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IN THE SUPERIOR COURT OF THE STATE OF DELAWARE  
IN AND FOR NEW CASTLE COUNTY  
IN RE: ASBESTOS LITIGATION

MOORE TRIAL GROUP } C.A. No. 92C-11-009  
Limited to: S. Przybylski } C.A. No. 92C-09-115

ELAM TRIAL GROUP } C.A. No. 93C-08-250  
Limited to: V. August } C.A. No. 94C-04-114

DEPOSITION OF  
JOHN DEMENT, P.H.D.  
At Durham, North Carolina  
January 3, 1996  
11:30 a.m.  
Reported by: Kimberly A. Petrarca, CVR

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A P P E A R A N C E S  
For the Plaintiffs: Thomas C. Crumplar  
JACOBS & CRUPLAR  
2 East 7th Street  
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For Metropolitan: Keith E. Coltrain  
OGLETREE, DEAKINS, NASH, SMOAK &  
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Raleigh, North Carolina 27622

For Steel Grip,  
Inc.: Derek L. Hall  
JUDE & COCO  
806 Westover Drive  
Post Office Drawer 17499  
Hattiesburg, Mississippi 39404-  
17499

For Lincoln Electric  
Company and Hobart  
Brothers Company: Ralph A. Davies  
DAVIES, MCFARLAND & CARROLL  
The Tenth Floor  
One Gateway Center  
Pittsburgh, Pennsylvania 15222-  
1416

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T A B L E O F C O N T E N T S  
E X A M I N A T I O N S

Examination Page  
Direct, Mr. Davies 10

T A B L E O F C O N T E N T S  
E X H I B I T S

| Exhibit No.                  | Description       | Marked |
|------------------------------|-------------------|--------|
| Defendant's<br>Exhibit No. 1 | Report on Testing | 75     |
| Defendant's<br>Exhibit No. 2 | Report on Testing | 75     |

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Attachment  
Publication Articles

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S T I P U L A T I O N S  
It is hereby stipulated and agreed between the parties to this action, through their respective counsel of record:

1. The deposition of John Dement, Ph.D., may be taken on January 3, 1996, beginning at 11:00 a.m., at the R. David Thomas Center, 1 Science Drive, in Durham Hill, North Carolina, before Kimberly A. Petrarca, a notary public.

2. Said deposition shall be taken for the purpose of discovery or for use as evidence in the above-titled action or for both purposes.

3. Any objections of any party hereto as to notice of the taking of said deposition, or as to the time or place thereof or as to the competency of the

person before whom the same shall be taken are deemed to have been met.

4. Objections to questions and motions to strike answers need not be made during the taking of this deposition but may be made for the first time during the progress of the trial of this case, or at any pretrial hearing held before any judge for the purpose of ruling thereon, or at any other hearing of said case at which said deposition might be used, except that an

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objection as to the form of a question must be made at the time such question is asked or objection is waived as to the form of the question.

5. That the original of this deposition will be mailed first-class postage to the appropriate party. Notice of filing is hereby waived.

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2  
3 Thereupon,  
4 John Dement, Ph.D.,  
5 having first been duly  
6 sworn, was examined and  
7 testified as follows:  
8 Mr. Crumplar: Dr. Dement was deposited in  
9 Delaware, two-day deposition, back in September  
10 1993 the purpose of which was to extensively cover  
11 all of his opinions. I know Lincoln was  
12 represented. Mr. Davies was there. It was our  
13 hope that would be the final deposition Dr. Dement  
14 would have to give.  
15 Dr. Dement has given an affidavit. We do  
16 think it's reasonable since that deposition that he  
17 be deposed on the matters covered in his affidavit  
18 therefore, and I rereviewed the deposition last  
19 night, and I saw that welding rods were not  
20 covered. Don't know why Mr. Davies did not have  
21 the opportunity to depose him but did not, so I  
22 have no objections to this deposition dealing with  
23 welding rods, but I will instruct him not to answer  
24 anything that comes in terms of his general  
25 testimony which was extensively covered before.

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2  
3 With regard to the duces tecum, we have  
4 instructed Dr. Dement to gather the materials  
5 pursuant to the duces tecum. We had previously  
6 provided his CV. He has another copy of it.  
7 Previously provided his list of articles. He has  
8 another copy of it. He has also brought along some  
9 additional articles that he feels may be relevant  
10 that aren't on his list of articles.  
11 He just found a list of depositions -- Can you  
12 just pull that out? -- which we thought he did not  
13 have such a list. I called up Mr. Davies last  
14 night and told him that that would be produced.  
15 The final thing that is here that I think Mr.  
16 Davies has not seen -- Most of this stuff is  
17 material that we have sent Dr. Dement which you  
18 folks have -- there is a report, really two reports  
19 but part of the same series, that he did for Ness,  
20 Motley.

21 I became aware of the formal report last  
22 night. I immediately then called up Mr. Davies to  
23 say that Dr. Dement would bring this report. Dr.  
24 Dement, when the affidavit was prepared, we are  
25 aware that he had done some work for Ness, Motley,

1 Dr. Dement Page 8

2  
3 but he was under a confidentiality order. He could  
4 not even tell us what the results of that were. He  
5 told me that until Ness, Motley released that  
6 report he could not testify regarding that report  
7 and he could not base any of his opinions on the  
8 report.  
9 We made certain that he could make his  
10 affidavit and testify simply based on his

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11 information about welding rods not including any  
12 information he got from the report. That report, I  
13 just learned yesterday, has now been released in  
14 the Texas litigations.

15 The attorneys have decided that it is no  
16 longer a consulting expert but an expert used for  
17 trial, and he was just listed as a witness, so  
18 therefore, Dr. Dement has been released from the  
19 confidentiality requirements just, as I might note,  
20 that Dr. Craighead had some reports he did in the  
21 welding process that he told me he could not  
22 release those until he got permission from the  
23 attorneys that retained him for it.

24 I did get the permission last night. That was  
25 conveyed to Dr. Dement, so we do have that report

1 Dr. Dement Page 9  
2  
3 which is being produced. That's not, again, what  
4 he bases his opinion in this case, but because the  
5 report does deal with welding rods and it has now  
6 been made public, I felt that it was discoverable.  
7 That's it.

8 Mr. Davies: Let me make a much briefer  
9 statement. To the extent that Mr. Crumplar is  
10 attesting that Dr. Craighead has done anything for  
11 me or for the Lincoln Electric Company --

12 Mr. Crumplar: I'm not suggesting that at all.

13 Mr. Davies: Just so we have an understanding  
14 that Dr. Craighead is not under my control, has  
15 done nothing for me, and that I have not instructed  
16 him to withhold anything, that's fine. With  
17 respect to the deposition that was taken some two  
18 years ago, if you reviewed the transcript last  
19 night, you are undoubtedly aware that you summarily  
20 concluded that deposition before I ever had an  
21 opportunity to ask any questions. I don't want to  
22 fight with you about that, but I never got a turn  
23 at that deposition.

24 Mr. Crumplar: I will agree just so we don't  
25 have to talk about things that we disagree with.

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2  
3 There were two days that were allocated by the  
4 court for the deposition. I am well aware that  
5 there are a number of defendants that never got a  
6 turn.

7 It is my view that that was the defendants'  
8 faults that they should have decided among  
9 themselves rather than allow one person, Mr.  
10 Phillips, to spend most of his time asking  
11 irrelevant questions, but I'm well aware of the  
12 fact that Mr. Davies, as well as other defendants,  
13 were ready to go but never had their turn, and  
14 that's one of the reasons why I'm making him  
15 available now.

16 Direct Examination By Mr. Davies:

17 Q. Good morning, Doctor.

18 A. Good morning.

19 Q. Doctor, my name is Ralph Davies. I have a few  
20 questions for you this morning, and as I indicated  
21 to you before you were sworn in, I don't propose to  
22 spend any time with you reviewing your views on  
23 asbestos generally. I am interested primarily in  
24 what you know about welding rods and any testing  
25 that you may have done and the basis of opinions

1 Dr. Dement Page 11  
2  
3 that you may render in the Delaware litigation.  
4 You've been through the deposition process a  
5 number of times and, I think, are familiar with all  
6 of the rules, so I won't attempt to repeat them. I  
7 would ask, however, that if I do not make myself  
8 clear in any question that I put to you that you  
9 tell me that so that I can try to rephrase the  
10 question and put it in intelligible form, fair  
11 enough?  
12 A. Yes. That's fine.

13 Q. Are you represented at this deposition this  
14 morning, Doctor?

15 A. Am I represented?

16 Q. Yes, sir. Do you have an attorney here with you?

17 A. No. I do not.

18 Q. Did you meet with Mr. Crumplar prior to the  
19 deposition?

20 A. He arrived here at about 9:30, so we met for about  
21 a half hour.

22 Q. Did you review the subject matter of your testimony  
23 at that time?

24 A. Not really. I brought the materials that I brought  
25 with me, and Mr. Crumplar just looked through them.

1 Dr. Dement Page 12

2  
3 That's really it.

4 Q. What material was provided to you by either Mr.  
5 Crumplar or anyone associated with his firm in  
6 conjunction with these cases?

7 A. I've brought all of the materials with me today.

8 Q. Could you just briefly outline for me those  
9 materials which he sent to you rather than  
10 materials that you may have already had?

11 A. Okay. There's an affidavit by -- maybe you can  
12 pronounce his name for me -- Edward Przybylski  
13 dated 29th of September 1995.

14 Mr. Crumplar: It's an affidavit which lists  
15 material attached which is the deposition, a  
16 portion of the deposition.

17 A. An affidavit by Vincent August dated August 8,  
18 1995, again also with some attachments, portions of  
19 depositions; a videotaped deposition of George  
20 Hudson, and I don't -- February 28, 1985.

21 Q. Is that the entire transcript, Doctor?

22 A. No. It starts on page 27. It's not the entire  
23 transcript. The deposition of Steven Hudson taken  
24 on June 8 of 1988.

25 Mr. Crumplar: To speed it up, there's an

1 Dr. Dement Page 13

2  
3 affidavit of Steven Hudson which is dated March 10,  
4 1995, in the Hudson pack which is clipped.

5 Q. Is that a complete transcript, Doctor?

6 A. No. There are portions of the transcript.

7 Mr. Crumplar: Same material that we provided  
8 to you.

9 A. The deposition of Jack Peterson, June 1, 1995.

10 Mr. Crumplar: And that is a complete  
11 transcript.

12 A. And the deposition of Thomas Eager, May 24, 1995.

13 Mr. Crumplar: That's also a complete  
14 transcript.

15 A. A complete transcript.

16 Q. Have you reviewed all of those materials, Doctor?

17 A. Yes. I've reviewed them.

18 Q. Have you reviewed any other material in preparation  
19 for the deposition today?

20 A. No.

21 Mr. Crumplar: I might just say I showed him  
22 Lincoln's answers to interrogatories literally in  
23 30 seconds. I don't think that was probably  
24 reviewed.

25 A. No.

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2  
3 Mr. Davies: Tom, this deposition would go a  
4 lot faster if you'll let the doctor testify instead  
5 of you doing it.

6 Mr. Crumplar: That's fine, but I'm just  
7 trying to be as complete as possible.

8 Q. Doctor, just a couple of questions about your  
9 curriculum vitae. As I understand it, you have a  
10 Ph.D., is that correct?

11 A. That's correct.

12 Q. In what field is that?

13 A. It's a program at UNC Chapel Hill that combined  
14 industrial hygiene and epidemiology.

15 Q. As I understand your CV, you do not have a degree  
16 in geology, is that right?  
17 A. No. I do not.  
18 Q. Or mineralogy?  
19 A. No.  
20 Q. Or chemistry?  
21 A. No degree in chemistry. Obviously, I've studied  
22 mineralogy and geology and chemistry, but I don't  
23 have degrees in those areas.  
24 Q. Do you have a degree in physics?  
25 A. No. Again, an area that I've studied.

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2  
3 Q. Do you have a degree in metallurgy?  
4 A. No.  
5 Q. Do you have a degree in material sciences or  
6 engineering?  
7 A. Yes, sir. I do have a degree in engineering.  
8 Q. In what area of specialization?  
9 A. Mechanical engineering.  
10 Q. Is that your undergraduate major?  
11 A. Yes.  
12 Q. Are you a professional engineer?  
13 A. No. I'm a certified industrial hygienist.  
14 Q. Are you certified in any other area besides  
15 industrial hygiene?  
16 A. That's the only certification. Yes.  
17 Q. You're on the faculty here at Duke, are you?  
18 A. Yes.  
19 Q. What position do you hold?  
20 A. I'm associate professor in the Division of  
21 Community and Family Medicine.  
22 Q. I saw in some of the material that was submitted to  
23 me the title adjunct associate professor.  
24 A. That's at UNC Chapel Hill. I'm an adjunct there as  
25 well.

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2  
3 Q. Let me back up a step then. Are you an adjunct  
4 professor here at Duke?  
5 A. No.  
6 Q. What does it mean to be an associate professor on  
7 the faculty? Where are you in the pecking order?  
8 A. You start as an assistant. Then you go to  
9 associate and then a full professor.  
10 Q. Are you tenured?  
11 A. No. I'm on tenure trial.  
12 Q. Do you have any teaching responsibilities here at  
13 Duke?  
14 A. Yes. I do some teaching.  
15 Q. Could you outline that for me, please?  
16 A. I teach in really three courses here at Duke. One  
17 is a course in which I lecture on occupational  
18 epidemiology, and that's in the School of  
19 Environment.  
20 Q. Let me just interrupt you there if I may. How  
21 often does that course meet and how often do you  
22 lecture?  
23 A. The course meets -- It's a fall course, and it's  
24 taught by a number of us in my division, and I give  
25 at least one lecture, sometimes two lectures, in

1 Dr. Dement Page 17  
2  
3 that course depending on whether or not I've  
4 covered the materials yet in my first lecture.  
5 Q. So if I understand it correctly, this is a one-term  
6 course, is that right?  
7 A. That's correct.  
8 Q. Your involvement would be to lecture on one or two  
9 occasions during the term?  
10 A. Yeah. We spread the lecture responsibilities among  
11 the faculty.  
12 Q. Would you go on to the next course in which you're  
13 involved?  
14 A. We have a spring course that's -- It's actually a  
15 survey course of environmental issues, and I give  
16 again one or two lectures on environmental

17 epidemiology.  
18 Q. That's the same kind of deal as in the fall in  
19 terms of your time commitment to the course?  
20 A. Yes.  
21 Q. How about the third one?  
22 A. The third is a course called clinical epidemiology.  
23 It's actually given in the summer, and I give  
24 actually a series of lectures on cohort and case  
25 control studies.

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2  
3 Q. How many lectures are ordinarily involved in that?  
4 A. Well, they meet for two hours. It's a two-hour  
5 lecture two times I think.  
6 Q. Any other teaching responsibilities here at Duke?  
7 A. I have some teaching responsibilities with regard  
8 to residents that we have in the occupational  
9 medicine residency program. The objective of their  
10 teaching is to learn epidemiology as well as some  
11 aspects of industrial hygiene, so it's more of a  
12 one-on-one teaching responsibility. For example,  
13 I'm in charge of what's called the research program  
14 within my division, and those individuals can  
15 choose a research project within my program that  
16 will satisfy a requirement for the MPH program, so  
17 I serve as their mentor more or less.  
18 Q. How many residents do you have working with you on  
19 a one-on-one basis now?  
20 A. I have one currently and one other faculty person  
21 that is a junior faculty that just came on board  
22 that's working with me. I also have some teaching  
23 responsibilities. I have at least two Ph.D. and  
24 epi students from UNC Chapel Hill that are working  
25 with me on projects that are part of their Ph.D.

1 Dr. Dement Page 19  
2  
3 research. I have one master's level industrial  
4 hygiene person from UNC Chapel Hill.  
5 Q. How often do you meet with them?  
6 A. I meet with them daily depending on the needs of  
7 the projects that they're working on.  
8 Q. Doctor, do you consider yourself to be an expert in  
9 the science of fracture mechanics?  
10 A. Fracture mechanics?  
11 Q. Yes.  
12 A. I didn't know there was such an expertise.  
13 Q. I take it then you don't consider yourself to be an  
14 expert in that area?  
15 A. I consider myself to be an expert in the area of  
16 asbestos and asbestos-related products, and of  
17 course, fracture and splitting and the release of  
18 fibers is certainly a part of that.  
19 Q. But you're not familiar with a discipline known as  
20 fracture mechanics?  
21 A. Boy. It's got to be a subdiscipline of something  
22 else because I don't think they offer a degree in  
23 fracture mechanics.  
24 Q. I take it your answer to my question then is no,  
25 you're not familiar with it?

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2  
3 Mr. Crumplar: I note an objection as to  
4 whether there is such a thing as a discipline of  
5 fracture mechanics. I mean you are implying that  
6 there's a recognized scientific discipline that  
7 presumably degrees are offered in chairs and  
8 universities.  
9 Q. Is it fair to say, Doctor, that if there is such a  
10 discipline, you are not aware of it?  
11 A. I don't think you would find a degree in fracture  
12 mechanics. You're going to find a degree in either  
13 mineralogy, which would include some issues of  
14 fracture, and you'll find some degrees in physics,  
15 but I don't think you're going to find a degree  
16 that's going to be called fracture mechanics.  
17 Q. Do you read any welding publications on a regular  
18 basis, Doctor?

19 A. I have read -- I don't consider it on a regular  
20 basis, but I certainly have read the welding  
21 literature throughout my career in public health  
22 service with NIOSH and others more from a  
23 perspective of health aspects of welding. Some of  
24 those were welding publications. Some of them were  
25 publications and the literature dealing with

1 Dr. Dement Page 21  
2  
3 welding and health effects.  
4 Q. Do you presently read any welding publications on a  
5 regular basis?  
6 A. I scan. I have a procedure that I use called  
7 Current Contents that I receive, and I scan  
8 hundreds of articles, and I pick out articles that  
9 have to do with my research and professional  
10 interest, so I can't say there's any one journal  
11 that I read on a routine basis. I tend to try to  
12 touch a broader base.  
13 Q. Do you read The Welding Journal?  
14 A. I occasionally read The Welding Journal if there's  
15 a relevant article in it.  
16 Q. Do you subscribe to it?  
17 A. No. I only subscribe personally to about three  
18 journals.  
19 Q. Which are those?  
20 A. The American Industrial Hygiene Journal, The  
21 Applied Occupational Environmental Hygiene Journal,  
22 The American Journal of Industrial Medicine, The  
23 American Journal of Epidemiology, and The Archives  
24 of Environmental Health. That's probably the ones  
25 I subscribe to.

1 Dr. Dement Page 22  
2  
3 Q. How do you determine whether The Welding Journal  
4 has an article in it that is relevant for you?  
5 A. You scan current contents and determine based on  
6 abstracts and article titles whether or not it's an  
7 article of interest.  
8 Q. When is the last time you looked at The Welding  
9 Journal?  
10 A. Probably a welding journal --  
11 Q. No. The Welding Journal. Are you aware that  
12 there's a publication known as The Welding Journal?  
13 A. Yes.  
14 Q. That's the one I'm referring to.  
15 A. Probably I've looked through some issues of that  
16 about a year or so ago.  
17 Q. For what purpose?  
18 A. That's when I was doing some research with regard  
19 to welding.  
20 Q. May I ask the nature of the research?  
21 A. I brought the report that was generated as part of  
22 that research here.  
23 Q. So a report that you have with you today has  
24 something to do with what you were looking for a  
25 year ago in The Welding Journal?

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2  
3 A. I sent you a list of articles that have to do with  
4 welding. As part of the process of putting  
5 together that list, some of which just came from my  
6 files which I collected over a number of years,  
7 part of the process was to look back through back  
8 issues of a number of journals, and The Welding  
9 Journal was one that I looked at.  
10 Q. What were you looking for in The Welding Journal  
11 that was pertinent to the contents of the report  
12 that you have with you today?  
13 A. I was primarily looking at the issues of coated  
14 welding rods.  
15 Q. What were you trying to find out?  
16 A. Whether or not anybody had ever done any testing  
17 with coated welding rods.  
18 Q. What did you learn?  
19 A. Very little actual testing, mostly looking at fumes  
20 and not looking at the asbestos particulates.

21 Q. Did you find that any testing had been done?  
22 A. I found and I brought with me some of the articles  
23 that had done some testing but, again, not  
24 necessarily looking directly at fumes. There are  
25 some older articles in the literature which I found

1 Dr. Dement Page 24  
2  
3 that did at least talk about fibers as a component  
4 of the fume.  
5 Q. Did you find any material in the literature that  
6 you reviewed that dealt directly with the question  
7 of release of asbestos fibers from the coating of  
8 welding rods?  
9 A. Yes.  
10 Q. Can you tell me what those articles are, please?  
11 A. I've listed those articles, at least part of them,  
12 in the list that I sent you.  
13 Mr. Crumplar: For the record, that list is  
14 attached to our interrogatory answers.  
15 Q. May I see the list you're referring to, Doctor?  
16 A. Sure.  
17 (Thereupon, witness hands document to  
18 counsel.)  
19 Mr. Crumplar: The interrogatory answers I'm  
20 referring to, the updated version is 12/29/95.  
21 A. There are some articles I haven't had time to add  
22 to my list I've brought with me today.  
23 Q. Would you mind going through that list of articles,  
24 and just for purposes of identification, this is a  
25 list which is titled "Welding Rods" Reference

1 Dr. Dement Page 25  
2  
3 Materials, correct?  
4 A. Right.  
5 Q. And it lists 56 articles?  
6 A. That's correct.  
7 Q. Would you go through there, please, and tell me  
8 which of those articles deal specifically with the  
9 question of release of asbestos fibers from the  
10 coating of welding rods?  
11 A. They either deal with it by mentioning it as a  
12 possibility or, in some cases, mention some  
13 measurements were taken, so I'll go through and  
14 list those.  
15 Q. Would you tell me which is which, please, as you go  
16 through?  
17 A. I'll do the best that I can.  
18 Q. I appreciate it. Thank you.  
19 A. If you'll look at number four, the Atfill article  
20 mentions in there coated rods as a possible source  
21 of exposure. The article number eight by Becker,  
22 "Cancer Risk Among Arc Welders Exposed to Fumes,"  
23 this article mentions coated rods. It found also  
24 an increase, a greater lung cancer risk with those  
25 using coated rods.

1 Dr. Dement Page 26  
2  
3 Q. Does it deal with asbestos, Doctor?  
4 A. It mentioned asbestos as a possible source of that  
5 increase.  
6 Q. I'm interested in knowing what any of these  
7 articles have to say about asbestos and release  
8 from the rods, okay.  
9 A. The article number ten by Bell published in 1976  
10 refers to measurements of some chrysotile wrapped  
11 asbestos rods in which they found some fairly  
12 significant asbestos concentrations.  
13 Q. Let me just ask you this. Do you have any reason  
14 to believe that any of the plaintiffs in the cases  
15 that we're talking about here worked with asbestos  
16 wrapped rods?  
17 A. No. I think these probably were -- If you look at  
18 the literature, it talks about early on having  
19 asbestos wrap that was then perhaps dipped in a  
20 binder material.  
21 Q. Okay. Go on, please.  
22 A. But I think this is a relevant article. These

23 other articles primarily deal with -- Some of them  
24 deal with an increased lung cancer risk among  
25 welders. A lot of them are epidemiological

1 Dr. Dement Page 27  
2  
3 articles.  
4 Q. Are there any other articles here of the 56 listed?  
5 A. Yes.  
6 Q. Please go on.  
7 A. Bonsib in item 13 talks about, actually reviews,  
8 some of the literature with regard to coated  
9 welding rods and the rods as a source of exposure  
10 to asbestos. The article by Doig, O-o-i-g, number  
11 19, mentions asbestos coated rods as a source of  
12 exposure. The article by Doig in 1936, item number  
13 20, mentions asbestos coated rods as a possible  
14 source of exposure. Also mentions in the article  
15 some fumes that were collected and looked at by the  
16 inspector of factories in London which found some  
17 asbestos fibers in the fume.  
18 The article number 24 from The Welding  
19 Encyclopedia, it talks about how asbestos is used  
20 in the process of welding, and it speaks of  
21 asbestos welding rods. Article number 32 --  
22 Mr. Crumplar: Excuse me. Was there something  
23 in between 20 and 30?  
24 Witness: Twenty-four.  
25 Mr. Crumplar: I'm sorry. Go ahead.

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2  
3 A. Thirty-two again mentions asbestos welding rods as  
4 a source, possible source, of exposure. The same  
5 with number 37. The NIOSH criteria document,  
6 number 40, also makes mention of asbestos coated  
7 rods as a possible source of exposure. Number 51  
8 makes mention of coated rods as another possible  
9 source of exposure, and I have three articles that,  
10 maybe four, maybe five, just aren't on the list. I  
11 haven't had time to update my list.  
12 Q. Would you tell us what those are, please?  
13 A. One is called "The Welding Environment," and it's  
14 put out by the American Welding Society, and  
15 although it doesn't make measurements, it mentions  
16 asbestos or makes mention of asbestos as a possible  
17 exposure. The 1942, 1943 document, I'm sorry,  
18 called "Minimum Requirements for Safety in  
19 Industrial Health in Contract Shipyards" by the  
20 U.S. Navy, U.S. Maritime Commission, mentions  
21 salvage of asbestos coated rods as a source of  
22 asbestos exposure.  
23 The article "Ventilation in Art Welding With  
24 Coated Electrodes" by Tebbins and Drinker in 1941  
25 also at least acknowledges the protective coating

1 Dr. Dement Page 29  
2  
3 and the presence of asbestos in the material. This  
4 article by Jockel, J-o-c-k-e-l, "Lung Cancer Risk  
5 in Welding, Preliminary Results from an Ongoing  
6 Case Control Study," in essence, this article found  
7 an increased risk for welders -- this is lung  
8 cancer risk for welders -- after adjusting for  
9 smoking and other non-welding related asbestos  
10 exposures, so it's just an epi study.  
11 An article by Pairon, "Retention of Asbestos  
12 Fibers in the Lungs of Welders," this article found  
13 that the longer a person welded the greater the  
14 presence of retained fibers in their lungs or the  
15 retained asbestos fibers and also reviews some of  
16 the literature on an increased risk of  
17 mesothelioma, and it talks about electrodes bound  
18 with asbestos.  
19 Q. May I see the last five, Doctor, that you just  
20 mentioned?  
21 A. Sure.  
22 (Thereupon, witness hands articles to  
23 counsel.)  
24 Q. Do you know when the first of those sources, that

25 is, the AWS document "The Welding Environment," was

1 Dr. Dement Page 30  
2  
3 published?  
4 A. I don't recall when the first one -- You can look  
5 in the front. It'll give you some idea of the most  
6 recent volume.  
7 Q. Perhaps you can find it and save us some time.  
8 A. I was referring primarily to the preface here, and  
9 it talks about some of the prior activities of the  
10 American Welding Society starting in 1946.  
11 Mr. Crumplar: I'll tell you what. To save  
12 time, I can be flipping through to see if I can  
13 find the date if you want while you're questioning  
14 him.  
15 Q. Doctor, is the preface of that document the only  
16 portion of it to which you were referring?  
17 A. No. There's a series. This document is a series  
18 of assessments of, first of all, the welding  
19 processes and possible sources of exposure, but a  
20 series of studies in which they try to measure  
21 fumes generated by different types of welding  
22 processes and different types of rods.  
23 Q. Is there anything in that document that you were  
24 able to find that indicates that asbestos was found  
25 in the fume?

1 Dr. Dement Page 31  
2  
3 A. They didn't look for it.  
4 Q. Anything in there that indicates that asbestos was  
5 found released by rods other than in the fume?  
6 A. Again, it wasn't look for. There was no study of  
7 that. There's a table on Figure 1.1 that talks  
8 about welding fumes and gases, and it talks about  
9 particulates, and it talks about fumes that you  
10 might expect. It also lists both asbestos and  
11 silica as possible sources of exposure.  
12 Q. Which page is that chart on?  
13 A. Page three.  
14 Q. Doctor, with your permission, before we conclude  
15 here, I'm going to see if we can get some copies  
16 made of those three if I may set those aside for a  
17 moment.  
18 Doctor, on this list to which we have been  
19 referring, have you read all 56 of those articles?  
20 A. Yes, sir. I have.  
21 Q. Is this a list that was prepared by you?  
22 A. Yes.  
23 Q. When did you prepare the list?  
24 A. Well, the actual list itself listing the articles  
25 was probably prepared a year or so ago. Some of

1 Dr. Dement Page 32  
2  
3 the articles -- Like everybody else, I have files,  
4 subject matter files, and for years, I've collected  
5 articles that deal with welding.  
6 Q. Was there any particular reason why you prepared  
7 the list?  
8 A. Well, I was trying to get organized more than  
9 anything else. I had it in files, and it was not  
10 organized.  
11 Q. Organized for what purpose?  
12 A. Whatever purpose.  
13 Q. Have you sent this list to any other attorneys  
14 besides Mr. Crumplar?  
15 A. I'm sure Ness, Motley has at least part of this  
16 list. I'm not sure they have the most recent  
17 update of the list.  
18 Q. When did you send the list to Mr. Crumplar or  
19 anyone in his office?  
20 A. About the time the affidavit was put together.  
21 Q. That's the affidavit dated October 18, 1995?  
22 A. Yeah. I think that's the date or the 16th.  
23 Q. Which of the articles on this list will you be  
24 relying upon as part of the basis of the opinions  
25 that you will give in this case?  
1 Dr. Dement Page 33

2  
3 A. Well, I think it's fair that I'll rely on the lists  
4 themselves because of the lists are epidemiologic  
5 studies. The evidence certainly points to an  
6 increased risk of lung diseases including lung  
7 cancer among welders.  
8 Q. All I want to know is what you're relying on,  
9 Doctor. I don't need you to give a speech.  
10 A. We went through certain articles that made direct  
11 reference to coatings of welding rods, but I think  
12 the list to me is appropriate to use, rely on the  
13 whole list.  
14 Q. So you will be relying then on all 56 articles plus  
15 the five additional publications that you gave me  
16 this morning, is that correct?  
17 A. Certainly as part of the reference materials. You  
18 know, obviously, I've reviewed a lot of other  
19 articles on asbestos which we haven't brought here  
20 today because they don't deal directly with welding  
21 rods.  
22 Q. Are there any other articles or publications or  
23 textbooks or writings having to do with welding  
24 upon which you will rely in giving the opinions  
25 that you have in this case?

1 Dr. Dement Page 34  
2  
3 Mr. Crumplar: Specific ones as opposed to the  
4 general body of knowledge.  
5 A. I can't think of any other specific article that I  
6 can sit here and quote to you. Obviously, I've  
7 read welding publications for a number of years. I  
8 can't quote article by article.  
9 Q. Are you a member of the American Welding Society,  
10 Doctor?  
11 A. No, sir. I am not. I have done a little welding  
12 in the past, but I am not a member of the society.  
13 Q. I'll get to that.  
14 Doctor, are you aware of the names of the  
15 plaintiffs in whose cases your deposition is being  
16 taken today?  
17 A. I'm not giving case specific testimony, so I really  
18 haven't reviewed names of plaintiffs.  
19 Q. When were you retained by Jacobs and Crumplar to  
20 consult in these cases?  
21 A. I can't give you an exact date. It would have been  
22 sometime before the preparation of this affidavit.  
23 Q. Can you give me any sense of how long before?  
24 Mr. Crumplar: Let me just make one -- Dr.  
25 Dement has been listed as a witness in these cases

1 Dr. Dement Page 35  
2  
3 and scheduled to testify for quite awhile, I mean,  
4 specifically questioning him if you're dealing with  
5 when did we specifically talk to him about welding  
6 rods. There may be a different answer as to when  
7 did he understand he was going to be testifying in  
8 the Przybylski group or whatever.  
9 Q. Do you remember the question I asked you, Doctor?  
10 A. Well, it was, I think you said, about these cases.  
11 Obviously, I've given a deposition a few years ago  
12 that dealt with more general issues of cases.  
13 About welding, my best guess would be sometime in  
14 the mid summer or sometime.  
15 Q. Of 1995?  
16 A. Yes. Mid to late summer.  
17 Q. What were you asked to do with respect to welding?  
18 A. We primarily discussed what my opinions were with  
19 regard to welding and would I be willing to put  
20 those on paper in the form of an affidavit.  
21 Q. And that's the affidavit of October 18, 1995?  
22 A. That's correct.  
23 Q. I take it from what you told me just a moment ago  
24 that you will not be offering any specific  
25 testimony about Mr. Przybylski's condition or Mr.

1 Dr. Dement Page 36  
2  
3 August's condition, is that correct?

4 A. That's correct. I haven't been asked to give case  
5 specific testimony.  
6 Q. I assume from that -- and you correct me if I'm  
7 wrong -- that you have not had occasion to review  
8 any of the medical records that pertain to either  
9 of those gentlemen?  
10 A. That's correct.  
11 Q. Will you be offering any product specific testimony  
12 at the trial of these cases, Doctor?  
13 A. Not to my knowledge. I think it's more general.  
14 With regard to this issue, it's more general  
15 welding rod issues.  
16 Q. Do you know whether any products manufactured by  
17 the Lincoln Electric Company ever contained  
18 asbestos?  
19 A. Primarily reviewing the response to interrogatory  
20 questions, which we mentioned I looked at briefly  
21 this morning, I understand that up until 1981 at  
22 least some of the rods contained asbestos.  
23 Q. Is that the sole source of your information about  
24 Lincoln's products and whether they contained  
25 asbestos?

1 Dr. Dement Page 37  
2  
3 A. I have, as I said, as Mr. Crumplar said before, was  
4 in the consulting capacity with Ness, Motley with  
5 regard to asbestos containing welding rods, so I  
6 had some knowledge through that consulting  
7 arrangement that some welding rods, including some  
8 Lincoln had, contained asbestos in the past.  
9 Q. Have you been involved in any testing of any  
10 Lincoln rods?  
11 A. I have brought the report on all the testing that I  
12 have conducted.  
13 Q. Once I get an opportunity to look at that, Doctor,  
14 we'll have some questions about it I'm sure, but  
15 just without spending a lot of time referring to  
16 that, do you recall whether there were any Lincoln  
17 rods involved in any testing that you did?  
18 Mr. Crumplar: Do you mind if he looks to see  
19 whether --  
20 Q. Help yourself.  
21 A. The rods that were tested in our experiment were  
22 Hobart and a Westinghouse and a partially burned,  
23 partially used rod that I received from another  
24 investigator which I don't have the specific  
25 identification on.

1 Dr. Dement Page 38  
2  
3 Q. Let me go back to the question I put to you a  
4 moment ago then. With respect to Lincoln rods, do  
5 you have any information about whether they  
6 contained asbestos other than what you reviewed in  
7 that interrogatory answer?  
8 A. Again, I, through the process of consulting in this  
9 prior arrangement, I was aware that Lincoln rods  
10 had contained asbestos, so that's in addition to  
11 response to interrogatories.  
12 Q. What was the source of that information?  
13 A. Some testing that I understand was being done on  
14 the rods, some historic rods themselves.  
15 Q. Who did that testing?  
16 A. I believe some of that was done by Jim Mallett and  
17 some others. I can't tell you everybody who's been  
18 testing.  
19 Q. Have you seen the results of any of those tests?  
20 A. The only results that I have are for the rods that  
21 we have looked at ourselves.  
22 Q. I understand that's what you have. My question is  
23 have you seen the results of any of those other  
24 tests?  
25 A. I can't recall that I have.

1 Dr. Dement Page 39  
2  
3 Q. Now with respect to Hobart rods, do you have any  
4 information about whether or which Hobart rods  
5 contained asbestos other than what you may have

6 gleaned as a result of whatever testing you did?  
 7 A. No. I haven't reviewed a list of all the product  
 8 I.D. numbers and whether or not they had asbestos  
 9 or not for any particular manufacturer.  
 10 Q. So is the source of your information then about  
 11 Hobart rods the testing that you have in front of  
 12 you?  
 13 A. Yes. And again, some of the Hobart rods were part  
 14 of the consulting with Ness, Motley and so as again  
 15 a part of that as well.  
 16 Mr. Crumplar: Let me just say I showed him  
 17 the Hobart interrogatories too.  
 18 Q. Are you aware of any testing done on Hobart rods  
 19 other than the testing that you're going to show me  
 20 before we're finished here today?  
 21 A. I've not -- If there's testing been done, I haven't  
 22 seen the results. I can't tell you.  
 23 Mr. Crumplar: Just so the record is clear,  
 24 we're not like delaying handing the report to Mr.  
 25 Davies until a later time. I mentioned in the

1 Dr. Dement Page 40  
 2 beginning.  
 3 Mr. Davies: I didn't mean to suggest that you  
 4 were if I did. I'm going to get to it eventually.  
 5 I assume you're going to give me an opportunity to  
 6 read it.  
 7 Mr. Crumplar: You can read it at any time. I  
 8 just didn't want later, a year from now, somebody  
 9 who's not here saying the record is that we're  
 10 playing some kind of game with you on the report.  
 11 Mr. Davies: I think your paranoia is showing,  
 12 Tom.  
 13 Q. Let me put the same question to you with respect to  
 14 Westinghouse rods, Doctor, since you've mentioned  
 15 them. Do you have any information about those rods  
 16 and the asbestos content other than what you have  
 17 determined as a result of your testing?  
 18 A. Again, same response as before, the interrogatory  
 19 response, the prior consulting.  
 20 Q. You may have answered this at least by implication,  
 21 but let me ask you the question directly. Do you  
 22 know which rods manufactured by the Lincoln  
 23 Electric Company contained asbestos?  
 24 A. I haven't reviewed an entire list of their rods.

1 Dr. Dement Page 41  
 2 There was a list as part of the interrogatory. I  
 3 just glanced at it.  
 4 Q. Same questions with respect to Hobart and  
 5 Westinghouse.  
 6 A. Same response.  
 7 Q. Do you know if there was any particular type of  
 8 welding rod that at one time contained asbestos,  
 9 for example, a rod used in a particular  
 10 application?  
 11 A. I'm not aware that it was restricted to any one  
 12 particular application. I know obviously rods are  
 13 made for different types of welding and base metals  
 14 and applications, but again, I haven't tried to  
 15 match up what the application is with the asbestos  
 16 content.  
 17 Q. Do you have any idea whether stainless steel rods  
 18 ever contained asbestos?  
 19 A. From the literature, it looks like stainless steel  
 20 rods contained some asbestos.  
 21 Q. Can you point to the literature in particular which  
 22 would lead you to that conclusion?  
 23 A. Basically the same articles we just went over.  
 24 Some of those mentioned welding of stainless steel.

1 Dr. Dement Page 42  
 2 All 61 of them?  
 3 A. No. The ones that we just flagged that made  
 4 specific mention in discussion of rods and  
 5 coatings.  
 6 Q. Should we add the last five articles that you gave

8 me to the list of those that are flagged or just to  
 9 the general list?  
 10 A. I guess they should be added to the flagged list.  
 11 They at least in some way address the presence of  
 12 asbestos in coatings.  
 13 Q. Do you have any understanding, Doctor, as to  
 14 whether or not all stick electrodes at one time  
 15 contained asbestos in the coating?  
 16 A. I don't think that's true.  
 17 Q. So as you understand it, some did and some didn't?  
 18 A. That's my understanding.  
 19 Q. Are you at all familiar with the AWS classification  
 20 system for rods?  
 21 A. I have reviewed it. I have looked at it at one  
 22 point in time. I have not studied it.  
 23 Q. If I were to say to you AWS classification 70-18,  
 24 would that have any meaning to you?  
 25 A. I probably have glanced at it, but I haven't --

1 Dr. Dement Page 43  
 2 It's not an issue I've really studied in detail.  
 3 Q. I take it from that that you can't tell me what 70-  
 4 18 means versus 60-10 or some other number.  
 5 Mr. Crumplar: Or even if 70-18 is a  
 6 classification.  
 7 A. I have, as I've said, generally looked at the some  
 8 classification systems under the American Welding  
 9 Society. I'm not a welder, so I didn't feel like  
 10 it was my responsibility to memorize those.  
 11 Q. I'm not suggesting that it was. All I want to know  
 12 is whether or not you know what the designation 70-  
 13 18 means. If you do, tell me. If you don't, tell  
 14 me you don't.  
 15 Mr. Crumplar: And again, assuming that is a  
 16 designation.  
 17 I represent to you that it is.  
 18 Q. Mr. Crumplar: That's fine.  
 19 I don't know what 70-18 is.  
 20 Q. Doctor, you indicated to me awhile ago that you had  
 21 done some welding at some point?  
 22 A. Yes. I did.  
 23 Q. Can you tell me when that was and what you did?  
 24 A. Well, I spent a number of summers in high school

1 Dr. Dement Page 44  
 2 and the first couple of years of college working in  
 3 garages and did both some acetylene welding and  
 4 some electric welding as part of that. One of the  
 5 things I did for a summer, the garage that I worked  
 6 at was in the process of expanding, making a bigger  
 7 facility, so the owner decided to make his own  
 8 steel beams for the roof, so I spent a summer  
 9 welding together channel iron and making beams for  
 10 the roof of that building. It's just mild steel  
 11 welding.  
 12 Q. Did you use stick electrodes?  
 13 A. Yes.  
 14 Q. Do you know whose you used?  
 15 A. I have no idea.  
 16 Q. Do you know what the classification was of the  
 17 rods?  
 18 A. I don't remember.  
 19 Q. How much time that summer did you spend welding?  
 20 A. Probably two-thirds, half to two-thirds of the  
 21 time.  
 22 Q. Did you wear a welding hood when you were doing  
 23 this work?  
 24 A. Of course.

1 Dr. Dement Page 45  
 2 Do you have any idea how much of your actual  
 3 welding time was spent with an arc struck?  
 4 A. I don't know. I couldn't give you an estimate.  
 5 Q. Do you consider yourself to be an expert in welding  
 6 processes?  
 7 A. I'm familiar. I'm generally familiar with welding  
 8 processes. I wouldn't consider I am an expert in

10 all processes of welding. I'm more interested in  
11 the health aspects of welding than the actual  
12 welding processes.  
13 Q. That's all I'm trying to find out, Doctor.  
14 Is there welding process in which you consider  
15 yourself to be an expert?  
16 Mr. Crumplar: Other than what he's already  
17 said?  
18 A. My response is my response. I'm not an engineer  
19 who's involved in the process of welding. I'm an  
20 industrial hygienist who's interested in the  
21 health, possible health aspects of welding so --  
22 You know, I'm not an expert in the process of  
23 welding necessarily. I do consider myself that I'm  
24 industrial hygienist with some expertise in welding  
25 health effects.

1 Dr. Dement Page 46

2  
3 Q. Have you ever taught welding?  
4 A. No.  
5 Q. Have you ever published any welding articles?  
6 A. No. Huh-uh (no).  
7 Q. Have you ever seen welding rods made?  
8 A. No. I haven't been to a factory making welding  
9 rods.  
10 Q. Are you familiar with the process of manufacturing  
11 welding rods?  
12 A. Only as it can gleaned from a look at the  
13 depositions I've read.  
14 Q. Do you recall from which deposition you gleaned  
15 that information?  
16 A. Well, both the depositions, the Peterson and Eager  
17 depositions, talk a little bit about welding rods.  
18 Some of the literature itself here talks about  
19 coatings and welding rods and sort of how they're  
20 made to some extent but also indicates that most of  
21 that is proprietary so it doesn't go into a lot of  
22 detail.  
23 Q. Would it be fair to say that the general  
24 information that you have regarding the  
25 manufacturing process came from the depositions of

1 Dr. Dement Page 47

2  
3 Drs. Peterson and Eager?  
4 A. There's some discussion in some of these documents  
5 that come from, for example, The Welding  
6 Encyclopedia.  
7 Q. Would you outline the other ones, please, that  
8 cover the manufacturing process?  
9 A. Again, as I've said, they basically talk about  
10 constituents of sort of how they're made, but they  
11 don't go into a lot specific detail because it's  
12 proprietary information.  
13 Q. Would you tell me, please, those which discuss that  
14 aspect?  
15 A. Okay. Actually, one of the articles that we're  
16 going to have copied, the Tebbins' article,  
17 mentions a bit about that. The two articles, 24  
18 and 25, deal with asbestos and coated electrodes.  
19 They're from The Welding Encyclopedia actually.  
20 Number 44 also deals. It's from The Welding  
21 Journal.  
22 Q. Okay.  
23 A. I think those are the ones that at least give some  
24 general discussion of.  
25 Q. Doctor, in your affidavit, you make the statement,

1 Dr. Dement Page 48

2  
3 "The welding process does decompose the asbestos at  
4 the point of arc." Do you stand by that statement  
5 today?  
6 A. I think the temperatures at the point of arc should  
7 be sufficient to destroy asbestos at least  
8 partially. Whether or not that is a complete  
9 process I think is open to a lot of debate.  
10 Q. Do you have any idea what the temperature is at the  
11 arc?

12 A. It can vary depending on the process but 3,000,  
13 6,000 degrees centigrade actually.  
14 Q. And at what temperature does asbestos decompose  
15 centigrade?  
16 A. Chrysotile asbestos will start to decompose at  
17 temperatures somewhere around 900 to 1,000.  
18 Q. When is the decomposition process complete?  
19 A. Well, it depends on -- It's not just a matter of  
20 temperature. It's a matter of time, and that  
21 really hasn't been determined to a great certainty.  
22 There are some studies with chrysotile using  
23 differential therm analyses, and you have to  
24 actually keep it heated at that temperature, at  
25 least at that temperature, for a period of time.

1 Dr. Dement Page 49

2  
3 It's not instantaneous.  
4 Q. Is there a relationship between time and  
5 temperature in the sense that as the temperature  
6 increases, the time decreases?  
7 A. It's not determined.  
8 Q. Do you know why asbestos was used in welding rods?  
9 A. Well, the function of the coating is to provide  
10 some shield to the pool of metal and to act as a  
11 flux. Why asbestos was chosen over other  
12 materials, I really couldn't tell you.  
13 Q. Do you know if it had a specific purpose?  
14 A. Well, apparently if it had a purpose, there were  
15 other materials that could be substituted because  
16 it was substituted, and I give you my impression  
17 because it's not detailed in the articles I've  
18 read, but some of the asbestos helped provide a  
19 structure to the coating itself, that is, give it  
20 some rigidity.  
21 Q. Is that the only purpose of which you are aware?  
22 A. I assume that it provides at least -- I'm not going  
23 to speculate beyond that.  
24 Q. When asbestos was used in the coating of welding  
25 rods, Doctor, do you have any idea what the

1 Dr. Dement Page 50

2  
3 percentage of asbestos was either by weight or  
4 volume?  
5 Mr. Crumplar: In the coating.  
6 A. From the data I've seen, it varies from one to two  
7 percent to some cases up to as high as ten percent  
8 or so.  
9 Q. Were there any particular rods that you can  
10 identify that had as much as ten percent in them?  
11 A. I looked at list this morning that indicated some  
12 had as high as ten percent, but I didn't memorize  
13 the numbers.  
14 Q. Do you know which company that was?  
15 A. I don't recall the specific company.  
16 Q. When asbestos was used in the coating of rods, do  
17 you have any idea what type of binding agent was  
18 used to hold that together with the other  
19 constituents of the flux?  
20 A. Well, most of that is proprietary, but typically,  
21 my understanding was sodium silicate material.  
22 Q. Do you have any experience working sodium silicate?  
23 A. Not specifically research on sodium silicate. I'm  
24 aware that it's called water glass. I'm aware of  
25 the material.

1 Dr. Dement Page 51

2  
3 Q. Other than any testing you may have done on welding  
4 rods, have you done any other type of testing with  
5 any material that utilized sodium silicate as a  
6 binder?  
7 A. I can't recall any.  
8 Q. Will sodium silicate bind with asbestos?  
9 A. To some extent, of course.  
10 Q. Do you know what type of bond is created when that  
11 occurs?  
12 A. Well, it's not going to be necessarily a chemical  
13 bond. It's going to be more or less held together

14 by electrostatic forces mostly.  
15 Q. Are you familiar with the concept known as wetting?  
16 A. Generally, yes.  
17 Q. Can you tell me what that is as you understand it?  
18 A. It's primarily the ability of, in most cases, a  
19 liquid material to adhere to the surface of a solid  
20 as wetability. It's typical for a solid to at  
21 least not repel the liquid material.  
22 Q. Is there capillary action involved in the concept  
23 of wetting?  
24 A. It can be. It depends on the material.  
25 Q. Will asbestos wet?

1 Dr. Dement Page 52  
2  
3 A. To some extent, it will, of course.  
4 Q. Will it wet with water?  
5 A. To some extent. Not entirely. That's the reason  
6 for continued release of asbestos during asbestos  
7 abatement. They tend to try to use materials that  
8 would reduce surface tension and help wetability,  
9 but still you have fibers released.  
10 Q. When chrysotile asbestos is exposed to water, will  
11 there be capillary action?  
12 A. To some extent. It's not going to be 100 percent.  
13 Q. How about with sodium silicate? If chrysotile  
14 asbestos is exposed to sodium silicate, will there  
15 be wetting?  
16 A. To some extent.  
17 Q. Would that involve capillary action of the sodium  
18 silicate into the asbestos?  
19 A. Well, you're not into the asbestos. All you're  
20 doing is pulling it into the matrix, the asbestos.  
21 Q. Just to be sure I understand what you're saying,  
22 when you say the matrix, are you saying that it is  
23 pulled into and around the fibers?  
24 A. Again, to some extent. It's never going to 100  
25 percent.

1 Dr. Dement Page 53  
2  
3 Mr. Davies: Can we take a short recess,  
4 please?  
5 (Thereupon, there was a short recess.)  
6 Q. Doctor, do you know how much sodium silicate by  
7 weight or volume was used in the coating of any of  
8 the rods that you tested?  
9 A. No.  
10 Q. Do you have any idea how much sodium silicate was  
11 used in the flux of any asbestos-containing welding  
12 rod ever manufactured?  
13 A. Again, that information has not been available to,  
14 not available in the literature really. Some  
15 ranges are given in some of the publications that  
16 we've gone through.  
17 Q. What ranges have you seen?  
18 A. I don't recall the ranges, but one of the articles,  
19 as I recall, gave some possible ranges. It may  
20 have been the American Welding Society publication.  
21 Q. Do you know what disease processes are involved in  
22 the Przybylski and August cases?  
23 A. I understand one was a mesothelioma, but I can't  
24 tell you what the other one is.  
25 Q. Do you know which is the meso case?

1 Dr. Dement Page 54  
2  
3 A. No.  
4 Q. Do you know whether Mr. Przybylski was a welder?  
5 A. I don't know. I presume that he was. I haven't  
6 reviewed his occupational history.  
7 Q. Do you know whether Mr. August was a welder?  
8 A. I couldn't tell you.  
9 Q. I take it from you've said you don't really know  
10 anything about their welding environments if, in  
11 fact, they had welding environments?  
12 A. The only thing I can relate to is what I have had a  
13 chance to review, and this is when it talks  
14 about -- I guess this is his brother who worked  
15 alongside Mr. Przybylski. He indicated when he and

16 his brother were working as a welder at Center Oil,  
17 and he talked about use of welding rods. That's  
18 the source of my information.  
19 Q. That was the question I was about to put to you.  
20 Would it be fair to say that anything you know  
21 about their welding histories or welding  
22 environments would be what you have gleaned from  
23 those portions of the depositions that were made  
24 available to you?  
25 A. And the affidavits, the material that we went

1 Dr. Dement Page 55  
2  
3 through this morning.  
4 Q. Fair enough. I didn't mean to exclude the  
5 affidavits.  
6 Other than anything that may be contained in  
7 those same materials, do you have any information  
8 about what types of welding rods either Mr.  
9 Przybylski or Mr. August used?  
10 A. No. Again, other than what was in the affidavit.  
11 It did mention the Lincoln Fleetwell Five.  
12 Q. Do you recall any other manufacturer being  
13 mentioned in those affidavits or depositions?  
14 A. He mentioned using some other brands but didn't  
15 know the brand names as I recall.  
16 Q. Are you aware of any published studies dealing with  
17 the release of respirable asbestos fibers during  
18 the use or handling of welding rods?  
19 A. Well, only with regard to the articles that we've  
20 listed.  
21 Q. Would the same be true with respect to theoretical  
22 release of asbestos fibers in the welding fume?  
23 Any information that you might have would be from  
24 those articles?  
25 A. You mean mention the possibility?

1 Dr. Dement Page 56  
2  
3 Q. Yes. Uh-huh (yes).  
4 A. I can't say that I've got an exhaustive list of  
5 every article that mentioned welding rod coatings,  
6 but this list of references forms at least a  
7 partial basis for my opinion.  
8 Q. Then what I need to know is what else is out there  
9 in the universe of literature that helps form the  
10 basis of your opinions about release of respirable  
11 asbestos fibers from welding rods?  
12 A. I based my affidavit not on any testing that I had  
13 done but based on the literature, so that's the  
14 basis of what I've said is the literature which I  
15 attached to the affidavit.  
16 Q. Let me ask you this. Do you intend to rely on any  
17 testing of rods or rod flux that you have done for  
18 any of the opinions that you will offer at the  
19 trial of this case?  
20 Mr. Crumplar: Besides the report you have in  
21 front of you?  
22 Q. My question is, I think, perfect clear. Do you  
23 understand the question, Doctor?  
24 A. It forms -- My testing that I did simply confirmed  
25 some of my or my opinions with regard to welding

1 Dr. Dement Page 57  
2  
3 rods gleaned from the literature. I don't think it  
4 necessarily goes beyond confirmation.  
5 Q. Will you be relying on the results of that testing  
6 for the opinions that you're going to give?  
7 A. I can't exclude that information as part of my base  
8 of knowledge, but as I said, it doesn't do anything  
9 more than confirm what I had, my opinions based on  
10 the available literature over the time.  
11 Q. Let me ask you this. Do you intend to testify at  
12 trial that you have done testing on welding rods?  
13 A. I can't tell you that. I think that's probably a  
14 question you'd ask Mr. Crumplar.  
15 Mr. Crumplar: Let me jump in. Until we got  
16 word that this testing was no longer confidential  
17 so that we could even be aware of it, we intended

18 to have him not testify regarding the testing but  
19 just testify based on the affidavit. Now that the  
20 material has been released, I would hope that he  
21 could refer to it although it's not essential in  
22 his opinion. It's not going to form the  
23 centerpiece of his opinion by any means.  
24 Mr. Davies: Fine. I think it is clear to me  
25 that you intend to have him testify that he has

1 Dr. Dement Page 58  
2  
3 done testing. I propose to try to read the reports  
4 that he has offered to us today, and I propose to  
5 try to interrogate him in an intelligent way about  
6 those reports. However, the record needs to be  
7 absolutely clear that I have not reviewed this  
8 material prior to this deposition.  
9 Mr. Crumplar: That is fine, and let me just  
10 say that I think how you should proceed is the way  
11 you're doing right now, on one track that you're  
12 confident to take him at trial if he doesn't  
13 mention those reports, finish that up, and then you  
14 do as much as you can on these reports. If after  
15 having more exhaustive time to review those reports  
16 you wanted to briefly question him over the phone  
17 or right before his testimony, we could try to do  
18 that.  
19 Mr. Davies: Tom, I don't agree to those  
20 terms.  
21 Mr. Crumplar: I'm not asking you to agree to  
22 those terms. I'm just making that offer.  
23 Mr. Davies: I don't want my attempting to  
24 interrogate him about the reports to be deemed a  
25 waiver of a right to question him further once I've

1 Dr. Dement Page 59  
2  
3 had an opportunity to analyze them and to consult  
4 with my experts about them.  
5 Mr. Crumplar: That's fine.  
6 Mr. Davies: If you want to tell me today that  
7 he isn't going to testify that he did any testing,  
8 then I won't bother to ask him any questions about  
9 it.  
10 Q. Doctor, are you aware of any medical literature  
11 which would support the proposition that one can  
12 suffer an asbestos-related disease from exposure to  
13 welding rods alone?  
14 A. Well, I think the earlier reports by Doig, D-o-i-g,  
15 and McLaughlin, talking about x-rays and the  
16 possible contribution of asbestos from fluxes  
17 probably is the only epidemiologic study that is  
18 capable or has tried to separate them off, asbestos  
19 exposure from the rods versus other asbestos  
20 exposures.  
21 Q. Which Doig article is that?  
22 A. That's the one that's listed, number 20.  
23 A. Do you recall whether that article provides any  
24 information about the environments in which the  
25 welders who were the subject of the study worked?

1 Dr. Dement Page 60  
2  
3 A. It's actually sort of a case. That article is a  
4 case series I would call it, and it describes the  
5 welders with x-ray appearance of disease, and it  
6 does go into a description of their environments,  
7 and I can't off the top of my head tell you every  
8 environment they worked in, but it does describe  
9 them.  
10 Q. Do you recall whether of those environments  
11 involved exposure to asbestos other than from the  
12 welding rods?  
13 A. I don't know that they can 100 percent exclude it  
14 although they're discussion in this article didn't  
15 point to other sources as being at least important  
16 in their review.  
17 Q. Have you testified at deposition or trial in any  
18 other case regarding release of asbestos from  
19 welding rods?

20 A. No. Of not specifically welding rods.  
21 Q. Do you anticipate rendering any opinions at trial  
22 that are not outlined in either the affidavit that  
23 you provided or in the answer to interrogatory  
24 which summarizes your testimony?  
25 A. No, sir. I think it's a fair summary.

1 Dr. Dement Page 61  
2  
3 Q. You have reviewed the answer to the interrogatory  
4 regarding your testimony I take it?  
5 A. The answer to the interrogatory?  
6 Q. Yes.  
7 A. My affidavit is what I have reviewed.  
8 Mr. Crumplar: He's looked at the --  
9 Mr. Davies: Why don't you let him answer the  
10 question.  
11 A. If you'll show me what it is, I can tell you if  
12 I've look at it.  
13 Q. Doctor, let me give you what is titled "Plaintiffs  
14 Represented by Jacobs and Crumplar Supplemental  
15 Answers to Interrogatories Directed to All  
16 Plaintiffs by All Defendants." In particular, this  
17 is the interrogatory 76 and the answer. Take a  
18 moment to look at that, please.  
19 Mr. Crumplar: Let me see that. Let me just  
20 note this is the supplemental of his earlier  
21 interrogatory which is also included which goes  
22 over his general testimony. It doesn't replace  
23 that.  
24 A. I honestly can't say whether I've seen this or just  
25 simply discussed it. I am aware of that.

1 Dr. Dement Page 62  
2  
3 Q. Why don't you just hang on to that for a second,  
4 Doctor. If I understand you correct, you don't  
5 know whether you have seen this particular document  
6 prior to my handing it to you a moment ago, is that  
7 right?  
8 A. Or simply discussed it over the telephone.  
9 Q. Let me ask you again. Have you seen this document  
10 before I just handed it to you?  
11 Mr. Crumplar: Asked and answered.  
12 A. I can't tell you that I have or haven't.  
13 Q. Thank you.  
14 A. I'm aware of its existence, but I can't tell you  
15 whether or not it was simply over the telephone or  
16 seeing the document.  
17 Q. Do you consider yourself to be an expert in the  
18 area of biostatistics?  
19 A. I'm not a biostatistician, but I'm an  
20 epidemiologist, and that's an area that we spend a  
21 fair amount of time in.  
22 Q. I guess what I'm trying to find out, Doctor, is  
23 whether the answer to subparagraph A is accurate or  
24 not? It says, "Dr. John Dement is an expert in  
25 epidemiology and industrial hygiene as well as

1 Dr. Dement Page 63  
2  
3 biostatistics." Are you an expert in biostatistics  
4 or aren't you?  
5 A. I'm not a biostatistician. I'm an epidemiologist,  
6 and biostatistics is an integral part of  
7 epidemiology. I don't know that I would separate  
8 it unnecessarily.  
9 Q. So you do consider yourself to be an expert in the  
10 area?  
11 A. I am not calling myself a biostatistician. I am an  
12 epidemiologist first and biostatistics.  
13 Q. In the middle of subparagraph B there, the  
14 statement is made that -- this is a quote -- "The  
15 substance of his," meaning your, "opinion  
16 concerning -- I'm sorry -- "the substance of his  
17 opinion is that asbestos-containing welding rod  
18 with asbestos-containing flux when new or used  
19 will, because of release of fibers from the flux  
20 due to chipping, breaking, crumbling, and  
21 friability, give off respirable and breathable

22 fibers and particles of asbestos."  
 23 Now do you stand by that statement as read?  
 24 A. I think it's consistent with the affidavit. Yes.  
 25 Q. Can you describe for me, please, what typical

1 Dr. Dement Page 64  
 2  
 3 welding practices you're aware of that would cause  
 4 the chipping, breaking, crumbling, and friability  
 5 of the flux?  
 6 A. Well, abrasion of rods themselves together as they  
 7 are received as the testimony of the workers  
 8 themselves indicates that there's an amount of  
 9 debris in the bottom which is considered to be from  
 10 the flux, and that's consistent with my  
 11 observations of other types of asbestos products  
 12 that are so-called bound. You see that, for  
 13 example, with brake lines and other materials.  
 14 Welding itself, in my opinion and I think it's  
 15 in the affidavit, the temperatures at the point of  
 16 weld are sufficient to destroy asbestos fibers.  
 17 Like brake lining temperatures and processes,  
 18 that's not 100 percent.  
 19 With regard to used rods -- First of all, in  
 20 order to weld at different angles, the rods were  
 21 bent and materials crumble and break off. Used  
 22 rods, as has been my observation having seen and  
 23 done welding, that one of the things that happens  
 24 with used rods is they are thrown on the floor and  
 25 trampled on, and if you look at a used rod,

1 Dr. Dement Page 65  
 2  
 3 typically you'll find that there's places where  
 4 it's broken. The material is chipped away.  
 5 It's also my opinion that when a rod is heated  
 6 during the welding process that some of the binder  
 7 material away from the point of the weld also  
 8 degrades because of temperature which causes  
 9 increased friability.  
 10 Q. Can you think of any other typical, ordinary  
 11 welding activity that would cause the breaking and  
 12 chipping and crumbling that has been described in  
 13 this interrogatory?  
 14 A. I think it's pretty inclusive.  
 15 Q. Did you, during that period of time when you were  
 16 welding, ever have occasion to bend a rod?  
 17 A. Uh-huh (yes). I sure did.  
 18 Q. For what purpose?  
 19 A. For welding within the center of a beam that was in  
 20 the middle which I couldn't get to without bending  
 21 the rod.  
 22 Q. Does bending the rod in any way affect the ability  
 23 of the rod to complete the weld?  
 24 A. Not unless you break the flux away at the point  
 25 that you have use.

1 Dr. Dement Page 66  
 2  
 3 Q. Can you think of any activity in which a welder  
 4 might be engaged where he would have occasion to  
 5 rub two rods together?  
 6 A. The process of shipping the rods together rubs them  
 7 together. The process of rubbing the rods together  
 8 to me is -- and you'll see in experiments that we  
 9 did -- was done more or less to see whether or not  
 10 some material could be abraded off. If you toss  
 11 them on the floor -- If you ever walk around the  
 12 shop of a welding shop, you'll see rods all over  
 13 the floor.  
 14 Q. Is that good industrial hygiene practice?  
 15 A. Nobody said it was good practice, but it's typical  
 16 practice.  
 17 Q. So it's not good practice, is that right?  
 18 A. It would not be a practice I would condone, but  
 19 it's a practice that welders have done for years  
 20 mainly because of the volume of material they  
 21 typically might weld.  
 22 Q. Dangerous to have them there, isn't it, if you step  
 23 on them?

24 A. It can be. Yes.  
 25 Q. Let me go back to the question I asked just a few

1 Dr. Dement Page 67  
 2  
 3 minutes ago and I don't think was answered. Can  
 4 you think of any occasion when a welder might rub  
 5 two rods together for some reason?  
 6 A. Not intentionally, but again, the process of  
 7 rubbing rods together is to try to observe whether  
 8 or not materials can be released doing some of the  
 9 other processes I've mentioned today in the  
 10 deposition.  
 11 Q. Is that something you would expect a typical welder  
 12 to do?  
 13 A. No. But they'll throw them on the floor, and  
 14 they'll be stepped on, and they'll be abraded, and  
 15 materials will be released.  
 16 Q. If you turn over to the second page of this  
 17 interrogatory answer right at the end of paragraph  
 18 B, the statement is made, "He," meaning you, "also  
 19 relies on the depositions of defense experts  
 20 concerning the fracturing of the flux in creation  
 21 of particles of at least 25 microns in particular  
 22 Mr. Peterson and Mr. Eager."  
 23 A. Yeah.  
 24 Q. Can you tell me what that means?  
 25 A. To me all it means is when a flux is fractured,

1 Dr. Dement Page 68  
 2  
 3 particles as small as, or maybe even smaller, 25  
 4 microns are produced.  
 5 Q. Do you subscribe to that general statement?  
 6 A. I think it's in a deposition. It's just a fact  
 7 stated in a deposition.  
 8 Q. Do you agree with it or don't you?  
 9 A. No. Actually, I think, based on some of my own  
 10 work and some of the concerns the Naval shipyard  
 11 had and bonds have had, I think you can actually  
 12 create particles that are smaller and much more  
 13 respirable.  
 14 Q. How much smaller?  
 15 A. Down to and including particles that are less than  
 16 a micron.  
 17 Q. Doctor, as I understand it, you started employment  
 18 with the EPA in 1969, is that correct?  
 19 A. Yes, sir.  
 20 Q. Then you worked for a number of years with NIOSH?  
 21 A. Yes.  
 22 Q. And then with the Office of Occupational Health and  
 23 Environmental Services?  
 24 A. They changed names. I think it was called  
 25 Technical Services at first, and then it changed

1 Dr. Dement Page 69  
 2  
 3 names a few times, but yes, same program.  
 4 Q. Do you still work for that organization?  
 5 A. No. I spent about a little over 21 years with the  
 6 U.S. Public Health Service during my days with  
 7 NIOSH and NIEHS as it's called, and I retired from  
 8 the Public Health Service in December of 1992.  
 9 Q. During any of the time that you worked for the  
 10 Public Health Service, did you conduct any studies  
 11 having to do with welding?  
 12 A. Not a study that was specific to welding. NIOSH  
 13 had, of course, interest in welding and was in the  
 14 process of trying to pull together information for  
 15 its criteria document, but when we were doing  
 16 industrial hygiene studies at a particular facility  
 17 if we ran across welding, we might, in fact, do  
 18 some sampling to evaluate exposures of welders as  
 19 more or less trying to be comprehensive.  
 20 Q. Did you do that is my question?  
 21 A. Yeah.  
 22 Q. Not NIOSH. Did you do it?  
 23 A. No. I have sampled for welding fume. Yes.  
 24 Q. What were you looking for when you sampled?  
 25 A. At the time, the welding fume was welding fume

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2

3 looking for primarily and then on a number of

4 occasions -- One study we were looking at, just

5 looking at, the welding fume for iron oxides, and

6 another, I think we might have analyzed for a broad

7 spectrum of metals including some nickels and

8 chromiums.

9 Q. Did you publish anything as a result of those

10 studies?

11 A. Not as a separate publication.

12 Q. I note from your CV that there are, I think, 45

13 publications in which you have participated. Maybe

14 there are more than that.

15 A. Yeah. I hope so. Yeah. There are a few more.

16 Q. How many are there on your current CV?

17 A. Fifty-something I believe.

18 Q. May I see that one, Doctor? That must be more

19 current than --

20 A. What's the date of yours?

21 Q. I don't know. I'll have some copies of this made,

22 Doctor. I don't believe that I have this

23 particular CV. This says it was prepared in July

24 of 1995, correct?

25 A. Yes.

1 Dr. Dement Page 71

2

3 Q. Of the publications which appear in this CV, are

4 any of them related to welding and welders?

5 A. Not by themselves. As I said, some of the cohorts

6 that were studied included some maintenance and

7 craftworkers that did some welding but not as a

8 study of welding by itself.

9 Q. I take it then that none of them deal with the

10 question of asbestos exposure to welders?

11 A. No.

12 Q. No. They don't?

13 A. No. They don't.

14 Q. Have you generated any type of report regarding

15 what your testimony will be or what your

16 conclusions are for the Jacobs and Crumplar firm

17 other than the affidavit that we've been talking

18 about?

19 A. No, sir. I have not.

20 Q. Have you provided anything to that firm other than

21 the affidavit and the list of welding publications?

22 A. No. I guess by way of the deposition today, I'll

23 be providing this report, but it was not provided

24 to them until today.

25 Mr. Crumplar: You're getting it at the same

1 Dr. Dement Page 72

2

3 time I am. You're getting the copy at the same

4 time I am.

5 Mr. Davies: To the extent that you are

6 suggesting that we are both prejudiced, I

7 respectfully disagree.

8 Mr. Crumplar: I would have been delighted to

9 have this earlier.

10 Mr. Davies: As would I.

11 Mr. Crumplar: It was beyond my control.

12 Mr. Davies: Certainly beyond mine.

13 Mr. Crumplar: It was in the hands of Ness,

14 Motley. I didn't even know there was a report.

15 Mr. Davies: You're not retracting the

16 statement you made to me that you were trying to

17 get authority to release it for three weeks, are

18 you?

19 Mr. Crumplar: I didn't know there was a

20 report. I was trying to get authority that he

21 could talk about his testing. I had known he had

22 done testing.

23 Mr. Davies: I don't want to take your

24 deposition time.

25 Mr. Crumplar: You asked me the question. Now

1 Dr. Dement Page 73

2

3 if it's for an affidavit, how many times I called

4 people.

5 Q. (By Mr. Davies) Doctor, can you point to any

6 studies or publications which in your view show

7 that welders are at an increased risk for

8 contracting asbestos-related diseases as a result

9 of having used asbestos-containing welding rods?

10 A. All the studies we went through today. The

11 problem, as I've mentioned, is that most cohorts of

12 welders, in addition to exposure from the welding

13 rods, have other sources of asbestos exposure, so

14 separating them off is difficult. The one study

15 that I mentioned to you, and I think you will be

16 making a copy of it, after trying to control for

17 other exposures in the analysis of other data, I

18 still find an increased risk of respiratory cancer

19 among welders which they at least suggest that

20 asbestos from the coatings may play a part, but

21 other than that. Numbers of studies found

22 mesotheliomas among welders, but again, it's the

23 same issue of multiple exposures.

24 Q. Are you in a position to say in terms of degree

25 what contribution the exposure from the rods

1 Dr. Dement Page 74

2

3 themselves plays in any given case?

4 Mr. Crumplar: Are you talking about in terms

5 of percentage, 5 percent, 50 percent, that type of

6 thing?

7 Mr. Davies: Any way the doctor can quantify.

8 Mr. Crumplar: Let me just say that --

9 Mr. Davies: Do you have an objection?

10 Mr. Crumplar: Yeah. Because it's really

11 beyond the scope of how we will use the doctor and

12 how we're restricted to use the doctor. He does

13 not testify as to medical causation in an

14 individual case. I mean you can go ahead and ask

15 him.

16 Mr. Davies: And won't be in these cases?

17 Mr. Crumplar: He will not testify on medical

18 causation in these cases. That's correct.

19 Q. Can you answer the question, Doctor, even though

20 you aren't an M.D.?

21 A. It has to do with risk assessment and ability to

22 recreate a person's lifetime exposure, and I think

23 you have to take each individual by themselves.

24 Generally, it's been my experience that it's almost

25 impossible to recreate that exposure with enough

1 Dr. Dement Page 75

2

3 confidence to make a percentage attribution. All

4 you can say is that yeah. These were the sources

5 of exposure. Based on what we know about exposure

6 response, they contributed, but to give a

7 percentage, I think, in most cases, you're sort of

8 fooling yourself.

9 Q. Is it fair to take the next step and say that to

10 try to ascribe some word, some adjective, to the

11 word contributing would also be fooling oneself?

12 A. To go beyond the issue of saying they contributed

13 to the risk of disease, that's all I really think.

14 Q. That's fair enough. Thank you.

15 Mr. Davies: Off the record for a second.

16 (Thereupon, there was a short recess.)

17 (Thereupon, Defendant's Exhibit Nos. 1 and 2

18 were marked for identification.)

19 Q. Dr. Dement, we have marked as Exhibits Nos. 1 and 2

20 what I understand to be reports on testing that you

21 provided to me this morning, is that correct?

22 A. Yes, sir. These are the reports that were given.

23 Q. Exhibit No. 1 consists of approximately 16 pages,

24 and Exhibit No. 2 is approximately 50 pages. I

25 have indicated to Mr. Crumplar that it is

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2

3 impossible with my limited expertise and abilities

4 to try to intelligently cross examine you regarding

5 these reports without the opportunity to analyze  
6 them and have them analyzed.  
7 I do have just a couple of questions about  
8 them to be sure that I understand what they are.  
9 Exhibit No. 1 -- that's the shorter of the reports  
10 -- indicates that dust was apparently collected  
11 from the bottom of a chamber and analyzed using  
12 transmission electron microscopy, is that right?  
13 A. Yes, sir. That's correct.  
14 Q. Could you tell me just generally what was done in  
15 the other test that is represented by Exhibit No.  
16 2?  
17 A. Yeah. Exhibit No. 2 was to take one asbestos-  
18 containing new rod that is unused, one nonasbestos,  
19 set of nonasbestos rods, and one rod, set of rods,  
20 that had been used, that had been welded with but  
21 still had lots of remaining flux. They were tested  
22 within an enclosed chamber which is described in  
23 the report. They were bumped and rubbed together  
24 to see if they would, in fact, liberate fibers.  
25 Samples were collected in the chamber and analyzed

1 Dr. Dement Page 77  
2  
3 by transmission electron microscopy, and results  
4 are in the report.  
5 Q. The only thing I'm trying to find out at this  
6 juncture about the report is whether that test  
7 involved samples of residue or whether it involved  
8 air sampling.  
9 A. It was air sampling. We also collected --  
10 Materials collected in the bottom of the chamber  
11 particularly with the used rod. As they're bumped  
12 and abraded, some materials actually fell to the  
13 floor of the chamber, visible material. That was  
14 then collected, and the vast results were presented  
15 in the analyses and actually what's called report  
16 one, so report two actually preceded report one.  
17 Q. Just so I am clear, and this is about as far into  
18 these reports as I'm prepared to go, the report  
19 which is later in time is a residue test. The  
20 report which is earlier in time is an air test  
21 which also included gathering of residue from  
22 burned rods?  
23 A. That's correct.  
24 Q. Which then became a part of the report which is  
25 later in time?

1 Dr. Dement Page 78  
2  
3 A. That's correct. The same experiment generated both  
4 the airborne sampling and the residue that was  
5 looked at, and what is called report one now is  
6 actually later in time.  
7 Q. I did note in the time that I had to try to get  
8 through this that there are on the second from the  
9 last page of Exhibit No. 2 photocopies of what  
10 appear to be photomicrographs?  
11 A. That's correct.  
12 Q. Are there prints of those photomicrographs  
13 available?  
14 A. I can't tell you. Probably if they were, they were  
15 sent with the original report that went to Ness,  
16 Motley.  
17 Q. Are they your photomicrographs?  
18 A. No. These were done by the laboratory that did the  
19 analysis of the samples.  
20 Q. Where is that laboratory located?  
21 A. It's indicated. It's Materials Analytical  
22 Services.  
23 Q. Where are they if you know?  
24 A. I'm trying to find their letterhead. They have two  
25

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2  
3 offices. They were in the Norcross, Georgia,  
4 office.  
5 Q. Do you know enough about the photomicrographic  
6 process to know whether there might be negatives of

7 some sort available from which prints could be  
8 made?  
9 A. There are likely exist at the laboratory for  
10 transmission electron microscopy usually generate a  
11 glass plate which is then used to produce a  
12 micrograph, so there probably are at least glass  
13 plates or something similar.  
14 Mr. Crumplar: Let me just say if you want  
15 such things, write me a letter, and I'll try to --  
16 I can't give any because I don't have them. I have  
17 exactly what you have, but I can at least use my  
18 best efforts to try to get it for you.  
19 Mr. Davies: I appreciate that.  
20 Q. Doctor, I don't have any other questions for you.  
21 Mr. Davies: I do want to put on the record  
22 what I indicated to Mr. Crumplar just a few minutes  
23 ago off the record and that is that it is my  
24 intention to file at the earliest possible time  
25 with the court a motion to preclude Dr. Dement from

1 Dr. Dement Page 80  
2  
3 testifying regarding the fact that he has done  
4 testing or what the results of the testing might be  
5 or, in the alternative, to postpone the trial of  
6 the Przybylski case until such time as we have had  
7 a fair opportunity to analyze the test data that  
8 was given to me this morning.  
9 Mr. Crumplar: Let me just say that I  
10 understand Mr. Davies' position. I think he would  
11 have the time today to question the doctor at  
12 greater length on these reports and still perhaps  
13 reserving the ability to do a brief follow-up  
14 deposition, but I understand. I just don't want  
15 the record to show that I am agreeing with the  
16 choice that he's presented.  
17 Mr. Davies: I understand your position. You  
18 attribute to me far greater technical skills than I  
19 have.  
20 Witness: Can I make one statement to the  
21 record? I didn't deliberately withhold information  
22 to the court or to this record. This study was  
23 done as part of a consulting arrangement. It was  
24 confidential. I was not in a position of releasing  
25 this information until I was told I could do so.

1 Dr. Dement Page 81  
2  
3 Mr. Davies: Doctor, if I have done or said  
4 anything to suggest that I felt that way, I did not  
5 mean to. I understand your position in this thing,  
6 and I in no way was suggesting or accusing you of  
7 any wrongdoing whatsoever with respect to the  
8 release of these reports.  
9 (Thereupon, the witness was dismissed.)  
10

Dr. Dement Page 82  
WITNESS' SIGNATURE PAGE  
I have read the foregoing pages, numbered 6  
through 81 inclusive, which contain a correct  
transcription of answers made by me to the  
questions therein recorded, with the exception(s)  
and/or addition(s) reflected on the correction  
sheet attached hereto, if any.  
Signed this the \_\_\_\_\_ day of \_\_\_\_\_  
1996.  
JOHN DEMENT, PH.D.  
\*\*\*\*\*  
STATE OF: \_\_\_\_\_  
COUNTY OF: \_\_\_\_\_  
Subscribed and sworn to before me this the \_\_\_\_\_  
day of \_\_\_\_\_, 1996.  
NOTARY PUBLIC  
My commission expires: \_\_\_\_\_ (SEAL)  
Dr. Dement Page 83  
STATE OF NORTH CAROLINA  
COUNTY OF LEE  
C E R T I F I C A T E

I, KIMBERLY A. PETRARCA, Notary Public/Court Reporter, do hereby certify that JOHN DEMENT'S, PH.D., said deposition was taken and transcribed under my supervision; and that the foregoing pages numbered 6 through 81 constitute a true and accurate transcript of the testimony of the witness.

I do further certify that I am not of counsel for, or in the employment of either of the parties to this action, nor am I interested in the results of this action.

IN WITNESS WHEREOF, I have hereunto subscribed by name this 7th day of January, 1996.

Kimberly A. Petrarca, CVR  
NOTARY PUBLIC FOR THE  
STATE OF NORTH CAROLINA

MY COMMISSION EXPIRES:  
MARCH 13, 1998

\*\* NOTES \*\*

\*\* NOTES \*\*

## PAGESAVER KEYWORD INDEX - SINGLE FILE INDEX

In Re: Asbestos Litigation  
Moore Trial Group  
Limited to: S. Przybylski  
Elam Trial Group  
Limited to: V. August ]

Deposition of John Dement

DATE(s): January 3, 1996

COMMENTS:

NOTES:

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