 30:10	LISA [1] 3:13
288:3	260:19 261:22 262:14	36:8 39:2 39:19	limitation [1] 13:3	Lisa [2] 6:5 148:11
kinds [1] 176:10	277:14 279:21 280:2	44:12 44:13 45:3	limiting [2] 272:23	list [7] 54:7 54:11
kit [10] 71:18 71:18	280:2 280:5	87:13 99:5 103:12	273:20	54:12 94:13 133:23
123:9 125:13 128:11	labeling [11] 159:16	104:6 104:11 104:13	limits [3] 216:20	206:9 206:11
128:17 158:18 159:4	227:3 227:15 227:21	104:22 105:2 105:8	216:23 217:2	listed [2] 150:14
230:18 254:10	228:4 257:13 260:24	106:19 112:18 112:20	Line [2] 188:3 188:7	207:3
kits [28] 54:2 58:14	262:7 262:20 263:16	113:8 126:24 127:3	line [24] 21:17 35:18	lists [1] 207:14
58:15 58:19 70:6	280:4	128:23 156:15 177:14	40:12 51:7 79:14	literature [8] 237:19
71:23 72:21 80:9	labels [16] 229:9	199:16	89:1 125:16 126:2	237:20 237:21 240:24
80:13 80:19 83:19	231:3 231:12 232:23	legal [7] 30:24 117:1	134:5 137:5 150:18	242:11 242:23 244:4
84:11 124:10 124:10	253:9 253:21 257:5	149:18 230:15 247:12	151:3 160:1 160:1	289:7
125:3 126:3 127:19	258:17 258:21 261:17	258:8 259:24	160:2 168:21 169:17	litigation [5] 14:23
129:11 129:13 141:12	267:5 267:11 277:5	legs [1] 272:15	169:18 179:23 186:19	17:9 90:1 90:4
158:10 158:23 159:11	277:19 279:2 279:6	Leland [13] 135:7	191:15 197:9 218:2	287:14
159:19 161:1 253:22	laboratory [4] 189:19	135:14 135:14 135:18	253:10	Littleford [2] 172:20
256:2 257:4	189:21 189:23 190:3	135:20 136:6 136:7	lines [35] 26:1	173:8
knew [16] 29:13	lack [1] 191:23	136:9 150:10 150:18	53:21 57:23 88:8	live [1] 17:12
66:5 90:13 113:22	Lackland [1] 22:15	150:20 151:10 151:13	90:23 94:22 94:22	LLP [2] 2:11 2:16
147:23 160:17 189:23	lading [1] 64:20	Leland/ [1] 206:22	94:24 95:4 95:23	load [1] 80:13
210:21 238:11 238:21	lady [3] 173:13 173:14	Leland/Grizzly [1]	98:18 119:16 119:17	lobby [1] 237:10
238:22 248:19 260:24	239:20	207:6	120:6 122:3 122:10	lobbying [4] 233:18
276:16 278:5 278:7	lamine [1] 33:10	length [4] 13:5	126:19 126:22 127:3	234:6 235:20 237:14
knowledge [66] 10:3	Langley [1] 22:16	68:15 140:4 145:21	127:6 133:14 134:22	local [1] 129:17
35:2 37:14 39:3	language [3] 259:15	Less [1] 79:6	137:13 137:22 139:10	located [7] 5:2
41:18 43:5 43:7	262:1 274:2	less [7] 21:14 52:22	141:2 152:17 159:12	10:18 30:11 66:7
43:23 43:24 44:3	large [13] 56:2	75:23 86:20 144:5	167:19 179:9 183:16	82:5 132:11 133:11
45:13 46:10 46:13	62:13 76:5 143:20	145:11 251:7	188:1 188:13 194:1	location [14] 25:4
48:2 48:4 51:11	158:12 171:8 174:20	letter [7] 257:10 259:17	207:19	25:13 29:16 50:20
56:10 65:19 66:1	197:24 198:2 201:22	276:22 277:2 278:11	Lining [1] 167:14	64:9 64:14 65:3
69:4 71:8 72:13	202:4 204:1 206:14	283:5 285:18	lining [54] 47:6	69:14 69:15 82:2
72:15 77:21 78:1	larger [2] 71:6	lettering [2] 262:19	47:7 52:11 53:10	85:7 97:11 97:12
79:8 91:19 94:21	largest [1] 184:16	262:20	53:12 53:16 53:17	172:10
127:21 131:14 135:17	last [7] 10:12 15:11	letters [1] 155:4	59:24 60:1 61:3	locations [3] 13:6
151:21 158:21 159:1	61:11 61:23 61:24	262:20	134:9 137:1 137:11	25:19 185:6
159:2 170:18 170:20	187:3 278:13	level [4] 121:22 216:16	141:19 143:24 146:14	lockup [1] 57:6
180:10 185:23 191:8	late [5] 82:11 214:22	249:14 257:21	153:24 154:18 155:13	logical [1] 168:3
209:20 211:23 215:10	260:21 261:4 272:6	levels [11] 163:11	155:15 155:18 156:8	logo'd [1] 160:3
215:16 215:21 221:13	lateral [1] 100:16	217:6 217:7 217:9	156:17 156:23 157:2	logo-ing [3] 280:6
221:16 222:11 223:14		232:20 235:4 236:12	157:9 167:7 167:8	logos [4] 153:2
225:23 227:9 228:11		250:1 265:9 268:3	174:16 174:23 175:19	160:24 165:7 165:16
237:8 238:16 248:8			176:14 176:14 176:16	
248:18 248:24 249:20			176:17 176:20 177:9	
267:18 269:3 282:20				

London [1] 239:4	46:2	manufacturer [7]	90:11 90:16 91:1	271:22 272:22 273:6
longer [5] 61:11	maintain [2] 219:1	62:21 93:16 95:10	91:3 91:8 91:14	273:10 273:16 274:14
61:24 156:14 246:23	266:7	119:16 154:6 155:10	91:20 92:2 92:10	274:22 279:12 279:18
248:1	maintained [1] 17:4	160:19	92:19 92:20 93:1	281:7 282:1 283:18
longevity [1] 166:7	maintaining [2] 293:11	manufacturers [16]	93:17 94:11 94:19	283:20 283:23 284:12
Look [1] 187:3	293:12	37:12 45:16 48:6	95:23 97:24 98:9	284:21 286:21 287:15
look [29] 29:1 67:8	maintenance [6]	56:9 60:13 74:7	98:20 99:5 99:8	287:17 287:19 287:21
145:15 155:19 156:7	22:3 22:19 37:21	74:10 157:14 157:18	99:10 99:11 99:14	288:7 288:14 289:12
156:9 156:11 156:22	37:23 267:24 268:8	158:22 162:2 235:21	100:5 103:1 103:22	289:16 289:18 291:24
165:18 170:23 171:1	major [12] 36:4	236:4 236:8 266:23	105:8 107:7 107:11	292:14 294:12
172:15 173:12 175:18	53:20 53:24 75:14	294:7	107:16 107:18 107:24	Maremont's [17]
178:4 178:21 189:4	82:23 95:10 130:4	manufactures [1]	108:11 108:16 108:20	14:14 75:19 80:24
189:7 196:15 196:17	130:17 130:21 140:3	58:12	108:22 109:2 109:18	83:2 84:15 95:4
196:21 205:18 205:19	158:22 207:2	Manufacturing [5]	109:19 110:2 110:15	96:18 129:24 132:1
206:22 212:11 246:21	majority [3] 76:10	23:7 46:2 120:22	111:2 111:12 111:14	132:18 158:5 181:20
255:12 279:18 288:12	79:9 269:8	121:1 182:10	113:2 113:8 113:11	206:10 220:1 227:6
looked [8] 14:3	makes [2] 163:8	manufacturing [47]	113:19 114:1 117:6	248:8 288:23
27:3 67:10 67:12	163:23	8:24 23:6 25:3	119:18 119:23 120:5	mark [1] 154:17
154:19 192:5 207:14	malleable [2] 145:17	26:14 27:19 28:12	120:17 122:11 124:9	MARKED [2] 4:9
259:17	146:17	28:14 33:14 33:17	124:18 124:22 125:1	4:11
looking [10] 169:18	managed [1] 23:20	35:1 43:9 45:24	125:3 125:17 126:16	marked [1] 150:9
176:4 181:13 182:6	management [11]	48:22 56:17 58:1	126:20 127:17 129:14	market [13] 45:17
192:2 194:17 206:15	21:10 36:11 36:24	65:17 69:9 73:21	130:2 131:3 131:23	71:9 72:2 75:19
253:4 253:6 256:3	99:3 100:11 105:19	75:15 83:2 84:2	132:10 132:14 132:15	88:17 89:15 93:24
looks [7] 171:9	114:14 211:3 211:7	85:8 85:11 86:3	132:22 132:24 133:13	95:19 95:24 134:20
188:24 192:20 197:4	231:7 231:11	89:20 98:4 112:2	133:18 133:21 133:23	157:21 158:19 164:21
202:1 204:14 284:23	manager [28] 23:17	143:3 148:22 149:1	134:16 135:13 139:9	marketed [2] 118:11
Lorain [1] 21:15	23:19 24:23 25:1	149:6 158:13 170:16	139:9 139:12 140:8	125:20
Los [1] 179:14	25:2 25:11 25:18	170:19 171:4 173:7	141:1 142:10 148:17	marketing [9] 15:7
lose [3] 57:9 57:11	28:18 29:14 30:1	180:18 181:21 187:2	148:21 148:24 149:4	54:16 54:17 86:17
251:3	30:16 31:5 31:20	187:22 194:16 194:19	149:14 149:19 150:2	104:7 194:5 225:9
lost [4] 92:17 104:10	32:19 32:21 40:18	195:20 196:1 196:8	150:17 150:21 151:2	232:8 253:15
125:9 171:20	46:19 100:14 100:22	210:8 214:4	151:19 152:2 152:9	marketplace [2]
Loudon [1] 43:11	102:3 102:5 102:6	Manville [2] 63:9	153:9 153:11 157:12	151:20 155:16
low [2] 137:12 156:4	103:6 104:17 106:2	63:16	157:19 157:20 157:23	markings [1] 159:13
Lowell [1] 46:2	106:8 225:9 281:6	MAR [1] 7:12	158:11 159:2 159:14	marks [1] 154:9
lower [4] 62:3	mandate [1] 262:16	March [3] 255:18	160:1 160:3 160:17	married [1] 24:10
62:8 122:4 293:9	mandated [1] 266:17	255:21 285:3	164:18 164:20 165:8	mash [1] 60:3
LTL [2] 79:4 79:5	Manhattan [3] 63:19	Maremont [339] 2:21	168:23 170:12 179:1	master [2] 54:11
lunch [2] 282:16	283:6 291:4	6:7 6:9 7:6	180:4 180:8 180:12	141:20
294:4	manner [2] 235:5	7:11 7:19 8:22	180:21 181:20 182:8	matches [1] 198:17
lung [8] 242:15 242:24	267:18	10:3 11:4 11:13	182:9 182:24 183:3	Material [1] 155:9
250:13 250:14 250:16	manpower [1] 98:18	11:20 11:23 12:4	183:4 183:13 183:16	material [43] 14:3
250:17 250:19 262:10	Manual [1] 55:10	12:11 12:14 13:21	185:19 185:23 186:6	52:12 53:19 57:17
lungs [1] 251:3	manual [2] 47:13	14:11 14:19 15:7	187:8 187:21 188:2	57:18 58:2 58:14
	55:9	16:3 18:5 18:14	188:18 189:13 189:24	59:20 60:22 61:2
	manufacture [12]	18:17 18:18 18:22	191:3 191:13 191:22	61:22 63:2 64:10
	10:4 27:20 32:24	24:4 24:6 24:8	191:24 193:2 193:9	65:10 65:17 66:13
	41:3 41:7 43:20	24:22 25:1 25:23	193:12 193:16 194:13	67:1 73:11 83:3
	44:18 49:21 58:7	34:19 38:14 38:21	207:21 208:4 208:17	88:17 89:15 93:15
	73:3 74:21 150:1	38:24 39:5 39:8	210:7 210:16 211:4	112:15 118:19 124:15
	Manufactured [3]	40:4 40:5 40:14	211:8 211:21 211:24	136:14 138:5 138:17
	136:15 137:2 137:18	40:17 41:3 41:9	212:8 212:15 212:20	138:21 139:15 142:3
	manufactured [31]	41:19 41:22 42:1	214:24 214:24 215:5	143:3 155:6 156:10
	11:4 37:11 42:11	44:1 48:24 49:6	215:21 215:24 216:10	158:9 176:5 177:11
	46:8 46:21 46:23	49:8 50:5 50:6	216:20 220:19 221:14	177:19 178:7 190:14
	47:23 48:10 52:13	50:17 50:24 51:7	223:9 223:19 223:22	238:23 272:6 294:7
	56:7 61:24 67:24	51:12 52:2 54:7	224:17 224:20 226:1	Materials [12] 89:14
	69:8 85:12 111:19	63:1 64:4 64:9	226:6 226:11 227:15	224:9 224:21 276:1
	122:14 126:15 134:1	65:12 72:17 76:9	227:20 229:1 229:5	283:10 284:3 284:7
	134:10 140:8 142:10	77:7 77:17 78:7	229:11 230:5 231:1	284:14 288:20 291:7
	151:10 151:13 152:11	78:16 80:8 81:1	231:16 233:16 234:4	291:23 294:1
	166:3 166:4 169:4	81:10 82:13 83:6	234:7 237:3 237:6	materials [58] 10:5
	183:13 226:1 243:11	83:13 83:18 83:24	237:24 238:16 246:18	38:5 56:22 56:23
	248:20	83:24 84:4 84:13	247:2 247:7 247:24	62:9 64:17 66:14
		84:17 84:21 85:1	248:6 251:17 253:11	66:16 67:23 68:21
		85:4 85:6 85:7	255:1 255:3 255:4	69:6 72:19 74:2
		85:13 85:22 86:21	256:12 256:16 257:4	
		87:15 87:18 87:21	258:11 261:4 261:24	
		88:7 88:17 89:6	262:13 263:10 265:12	
			265:18 265:23 266:2	
			266:21 267:3 269:22	

-M-**M-c-i-n-z** [1] 15:17**M-c-l-l-o-w** [1] 225:8**M-c-r-e-n-c-s-s** [1]
293:19**machine** [10] 42:5

45:21 46:1 46:7

46:11 145:5 186:12

199:9 204:1 204:3

machines [8] 181:17

186:9 199:8 199:8

199:9 203:22 255:5

265:2

Macks [1] 56:3**mailing** [2] 131:22

131:23

main [1] 42:17**Maine** [2] 42:13

74:6 74:23 75:15	193:5 193:10 199:9	MICHAEL [1] 2:8	modifiers [9] 57:3	N [1] 4:1
75:20 77:1 77:23	254:2 259:10 263:2	Michael [1] 5:24	57:4 57:13 60:10	name [45] 5:1
78:4 78:22 79:1	263:12 263:19 270:4	microscope [1] 218:17	67:17 191:1 191:2	8:12 8:14 8:22
88:18 93:22 93:23	270:14 270:23 271:3	mid [7] 32:4 212:15	191:4 202:17	15:11 27:9 33:22
112:12 118:15 119:5	271:6 271:14 272:23	216:6 267:23 268:6	modify [1] 236:11	33:22 41:15 42:17
119:6 119:7 120:1	273:19	283:11 283:15	molded [2] 187:6	50:11 66:9 66:12
122:18 135:20 138:13	media [2] 208:11		202:4	69:16 92:7 92:18
141:10 152:4 152:12	234:23	middle [1] 122:4	molds [1] 148:6	94:4 94:7 102:10
152:14 153:1 153:8	medical [8] 224:5	middle-of-the-road	Monday [1] 40:23	102:16 103:15 108:4
154:8 157:24 158:17	237:19 237:20 238:2	[1] 122:1	monitor [1] 214:1	118:17 119:3 119:20
164:17 171:22 181:22	241:7 241:13 244:4	Midget [1] 218:5	monographs [1]	121:2 121:3 121:18
190:4 190:14 190:20	250:9	midway [1] 207:5	245:6	122:3 139:10 149:16
190:21 194:20 210:8	meet [4] 13:19 211:6	Might [1] 43:3	Montgomery [1]	151:13 153:2 155:1
225:16 227:17 258:17	213:11 220:12	might [15] 44:17	130:5	158:2 162:22 163:15
276:10 289:10 290:16	meeting [6] 8:19	47:18 50:12 78:11	month [2] 166:4	164:4 164:7 164:12
matter [7] 7:16	65:21 117:9 211:12	146:6 169:16 172:1	230:4	165:24 167:18 184:2
19:17 65:8 144:3	276:9 294:8	179:19 179:20 179:21	months [1] 227:2	named [2] 239:15
162:5 227:1 289:5	meetings [5] 235:18	206:13 206:20 215:18	Mopar [1] 158:3	284:22
matters [15] 6:23	236:19 244:12 274:15	291:3 291:17	morning [2] 8:11	names [34] 10:19
6:24 9:19 10:7	293:6	mile [3] 167:20 167:23	288:17	15:8 31:17 42:14
10:18 11:12 12:4	Mellow [2] 225:8	168:1	Most [4] 14:12 79:17	42:16 43:13 63:4
18:3 18:7 18:19	225:11	mileage [2] 167:2	83:1 242:7	92:7 118:10 118:23
18:21 20:6 39:24	member [9] 224:12	167:4	most [12] 64:24	120:2 120:4 120:8
238:20 247:7	233:22 234:4 234:7	miles [3] 8:18	69:5 72:6 98:3	120:16 120:19 122:21
May [4] 257:11 259:14	236:15 238:14 276:8	167:8 167:8	130:1 130:20 162:14	134:2 151:10 151:19
276:23 277:10	284:17 284:18	military [5] 22:20	162:16 195:17 195:24	152:13 152:21 153:11
may [29] 12:16 14:5	members [2] 49:13	22:23 46:3 208:18	269:18 289:3	158:6 160:23 164:15
17:19 20:21 33:2	294:1	milk [1] 166:10	mostly [3] 9:1	164:16 164:19 165:3
37:16 50:9 50:14	membership [1] 276:6	millions [1] 203:20	70:2 72:19	185:2 185:7 205:18
53:4 61:22 61:24	membranes [1] 251:4	Mills [1] 149:13	motivating [1] 95:21	206:12 206:19 213:8
74:8 74:10 93:11	memo [1] 260:14	mind [4] 49:4 173:3	Motor [3] 21:15	Naperville [3] 8:15
116:22 116:23 131:20	memorandum [1] 229:10	183:8 279:10	36:9 36:23	8:16 8:17
165:2 177:2 188:14	memory [5] 14:10	mine [4] 24:7 29:13	Motorcraft [1] 158:3	narrow [1] 146:5
204:21 206:13 207:4	14:10 115:23 135:2	62:24 63:9	Motors [1] 158:4	Nashville [84] 21:4
207:10 212:8 224:6	182:13	Mines [1] 63:5	mountains [1] 57:10	24:9 24:9 24:14
229:4 229:16 242:5	memos [1] 229:10	mines [1] 63:1	mounted [1] 47:6	25:5 25:18 40:19
McCook [4] 1:20	mention [13] 92:18	minimal [1] 254:21	move [2] 144:23	46:17 48:17 69:7
5:7 32:14 298:9	93:8 121:9 131:7	mining [1] 184:23	260:16	69:10 69:13 69:21
McGuire [1] 22:18	134:3 134:23 139:1	minor [1] 147:3	moved [7] 23:8	71:21 71:24 73:1
mean [25] 39:3	139:2 140:6 150:11	minute [2] 87:5	25:22 51:11 97:18	73:6 73:14 73:17
44:11 50:23 52:9	245:2 250:13 250:24	272:16	171:17 172:2 180:15	73:20 74:1 74:5
53:10 57:4 83:13	mentioning [1] 250:16	minutes [2] 272:12	MS [16] 2:20 3:13	76:17 76:20 77:5
123:18 123:20 154:11	mentions [1] 184:9	294:14	3:21 6:3 6:5	77:13 77:20 78:5
154:12 154:15 161:6	Mereness [1] 293:19	misnomer [2] 53:17	6:7 6:13 6:17	81:12 81:19 82:4
181:2 182:23 185:4	Meridian [1] 3:18	178:16	7:5 7:18 7:22	82:22 83:20 84:8
199:5 212:7 215:11	mesothelioma [11] 242:16 243:1 246:3	missed [1] 123:23	7:24 8:5 38:15	85:14 85:16 97:10
217:17 234:20 258:10	246:11 249:19 250:23	misstate [1] 71:2	260:15 296:1	97:16 98:1 100:10
258:19 271:8 283:23	251:15 251:18 252:11	mistaken [1] 172:1	Ms [1] 148:11	101:4 101:23 103:11
meaning [3] 74:11	252:21 253:1	misunderstood [2] 89:11 226:22	muffler [8] 43:16	104:1 104:5 104:18
181:24 254:11	met [3] 17:7 88:20	mixed [1] 143:21	45:6 45:9 110:16	104:23 105:3 106:17
means [8] 184:1	213:22	mixer [3] 172:21	139:6 139:7 140:9	106:18 107:4 107:7
185:2 185:6 186:1	Metal [5] 30:5	173:8 173:18	140:11	108:9 108:19 108:23
199:6 260:9 271:4	30:6 30:7 31:5	mixers [1] 143:20	mufflers [9] 43:18	109:13 111:23 112:1
288:10	31:23	mixing [1] 173:9	44:22 72:11 84:11	112:2 122:16 122:22
meant [3] 92:14	metal [9] 28:20	mixture [2] 144:13	111:13 139:2 140:13	124:21 147:12 159:19
128:19 144:12	33:3 53:14 58:9	144:21	140:19 172:7	171:12 171:18 171:19
measure [3] 174:24	73:10 123:5 135:8	model [2] 110:10	multiple [5] 64:13	172:3 172:9 175:10
201:2 254:16	135:11 177:15	165:22	195:9 195:10 201:20	175:15 211:4 211:8
measured [3] 218:13	Metallic [1] 138:12	Modesto [1] 23:8	284:5	213:12 213:17 213:20
254:22 255:4	method [1] 177:23	modified [3] 219:12	Muskogee [1] 30:12	214:4 218:23 225:10
Mechanic [1] 165:19	MG [1] 154:10	256:16 273:23	must [1] 51:22	225:11 231:23 264:22
mechanic [10] 37:24				282:12 282:24
52:18 124:5 156:3				National [1] 267:21
156:7 156:22 162:24				national [3] 78:20
169:21 192:21 269:2				102:13 136:7
mechanics [23] 128:8				nationally-recognized
130:22 160:15 161:12				[1] 136:9
170:1 192:16 193:3				nationwide [1] 78:17

-N-

nature [5] 9:2	143:22 188:17 189:22	139:14 139:19 141:16	272:8 275:20 278:22	82:5 94:13 103:4
9:24 11:24 24:16	200:2 205:10 207:23	165:21 190:19 206:14	285:19 286:15 288:8	107:11 136:16 147:10
282:10	260:23	206:18 206:19 216:1	291:13 292:2 293:4	172:22 173:8 180:15
necessarily [4] 51:2	NIOSH [11] 218:14	218:18 229:8 246:7	objection [1] 8:1	180:19 189:12 194:16
183:13 288:22 291:14	218:15 232:14 233:5	253:7 275:11 281:19	objections [3] 6:16	225:12 258:24
necessary [3] 7:2	233:7 233:10 244:22	numbers [3] 7:16	7:8 7:20	Oil [1] 131:15
266:3 266:6	262:2 262:6 268:6	155:3 155:7	obligation [1] 259:24	oil [7] 130:21 144:3
necessity [2] 6:24	268:17	Numoabex [3] 93:11	observable [1] 262:21	144:10 186:8 187:5
274:18	non-Scars [1] 125:18	94:1 94:2	observe [3] 218:21	187:10 204:4
need [17] 14:2	None [6] 16:20	Nuturn [112] 25:23	220:14 291:17	oil-based [8] 144:1
41:5 56:24 59:16	20:4 119:13 137:6	26:1 26:7 26:22	observed [3] 195:5	144:5 144:11 144:21
85:23 128:4 132:12	224:1 283:21	26:24 27:1 28:4	261:7 278:4	147:15 148:2 167:7
163:4 192:8 218:1	none [3] 37:18 48:4	28:5 34:19 38:24	observing [1] 270:6	203:23
229:4 243:24 253:22	223:14	39:2 39:8 39:17	obtain [4] 29:12	Oklahoma [5] 26:18
263:13 265:14 285:15	nonhazardous [1] 268:22	39:19 40:1 40:4	31:21 113:23 243:21	27:16 29:17 29:20
295:3	nonsmokers [5] 235:9	40:18 87:19 87:24	occasionally [2] 212:10 219:11	30:12
needed [21] 29:14	235:11 240:19 241:1	88:6 88:7 88:21	occupation [1] 39:12	Okmulgee [2] 29:17
60:9 65:15 76:10	250:15	90:9 90:23 91:4	Occupational [2] 233:11 267:22	29:18
76:14 80:19 80:20	nor [2] 299:13 299:14	91:21 92:1 92:13	occur [3] 171:12 176:10	old [6] 52:10 52:11
83:16 83:17 83:19	normally [2] 107:1	92:15 92:21 92:24	occurred [13] 51:6	52:14 52:24 53:3
86:5 109:20 110:1	131:1	94:11 95:3 95:22	69:9 96:17 171:16	115:14
110:9 110:20 111:11	North [1] 3:18	96:2 96:8 97:6	171:16 171:19 171:22	omitted [1] 256:4
147:8 147:9 147:19	notarial [1] 299:17	98:1 98:11 98:20	172:10 173:7 180:8	Once [3] 17:3 77:4
147:22 213:24	notarized [1] 299:7	99:6 107:3 107:23	196:1 228:12 229:17	85:6
needs [5] 62:13	Notary [3] 1:18	108:12 108:13 108:16	occurring [1] 203:15	once [7] 142:18 143:18
62:14 84:5 110:22	298:5 299:23	108:22 109:8 110:2	oddball [1] 129:21	143:21 146:24 155:15
199:6	noted [1] 277:23	110:11 110:19 110:23	OEM [4] 37:7	223:18 254:15
negotiate [1] 12:21	notes [1] 38:9	111:3 111:4 111:5	47:24 71:13 157:9	One [5] 3:4 123:2
negotiations [2] 92:1 256:19	Nothing [3] 167:11	111:19 111:20 112:18	Off [7] 16:9 87:6	131:22 207:5 207:8
Neither [1] 122:17	206:1 294:3	112:20 113:3 113:18	115:2 148:8 228:16	one [103] 8:1 11:2
nestled [1] 141:17	nothing [1] 298:18	113:19 113:21 113:24	272:18 294:16	17:17 17:18 20:17
Never [3] 131:11	Notice [2] 1:13	114:8 124:9 124:19	off [23] 16:8 16:10	20:19 21:14 22:12
270:6 294:5	298:16	126:20 126:23 127:17	19:24 30:14 38:9	31:24 33:19 34:17
never [12] 39:23	notice [3] 6:15	129:15 130:2 132:15	59:6 77:18 77:22	36:17 43:11 43:15
112:14 125:18 127:19	247:9 248:16	134:16 148:21 149:1	80:14 84:16 87:5	47:4 48:19 53:1
131:3 158:11 168:11	noticeable [1] 262:19	149:4 150:2 152:3	87:13 118:1 145:2	53:8 58:13 61:1
235:11 271:17 276:8	notices [1] 233:1	152:9 153:10 153:11	145:14 156:8 156:18	61:12 66:18 68:20
276:9 282:6	notification [1] 85:8	157:12 157:19 157:24	156:19 162:18 205:7	71:24 73:2 75:5
New [2] 2:13 2:13	notify [3] 83:18	159:3 159:14 160:1	270:17 272:19 294:14	75:9 76:21 81:11
new [29] 27:3 30:24	84:21 86:3	160:3 164:18 165:8	offer [1] 72:1	82:3 83:17 84:1
52:11 52:15 52:23	notifying [1] 227:16	168:23 170:12 179:2	offered [3] 72:2	84:4 84:16 85:13
53:1 53:7 53:8	November [2] 230:6	181:21 185:24 191:3	217:14 217:18	93:9 95:21 105:10
59:9 59:17 65:24	261:13	191:16 207:21 216:1	offhand [1] 118:23	117:1 121:8 123:1
65:24 70:7 70:8	Now [13] 53:14	223:23 224:17 224:20	office [8] 9:13	123:11 126:4 127:2
71:11 71:17 71:22	59:22 95:1 106:1	238:13 265:13 265:18	86:23 97:19 97:19	127:5 128:9 130:21
74:22 76:24 97:17	119:15 122:9 126:2	266:7 273:10 290:4	116:4 116:21 213:16	133:21 134:23 137:16
109:11 124:10 148:19	126:13 171:11 180:7	292:14 292:16 292:19	276:20	140:3 141:17 148:19
158:23 159:4 159:6	200:14 210:6 225:13	-O-	officer [2] 22:3	150:9 151:24 152:20
163:5 270:17 276:4	now [18] 42:7 42:19	o'clock [1] 1:21	231:22	154:2 155:6 160:14
Newall [22] 88:16	43:12 75:10 75:18	object [2] 182:22	offices [4] 9:4	163:9 165:2 167:18
88:21 89:4 89:13	111:19 145:20 151:24	248:15	9:11 180:18 195:19	168:21 173:8 173:17
89:16 89:24 90:5	162:22 167:11 204:8	Objection [58] 51:8	official [2] 132:4	174:2 177:14 181:5
93:4 93:7 93:12	246:21 267:10 282:24	53:9 70:24 75:22	132:6	181:16 186:7 187:13
95:2 95:3 96:14	295:2 295:2 295:13	87:3 88:11 89:7	often [2] 128:11 129:23	189:13 194:13 195:7
107:19 238:11 238:11	298:10	98:2 98:13 122:7	Ohio [36] 21:15	195:12 195:17 196:24
238:17 238:19 238:21	NUMBER [1] 4:9	127:24 135:16 151:11	25:12 25:14 46:17	198:4 203:22 206:4
239:2 239:10 239:22	number [28] 5:11	152:5 157:3 160:8	46:22 47:24 48:5	213:1 213:6 213:7
news [3] 135:15 208:11	7:13 9:23 17:10	161:4 162:10 168:16	48:10 48:16 48:21	215:11 247:3 253:6
270:22	34:17 41:21 55:14	169:1 171:13 187:15	50:21 51:12 51:15	253:8 255:9 259:4
newsletters [1] 267:7	55:15 89:19 105:16	193:19 199:11 199:22	51:20 52:2 52:6	262:15 263:15 264:24
Next [6] 46:15 172:19	116:22 121:2 133:24	208:6 211:11 220:2	52:13 56:21 57:20	275:7 277:22 280:2
174:15 179:5 188:21	news [3] 135:15 208:11	235:6 235:22 239:12	60:16 62:17 69:18	280:14 287:8 287:16
197:17	newsletters [1] 267:7	239:23 240:2 240:20		287:17 288:16 292:4
next [15] 25:9 43:8	Next [6] 46:15 172:19	242:17 245:10 245:16		293:8 293:13
45:21 69:7 87:15	174:15 179:5 188:21	245:23 246:4 246:12		Ones [1] 277:17
87:16 87:19 108:17	197:17	252:4 257:23 258:7		ones [17] 45:17
		259:18 260:3 262:3		66:15 84:18 116:20
		263:5 269:6 270:19		121:8 129:14 131:6

131:9 136:19 136:20 140:16 160:11 183:8 196:20 230:20 230:22 286:21 ongoing [2] 114:18 219:5 onto [5] 139:6 139:8 145:5 176:21 177:8 open [2] 105:17 174:13 opened [3] 49:17 160:16 195:17 opens [1] 174:6 operate [1] 72:14 operated [3] 78:6 87:18 195:8 operating [6] 57:15 95:13 107:6 107:10 126:16 173:22 operation [6] 81:20 81:22 178:24 197:21 197:22 282:21 operational [2] 98:17 253:14 Operations [1] 24:23 operations [18] 24:24 25:2 25:3 25:11 25:18 26:11 26:14 28:12 34:2 40:18 42:21 102:5 102:6 103:6 104:17 106:8 108:11 184:23 operator [1] 173:13 operators [1] 173:17 opinion [12] 241:13 242:5 246:20 247:16 250:22 251:13 251:16 251:17 258:1 268:7 272:22 278:21 opinionated [1] 258:1 opinions [8] 241:17 243:9 245:13 246:16 248:12 248:17 250:19 288:13 opportunities [1] 24:17 opportunity [5] 9:18 16:21 24:9 116:20 245:5 oppose [1] 293:1 opposed [2] 69:2 87:1 opposite [1] 199:1 option [1] 71:17 order [1] 81:2 ordering [1] 112:14 orders [4] 64:7 80:18 80:24 108:15 organization [7] 96:3 155:8 233:5 233:8 233:22 235:20 236:4 Organizations [1] 105:24	organizations [6] 234:7 234:15 235:16 236:15 244:16 268:14 organized [1] 105:21 origin [1] 292:12 original [10] 45:19 48:7 50:9 56:8 157:6 157:20 157:21 158:3 201:6 262:2 original's [1] 50:11 originally [4] 49:9 49:12 97:1 157:2 origination [1] 49:10 ORZESKE [1] 3:17 OSHA [64] 209:11 209:14 209:16 209:21 210:4 210:14 210:21 211:1 211:15 211:22 212:24 214:9 214:15 216:5 217:7 217:10 219:2 219:9 219:13 220:20 223:4 223:12 223:16 223:18 226:16 227:4 227:4 227:11 228:7 229:3 229:12 231:2 231:8 232:17 233:9 244:21 245:12 253:9 253:21 257:5 257:12 258:4 258:21 258:21 259:5 259:23 260:8 262:16 263:16 264:6 265:3 265:8 266:4 266:8 267:15 267:18 274:12 274:16 275:2 277:11 279:3 282:3 282:21 294:8 OSHA's [2] 225:13 245:20 otherwise [1] 153:9 outcome [1] 299:14 outside [11] 76:11 129:17 149:2 149:5 150:1 160:5 193:6 195:19 197:5 197:7 202:19 outsourced [1] 79:12 oven [11] 144:24 144:24 145:6 145:19 173:10 174:2 174:4 174:6 174:9 176:18 178:1 ovens [1] 146:24 Over-The-Counter [14] 123:19 123:21 123:23 124:1 125:5 125:6 125:10 126:2 127:22 128:1 128:18 167:23 169:12 280:20 Over-The-Counters [2] 126:14 136:23 overheat [1] 57:11 oversized [1] 254:11 own [19] 37:11 58:20 65:12 76:11 139:10 152:19 154:2 170:18 193:6 219:14 219:18 219:20 239:3 244:14	255:5 264:16 271:18 283:14 294:8 owned [10] 34:7 34:9 63:9 89:13 93:7 108:20 109:19 125:1 150:17 238:21 owner [7] 30:24 30:24 33:21 51:18 92:11 92:14 92:16 ownership [2] 92:19 93:10 oxygen [1] 251:3 oxygenate [1] 251:5 -P- P [1] 3:6 P-a-u-l-d-i-n-g [1] 25:16 P.C [1] 3:17 P.M [1] 296:10 p.m [5] 87:8 115:5 148:10 228:19 294:18 package [1] 207:5 packages [3] 258:23 267:6 267:11 packaging [6] 227:11 227:14 228:5 229:5 272:22 279:13 pad [8] 47:10 53:6 58:14 145:14 199:15 199:17 199:18 290:22 pads [35] 46:24 47:9 52:7 53:16 55:1 58:3 69:11 70:5 70:23 71:4 71:5 71:7 72:22 73:4 74:1 74:23 76:16 77:1 119:9 119:12 121:14 122:3 123:3 123:3 123:13 123:15 124:3 125:11 126:4 126:8 128:12 129:1 129:6 136:17 280:16 PAGE [1] 298:3 page [13] 171:1 172:15 172:19 172:23 174:15 176:23 181:9 187:3 189:15 189:18 197:17 200:2 207:3 Pages [1] 297:13 pages [3] 168:7 192:6 203:16 paid [2] 11:22 247:5 Paint [2] 36:6 36:7 paint [3] 52:14 53:1 72:14 Pampers [2] 23:7 23:20 pamphlets [1] 179:3 panels [2] 27:22 35:23 paper [1] 280:13 papers [4] 140:8	140:11 140:13 140:19 paragraph [1] 285:15 parallel [2] 232:13 233:4 parameters [2] 57:15 241:11 parent [1] 41:18 parking [1] 19:4 part [23] 7:15 35:13 35:18 45:6 50:23 53:14 53:18 57:19 58:13 60:2 66:24 67:1 107:16 129:18 129:21 143:5 162:16 165:21 193:15 204:12 204:17 241:23 283:23 participant [1] 233:22 participate [2] 237:9 237:13 particles [2] 278:3 278:12 particular [13] 43:13 65:14 68:3 98:20 105:18 114:17 116:15 137:24 164:3 170:24 196:20 206:3 281:15 particularly [1] 114:22 parties [3] 5:22 10:13 299:13 Partitions [4] 9:6 9:7 19:21 32:7 partitions [4] 32:24 33:3 33:8 33:12 parts [48] 37:2 37:3 39:11 52:17 57:19 58:10 58:13 58:18 59:1 59:18 59:19 59:20 71:17 71:23 73:10 73:16 74:14 74:24 76:13 80:21 80:22 112:15 114:8 123:4 123:5 126:10 130:24 131:4 131:13 133:7 135:8 135:11 135:14 135:21 136:10 150:10 150:14 151:13 151:24 152:1 157:17 157:17 158:23 160:7 161:15 161:16 164:10 206:15 party [3] 20:5 20:11 229:16 pass [1] 251:3 passed [2] 257:2 274:12 Passenger [1] 100:7 passenger [6] 55:18 55:22 70:12 136:21 138:3 184:17 past [6] 8:23 9:20 14:11 118:9 119:18 229:23 pastures [1] 114:15 patch [1] 166:16 pathological [1] 239:20	pathologically [1] 239:9 patience [1] 294:22 PAULA [1] 2:20 Paula [2] 6:7 6:11 Paulding [106] 25:14 25:19 46:17 46:21 46:23 47:23 48:5 48:10 48:16 48:21 49:17 49:18 50:21 51:4 51:20 52:2 52:6 52:12 56:7 56:16 56:20 57:20 57:24 58:6 58:12 58:17 59:23 60:15 62:17 64:22 65:7 65:18 66:7 66:10 66:11 67:3 67:24 68:22 69:11 69:17 69:17 69:18 72:17 74:3 74:13 75:16 77:2 77:24 78:24 82:5 82:7 82:22 94:13 103:4 106:2 106:23 107:11 108:23 112:5 112:8 112:11 118:16 124:15 136:16 137:2 137:18 138:6 138:14 138:18 141:22 142:1 143:2 147:10 147:13 152:11 152:17 152:24 154:8 158:17 171:5 171:6 171:12 171:17 171:23 172:4 172:9 172:14 172:22 173:8 175:9 175:16 177:3 177:4 178:20 178:23 180:15 189:12 194:16 195:7 201:14 203:17 204:5 214:5 218:23 225:12 258:24 paving [1] 19:4 pay [2] 13:2 98:23 payables [1] 64:7 paying [1] 248:6 pedal [1] 60:3 pending [5] 5:9 6:23 11:8 11:16 298:10 Pennsylvania [1] 23:2 People [2] 191:21 220:24 people [28] 15:6 36:24 52:10 55:18 55:19 86:17 86:18 105:20 114:1 116:14 117:11 163:12 168:14 169:10 170:1 189:20 193:7 212:9 220:12 221:3 221:6 221:8 222:12 222:16 258:6 280:18 286:4 289:8 per [1] 217:11 percent [3] 68:2 75:24 139:15 perception [1] 244:3
---	--	---	--	---

Performance [1] 61:16	202:21	pleasantly [1] 114:7	predominantly [2] 56:11 57:24	119:3 131:23 213:13
performance [13] 19:4 43:21 43:22 62:3 62:3 62:7 62:8 65:21 69:5 121:17 144:7 156:4 156:4	physical [3] 252:7 274:20 physicals [4] 212:10 223:3 223:19 274:18 pick [5] 161:16 162:21 162:23 172:7 174:2 picking [2] 162:18 163:1 picks [1] 198:4 picture [14] 56:16 171:2 172:20 177:22 178:9 181:8 189:19 201:17 201:19 202:6 203:6 203:8 203:12 203:14 pictures [6] 170:15 170:16 170:21 170:22 175:8 178:22 piece [3] 45:8 52:11 280:13 pieces [4] 47:18 160:6 201:23 202:7 pipe [4] 139:6 139:8 188:9 205:3 place [26] 73:21 78:3 80:18 81:16 82:7 85:13 85:17 98:17 107:15 110:19 112:18 115:1 131:24 133:8 143:3 147:8 148:7 176:6 178:20 198:16 200:6 228:14 261:1 264:5 275:8 279:12 placed [2] 229:4 232:24 places [3] 34:21 37:15 117:12 plaintiff [1] 5:14 plaintiff's [2] 6:19 14:14 Plaintiffs [4] 1:6 2:9 297:5 298:12 plaintiffs [3] 5:24 10:17 14:23 plank [1] 146:10 planning [1] 196:6 plans [1] 34:13 plant [13] 19:4 26:12 31:23 52:13 111:7 171:6 172:4 189:12 189:18 190:5 191:23 194:18 212:11 plants [3] 31:24 42:24 84:2 plastic [2] 33:9 33:10 plate [3] 47:10 47:14 123:7 plates [1] 70:8 player [1] 76:2 playing [1] 13:8 Plaza [4] 3:4 85:16 85:17 85:20	pleasure [1] 8:19 plugs [1] 131:15 pneumatic [2] 270:9 270:14 point [25] 24:11 93:18 103:9 103:11 103:21 104:3 145:10 146:17 156:14 156:17 171:21 180:2 187:23 200:5 200:16 211:14 211:21 238:18 247:17 254:12 263:12 268:18 271:2 271:7 274:23 poles [1] 30:7 Pond [14] 91:10 91:11 92:9 99:13 99:16 102:12 103:16 103:17 103:18 103:21 103:24 104:8 105:6 106:20 popular [1] 74:12 Porcelain [1] 27:21 pose [2] 190:15 191:6 position [18] 24:1 24:21 25:7 25:17 29:4 30:17 40:21 99:19 102:12 104:4 104:14 104:23 105:13 106:24 211:3 237:1 265:18 268:13 positions [3] 100:16 105:9 105:16 possible [1] 269:10 possibly [1] 172:9 potency [1] 241:18 potential [9] 208:7 208:14 210:22 215:1 215:5 216:11 222:13 222:18 271:12 potentially [2] 268:2 268:10 pound [2] 60:17 62:16 Power [1] 188:5 power [3] 47:21 55:4 55:5 practice [3] 152:9 270:13 270:23 practices [1] 217:19 preceded [1] 50:9 precipitated [4] 24:5 219:14 222:9 275:16 precise [1] 176:19 Precision [1] 9:5 predating [1] 49:22 predecessor [6] 50:5 50:7 119:16 179:19 180:6 240:14 predetermined [2] 174:12 176:19 predominant [1] 122:21	preemployment [1] 56:11 57:24 274:20 preexisted [1] 216:16 preexisting [1] 133:17 prefix [1] 7:12 preform [1] 142:11 preliminary [1] 182:7 premises [1] 77:14 premium [1] 121:23 preparation [2] 13:16 13:22 prepare [3] 117:13 117:21 218:16 prepared [9] 116:8 172:22 241:11 281:1 281:3 281:12 292:10 292:19 292:22 preparing [1] 15:4 presence [1] 298:21 present [8] 5:6 13:20 234:12 234:14 245:12 246:16 268:19 282:3 presented [5] 14:13 234:16 234:22 235:18 235:23 presenting [1] 282:21 presently [1] 6:23 preset [1] 146:23 president [27] 26:11 27:1 27:11 27:18 28:14 91:8 92:10 92:12 92:13 92:21 92:24 99:6 99:7 99:10 99:13 99:22 100:1 100:20 100:22 103:1 103:22 104:20 105:7 106:13 112:21 231:22 276:17 press [1] 202:4 pressure [2] 144:21 268:23 presume [3] 168:22 197:11 241:12 presuming [2] 133:17 180:5 Pretty [1] 192:22 pretty [10] 80:16 87:17 98:16 113:6 116:1 182:12 205:8 207:20 214:11 259:4 previous [2] 30:23 138:22 previously [4] 107:7 107:11 107:24 191:23 Primarily [3] 77:7 118:10 134:20 primarily [9] 35:22 52:8 55:24 68:15 71:24 73:10 79:24 128:7 164:20 primary [5] 80:3	principal [1] 236:10 principally [1] 133:11 print [1] 110:22 printed [4] 154:17 226:7 280:3 280:17 printer [1] 110:22 printing [1] 267:11 privately-owned [1] 34:5 privy [3] 228:24 229:14 291:10 problem [5] 166:8 166:17 220:24 285:17 287:20 problems [14] 113:1 212:13 241:8 282:4 282:22 286:13 286:20 287:7 289:8 289:21 290:18 291:1 293:8 294:8 Procedure [1] 1:14 procedure [2] 204:17 257:13 procedures [2] 98:17 266:12 proceed [2] 8:4 257:13 proceedings [3] 18:10 148:12 207:22 process [31] 35:14 36:1 56:17 78:13 108:2 112:17 114:19 142:12 143:3 143:22 144:9 148:2 148:3 158:16 170:16 171:5 171:17 173:7 175:20 177:15 178:20 194:19 196:7 204:22 219:5 254:8 256:8 263:18 264:20 279:8 288:3 processes [12] 23:6 37:2 89:21 177:1 196:1 216:21 242:2 249:12 263:4 265:14 270:11 289:9 Procter [11] 22:24 23:10 24:5 38:15 38:17 38:19 208:24 209:1 209:2 209:15 210:5 produce [2] 60:14 74:14 produced [8] 7:11 7:15 66:19 67:3 69:11 111:5 148:16 299:7 product [87] 19:20 26:1 51:7 53:20 57:23 66:24 67:5 72:2 79:15 88:8 89:1 95:4 95:23 98:18 109:11 119:16 119:17 120:6 122:10 125:16 125:20 126:2

126:19	126:22	127:3	professional [1]	pumps [1]	221:8	190:6	203:12	244:6	129:21	132:13	236:17
127:6	133:14	134:5	27:7	punch [1]	198:20	269:15			really [14]		10:20
134:18	134:22	136:2	proffer [1]	7:2		quantities [3]	79:10		40:16	51:22	51:23
137:5	137:13	137:22	proffered [2]	247:9	purchase [2]	64:7	141:18	282:3	71:9	73:2	91:18
138:10	139:10	141:1	248:18		purchased [6]	56:22	quarter [2]	67:12	114:24	130:14	147:19
143:16	143:18	143:23	program [4]	193:2	132:10	136:1	146:2		162:4	263:19	285:9
145:16	146:17	147:1	193:9	285:8	182:9	292:11	Quebec [2]	63:12	285:22		
147:4	150:18	152:16	programs [3]	210:24	purchaser [1]	226:3	63:13		reask [1]		80:11
153:10	154:9	155:20	227:15	291:22	purchasers [1]	227:16	questionnaires [1]	117:8	reason [5]		28:22
156:24	159:12	159:14	prolonged [1]	249:15	purchases [1]	79:16	questions [21]	30:13	88:5	105:18	149:19
159:15	160:1	160:1	promote [1]	168:15	purchasing [3]	43:4	34:17	90:10	282:20		
160:2	160:6	160:19	promotional [1]	24:16	64:21	158:22	90:20	117:16	reasoned [1]		234:14
160:20	162:8	162:18	propensities [2]	242:6	245:22		139:12	183:9	reasons [6]		61:12
163:2	165:8	166:7	proper [3]	147:20			231:2	284:19	69:1	105:17	155:23
166:17	166:22	167:19	156:24	197:9	purpose [16]	26:21	295:9	295:12	160:22	277:20	
167:21	168:1	168:21	properly [2]	142:19	26:24	30:19	295:22	296:2	rebrand [1]		136:3
169:4	169:17	169:18	176:7		51:14	52:21	296:5	297:15	rebranded [2]		136:2
179:9	179:23	181:13	properties [1]	60:24	88:24	155:11	quickly [4]	254:19	152:3		
183:16	186:18	191:15	property [2]	97:18	190:2	192:4	290:22	290:23	rebranding [3]		151:18
194:1	201:24	225:19	207:19		195:2	198:11	Quite [1]	114:5	152:10	157:13	
226:3	227:17	253:9	proportion [1]	234:24	Purposes [1]	43:2	quite [2]	86:18	rebuild [2]		55:19
273:7	282:12		proposed [1]	216:22	50:16	61:8			123:4		
production [5]	101:2		protection [2]	266:15	217:14	219:24			rebuilder [6]		93:23
183:4	190:5	288:22	266:18		pursuant [5]	1:13			134:20	145:9	147:11
288:24			protectors [1]	188:9	1:13	6:15			164:21	164:21	
Products [3]	100:7		provide [13]	111:2	298:16				rebuilders [13]		52:8
107:19	281:7		111:3	117:17	pushes [2]	60:4			54:3	56:13	57:18
products [118]	9:1		243:7	243:19	60:5				58:2	69:12	73:16
11:4	36:18	37:16	256:9	260:1	put [53]	53:7			78:20	141:21	206:11
41:12	42:5	43:14	273:19	281:15	58:19	59:5			206:13	206:17	207:2
44:1	44:21	45:15			77:4	126:15			rebuilding [5]		53:21
46:15	46:16	47:3	provided [26]	62:17	141:20	144:23			54:2	56:18	58:18
47:23	48:3	48:5	66:13	66:15	145:8	145:22			129:2		
48:9	48:22	49:21	116:21	118:9	148:5	151:18			rebuilt [15]		52:19
52:6	55:12	56:7	131:20	135:13	151:22	153:2			52:21	55:14	55:18
64:16	64:16	65:10	157:7	165:9	159:19	161:17			59:18	70:6	71:18
65:18	65:21	65:24	179:7	186:3	162:24	172:5			71:23	72:2	72:21
68:10	73:2	73:13	194:9	214:12	174:1	174:1			112:10	141:11	158:10
76:8	77:11	77:19	229:7	235:20	192:17	192:17			158:18	158:23	
78:4	82:24	83:23	258:6	259:3	192:19	197:5			recalled [2]		20:8
84:10	88:19	95:11	273:17		198:24	205:1			150:17		
95:19	97:23	111:5	provider [2]	80:10	218:17	221:8			received [2]		7:14
118:10	118:12	118:13	193:17		226:20	238:23			266:22		
119:21	120:1	120:21	provides [1]	47:14	254:18	256:20			recently [2]		229:18
121:2	121:8	121:13	providing [10]	47:21	258:23	260:10			229:20		
121:17	122:3	122:13	109:2	116:8	272:22	273:3			recipe [3]		143:14
127:14	133:24	137:24	244:3	244:7	puts [1]	198:4			143:15	173:9	
139:14	140:9	141:12	261:24	262:13	putting [11]	125:2			recognize [2]		149:16
142:9	143:7	144:9	proximity [1]	195:23	156:4	170:9			162:22		
148:21	150:1	151:4	Public [3]	1:18	176:13	177:24			recollection [8]		15:8
151:9	152:11	152:18	298:5	299:23	201:1	226:16			93:21	117:11	139:17
152:19	154:4	156:5	public [2]	33:2	262:18				213:8	226:5	227:8
158:5	158:18	159:4	267:23						250:7		
160:24	165:15	167:6	published [1]	245:7					recommendations [3]		262:2
169:23	174:14	183:6	Pulaski [1]	42:12					262:6	262:9	
183:12	187:5	188:14	pulled [2]	270:16					recommended [2]		
190:5	190:9	190:15	270:17						114:1	216:22	
190:19	193:4	193:8	pulling [3]	181:16					record [23]		5:21
194:5	210:8	214:3	186:9	186:12					6:14	8:12	16:8
214:4	225:24	227:24	pulls [1]	165:19					16:9	16:10	16:11
228:6	229:5	229:9	pulmonary [3]	223:5					30:14	64:15	87:5
233:1	236:5	236:12	pump [1]	218:9					87:6	87:9	115:3
237:16	238:24	243:10							115:8	148:8	148:13
246:9	246:24	248:21							228:17	228:22	272:18
263:2	263:14	273:4							272:19	294:15	294:16
277:18	286:22	287:22							294:19		
290:20	290:21	290:23									
Professional [1]											
27:8											

recorded [1] 222:17	265:5	remember [20] 15:5	107:1 108:18 110:8	resin-based [5] 144:2
recording [1] 5:13	regulations [55] 209:12	16:15 23:13 31:8	298:20	144:4 144:6 167:8
records [4] 64:4	209:15 209:17 209:22	68:8 93:2 97:15	REPORTER [1] 5:17	204:4
97:21 98:4 98:9	209:24 210:15 211:10	100:21 113:17 115:18	Reporter [3] 1:17	Resins [1] 57:3
recover [1] 290:24	211:16 212:24 214:9	121:5 123:11 135:3	298:5 299:23	resins [5] 60:10
rectangle [3] 145:23	214:16 219:2 219:9	136:19 153:16 204:20	reporter [1] 5:15	67:16 190:23 191:4
145:24 146:2	223:4 223:12 223:17	211:15 230:4 236:21	Reporting [1] 5:18	202:17
rectangular [2] 144:20	223:18 225:14 226:20	remind [1] 282:11	reporting [1] 105:10	resold [2] 136:1
280:2	226:23 227:5 227:6	removal [3] 263:4	reports [3] 110:21	151:20
rectangular-shaped	227:12 227:22 228:7	270:10 272:5	220:16 268:6	resources [1] 191:24
[1] 145:11	229:4 229:12 231:3	remove [4] 52:11	repository [4] 64:8	respect [73] 6:20
Red [1] 188:7	231:8 232:18 236:11	174:14 192:23 289:13	65:3 65:4 85:2	7:9 7:14 13:21
red [7] 262:20 280:3	237:10 256:24 257:3	render [1] 241:17	represent [6] 177:3	14:5 15:3 38:4
280:4 280:5 280:10	257:12 258:9 259:23	rented [1] 97:19	177:4 178:19 189:10	40:3 40:6 45:10
280:11 280:12	260:9 264:6 265:3	reordering [1] 108:2	194:12 194:17	47:22 49:5 56:6
redeposing [1] 7:1	265:4 265:8 265:13	rep [1] 247:19	representative [11] 90:8	59:22 60:20 61:2
redistributed [1] 151:14	266:19 267:15 267:19	repair [9] 72:7	146:18 169:21	76:6 79:22 89:24
redistribution [1] 151:17	272:4 274:13 274:16	110:5 130:18 130:22	181:10 215:10 215:17	90:4 90:14 90:19
reduce [1] 265:15	275:2 277:11 279:3	156:17 159:20 192:23	247:10 247:24 248:12	91:19 95:19 96:4
reduced [1] 298:22	relate [4] 110:20	268:1 268:8	261:10 285:3	97:6 98:16 98:23
reference [2] 5:7	240:12 241:17 241:19	repairs [2] 72:9	representatives [13] 12:11	99:2 103:3 118:15
288:21	related [23] 18:3	269:18	193:12 213:18	127:22 132:18 133:14
referenced [2] 69:18	40:4 73:9 93:12	repeat [1] 295:20	224:20 231:1 231:7	139:13 142:2 144:8
69:21	97:23 107:23 111:18	rephrase [1] 295:20	244:11 263:11 271:2	157:6 164:2 183:23
referencing [1] 207:12	209:17 210:16 216:5	replace [7] 59:18	283:19 284:13 293:24	190:9 190:13 206:17
referring [5] 41:4	229:1 232:14 233:18	111:12 128:11 131:1	294:6	208:4 209:12 209:21
64:22 191:18 191:19	235:3 243:15 244:4	139:5 139:7 192:23	Representing [5] 2:9	210:15 212:19 216:10
220:8	256:17 256:22 266:8	replaced [4] 59:14	2:21 3:7	220:20 228:7 231:11
reflect [5] 20:23	271:24 277:5 286:20	128:10 161:10 161:23	3:14 3:22	233:6 237:4 248:13
166:2 229:8 242:12	relates [4] 184:8	replacement [21] 45:18	representing [1] 12:20	248:24 250:17 250:19
258:11	241:14 250:11 252:16	74:22 108:5	reproduced [1] 299:10	250:23 251:12 252:18
reflected [5] 68:12	relating [1] 241:2	111:18 123:9 126:4	reputation [2] 163:19	252:24 253:3 262:7
121:18 206:19 268:7	relation [2] 10:4	126:9 131:4 131:13	163:20	263:1 263:3 264:19
285:18	relationship [15] 11:19	156:6 156:13 156:21	request [4] 5:14	265:9 269:4 272:23
reflecting [2] 221:21	12:24 17:5	156:24 157:16 157:17	9:16 237:24 243:18	279:13 290:4 293:15
282:2	27:2 81:3 81:11	157:21 158:1 158:2	requested [3] 10:14	respects [2] 93:20
reflects [1] 245:20	96:10 96:12 96:14	158:23 160:16 161:2	11:11 11:17	235:2
REFRACTORIES [3] 1:8	107:20 107:22 107:23	replacing [3] 129:1	requests [5] 111:1	respiratory [2] 266:15
297:7 298:13	109:4 193:23 252:2	129:2 169:16	117:18 117:20 117:23	266:18
Refractories [1] 5:9	relatively [2] 146:18	replenish [2] 84:18	118:7	respond [2] 81:1
refresh [3] 14:10	195:3	85:24	required [7] 142:17	117:18
115:22 135:2	relayed [4] 110:11	replenished [3] 86:5	223:5 226:20 232:24	response [9] 117:7
regard [6] 207:24	110:14 275:24 282:6	109:21 129:21	258:12 272:4 279:3	224:5 247:9 256:17
241:23 247:13 263:9	release [5] 190:10	replenishment [19] 80:24	requirement [2] 225:15	260:18 265:12 265:13
267:4 279:4	266:9 278:2 278:12	81:1 81:6	249:24	275:5 275:11
regarding [9] 8:23	281:20	81:8 83:22 84:5	requirements [1] 226:11	responses [2] 182:6
10:3 34:17 97:21	released [2] 254:23	108:5 108:8 108:15	requiring [2] 223:18	214:23
115:22 210:5 232:18	255:4	108:18 109:15 110:1	258:4	Responsibilities [1] 32:22
246:16 281:19	relevance [2] 166:6	110:20 110:21 111:1	research [7] 65:13	responsibilities [5] 23:18
regional [1] 86:23	167:15	111:6 111:15 112:9	95:11 235:15 235:17	86:11 86:15
Register [4] 211:18	relevant [4] 39:11	report [15] 27:13	237:20 244:14 289:6	247:12 253:14
245:2 245:6 245:19	207:22 248:9 269:1	33:20 33:21 100:15	reserve [2] 6:15	responsibility [5] 25:10
register [1] 155:10	relocated [5] 51:3	103:18 104:11 104:18	7:19	32:23 246:19
registering [1] 149:20	51:21 52:2 82:22	106:5 106:13 106:20	residential [1] 30:8	276:19 299:9
regular [1] 83:24	180:17	111:22 220:19 281:8	270:15 270:16	responsible [2] 25:2
regulate [1] 274:13	relocation [1] 51:15	281:10 281:19	residue [3] 268:19	232:9
regulated [1] 217:7	remain [1] 107:15	reported [29] 80:22	resigned [1] 27:3	rest [4] 156:18
regulating [1] 233:19	remained [1] 112:18	83:22 100:17 100:24	resin [5] 143:13	272:13 289:3
regulation [5] 211:1	remaining [1] 110:14	101:1 101:8 102:4	148:2 167:20 254:10	restrict [1] 265:22
226:6 226:10 260:11	remanufacture [1] 58:3	102:7 102:9 102:10	Resin-based [1] 148:4	restricting [3] 101:16
	remanufactured [1] 59:2	102:11 102:12 102:16		293:8 293:9
		102:20 102:21 102:23		restrictions [1] 293:1
		103:13 103:20 104:8		restrictive [1] 271:23
		104:19 104:19 105:3		restroom [2] 33:2
		105:5 105:11 106:15		33:4

result [6] 11:3 17:9 18:4 25:24 110:3 289:21	198:23 198:24 199:1 204:1	Running [1] 26:14 running [1] 172:6 RUNYAN [1] 2:8 Runyan [1] 5:24 rusted [1] 53:4	says [19] 163:4 178:3 178:14 179:8 181:16 185:13 207:6 260:5 260:15 260:15 278:2 278:10 278:11 278:15 278:17 278:18 285:23 286:2 286:9	167:12 167:14 167:17 168:12 168:20 170:1 170:12 170:17 170:22 171:2 172:3 193:7 193:10 193:13 193:16 194:5 204:18 206:8 230:22 231:1 231:2 231:7 231:11 231:14 232:9 253:3 253:7 253:11 253:23 254:2 254:2 255:6 255:8 256:1 256:7 256:13 256:17 256:22 257:5 257:12 259:7 259:14 260:2 260:19 261:18 263:11 264:5 264:15 271:3 271:5 271:19 272:23 273:4 273:18 276:12 276:19 277:6 277:10 277:24 279:5 279:12 279:15 279:18 280:8 281:2 281:16 282:14 284:20 285:1 285:2 286:18 287:6 287:8 287:10 287:18
resulted [1] 295:15	riveted [4] 171:10 176:8 197:23 201:21	S [1] 4:8 s [2] 297:17 297:18 S-40 [4] 167:14 167:14 167:19 167:24 S-e-i-g-l-e-r [1] 75:12 S-h-e-r-r [1] 230:9 S-t-e-i-n-m-e-t-z [1] 15:18 S-t-i-c-n-m-e-t-z [1] 15:12 S-y-n-c-r-o [1] 138:4 Saco [1] 46:2 Safety [2] 233:11 267:22 safety [3] 212:3 217:19 283:15 Saftibond [1] 138:20 Saftigrip [4] 120:20 121:10 121:11 136:24 SAITH [1] 296:10 sale [12] 25:24 30:23 57:16 57:17 60:14 83:22 98:16 99:14 110:3 150:3 191:15 193:24 sales [21] 15:6 32:23 54:16 54:17 64:10 64:16 74:18 86:17 88:6 104:7 128:2 168:13 168:15 169:21 179:2 192:15 192:20 193:12 225:9 232:8 253:15 salesman [2] 287:9 287:19 sample [1] 218:3 sampled [1] 221:1 sampling [17] 210:24 213:24 214:8 214:14 218:8 219:14 219:18 219:21 220:1 220:6 220:12 220:21 220:23 221:14 221:21 225:4 254:24 samplings [2] 220:17 222:10 sanding [2] 142:23 147:17 satisfied [2] 244:6 244:19 save [1] 255:13 Savers [1] 188:3 saw [2] 145:2 202:14 saws [4] 202:8 202:10 202:10 202:11	scales [1] 98:23 scare [1] 234:23 scattered [1] 54:4 scenario [1] 162:17 schedule [1] 111:7 school [2] 21:5 21:6 scientific [3] 237:20 238:2 252:1 Scored [1] 199:6 scored [2] 199:4 199:5 scratched [1] 199:6 screw [1] 139:6 screwed [1] 139:8 seal [1] 299:17 Sealy [16] 231:21 232:6 232:7 232:8 274:6 276:15 276:16 277:9 277:22 278:4 278:7 278:11 278:20 279:5 282:13 284:21 Sealy's [1] 279:9 search [2] 28:1 32:1 Sears [178] 72:1 72:1 72:3 72:4 73:4 76:7 76:7 76:17 76:22 77:6 77:9 78:9 78:14 79:22 80:10 80:15 80:19 80:22 81:11 82:23 83:4 83:7 83:16 84:4 84:9 84:15 84:18 84:21 84:24 85:3 85:6 85:21 86:6 87:14 107:14 107:21 107:22 107:23 108:2 108:12 108:18 109:11 109:16 110:1 110:5 110:6 110:7 110:8 110:20 110:22 111:10 112:9 112:14 122:23 124:4 127:14 127:23 128:2 128:5 128:7 128:11 128:16 128:20 129:11 129:13 130:3 130:10 130:13 130:14 130:18 130:23 134:19 159:5 159:9 159:12 159:15 159:20 159:24 160:2 160:9 160:12 160:14 160:15 160:17 160:22 161:2 161:8 161:9 161:12 162:8 162:22 163:7 163:7 163:8 163:11 163:13 163:20 163:23 164:4 164:11 164:24 165:11 165:15	232:9 253:3 253:7 253:11 253:23 254:2 254:2 255:6 255:8 256:1 256:7 256:13 256:17 256:22 257:5 257:12 259:7 259:14 260:2 260:19 261:18 263:11 264:5 264:15 271:3 271:5 271:19 272:23 273:4 273:18 276:12 276:19 277:6 277:10 277:24 279:5 279:12 279:15 279:18 280:8 281:2 281:16 282:14 284:20 285:1 285:2 286:18 287:6 287:8 287:10 287:18 Sears' [1] 253:18 seats [1] 35:22 second [4] 61:16 101:3 196:24 285:14 sections [4] 146:10 146:12 147:14 194:18 sector [1] 134:19 sedan [1] 62:15 see [19] 22:11 114:7 116:20 155:19 156:15 178:7 179:12 181:13 190:15 197:3 200:4 201:3 202:21 221:20 260:12 275:7 278:7 282:15 292:3 seccing [4] 189:21 230:1 277:7 291:21 seck [2] 31:16 114:14 secking [3] 28:1 31:24 117:21 seem [2] 168:3 195:3 segment [1] 174:22 segments [3] 145:3 145:4 178:7 segregate [1] 110:24 Seigler [5] 75:5 153:19 153:21 154:1 154:3 Selikoff [2] 240:7 240:10 sell [11] 45:18 52:15 52:16 52:17 57:20 75:1 125:17 129:13 148:22 157:20 158:23 seller [1] 88:20 selling [5] 52:21 78:23 153:24 158:9 271:19 sellout [1] 30:22 send [7] 108:14 111:4 111:6 111:13 111:17
retail [3] 45:17 134:18 269:18	rivets [5] 176:6 177:19 198:12 198:15 198:21	-S-	scared [1] 199:6 scored [2] 199:4 199:5 scratched [1] 199:6 screw [1] 139:6 screwed [1] 139:8 seal [1] 299:17 Sealy [16] 231:21 232:6 232:7 232:8 274:6 276:15 276:16 277:9 277:22 278:4 278:7 278:11 278:20 279:5 282:13 284:21 Sealy's [1] 279:9 search [2] 28:1 32:1 Sears [178] 72:1 72:1 72:3 72:4 73:4 76:7 76:7 76:17 76:22 77:6 77:9 78:9 78:14 79:22 80:10 80:15 80:19 80:22 81:11 82:23 83:4 83:7 83:16 84:4 84:9 84:15 84:18 84:21 84:24 85:3 85:6 85:21 86:6 87:14 107:14 107:21 107:22 107:23 108:2 108:12 108:18 109:11 109:16 110:1 110:5 110:6 110:7 110:8 110:20 110:22 111:10 112:9 112:14 122:23 124:4 127:14 127:23 128:2 128:5 128:7 128:11 128:16 128:20 129:11 129:13 130:3 130:10 130:13 130:14 130:18 130:23 134:19 159:5 159:9 159:12 159:15 159:20 159:24 160:2 160:9 160:12 160:14 160:15 160:17 160:22 161:2 161:8 161:9 161:12 162:8 162:22 163:7 163:7 163:8 163:11 163:13 163:20 163:23 164:4 164:11 164:24 165:11 165:15	232:9 253:3 253:7 253:11 253:23 254:2 254:2 255:6 255:8 256:1 256:7 256:13 256:17 256:22 257:5 257:12 259:7 259:14 260:2 260:19 261:18 263:11 264:5 264:15 271:3 271:5 271:19 272:23 273:4 273:18 276:12 276:19 277:6 277:10 277:24 279:5 279:12 279:15 279:18 280:8 281:2 281:16 282:14 284:20 285:1 285:2 286:18 287:6 287:8 287:10 287:18 Sears' [1] 253:18 seats [1] 35:22 second [4] 61:16 101:3 196:24 285:14 sections [4] 146:10 146:12 147:14 194:18 sector [1] 134:19 sedan [1] 62:15 see [19] 22:11 114:7 116:20 155:19 156:15 178:7 179:12 181:13 190:15 197:3 200:4 201:3 202:21 221:20 260:12 275:7 278:7 282:15 292:3 seccing [4] 189:21 230:1 277:7 291:21 seck [2] 31:16 114:14 secking [3] 28:1 31:24 117:21 seem [2] 168:3 195:3 segment [1] 174:22 segments [3] 145:3 145:4 178:7 segregate [1] 110:24 Seigler [5] 75:5 153:19 153:21 154:1 154:3 Selikoff [2] 240:7 240:10 sell [11] 45:18 52:15 52:16 52:17 57:20 75:1 125:17 129:13 148:22 157:20 158:23 seller [1] 88:20 selling [5] 52:21 78:23 153:24 158:9 271:19 sellout [1] 30:22 send [7] 108:14 111:4 111:6 111:13 111:17
retailers [2] 127:20 205:21	Road [3] 1:19 5:7 298:9	S [1] 4:8 s [2] 297:17 297:18 S-40 [4] 167:14 167:14 167:19 167:24 S-e-i-g-l-e-r [1] 75:12 S-h-e-r-r [1] 230:9 S-t-e-i-n-m-e-t-z [1] 15:18 S-t-i-c-n-m-e-t-z [1] 15:12 S-y-n-c-r-o [1] 138:4 Saco [1] 46:2 Safety [2] 233:11 267:22 safety [3] 212:3 217:19 283:15 Saftibond [1] 138:20 Saftigrip [4] 120:20 121:10 121:11 136:24 SAITH [1] 296:10 sale [12] 25:24 30:23 57:16 57:17 60:14 83:22 98:16 99:14 110:3 150:3 191:15 193:24 sales [21] 15:6 32:23 54:16 54:17 64:10 64:16 74:18 86:17 88:6 104:7 128:2 168:13 168:15 169:21 179:2 192:15 192:20 193:12 225:9 232:8 253:15 salesman [2] 287:9 287:19 sample [1] 218:3 sampled [1] 221:1 sampling [17] 210:24 213:24 214:8 214:14 218:8 219:14 219:18 219:21 220:1 220:6 220:12 220:21 220:23 221:14 221:21 225:4 254:24 samplings [2] 220:17 222:10 sanding [2] 142:23 147:17 satisfied [2] 244:6 244:19 save [1] 255:13 Savers [1] 188:3 saw [2] 145:2 202:14 saws [4] 202:8 202:10 202:10 202:11	scared [1] 199:6 scored [2] 199:4 199:5 scratched [1] 199:6 screw [1] 139:6 screwed [1] 139:8 seal [1] 299:17 Sealy [16] 231:21 232:6 232:7 232:8 274:6 276:15 276:16 277:9 277:22 278:4 278:7 278:11 278:20 279:5 282:13 284:21 Sealy's [1] 279:9 search [2] 28:1 32:1 Sears [178] 72:1 72:1 72:3 72:4 73:4 76:7 76:7 76:17 76:22 77:6 77:9 78:9 78:14 79:22 80:10 80:15 80:19 80:22 81:11 82:23 83:4 83:7 83:16 84:4 84:9 84:15 84:18 84:21 84:24 85:3 85:6 85:21 86:6 87:14 107:14 107:21 107:22 107:23 108:2 108:12 108:18 109:11 109:16 110:1 110:5 110:6 110:7 110:8 110:20 110:22 111:10 112:9 112:14 122:23 124:4 127:14 127:23 128:2 128:5 128:7 128:11 128:16 128:20 129:11 129:13 130:3 130:10 130:13 130:14 130:18 130:23 134:19 159:5 159:9 159:12 159:15 159:20 159:24 160:2 160:9 160:12 160:14 160:15 160:17 160:22 161:2 161:8 161:9 161:12 162:8 162:22 163:7 163:7 163:8 163:11 163:13 163:20 163:23 164:4 164:11 164:24 165:11 165:15	232:9 253:3 253:7 253:11 253:23 254:2 254:2 255:6 255:8 256:1 256:7 256:13 256:17 256:22 257:5 257:12 259:7 259:14 260:2 260:19 261:18 263:11 264:5 264:15 271:3 271:5 271:19 272:23 273:4 273:18 276:12 276:19 277:6 277:10 277:24 279:5 279:12 279:15 279:18 280:8 281:2 281:16 282:14 284:20 285:1 285:2 286:18 287:6 287:8 287:10 287:18 Sears' [1] 253:18 seats [1] 35:22 second [4] 61:16 101:3 196:24 285:14 sections [4] 146:10 146:12 147:14 194:18 sector [1] 134:19 sedan [1] 62:15 see [19] 22:11 114:7 116:20 155:19 156:15 178:7 179:12 181:13 190:15 197:3 200:4 201:3 202:21 221:20 260:12 275:7 278:7 282:15 292:3 seccing [4] 189:21 230:1 277:7 291:21 seck [2] 31:16 114:14 secking [3] 28:1 31:24 117:21 seem [2] 168:3 195:3 segment [1] 174:22 segments [3] 145:3 145:4 178:7 segregate [1] 110:24 Seigler [5] 75:5 153:19 153:21 154:1 154:3 Selikoff [2] 240:7 240:10 sell [11] 45:18 52:15 52:16 52:17 57:20 75:1 125:17 129:13 148:22 157:20 158:23 seller [1] 88:20 selling [5] 52:21 78:23 153:24 158:9 271:19 sellout [1] 30:22 send [7] 108:14 111:4 111:6 111:13 111:17
retainers [1] 11:22	Road [3] 1:19 5:7 298:9	S [1] 4:8 s [2] 297:17 297:18 S-40 [4] 167:14 167:14 167:19 167:24 S-e-i-g-l-e-r [1] 75:12 S-h-e-r-r [1] 230:9 S-t-e-i-n-m-e-t-z [1] 15:18 S-t-i-c-n-m-e-t-z [1] 15:12 S-y-n-c-r-o [1] 138:4 Saco [1] 46:2 Safety [2] 233:11 267:22 safety [3] 212:3 217:19 283:15 Saftibond [1] 138:20 Saftigrip [4] 120:20 121:10 121:11 136:24 SAITH [1] 296:10 sale [12] 25:24 30:23 57:16 57:17 60:14 83:22 98:16 99:14 110:3 150:3 191:15 193:24 sales [21] 15:6 32:23 54:16 54:17 64:10 64:16 74:18 86:17 88:6 104:7 128:2 168:13 168:15 169:21 179:2 192:15 192:20 193:12 225:9 232:8 253:15 salesman [2] 287:9 287:19 sample [1] 218:3 sampled [1] 221:1 sampling [17] 210:24 213:24 214:8 214:14 218:8 219:14 219:18 219:21 220:1 220:6 220:12 220:21 220:23 221:14 221:21 225:4 254:24 samplings [2] 220:17 222:10 sanding [2] 142:23 147:17 satisfied [2] 244:6 244:19 save [1] 255:13 Savers [1] 188:3 saw [2] 145:2 202:14 saws [4] 202:8 202:10 202:10 202:11	scared [1] 199:6 scored [2] 199:4 199:5 scratched [1] 199:6 screw [1] 139:6 screwed [1] 139:8 seal [1] 299:17 Sealy [16] 231:21 232:6 232:7 232:8 274:6 276:15 276:16 277:9 277:22 278:4 278:7 278:11 278:20 279:5 282:13 284:21 Sealy's [1] 279:9 search [2] 28:1 32:1 Sears [178] 72:1 72:1 72:3 72:4 73:4 76:7 76:7 76:17 76:22 77:6 77:9 78:9 78:14 79:22 80:10 80:15 80:19 80:22 81:11 82:23 83:4 83:7 83:16 84:4 84:9 84:15 84:18 84:21 84:24 85:3 85:6 85:21 86:6 87:14 107:14 107:21 107:22 107:23 108:2 108:12 108:18 109:11 109:16 110:1 110:5 110:6 110:7 110:8 110:20 110:22 111:10 112:9 112:14 122:23 124:4 127:14 127:23 128:2 128:5 128:7 128:11 128:16 128:20 129:11 129:13 130:3 130:10 130:13 130:14 130:18 130:23 134:19 159:5 159:9 159:12 159:15 159:20 159:24 160:2 160:9 160:12 160:14 160:15 160:17 160:22 161:2 161:8 161:9 161:12 162:8 162:22 163:7 163:7 163:8 163:11 163:13 163:20 163:23 164:4 164:11 164:24 165:11 165:15	232:9 253:3 253:7 253:11 253:23 254:2 254:2 255:6 255:8 256:1 256:7 256:13 256:17 256:22 257:5 257:12 259:7 259:14 260:2 260:19 261:18 263:11 264:5 264:15 271:3 271:5 271:19 272:23 273:4 273:18 276:12 276:19 277:6 277:10 277:24 279:5 279:12 279:15 279:18 280:8 281:2 281:16 282:14 284:20 285:1 285:2 286:18 287:6 287:8 287:10 287:18 Sears' [1] 253:18 seats [1] 35:22 second [4] 61:16 101:3 196:24 285:14 sections [4] 146:10 146:12 147:14 194:18 sector [1] 134:19 sedan [1] 62:15 see [19] 22:11 114:7 116:20 155:19 156:15 178:7 179:12 181:13 190:15 197:3 200:4 201:3 202:21 221:20 260:12 275:7 278:7 282:15 292:3 seccing [4] 189:21 230:1 277:7 291:21 seck [2] 31:16 114:14 secking [3] 28:1 31:24 117:21 seem [2] 168:3 195:3 segment [1] 174:22 segments [3] 145:3 145:4 178:7 segregate [1] 110:24 Seigler [5] 75:5

218:14 221:8	Shenute [1] 22:16	175:7 177:6 177:10	Smithville [1] 26:12	specifically [3] 101:9
sending [1] 112:9	Sherr [5] 230:9	179:13 181:8 189:1	smoker [1] 249:16	209:8 273:22
sent [13] 84:7 84:12	230:10 230:12 255:17	193:3 196:12 199:19	smoking [5] 249:24	specifications [3]
115:19 168:14 211:17	256:1	280:17	250:4 250:11 250:21	60:20 65:9 201:6
212:9 213:20 220:11	ship [3] 80:9 81:2	showed [7] 110:21	252:19	specificity [1] 208:13
257:10 259:5 259:9	83:6	143:11 174:15 177:23	smooth [1] 199:10	Specifics [2] 138:14
260:2 267:7	shipments [4] 77:8	204:18 219:8 235:8	social [3] 17:3	138:18
sentence [1] 278:13	79:9 79:20 231:13	showing [1] 165:20	17:4 17:7	specifics [1] 286:2
separate [7] 40:14	shipped [12] 78:6	Shows [1] 200:3	socially [1] 17:7	specs [1] 143:8
47:18 85:15 111:12	79:2 84:17 141:13	shows [8] 173:3	sold [33] 28:24 29:5	speculation [1] 204:12
151:3 151:3 283:6	141:21 145:8 154:7	173:10 177:5 177:7	42:15 45:15 48:6	speed [2] 206:7
separated [2] 82:21	258:24 261:18 273:4	177:7 201:10 201:13	52:8 55:16 56:8	255:12
196:2	273:18 279:14	242:23	58:18 58:19 73:15	speeds [1] 201:2
separately [3] 48:20	Shock [1] 42:9	shut [1] 174:11	80:23 84:10 84:19	spell [3] 15:11 25:15
73:1 73:6	shock [13] 42:4	sickness [5] 11:6	85:22 107:18 108:11	75:11
sequential [2] 168:6	42:21 43:6 45:11	222:18 235:10 240:12	118:16 129:5 132:15	Spelling [1] 33:24
179:6	77:8 83:7 84:10	287:10	134:18 135:9 136:6	spend [4] 192:8
sequentially [2] 150:9 205:10	94:22 110:15 111:6	side [4] 97:23 177:9	141:10 159:10 161:1	196:10 265:19 285:4
series [3] 188:21	111:13 133:17 135:21	199:1 204:16	163:23 164:11 164:17	spindle [1] 201:20
194:10 194:23	Shocks [1] 131:10	signature [1] 299:2	164:20 164:24 258:18	spoke [1] 172:2
serious [1] 228:8	shocks [5] 83:16	signed [4] 118:1	260:18	spoken [2] 16:23
Service [7] 72:8	83:23 85:22 133:7	118:3 118:5 299:6	solid [1] 33:9	17:1
110:7 110:8 159:9	172:7	significant [6] 99:4	solvent [2] 205:6	sponsored [1] 236:4
199:12 263:11 287:10	Shoe [2] 200:7 281:1	236:16 238:16 240:16	205:6	spools [1] 202:22
service [9] 22:9	shoe [50] 47:6 47:6	242:14 251:18	someone [7] 102:11	sports [2] 62:6
78:16 124:5 128:10	47:19 47:20 52:14	signs [1] 222:24	103:13 104:19 128:9	62:14
130:6 167:21 263:10	52:23 53:1 53:4	Silvertip [2] 121:12	155:17 157:14 221:9	spread [1] 176:15
269:24 271:1	53:6 53:10 53:14	137:10	sometimes [2] 128:16	spring [2] 126:9
serviced [1] 78:19	58:9 60:3 60:5	similar [13] 9:19	162:15	135:21
services [3] 109:2	61:22 83:19 84:11	18:3 47:16 52:12	somewhat [4] 123:8	springs [10] 58:10
248:6 281:7	109:12 142:8 142:9	55:13 67:14 130:4	181:10 205:20 271:23	123:5 123:6 123:6
set [11] 59:2 73:13	142:16 146:19 147:20	130:23 145:13 181:7	Somewhere [1] 30:3	128:13 129:3 200:5
97:4 164:24 176:20	154:19 156:1 159:6	227:10 234:22 237:7	somewhere [3] 92:17	200:6 200:11 200:12
189:1 194:8 205:11	160:15 164:4 164:5	227:10 234:22 237:7	171:15 255:11	spun [1] 203:4
217:10 254:17 299:16	171:10 171:12 176:1	similarly [1] 55:1	sophisticated [2] 158:11 191:10	square [7] 144:18
set-up [1] 84:10	176:4 176:5 176:7	simplified [1] 80:16	sophistication [1] 191:24	144:19 198:1 200:9
sets [6] 77:16 122:20	176:15 176:16 176:17	simultaneously [1] 85:9	sorry [6] 101:18 137:24	204:6 204:10 204:13
122:22 175:6 207:4	177:12 177:20 178:11	sister [1] 34:9	144:12 273:10 288:16	squeeze [1] 144:15
234:14	197:15 198:13 198:14	sits [1] 249:2	289:15	SS [2] 138:12 298:2
setting [2] 74:21	200:5 204:2 254:18	sitting [1] 294:3	sort [6] 88:22 136:8	stable [1] 29:2
238:12	263:20 269:17 270:1	situation [2] 129:19	153:8 177:16 191:6	stack [5] 171:8 172:12
setup [1] 130:3	Shoes [1] 167:14	153:23	215:13	173:22 197:24 198:2
setups [1] 130:24	shoes [43] 9:1	six [1] 23:20	sound [1] 182:12	stacked [1] 172:13
several [5] 118:22	36:11 36:16 41:8	size [3] 105:24 158:14	source [6] 64:17	stacks [1] 198:3
134:24 198:2 208:16	52:11 52:20 52:22	174:22	76:11 136:9 152:1	stadium [1] 30:9
246:21	53:7 59:2 70:7	Skelton [3] 141:6	213:1 257:7	stage [2] 145:16 196:7
severe [1] 265:8	85:23 109:16 110:10	225:1 225:12	sourced [1] 74:14	stainless [1] 33:9
shafts [1] 135:22	123:2 123:3 124:2	Skelton's [1] 225:2	136:5 151:24 243:20	stamped [2] 7:12
shape [4] 144:17	125:10 126:4 126:8	skid [1] 57:6	246:21	171:2
144:19 159:23 197:13	128:10 128:12 128:22	skipping [1] 289:3	space [3] 83:1	stand [1] 262:21
shaped [1] 142:13	129:1 142:19 161:9	slabs [2] 201:22 202:7	97:19 195:18	Standard [1] 155:9
shaping [1] 147:8	162:21 164:2 164:10	Slawomir [1] 5:1	spark [1] 131:15	Standards [8] 224:10
share [3] 33:19 75:20	164:17 169:13 169:16	slide [1] 188:24	speak [6] 36:17	224:21 276:1 283:10
258:2	179:24 193:18 198:16	slightly [1] 216:19	91:22 129:22 267:9	284:3 284:7 284:15
shared [2] 70:11	246:9 254:3 270:1	small [4] 54:3	279:9 285:10	291:23
195:18	270:5 270:18 271:24	55:15 62:14 191:10	speakers [1] 236:21	standards [3] 233:9
shareholder [1] 91:2	277:24 282:2 289:14	smaller [2] 55:14	278:6	293:3 293:10
sharing [2] 194:3	Shop [1] 281:1	Smith [9] 179:14	specific [9] 137:22	standing [1] 174:9
194:4	shops [7] 72:14	179:15 179:16 179:22	138:10 157:7 207:24	standpoint [13] 34:22
sheet [3] 28:20 297:17	110:6 110:6 128:8	180:3 180:5 181:3	232:16 241:5 262:14	91:1 96:4 112:10
297:18	254:4 270:1 270:9	183:6 188:13	279:13 285:9	155:21 156:6 156:21
shelf [2] 84:16 162:18	Short [1] 16:7			165:4 216:8 221:5
	short [2] 78:12 146:7			
	Shorthand [3] 1:17			
	298:4 299:23			
	show [14] 126:10			
	168:4 171:7 173:20			

238:3 252:1 254:24	147:7 156:10 259:14	subsidiaries [1]	synergistic [2]	206:4 206:6 282:12
standstill [1]	285:5	89:19	252:24	tens [1]
start [2]	stipend [1]	subsidary [2]	system [32]	tenure [12]
started [10]	stipulation [1]	151:3	43:14 44:1 45:7	28:10 29:24 113:9
48:24 49:3 103:8	stock [5]	subsidized [1]	48:12 48:16 52:5	126:17 134:12 134:14
104:17 223:3 226:16	129:18 129:20 129:23	substantive [1]	54:20 54:22 54:24	137:7 138:14 138:18
257:4 261:8 261:17	129:24	substitutes [3]	55:11 70:22 73:7	149:24 205:15
starting [1]	stocking [1]	290:1	76:15 83:22 84:1	term [1]
STATE [1]	Stop [2]	290:14 290:19	84:4 84:5 84:9	239:16
State [3]	stop [8]	suburb [1]	84:22 87:13 87:15	terms [21]
298:6	57:7 59:10 155:18	success [4]	94:22 108:8 108:19	10:10 10:18 12:17
state [11]	174:23 175:5 201:3	290:14 290:17 290:19	109:10 109:17 109:23	12:21 17:1 20:23
49:12 195:24 205:11	stopping [3]	successful [2]	110:9 128:18 202:2	24:17 64:15 67:15
205:20 205:21 206:3	57:8 57:8	290:1	247:5	74:17 78:5 96:24
206:4 206:10 207:9	stops [1]	successor [2]	systems [18]	98:18 143:12 163:18
253:13	60:7	88:9	43:8 43:16 44:7	165:8 166:6 195:12
statement [3]	storage [1]	240:14	44:18 48:14 58:20	237:19 269:19
182:8 259:22	store [8]	such [23]	73:13 77:16 78:3	test [10]
statements [1]	77:9 80:19 84:24	15:4 84:16 98:10	83:7 83:18 109:15	174:16 190:4
States [11]	85:10 110:22 161:9	106:11 146:20 158:3	110:16 130:19 133:18	190:4 195:21 200:23
54:5 73:16 88:16	stores [17]	185:22 191:14 225:23	169:24 264:5	201:11 201:13 201:13
89:2 95:14 96:1	78:9 78:14 78:16	227:9 240:23 243:4		214:13 264:24
149:3 149:5 150:1	80:10 80:15 164:11	246:9 259:8 261:22		tested [2]
150:4	193:13 194:6 230:22	262:20 268:16 273:2		191:3
states [2]	231:14 259:10 273:18	284:9 284:13 287:7		Testified [1]
297:15	277:6 277:24 279:15	sudden [1]		153:18
stating [1]	279:18	sued [1]		testified [8]
station [3]	stories [1]	31:1		8:8
59:6 130:22	Story [1]	suffering [2]		10:6 153:15 183:1
stationed [1]	256:6	287:20		222:1 264:10 264:21
stations [2]	59:4	suggested [3]		282:23
269:24	story [1]	216:19		testify [7]
statistically [1]	238:10	217:2 217:6		14:5 241:12 241:22
status [1]	straight [1]	suing [1]		248:7 260:12 298:17
stay [3]	strange [1]	20:1		testifying [1]
26:6 32:2	Street [2]	suit [1]		247:6
98:17	30:9	299:13		TESTIMONY [1]
stayed [5]	street [2]	suitable [1]		299:16
65:1 88:8 98:5	69:22	Suite [3]		testimony [10]
steel [5]	stretch [1]	2:18 3:11		7:2
33:9 47:9 174:21	272:15	3:19		71:2 87:20 95:16
steep [1]	Strictly [1]	summary [1]		115:12 116:9 140:2
57:10	123:2	208:23		150:12 298:19 298:24
Steinmein [1]	strike [2]	supervise [2]		testing [11]
15:14	250:12	35:19		191:12 213:2 216:18
Steinmetz [4]	stripes [3]	220:13		221:7 225:3 225:4
15:17 16:15 16:23	177:8 178:8	supervising [2]		225:5 225:6 255:8
stenographically [1]	strong [1]	40:6		283:1
298:20	250:2	supervisor [1]		tests [3]
Sterling [7]	stronger [2]	231:23		190:13 218:22
28:19 28:23 29:12	262:14	supervisors [1]		219:7
29:18 29:22 30:20	structure [3]	101:1		TEXAS [2]
Steve [1]	100:19 105:19	60:15		297:2
141:6	structured [1]	supplied [1]		Texas [5]
stick [2]	96:7	supplier [2]		2:19 3:12 5:10
145:7 205:2	studies [11]	202:19		298:11
205:2	214:14 223:11 235:8	suppliers [4]		textile [3]
sticks [1]	236:1 240:11 242:12	75:3 266:23		239:4 239:24
141:19	242:12 243:24 267:22	294:7		Thank [3]
Stienmetz [1]	268:5	supply [1]		295:24 296:6
15:10	study [3]	supplying [1]		thank [1]
stiff [1]	283:8	187:9		272:17
145:21	283:20 284:6	surface [3]		themselves [2]
Still [1]	stuff [6]	197:5 197:9		191:5
23:10	33:4 33:6	surfaces [1]		thereof [1]
still [27]	59:17 151:18 184:1	surprised [1]		299:15
11:8 17:12	186:22	suspension [1]		Thetford [2]
24:14 28:3 36:15	style [2]	5:16		63:5
74:2 91:11 91:12	10:21 114:14	switched [1]		63:6
91:13 106:15 107:6	subject [2]	273:12		thick [2]
107:16 108:20 109:17	289:5	SWORN [1]		67:12 146:3
109:19 112:8 115:17	SUBSCRIBED [1]	297:22		thin [1]
124:10 124:13 133:20	297:22	Sworn [1]		146:10
145:16 145:20 146:16		8:8		thinking [2]
		298:17		117:16
		Syncro [1]		third [2]
		138:4		61:17 62:13
		syndication [1]		295:7
		292:9		

295:19	thought [11]	49:20	92:18	148:18	171:20	179:18	187:19	222:5	226:22	233:7	236:16	246:19	thousands [2]	203:21	204:10	Three [2]	25:8	29:23	three [5]	10:2	30:18	38:17	192:6	254:15	thresholds [1]	217:10	Through [1]	56:12	through [58]	20:10	20:24	28:13	38:8	56:17	56:19	57:8	57:22	58:20	61:7	75:20	83:10	85:2	87:14	88:18	105:23	108:9	108:19	109:7	109:17	116:4	116:24	118:16	126:23	126:24	142:12	143:2	143:8	144:14	144:22	145:4	145:6	145:19	148:15	158:2	158:15	174:12	176:18	188:23	189:4	192:7	192:22	196:11	196:23	198:21	198:23	198:24	202:1	207:5	212:11	223:21	251:4	253:6	254:19	255:12	272:13	279:19	291:18	throughout [1]	215:14	thumb [1]	192:7	tight [1]	198:6	times [10]	9:23	10:2	17:2	19:19	29:1	29:6	44:7	78:11	219:7	254:15	tire [1]	199:20	tired [1]	251:8	tires [5]	72:10	126:5	126:5	270:10	270:16	title [20]	25:9	26:9	26:13	27:17	28:13	28:17	29:24	30:15	31:19	32:18	32:20	100:6	100:21	101:9	102:1	102:3	102:5	106:8	232:2	237:7	to-wit [1]	298:7	Toccoa [1]	33:19	today [33]	5:6	6:12	7:15	8:20	14:6	15:3	32:16	32:20	40:9	66:21	79:18	87:20	90:8	90:11	95:17	115:12	115:15	117:1	181:11	183:5	210:12	247:2	247:23	248:7	248:12	248:17	248:18	249:2	251:17	270:22	294:22	295:15	295:23	toc [1]	20:1	together [15]	24:12	58:19	77:4	125:2	126:15	151:23	170:9	170:13	178:1	192:17	192:17	192:19	192:19	198:18	205:2	toilet [1]	32:24	token [1]	110:13	too [6]	163:23	215:20	247:22	265:23	284:20	289:4	took [11]	84:16	87:12	133:8	143:3	178:20	183:3	194:22	195:1	201:3	260:24	275:8	tool [1]	200:18	tooling [1]	74:13	tools [1]	270:9	toothpaste [2]	144:15	144:16	top [12]	100:23	106:6	122:5	173:2	173:8	177:10	177:14	177:22	198:5	199:15	205:14	207:6	TORRES [1]	2:11	Total [1]	32:23	total [1]	206:18	totally [1]	90:24	town [1]	9:12	tracking [1]	86:12	traction [1]	59:20	tractors [2]	150:15	182:3	trade [15]	43:13	119:3	120:4	121:3	121:18	122:3	152:13	155:1	158:6	162:22	163:15	164:4	164:7	164:16	164:19	trademark [12]	118:18	119:21	120:2	120:22	121:7	121:21	148:19	151:22	154:23	160:4	164:12	167:18	trademarks [6]	149:20	150:2	151:19	153:12	165:7	165:16	traditional [1]	131:13	traffic [1]	30:9	trailer [1]	206:15	trailers [1]	150:15	train [1]	193:14	trained [1]	169:22	training [4]	192:21	193:2	193:9	193:24	transaction [7]	50:24	51:2	88:6	88:14	95:8	96:17	188:15	transcript [4]	297:11	297:14	298:24	299:6	Transcription [1]	298:23	transfer [7]	80:20	85:1	85:3	91:20	97:21	110:18	172:10	transferred [5]	50:20	65:2	94:10	94:17	98:11	transmission [1]	47:13	transmissions [2]	36:2	55:10	transmit [1]	108:16	travel [1]	9:12	traveled [1]	193:13	Travis [1]	3:10	treated [1]	222:18	trial [4]	7:2	10:6	11:12	11:17	tried [5]	114:12	117:11	125:22	198:20	234:11	Trim [3]	35:20	36:6	36:7	trim [1]	35:21	Tru-Gard [2]	121:12	138:16	Truck [2]	47:16	73:9	truck [30]	46:24	47:21	55:17	55:19	56:6	56:9	70:9	70:13	73:8	73:9	73:15	79:14	119:12	121:14	122:4	136:11	136:20	152:1	181:14	184:11	196:17	201:13	201:21	201:22	202:6	204:2	204:2	206:15	268:1	268:8	truckload [3]	79:6	79:7	79:10	trucks [19]	21:20	21:21	35:4	35:11	35:13	47:17	55:21	55:22	55:24	56:1	83:5	135:9	138:1	138:3	150:15	172:6	181:24	184:22	225:6	true [6]	147:20	163:17	215:20	235:12	244:12	298:23	truly [2]	115:18	185:8	trust [1]	34:8	truth [3]	298:17	298:18	298:18	try [6]	89:12	104:16	125:17	151:22	234:14	241:10	trying [16]	38:9	56:15	90:12	116:14	147:24	153:16	157:1	158:15	163:6	168:19	169:10	182:20	229:13	255:12	284:4	285:5	tube [2]	144:15	218:11	Tulane [1]	236:24	Tullahoma [1]	31:15	Tulsa [1]	29:20	Tunkhannock [2]	23:2	23:8	turn [6]	34:19	58:17	173:4	199:13	200:19	207:23	turned [3]	147:23	199:7	254:15	Turner [22]	88:15	88:21	89:4	89:13	89:16	89:24	90:5	93:4	93:7	93:12	95:2	95:3	96:14	107:19	238:10	238:11	238:17	238:19	238:21	239:2	239:10	239:22	turning [3]	124:9	128:24	174:21	twice [3]	17:3	254:15	282:23	two [28]	28:24	32:3	38:17	46:18	47:18	67:11	73:2	82:17	94:23	105:9	122:21	138:22	145:14	169:23	172:15	173:2	175:6	175:8	175:11	176:23	177:10	189:20	192:5	198:7	207:4	207:11	280:12	294:14	type [46]	14:8	33:4	33:6	39:24	40:23	43:22	46:7	47:2	56:23	62:5	64:15	68:13	68:20	69:2	91:19	96:11	97:3	110:16	116:9	116:13	130:3	139:5	143:11	143:24	165:22	167:15	169:7	170:9	178:16	182:3	184:22	187:12	191:12	196:6	212:12	222:21	225:23	240:9	241:8	246:15	252:3	252:8	272:21	274:11	275:24	279:13	types [27]	61:4	61:8	68:4	68:18	69:3	98:8	117:7	167:5	218:21	229:14	237:15	241:2	241:5	241:6	242:1	242:5	242:7	245:14	245:21	246:2	246:17	252:3	252:9	252:13	260:1	264:4	266:14	typewriting [1]	298:22	typical [8]	129:19	146:4	165:17	171:4	172:21	178:23	184:16	269:17	Typically [6]	56:3	60:17	62:23	141:16	154:5	163:4	typically [11]	56:20	58:23	59:19	67:23	79:16	154:22	156:11	156:22	167:5	270:1	274:21	-U-	U.S. [6]	21:22	22:1	22:14	37:19	37:20	89:14	Ultra [2]	134:5	134:6	umbrella [1]	135:19	unassociated [1]	90:24	unbiased [1]	244:3	Under [1]	162:14	under [16]	42:15	118:11	120:1	136:10	139:10	151:10	151:13	151:17	152:1	159:21	195:8	208:10	218:17	263:16	299:8	299:10	underside [1]	178:10	undersigned [1]	299:8	understand [40]	7:13	13:24	20:12	57:24	64:12	65:11	73:20	74:16	78:2	82:18	84:9	87:20	88:14	90:17	90:23	95:5	109:10	119:15	126:13	127:13	140:2	157:22	161:6	164:6	168:20	183:23	190:17	217:16	220:8	247:18	247:23	248:3	257:7	257:21	263:18	265:7	273:14	295:9	295:14	295:18	understandable [1]	292:17	understands [1]	183:12	understood [11]	89:4	128:15	225:13	226:13	233:10	236:3	243:14	256:21	260:13	278:8	287:18	undetermined [1]	298:10	unidentified [1]	159:15	uniform [1]	57:14	Union [6]	30:5	30:6	30:7	31:5	31:23	63:21	union [1]	41:1	unit [2]	254:20	264:17	United [12]	1:14	54:4	73:16	88:16	89:1	95:14	96:1	149:3	149:5	150:1	150:3	283:14	University [3]	8:14	21:8	236:24	unless [1]	160:16	unlikely [1]	157:23	unrelated [1]	18:22	unusual [1]	114:11	up [46]	13:7	24:13
--------	--------------	-------	-------	--------	--------	--------	--------	-------	--------	-------	--------	--------	---------------	--------	--------	-----------	------	-------	-----------	------	-------	-------	-------	--------	----------------	--------	-------------	-------	--------------	-------	-------	-------	------	-------	-------	------	-------	-------	------	-------	-------	------	-------	-------	--------	-------	--------	-------	--------	-------	--------	--------	--------	--------	--------	-------	-------	--------	--------	-------	-------	--------	--------	-------	--------	--------	--------	--------	-------	-------	--------	--------	--------	--------	--------	--------	-------	-------	--------	--------	-------	-------	--------	--------	--------	--------	--------	----------------	--------	-----------	-------	-----------	-------	------------	------	------	------	-------	------	------	------	-------	-------	--------	----------	--------	-----------	-------	-----------	-------	-------	-------	--------	--------	------------	------	------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	--------	-------	-------	-------	-------	-------	-------	-------	------------	-------	------------	-------	------------	-----	------	------	------	------	------	-------	-------	------	-------	-------	-------	------	-------	-------	--------	--------	-------	--------	-------	--------	-------	--------	-------	--------	--------	--------	-------	--------	--------	--------	--------	--------	---------	------	---------------	-------	-------	------	-------	--------	--------	-------	--------	-------	--------	--------	--------	--------	--------	-------	------------	-------	-----------	--------	---------	--------	--------	--------	--------	--------	-------	-----------	-------	-------	-------	-------	--------	-------	--------	-------	-------	--------	-------	----------	--------	-------------	-------	-----------	-------	----------------	--------	--------	----------	--------	-------	-------	-------	-------	--------	--------	--------	-------	--------	--------	-------	------------	------	-----------	-------	-----------	--------	-------------	-------	----------	------	--------------	-------	--------------	-------	--------------	--------	-------	------------	-------	-------	-------	-------	--------	-------	--------	-------	-------	--------	--------	-------	-------	--------	--------	----------------	--------	--------	-------	--------	-------	--------	--------	--------	--------	-------	--------	--------	----------------	--------	-------	--------	--------	-------	--------	-----------------	--------	-------------	------	-------------	--------	--------------	--------	-----------	--------	-------------	--------	--------------	--------	-------	-------	--------	-----------------	-------	------	------	-------	------	-------	--------	----------------	--------	--------	--------	-------	-------------------	--------	--------------	-------	------	------	-------	-------	--------	--------	-----------------	-------	------	-------	-------	-------	------------------	-------	-------------------	------	-------	--------------	--------	------------	------	--------------	--------	------------	------	-------------	--------	-----------	-----	------	-------	-------	-----------	--------	--------	--------	--------	--------	----------	-------	------	------	----------	-------	--------------	--------	--------	-----------	-------	------	------------	-------	-------	-------	-------	------	------	------	-------	------	------	-------	-------	--------	--------	-------	--------	--------	-------	--------	--------	--------	--------	--------	--------	-------	-------	-------	--------	-------	-------	---------------	------	------	-------	-------------	-------	-------	------	-------	-------	-------	-------	-------	-------	------	------	-------	-------	-------	--------	-------	--------	--------	-------	----------	--------	--------	--------	--------	--------	--------	-----------	--------	-------	-----------	------	-----------	--------	--------	--------	---------	-------	--------	--------	--------	--------	--------	-------------	------	-------	-------	--------	--------	--------	-------	--------	-------	--------	--------	--------	--------	--------	-------	-------	----------	--------	--------	------------	--------	---------------	-------	-----------	-------	-----------------	------	------	----------	-------	-------	-------	--------	--------	--------	------------	--------	-------	--------	-------------	-------	-------	------	-------	-------	-------	------	------	------	-------	------	------	-------	--------	--------	--------	--------	--------	--------	-------	--------	--------	-------------	-------	--------	--------	-----------	------	--------	--------	----------	-------	------	-------	-------	-------	-------	------	-------	-------	-------	--------	--------	--------	--------	--------	-------	-------	-------	--------	--------	--------	--------	-------	-------	-------	--------	--------	--------	-----------	------	------	------	-------	-------	-------	------	------	-------	------	-------	-------	-------	------	-------	-------	------	--------	-------	--------	-------	-------	--------	--------	--------	--------	-------	-------	--------	-------	--------	--------	--------	-------	--------	--------	--------	-------	-------	--------	-------	-------	--------	--------	--------	--------	------------	------	------	------	-------	------	------	-------	-------	--------	--------	--------	-------	-------	-------	-------	-------	-------	--------	--------	-------	--------	-------	-------	--------	-------	-------	--------	-----------------	--------	-------------	--------	-------	--------	-------	--------	--------	--------	--------	---------------	------	-------	-------	--------	-------	-------	----------------	-------	-------	-------	-------	-------	--------	--------	--------	-------	-------	--------	-----	----------	-------	------	-------	-------	-------	-------	-----------	-------	-------	--------------	--------	------------------	-------	--------------	-------	-----------	--------	------------	-------	--------	-------	--------	--------	--------	--------	--------	-------	--------	-------	--------	--------	--------	-------	--------	---------------	--------	-----------------	-------	-----------------	------	-------	-------	-------	-------	-------	-------	-------	------	-------	------	-------	-------	-------	-------	------	--------	--------	--------	--------	-------	--------	-------	-------	--------	--------	--------	--------	-------	--------	--------	-------	-------	--------	--------	-------	--------	-------	--------	--------	--------------------	--------	-----------------	--------	-----------------	------	--------	--------	--------	--------	-------	--------	--------	--------	-------	--------	------------------	--------	------------------	--------	-------------	-------	-----------	------	------	------	------	-------	-------	-----------	------	----------	--------	--------	-------------	------	------	-------	-------	------	-------	------	-------	-------	-------	-------	--------	----------------	------	------	--------	------------	--------	--------------	--------	---------------	-------	-------------	--------	---------	------	-------

