

ROGER HOBBIE

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1 also had the Ford Motor account in Detroit, Dearborn and 2 Louisville and Canada. 3 Q I think there is one more? 4 A Jack Murray had — the OEMs were Western Star which 5 was a smaller OEM at that time, Kenworth, Freightliner, 6 Peterbilt. Volvo had an operation in Ogden, Utah evidently 7 Jack called on. The rest of these are smaller trailer 8 manufacturers and crane manufacturer appears specific. And I 9 would say they are probably a specialty equipment 10 manufacturer. 11 Q Do you keep in touch with any of these individuals? 12 A Jim Mollard, I run across him at some industry 13 function meetings, American Trucking Association, Maintenance 14 Council meetings. He works for — the last I knew, I think he 15 worked for Abex. Pretty sure it was Abex. 16 Q He worked for Eaton and then moved on at some point 17 to work for Abex? 18 A Yes. 19 Q When was the last time you saw him; do you remember? 20 A Probably within the last year. 21 Q Do you know where he presently resides? 22 A In the Detroit area. 23 Q Do you know if he is still working for Abex? 24 A I don't know for sure but I would guess he still is. 25 Q Is there a way for you to find out Mr. Mollard's	1 A Okay. 2 Q Do you recognize that document? 3 A Yes. 4 Q Can you describe what it is? 5 A Basically a communication from Jim Clark who was I 6 think the chief brake engineer at that time, September 1986. 7 He was I believe, Tom Bruggeman, I believe he was in the 8 scheduling department, production scheduling and in a chain 9 somewhere. I guess he was located in Galesburg. But I think 10 Jim was just alerting people of the fact of being careful not 11 to give the truck manufacturers a specific cutoff deadline on 12 the asbestos linings because of some uncertainties of certain 13 specifications being able to be replaced by nonasbestos at 14 that time. 15 Q This is dated September 25, 1986? 16 A Right. 17 Q The subject is nonasbestos phase-out, correct? 18 A Yes. 19 Q It reads, engineering is continuing to investigate 20 consequences of announced deadlines for the stoppage of 21 asbestos production by Abex and Carlisle. Correct? 22 A Yes. 23 Q Now, specifically, it addresses a list attached to 24 this memo, correct? 25 A Yes.
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1 address? 2 A Yes. 3 Q How would you do that? 4 A I have a list of members of the American Truckers 5 Association maintenance council. 6 Q Do you keep in touch or have you had any contact 7 with any of the other account executives listed in the 8 exhibit, for instance, Craig Arms? 9 A No, I haven't. 10 MR. BARTELS: I will follow this up, Harry, 11 but I'm going to request that he produce Mr. Mollard's 12 address. 13 MR. QUICK: Do you want to pay him to do it? 14 A It's confidential information, I have to get ATA's 15 permission. 16 Q Oh, you do? 17 A No, just kidding. 18 MR. QUICK: Do it with a letter so I can 19 follow up. 20 Q I would like to mark this as the next exhibit. 21 (Exhibit 10, internal correspondence-9/25/86, 22 was marked for identification.) 23 MR. QUICK: For those of you on the phone, it 24 looks like Pat is getting near the bottom of the stack. 25 Q This is Hobbie 10.	1 Q Apparently, the memo reads as follows, based on the 2 attached list, Navistar has requested all current brake 3 assemblies using asbestos linings to be provided (via 4 stockpiling, if necessary) through 1987. 5 A Correct, yes. 6 Q It also talks about applications that have not been 7 currently having nonasbestos materials will require continued 8 supply of asbestos products through 1988, while test programs 9 are completed? 10 A Correct. 11 Q Navistar has requested stockpiling for asbestos 12 linings to be used through 1987, correct? 13 ALL COUNSEL: Objection to the form. 14 A That's correct. 15 Q It also looks like they are continuing the testing 16 of nonasbestos materials and they don't anticipate that they 17 will be in a position to replace the nonasbestos materials 18 until some time through 1988? 19 A Correct. I think he was speaking from his best 20 knowledge of the whole situation, I think. 21 Q And now, attached is what appears to be a pretty 22 detailed listing of Eaton parts used by International 23 Harvester; is that correct? 24 A It looks like it, yes. 25 Q Apparently, these are lists of all current brake

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