

SUPREME COURT: ALL COUNTIES
WITHIN THE STATE OF NEW YORK

IN RE: NEW YORK CITY :
ASBESTOS LITIGATION :
: DEPOSITION UPON
This Document Applies To: : ORAL EXAMINATION
: OF
CHARLES HAUCK : LEWIS BRINGMAN
----- :

T R A N S C R I P T of the deposition of
LEWIS BRINGMAN, called for Oral Examination in the above
entitled action, said deposition being taken pursuant to
Rules governing Civil Practice in the Courts of New York,
by and before KERRY D. HALPERN, a Notary Public and
Shorthand Reporter of the State of New York, at the LAW
OFFICES of DeCICCO, GIBBONS & McNAMARA, ESQS, 14 East
38th Street, New York, NY 10016, on Tuesday, December
20, 2005, commencing at 10:00 a.m.

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Draft Copy

Page 2 1 IT IS HEREBY STIPULATED AND AGREED 2 by and between the attorneys for the respective parties 3 hereto that filing, sealing and certification of the 4 within Examination Before Trial be waived; that all 5 objections, except as to form, are reserved to the time 6 of trial. 7 IT IS FURTHER STIPULATED AND AGREED 8 that the transcript may be signed before any Notary 9 Public with the same force and effect as if signed before 10 a Clerk or Judge of the Court. 11 IT IS FURTHER STIPULATED AND AGREED 12 that the within examination may be utilized for all 13 purposes as provided by the CPLR. 14 IT IS FURTHER STIPULATED AND AGREED 15 that all rights provided to all parties by the CPLR shall 16 not be deemed waived and the appropriate sections of the 17 CPLR shall be controlling with respect thereto. 18 IT IS FURTHER STIPULATED AND AGREED by and 19 between the attorneys for the respective parties hereto 20 that a copy of this Examination shall be furnished, 21 without charge, to the attorney representing the witness 22 testifying herein. 23 24 25	Page 4 1 FOR THE DEFENDANT TREADWELL: 2 McGIVNEY & KLUGER, P.C. 3 BY: ROBERT K. GUNN, ESQ. 4 80 Broad Street 5 20th Floor 6 New York, NY 10007 7 8 FOR THE DEFENDANT GOULDS PUMPS: 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 3 1 A P P E A R A N C E S: 2 FOR THE PLAINTIFF: 3 WEITZ & LUXENBERG, P.C. 4 BY: CHRIS ROMANELLI, ESQ. 5 180 Maiden Lane 6 17th Floor 7 New York, NY 10038 8 9 FOR THE DEFENDANT KOPPERS: 10 11 DeCICCO, GIBBONS & McNAMARA, ESQS. 12 BY: DANIEL McNAMARA, ESQ. 13 14 East 38th Street 14 New York, NY 10016 15 16 FOR THE DEFENDANT GENERAL ELECTRIC: 17 18 SEDGWICK, DETERT, MORAN & ARNOLD, P.C. 19 BY: MARTIN HEALY, ESQ. 20 125 Broad Street 21 New York, NY 10004 22 23 FOR THE DEFENDANT VIACOM, INC.: 24 25 MALABY, CARLISLE & BRADLEY, LLC BY: GRACE DeMARIO, ESQ. 150 Broadway New York, NY 10038 FOR THE DEFENDANT AMCHEM: FOR THE DEFENDANT UNION CARBIDE: ANDERSON, KILL & OLICK, P.C. BY: JONATHAN KROMBERG, ESQ. 1251 Avenue of the Americas New York, NY 10020-1182 22 23 24 25	Page 5 1 I N D E X 2 3 WITNESS: LEWIS BRINGMAN 4 EXAMINATION PAGE 5 MR. ROMANELLI 7 6 7 8 EXHIBITS: 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

Page 6 1 MOVE TO STRIKE: 2 PAGE LINE 3 None 4 5 MARK FOR RULING: 6 PAGE LINE 7 None 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 8 1 If you can make an effort to answer yes 2 or no questions with the words yes or no as opposed to 3 uh-huh or uh-uh because they both appear the same on the 4 transcript, I would ask you to do that too. 5 It is also much easier for the court 6 reporter if we each wait for the other to finish before 7 responding, otherwise the transcript is very difficult to 8 read. I will ask that you wait until I am finished 9 asking my question before you answer, and I will try and 10 extend the same courtesy. Unlike a normal conversation 11 where people talk back and forth and process it in their 12 mind, it is a little difficult for the court reporter to 13 take it down and for people read back and forth. 14 If there is anything that you don't 15 understand, please let me know, and I will try to 16 rephrase the question. If there is anything that you 17 don't know the answer to, I don't know is a perfectly 18 acceptable answer. If there's something that you might 19 have known but you don't any more, I don't know is a 20 perfectly acceptable answer. 21 (Pause in proceedings.) 22 Q. There is no need to guess. If you want 23 to estimate based on facts, that is fine, but guessing is 24 something that's not appropriate for deposition. 25 Do you understand those instructions?
Page 7 1 LEWIS BRINGMAN, 2 having first been duly sworn, was 3 examined and testified as follows: 4 5 EXAMINATION 6 MR. ROMANELLI: 7 Q. Mr. Bringman, my name is Chris 8 Romanelli, and I represent the spouse of somebody who 9 died of mesothelioma. 10 I am here to take your deposition today 11 in connection with this case. I am going to ask you a 12 series of questions and ask you to do your best to answer 13 them. 14 The first question is, have you ever 15 been deposed before? 16 A. No. 17 Q. Then, let me take a little time and give 18 you the instructions. 19 A. Okay. 20 Q. Because the court reporter is taking 21 down our words, and it is easier for her to take down 22 words than gestures, we are going to ask that all of your 23 questions -- all of your responses rather be verbal, that 24 you respond in words, because things like shaking the 25 head and nodding of the head turn out ambiguous.	Page 9 1 A. Yes. 2 Q. Can you state your name and address 3 again for the records? 4 A. Lewis Bringman, 800 Brinkwood Road, 5 Baltimore, Maryland 21229. 6 Q. Is that your home address? 7 A. Yes, it is. 8 Q. Okay. 9 Mr. Bringman, what is your date of 10 birth? 11 A. October 18, 1942. 12 Q. Are you currently employed? 13 A. Yes. 14 Q. What do you do? 15 A. Air pollution control engineer on a 16 consultant -- on a contract basis. 17 Q. How many hours in 2005 did you spend 18 working in air pollution control? 19 A. Hours? 20 Q. Hours. If you can estimate. 21 A. Days. 22 Q. However you want to estimate it is fine. 23 A. 200 days. 24 Q. So, it's a relatively full-time 25 position?

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1 A. Yes.
2 Q. Are your offices in your home or do you
3 have offices someplace else?
4 A. Out of my home when. I work out of my
5 home.
6 Q. Okay.
7 Do you have a corporation?
8 A. Yes.
9 Q. What is the name of the corporation?
10 A. Lewis B. Bringman LLC.
11 Q. Okay.
12 What kind of things do you do in
13 consulting on a contract basis for doing this air
14 pollution control work?
15 A. I assist in the design and the sizing of
16 electrostatic precipitators primarily to the pulp and
17 paper industry now. I have two general employers. One
18 of them is in Brazil and one of them is in the United
19 States here in Alabama.
20 Q. What is the name of the company that is
21 in Brazil?
22 A. Enfil, E-N-F-I-L.
23 Q. What is the name of the company that is
24 in Alabama?
25 A. AirTek and that is spelled A-I-R capital

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1 T-E-K. Both of those are on contract basis, not an
2 employee, but on an contract employee basis.
3 Q. Okay.
4 Do you work for any other companies --
5 have you worked for any other companies on a contract
6 basis within the last two or three years?
7 A. Yes.
8 Q. What other companies?
9 A. Environmental Elements Corporation.
10 Q. Anyone else?
11 A. International Paper Company.
12 Q. Let me go back a little bit and move
13 forward. I think it will be a little easier to set it up
14 the chronology that way.
15 Where did you go to high school?
16 A. Milford Mills High School.
17 Q. Where is that?
18 A. Baltimore County, Maryland.
19 Q. Did you graduate?
20 A. Yes.
21 Q. What year?
22 A. 1960.
23 Q. What did you do after you graduated
24 Milford Mills High School in 1960?
25 A. Went in the Army.

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1 Q. How long did you go in the Army for?
2 A. Eight months.
3 Q. What did you do after that?
4 A. I was employed by Koppers Company.
5 Q. So, you first became employed by Koppers
6 Company in about 1960, 1961?
7 A. April 1961.
8 Q. April '61.
9 How long did you work for Koppers
10 Company for?
11 A. Until it was split or until the division
12 that I worked with was to be purchased by environmental
13 Elements Corporation, 1983.
14 Q. What did you do after that?
15 A. I worked for Environmental Elements
16 Corporation who was the successor to Koppers.
17 Q. How long did you work for Environmental
18 Elements Corporation?
19 A. Until June 2003.
20 Q. Is that when you started consulting
21 after that?
22 A. Generally, yes.
23 Environmental had a corporate downsizing
24 and I retired.
25 Q. Okay.

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1 You answered my next question.
2 A. Okay.
3 Q. When you first started working for
4 Koppers Company in 1961, what was your job?
5 A. Engineering clerk.
6 Q. How long did you do that for?
7 A. For two years probably.
8 Q. What did you do as an engineering clerk?
9 A. Ran the engineering department from a
10 clerical point of view, retrieved drawings, filed
11 drawings, maintained the files, etc., etc.
12 Q. All right.
13 A. Got coffee for everybody.
14 Q. After -- what job did you next have at
15 Koppers after you were an engineering clerk for about two
16 years?
17 A. Proposal drafter.
18 MR. ROMANELLI: I am sorry.
19 Can you read that back.
20 (The last answer was read back.)
21 Q. How long did you do that for?
22 A. Five years?
23 Q. What did you do on a daily basis -- on a
24 regular basis as a proposal drafter?
25 (Interruption by door.)

Page 14 1 MR. ROMANELLI: Please read 2 the question back. 3 (The last question was read back.) 4 A. Generate or made drawings of the sizes 5 of the precipitators to be included in the proposals that 6 were sent to customers. 7 Q. During the five years that you were a 8 proposal drafter for Koppers Company, what customers did 9 you interact with, if any? 10 A. Generally, the full spectrum of the 11 industries that Koppers Company was supplying 12 precipitators to steel industry. The major steel 13 players, U.S. Steel, Youngstown Steel, Granite City 14 Steel, Great Lakes Steel. The major paper companies, 15 International Paper Company, Georgia-Pacific. Cement 16 companies, Lehigh, etc. 17 Q. Any power companies? 18 A. Yes. 19 Q. What power companies? 20 A. American Electric Power, Monongahela 21 Power. 22 MR. McNAMARA: Can you spell 23 that? If you can't, that is fine. 24 A. How about Allegheny Power, that's 25 easier.	Page 16 1 provide, so that I could make our machinery fit within 2 the confines of the plant drawings? 3 Q. Okay. 4 Would you ever review -- did you ever 5 review any contracts between Koppers Company and any of 6 the customers? 7 A. No. 8 Q. Did you ever review any of the 9 conditions that they required? 10 A. No. 11 Q. Who, if anyone, would do that? 12 A. That was the proposal engineers 13 function. 14 Q. What were the names of the proposal 15 engineers that you remember working for during that 16 five-year period 17 A. Walter West, Charles Strasser, 18 S-T-R-A-S-S-E-R, Clinton Johnson, Henry Wise and the 19 manager of the operation was Gene Stastny, S-T-A-S-T-N-Y. 20 He was the manager. 21 Q. Are any of these -- is Walter West 22 alive? 23 A. To the best of my knowledge, yes. 24 Q. Is Charles Strasser alive? 25 A. He just retired, yes.
Page 15 1 Q. Other than -- did you ever have any 2 interaction with Con Edison? 3 A. I do not remember specifically Con 4 Edison. 5 Q. Did you typically interact -- with 6 whom -- did you interact with anybody at the customers 7 while you were doing the drawings? 8 A. No. It was all in-house with the 9 proposal engineer and the sales engineer. 10 Q. Would the proposal engineer, if you 11 know, interact with the customer at all? 12 A. Yes. 13 Q. Would the sales engineer interact with 14 the customer? 15 A. Yes. 16 Q. And you would create drawings based on 17 your interaction with the proposal engineer and/or sales 18 engineer? 19 A. That is correct. 20 Q. Did you ever review documents that the 21 customers would provide? 22 A. No. 23 Q. Okay. 24 A. Well, I take that back. I would see 25 drawings of plant layouts that the customer would	Page 17 1 Q. Is Clinton Johnson alive? 2 A. I do not know. 3 Q. Is Henry Wise alive? 4 A. No. 5 Q. Is Gene Stastny alive? 6 A. I do not know. 7 Q. After you worked as a proposal draft -- 8 let me ask you a different question. 9 Do you know the names of any of the 10 sales engineers that you worked for? 11 A. Yes. 12 Q. Who are the sales engineers that you 13 worked for? 14 A. That would be Richard, the last name is, 15 Dissinger, D-I-S-S-I-N-G-E-R. He is deceased. 16 Q. Okay. 17 A. Stuart Edwisel (phonetic) and he is 18 deceased. Carl Einbrod, E-I-N-B-R-O-D, and he is still 19 alive. 20 Q. Okay. 21 Does Carl Einbrod still work for -- let 22 me ask you another question. 23 Is Carl Einbrod employed? 24 A. Retired. 25 Q. Retired?

Page 18 1 A. To the best of my knowledge. 2 Q. Is Walter West employed? 3 A. I do not know. 4 Q. Is Charles Strasser employed? 5 A. I heard that he retired this year. 6 Q. Okay. 7 And you don't know if Gene Stastny is -- 8 A. I do not know his status. 9 Q. You do not know? 10 A. No. 11 Q. Okay. 12 For the five years that you worked as a 13 proposal drafter, what did you do after that? 14 A. During that time period, Koppers Company 15 paid my tuition to go to college, and when I graduated 16 from night school they moved me into the proposal 17 engineering department as proposal engineer. 18 Q. So, you went to college at night during 19 that period of time? 20 A. Yes, Johns Hopkins. 21 Q. Where did you go to college? 22 A. Johns Hopkins. It was local. 23 Q. Did you graduate from Johns Hopkins? 24 A. Yes. 25 Q. What degree did you get?	Page 20 1 that. 2 After you worked as a contract 3 administrator, what did you do? 4 A. I went back into proposal engineering. 5 Q. What was your title? 6 A. Proposal engineer. 7 Q. How long did you do that for? 8 A. Until I split to Coppersburg and until 9 Environmental Elements did the leverage buy-out. 10 Q. What did you do after? 11 A. The same thing, proposal engineering for 12 Environmental Elements. 13 Q. Let me ask you a question. The period 14 from 1980 until your retirement, if I compared -- let me 15 ask it a different way. If you compared your -- forget 16 it. 17 During the time '72 to '75 when you were 18 a proposal engineer, what customers did you interact 19 with, if any? 20 A. American Electric Power, International 21 Paper Company, Georgia-Pacific Corporation, I know Great 22 Lake Steel Corporation. It was -- I was a general 23 proposal engineer and the next inquiry that came through 24 the door the manager assigned it to the person who was 25 the least busy.
Page 19 1 A. Bachelor of the science. 2 Q. In what discipline? 3 A. Industrial management. 4 Q. Okay. 5 How long did you work in the proposal 6 engineering department for? 7 A. Just a couple of years, and then they 8 moved me into the contract administration group. 9 Q. While you were working in the proposal 10 engineering department, what was your title? 11 A. Proposal engineer. 12 Q. After you did that, you went into the 13 contract administration department? 14 A. Yes. 15 Q. What was your title? 16 A. Contract administrator. 17 Q. How long did you do that for? 18 A. Three or four years. 19 Q. When you said a few years as a proposal 20 engineering, can you give me a tighter estimate of that? 21 A. I graduated in 1972, so it was '72 22 through probably '75, and then '75 through probably '80 23 as the contract group, and then back in the proposal 24 engineering. 25 Q. Let me just get the time line down after	Page 21 1 Q. Okay. 2 What did you generally do as a proposal 3 engineer? 4 A. Took the customer's specifications for 5 his requirements, generated the internal paperwork to get 6 a drawing made by a proposal drafter, and then processed 7 the paperwork through the estimating department so that a 8 price would be generated, wrote the proposal, made sure 9 it got out the door and it is on time. After the 10 proposal is submitted to the customer, answer the 11 technical and some commercial questions that the customer 12 would have, interface with the customer during technical 13 presentations either at his facility or his architect 14 engineer's facility. 15 Q. In your career, have you ever had any 16 interaction with Con Ed? 17 A. No. 18 Q. But, you have had interaction with other 19 power generation facilities? 20 A. Yes. 21 Q. Explain to me what you did as a contract 22 administrator on a regular basis? 23 A. After Koppers Company received a 24 contract, they would take it out of the proposal group 25 and give it to the contract group. The contract

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1 administrator was pretty much a paper follower, made sure
2 that the schedules were maintained, that the purchasing
3 department actually purchased the material that the
4 engineering department requisitioned. Just a general
5 make sure things get done on time.
6 Q. Okay.
7 As a proposal engineer in the beginning
8 of 1980, were your tasks any different from what you did
9 in the 1972 to 1975 period?
10 A. Only in the respect that the client base
11 shifted. I became more of a specialist in the paper
12 industry --
13 Q. Okay.
14 A. And did not work in the steel and the
15 utility industry as much.
16 Q. When you were working as a proposal
17 engineer from '72 to '75, explain to me how often you
18 would visit a power generation facility.
19 Let me actually ask a broader question
20 first.
21 A. Okay.
22 Q. How often would you visit a customer's
23 facility regardless of the type of customer it was, if
24 you can estimate? If you can't, say so.
25 A. You always want to get in front of the

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1 customer to be honest. You know, if you work in front of
2 the customer, you have a better chance to get the job.
3 Q. It's harder to chase you out if they
4 know your face.
5 A. That's correct. 30 percent of the time
6 or 30 percent of the projects you actually got to see the
7 customer.
8 Q. About how much of that was power
9 generation?
10 A. 50/50.
11 Q. Okay.
12 Did you review any documents in
13 preparation of your deposition today?
14 A. Only the ones that were sent to me.
15 Q. Do you know what they were?
16 A. They were the depositions I think from
17 Mary Wright and there were some drawings and --
18 MR. McNAMARA: By counsel,
19 they were the interrogatory answers
20 with annexations.
21 MR. ROMANELLI: Okay, that's
22 fine.
23 Again, everything he has
24 reviewed I have been provided with?
25 MR. McNAMARA: Yes.

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1 Q. How are records currently maintained at
2 Beazer slash Koppers?
3 A. I do not know other than what's in the
4 document retention or records file.
5 Q. Do you have any knowledge of who you
6 contacted there if you needed a document --
7 A. No.
8 Q. -- from Koppers.
9 A. No.
10 Q. Do you maintain any documents from your
11 work at Koppers in your own personal possession?
12 A. No.
13 Q. Do you participate in -- I am fairly
14 sure I know the answer, but I have to ask the question
15 anyway.
16 Did you participate in looking for
17 documents in response to our inquiry to Mr. McNamara?
18 A. To McNamara?
19 Q. Right. As the lawyer for Koppers.
20 A. No.
21 Q. Explain to me what a precipitator is?
22 A. When you burn a fossil fuel or an
23 industrial -- well, I will use a coal-fired boiler since
24 that is what we are talking about.
25 When you burn coal, you generate soot or

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1 ash. In the industry, that is termed flyash. Some of it
2 stays in the boiler and comes out as bottom ash. The
3 rest of it goes out with the exhaust gas and that is
4 called -- and that is referred to as the flyash. The
5 precipitator is a mechanical electrical device that is
6 between the boiler and the chimney, and it removes a
7 certain percentage of the ash that is entrained in the
8 gas before it goes up the chimney.
9 Q. Just so the jury and I can understand,
10 how does the precipitator remove that dust?
11 A. It works very -- it puts an
12 electrostatic charge. Probably an analogy is like a
13 static electricity charge when you rub a balloon on a
14 sweater and then sprinkle some dust, the dust will adhere
15 to the balloon surfaces. It's the same way only you use
16 much higher voltages and much more sophisticated
17 controls.
18 Q. Was the concept of a precipitator ever
19 patented?
20 A. I do not know.
21 Q. Do you know if Koppers had its own
22 research department?
23 A. Koppers had a research department. I am
24 aware of that.
25 Q. What did the research department do?

Page 26 1 A. I do not know. They were in Verona, 2 Pennsylvania. That's what I know. 3 Q. The precipitator, what is it connected 4 to, if anything, in, let's say, a powerhouse? 5 A. The boiler on one side via some duct 6 work. 7 Q. Right. 8 A. Generally, a fan on the other side which 9 sucks the gas through the system, and then out the 10 chimney. 11 At the bottom, there are an ash removal 12 system to remove the flyash that the precipitator 13 collects. 14 Q. How hot is the gas going into the 15 precipitator? 16 A. It varies depending on the application. 17 Q. In a power generation facility? 18 A. In a power generation, they generally 19 run between 250 and 350 degrees Fahrenheit. 20 Q. What is the temperature of the exhaust 21 gas? 22 A. Optimally the same. There is some 23 temperature loss, but it is 20 degrees, 30 degrees, 24 maximum. 25 Q. Is the gas ever heated within the	Page 28 1 the surfaces. 2 Q. What form was this insulation? 3 A. Mineral wool. 4 Q. When I say "form," I mean, what did it 5 look like? Were there blankets? Was there block? Was 6 there cement? 7 Let me just ask you this question 8 specifically. Was the mineral wool that you are talking 9 about in a blanket form? 10 A. Yes, generally. 11 Q. Where would the blankets be used on the 12 precipitator? 13 A. On the outside walls. 14 Q. What about block, would block be used on 15 a precipitator? 16 A. Sometimes. 17 Q. What was the block made of? 18 A. Calcium silicate generally. 19 Q. Do you know what brands? 20 A. No. 21 Q. What about cement, would cement be used 22 on a precipitator? 23 A. No. 24 Q. How do you know that mineral wool and 25 block were used on a precipitator?
Page 27 1 precipitator? 2 A. No. 3 Q. When you say there is some heat loss, 4 about how much heat loss would you say there is? 5 A. 20 degrees generally is what you see. 6 Q. Did the precipitator contain asbestos 7 back when you were working as a proposal engineer from 8 '72 to '75? 9 A. No. 10 Q. Did it ever? 11 A. Yes. 12 Q. When did it contain asbestos? 13 A. Some in the early days there was 14 asbestos in it. 15 Q. Where would the asbestos be? 16 A. Gaskets generally. 17 Q. Where would the gaskets be? 18 A. Between flanges. 19 Q. Was there any thermal insulation on a 20 precipitator at any point? 21 A. Yes. 22 Q. Where would it be? 23 A. On the outside. 24 Q. Where on the outside? 25 A. Around the entire -- its perimeter, all	Page 29 1 A. I don't understand. 2 Q. Did you see it? 3 A. Yes. I have seen it. 4 Q. Where have you seen it? 5 A. On precipitators in the field during 6 construction. 7 Q. What locations or what types of 8 locations? 9 A. Paper mills, cement plants, utilities. 10 Q. Is there any difference in the 11 temperature of the exhaust gas in a paper mill as opposed 12 to power generation facility? 13 A. Sometimes, yes. 14 Q. What's the difference? 15 A. Some applications are hotter. 16 Q. Which applications? 17 A. Lime kilns. 18 Q. How hot are lime kilns? 19 A. 400, 500 degrees. 20 Q. The reason for that? 21 A. It's a process application. 22 Q. Is there any difference in how a 23 precipitator is insulated in a paper mill as opposed to a 24 power generation facility? 25 A. Only in the thickness.

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1 Q. What is the difference?
2 A. Power generation, usually two to three
3 inches. Lime kilns five to six inches thick.
4 MR. ROMANELLI: Can we go off
5 the record for just a second?
6 (Pause in proceedings.)
7 Q. Did a precipitator ever contain asbestos
8 pads to your knowledge?
9 A. Not that I am aware of.
10 Q. Did you ever see a precipitator while it
11 was being installed?
12 A. Yes.
13 Q. How many times?
14 A. Many.
15 Q. Okay.
16 I was going to say you don't have to
17 give me a number. Just a lot or a little would be fine.
18 What trades would participate in the
19 installation of a precipitator?
20 A. The building trades, primarily
21 boilermakers, electricians, for the steel construction
22 pipefitters, insulation contractor, insulators, sheet
23 metal workers. It depends on the area and which trade
24 claims the work.
25 Q. Okay.

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1 Did Koppers ever hire any of these
2 trades?
3 A. Yes.
4 Q. So, did it hire boilermakers?
5 A. I would expect, yes.
6 Q. Did it hire sheet metal workers?
7 A. Generally or with respect to Con Ed?
8 Q. Generally.
9 A. Yes.
10 Q. Is your answer different with respect to
11 Con Ed?
12 A. Yes.
13 Q. What's the answer?
14 A. Koppers Company did not furnish the
15 insulation on the Con Ed contracts, therefore, they would
16 not have hired insulation or sheet metal workers.
17 Q. I was talking about -- fine.
18 Who supplied the insulation?
19 A. I do not know.
20 Q. How do you know what was just told me?
21 A. One of the documents in the files there
22 shows that the thermal insulation was not furnished by
23 Koppers Company.
24 Q. What about did Koppers ever hire
25 electricians?

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1 A. Yes.
2 Q. Okay.
3 What about with respect to Con Edison?
4 A. I do not know personally.
5 Q. Okay.
6 Do you know through any other source
7 whether Con Ed --
8 A. No.
9 Q. Just so I am clear, Koppers would hire
10 sheet metal workers. It would hire insulators. But with
11 respect to the Con Ed documents that you have seen, it
12 did not in those circumstances hire insulators or sheet
13 metal workers?
14 A. For the precipitator work, that is
15 correct.
16 MR. McNAMARA: When you say
17 hire are you referring to direct
18 employee or possibly some contracting
19 or both?
20 MR. ROMANELLI: Both.
21 MR. McNAMARA: I want to make
22 sure you understand that.
23 Q. Did you understand my question to --
24 A. Yes.
25 Q. -- be as direct employee versus

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1 subcontractor.
2 A. Generally, thermal insulation contracts
3 are let to an insulation contracting company who hires
4 his own employees and furnishes the material.
5 Q. Understood.
6 But, there are circumstances where
7 Koppers would subcontract out the insulation work. Is
8 that correct?
9 A. That is correct.
10 Q. How essential are the ducts connecting
11 the boiler to the precipitator?
12 MR. McNAMARA: I will object
13 as to the form.
14 You can answer it if you
15 understand.
16 You mean without ducts?
17 Q. Would the precipitator work without
18 ducts connecting it to the boiler?
19 A. No.
20 Q. Would the precipitator work without
21 ducts connecting it to the exhaust stack?
22 A. No.
23 Q. Are there any different types of
24 precipitators?
25 Do you understand that?

Page 34 1 A. No. 2 Q. For example -- let me give you an 3 example. There are water tube and fire tube boilers. 4 You understand that? 5 A. Yes. 6 Q. Are there different types of 7 precipitators or are they generally the same and they 8 operate on the same principal? 9 A. They all operate on the same principle. 10 There are wet precipitators and there are dry 11 precipitators. 12 Q. What's the differences? 13 A. A wet precipitator operates at a 14 temperature under the boiling point of water, you know, 15 150, 200 degrees, and they have sprays for irrigation 16 systems to remove the collected material, and they are 17 generally smaller in size. Dry precipitators are large 18 machines and they remove the material by shaking or 19 vibrating the components. 20 Q. Is your experience with the dry 21 precipitators? 22 A. A little bit of -- more dry. I have a 23 little bit of wet experience. 24 Q. Generally, what we have been talking 25 about, the type of precipitator that is at a power	Page 36 1 A. Yes. The ones from the depositions. 2 MR. McNAMARA: Off the record. 3 (Discussion held off the 4 record.) 5 Q. Would the proposal engineering 6 department's relationship with the customer end when the 7 precipitator was installed and finished -- completed? 8 A. Yes, technically. 9 Q. Well, what do you mean by technically? 10 A. After the contract was signed and all of 11 the documentation was turned over to the engineering 12 department, the proposal engineer went on to the next 13 proposal. If a question came up as to why things were 14 done certain ways, it may come back to the proposal 15 engineer for questions. 16 Q. But, who would come back to the proposal 17 engineer? 18 A. The contract administrator section or 19 one of the engineers working on the project on the 20 contract side. 21 Q. Would the customer have any point of 22 contact for problems that arose after the contract was 23 completed at Koppers? 24 A. Generally through the sales department. 25 Q. Okay.
Page 35 1 generation facility would be a dry precipitator? 2 A. In the vintage we are talking about, 3 yes. 4 Q. Are you aware of -- what locations -- 5 what Con Ed powerhouses were Koppers precipitators 6 installed in? 7 A. There's a list in the Interrogatories. 8 The top of my head, Ravenswood or is 50 and 60 at 39th 9 Street or 59 Street or something like that, Astoria and 10 Kips Bay are the ones that I can remember offhand. 11 Q. What about East River? 12 A. Yes, East River. 13 Q. How many Koppers precipitators were 14 installed at East River? 15 A. Is that boiler 50 and 60? 16 Q. I will tell you in a second. 17 MR. McNAMARA: Yes. 18 A. Yes. There are two then. One for 19 boiler 50 and one for boiler 60. 20 Q. Are you aware of whether they are still 21 in operation? 22 A. No. I am not. I see by the sheet that 23 they have been decommissioned. 24 Q. And that's the sheet that you referred 25 to with counsel for Koppers earlier?	Page 37 1 Was there any service department at 2 Koppers? 3 A. Yes. 4 Q. What was the name of that department? 5 A. The test and service group. 6 Q. Did they provide -- what kind of 7 services did they provide for customers? 8 A. Service engineering facilities that when 9 the customer had a problem that he could not solve with 10 his own maintenance people they would call the 11 manufacturer to send out an expert. 12 Q. Did the test and service group perform 13 these functions as part of its initial contract for the 14 installation of the precipitator, or was there a separate 15 service contract, or something different? 16 A. The service engineers did the inspection 17 before start up or before turnover, and then it was 18 as-called basis by the customer. 19 Q. What do you mean by as-called? 20 A. It may go one, or two, or three years, 21 or they may never call, the customer may never call. 22 Q. Was this something that Koppers provided 23 as part of its installation? 24 A. No. It was aftermarket work. 25 Q. I am trying to analogize it to -- was

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1 this on a per call basis?
2 A. Yes.
3 Q. So, it is not analogous to, let's say, a
4 car warranty -- let me withdraw that.
5 Was there any sort of warranty period
6 within which a customer could call Koppers and say
7 something is wrong with the precipitator and can you send
8 somebody out to look and I am not paying for it?
9 A. Standard was 12 months after startup or
10 18 months after shipment, whichever occurs first.
11 Q. How often during your tenure did service
12 engineers visit customers after the precipitators had
13 been installed within that warranty period?
14 A. Very greatly on the installations.
15 Q. Okay.
16 Can you give me a range over which that
17 would --
18 A. Not really.
19 Q. At power generation facilities, how
20 often would -- let me just ask you generally.
21 How often would a service representative
22 visit a power generation facility to look at a
23 precipitator that had been installed?
24 A. Power generation facilities are
25 generally vary reliable. Therefore, they only come down

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1 once a year for their annual outage inspection things --
2 Q. Okay.
3 A. -- and typically the plant people did
4 those inspections.
5 Q. When you say "the plant people," who do
6 you mean?
7 A. Plant maintenance facilities.
8 Q. The power generation plant maintenance
9 people?
10 A. Yes.
11 Q. Would Koppers service employees ever
12 participate --
13 A. Yes.
14 Q. -- in those inspections?
15 A. Yes.
16 Q. What kind of things would they inspect,
17 Koppers people?
18 A. Look for corrosion, make sure the
19 alignment is proper. You know, alignment. There are
20 high voltage and grounded surfaces. If they get too
21 close to one other --
22 Q. They short?
23 A. -- they will short, so the spacing is
24 critical.
25 Q. Where would they look for corrosion?

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1 A. Around doors and around areas that
2 historically have corrosion.
3 Q. What areas would typically be --
4 A. Corners.
5 Q. What was the precipitator made out of?
6 A. Carbon steel.
7 Q. Was that all the time?
8 A. For utilities, yes.
9 Q. Other than checking alignment and
10 checking for corrosion, what else, if anything, would
11 service employees for Koppers check at a customer's side?
12 A. If the controls don't work, why do not
13 they work or why don't they work.
14 Q. That would be the electrical controls?
15 A. Yes.
16 Q. Are you aware of who -- did Koppers have
17 any competitors in the precipitator business?
18 A. Yes.
19 Q. Who were they?
20 A. What vintage?
21 Q. I kind of look at the vintage during the
22 time that you were an employee. Let's end it at '75.
23 From when you started to '75?
24 A. Research-Cottrell.
25 Q. Okay.

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1 A. A company called Western Precipitation
2 or referred to as Joy Western and Koppers were the three
3 major players. There are other smaller companies, a half
4 a dozen or so of those.
5 Q. When did you first -- when did you
6 personally first become aware of the dangers of asbestos?
7 MR. McNAMARA: Objection to
8 the form.
9 You can answer.
10 A. Mid 70s, early 80s.
11 Q. How did you learn that?
12 A. Well, there were some drawings that were
13 changed to remove the word asbest -- or change the
14 material specifications.
15 Q. How were the material specifications
16 changed?
17 A. The word Garlock 605 was taken off and
18 substituted with other materials.
19 Q. Were any changes made to the existing
20 precipitators?
21 A. I don't know.
22 Q. Did you ever personally handle any
23 asbestos-containing products in your work at Koppers?
24 A. No.
25 Q. Were any changes made to external

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1 thermal insulation of any precipitators, if you are
2 aware?
3 A. No. Not that I am aware of.
4 Q. That was a bad question. Let me just
5 ask you.
6 Just so I understand, you are not aware
7 of any changes having been made to external thermal
8 insulation to any of the precipitators that you have
9 worked on since they were installed?
10 MR. McNAMARA: This is now as
11 of the mid '70s or early 80s that you
12 are referring to?
13 MR. ROMANELLI: Well, no. I
14 am not limiting this question to a
15 particular time.
16 Q. Are you aware of any thermal insulation
17 being changed on any of the precipitators that you
18 personally ever worked on?
19 A. No.
20 Q. Are you aware of any thermal insulation
21 being changed on any of the precipitators that Koppers
22 has installed?
23 A. I do not know.
24 MR. ROMANELLI: Now may be a
25 good time for a five-minute break.

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1 MR. McNAMARA: Okay.
2 (Plaintiff's Exhibit KOP-1 was
3 marked for identification.)
4 (A short recess was taken.)
5 Q. Before I get to this, just another
6 question.
7 Would blankets and block be used
8 interchangeably to insulate a precipitator?
9 A. Not generally.
10 Q. How would they be used differently?
11 A. The block insulation was generally put
12 on the roof. The blanket insulation was used everywhere
13 else.
14 Q. How was the blanket insulation attached
15 to the precipitator?
16 A. Pins and then a sheet metal covering
17 over it to keep the weather off of it.
18 Q. Was there anything else put on top of
19 the blanket, to your knowledge?
20 A. No. Not generally, no.
21 Q. How is the block attached to the
22 precipitator?
23 A. Laid on the roof and then a weather
24 proof covering over the top of it.
25 Q. Are you familiar with -- have you ever

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1 seen cement used on top of either blankets or block?
2 A. Yes. Only -- yes.
3 Q. How do you know about blankets and block
4 being used on precipitators? Did you see them in person,
5 or did you see them in drawings or both?
6 A. Both.
7 Q. Are you aware of any -- did you ever see
8 blankets being applied to a precipitator?
9 A. Yes.
10 Q. Did you ever see block being applied to
11 a precipitator?
12 A. Yes.
13 Q. When was the first time that you saw
14 blankets being applied to a precipitator?
15 A. My early days.
16 Q. When was the last --
17 A. '70s. The last time?
18 The last time was three months ago.
19 Q. When was the first time that you saw
20 block being applied to a precipitator?
21 A. Early on, many years ago.
22 Q. When was the last time?
23 A. It's been a long time.
24 Q. Okay
25 MR. McNAMARA: Just so I am

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1 clear, you are not referring
2 necessarily to asbestos-containing
3 blanket or block, correct?
4 MR. ROMANELLI: I am pretty
5 safe in assuming that the -- I am
6 hoping that the blankets applied to a
7 precipitator three months ago wouldn't
8 be asbestos.
9 MR. McNAMARA: Okay. I just
10 want the record to be clear.
11 MR. ROMANELLI: My questions
12 are what they are, though.
13 MR. McNAMARA: Okay.
14 Q. What brands, if any, of blanket are you
15 familiar with?
16 A. Mineral wool.
17 Q. Are you familiar with any specific brand
18 names rather than a trade name?
19 A. John Manville. That was probably the
20 big one at that time. Rockwell.
21 Q. What about block, what brands are you
22 familiar with?
23 A. I'm not generally familiar with the
24 brand names on that, but calcium silicate is a trade
25 name.

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Page 46 1 Q. Does the brand Phillip Carey sound 2 familiar to you? 3 A. I do not know that. 4 Q. Does the brand name Kaylo have any 5 familiarity to you? 6 A. No. 7 Q. You are not aware of the chemical 8 composition of any of the block that's ever been 9 installed? 10 A. Calcium silicate is what I am familiar 11 with. 12 Q. And that is a -- okay. 13 Beyond that name and those words calcium 14 silicate, you have no further knowledge about what the 15 contents of any block installed on any precipitator would 16 be? 17 A. That's correct. 18 Q. Beyond the words mineral wool, you have 19 no knowledge of what the chemical composition of what the 20 blankets installed on a precipitator would be? 21 A. That's correct. 22 Q. Did Koppers maintain an industrial 23 hygiene department at any time? 24 A. I do not know. 25 Q. Did Koppers ever put a warning on a	1 A. No. 2 Q. Has Koppers ever hired a toxicologist? 3 A. I do not know. 4 Q. Has Koppers ever been a member of the 5 Industrial Hygiene Foundation? 6 A. I do not know. 7 Q. How about the National Safety Council? 8 A. I do not know. 9 Q. What about the American Ceramics 10 Society? 11 A. I do not know. 12 Q. What about the American -- has Koppers 13 ever been a member of the American Petroleum Institute? 14 A. I do not know for sure. 15 Q. What about the American Society of 16 Mechanical Engineers? 17 A. Yes. 18 Q. When was Koppers first a member of the 19 American Society of Mechanical Engineers? 20 A. I do not know. 21 Q. Were any officers of Koppers also 22 individual members of the American Society of Mechanical 23 Engineers? 24 A. I do not know. 25 Q. Did Koppers test its products?
	Page 49
Page 47 1 precipitator of any kind? 2 A. Yes. 3 Q. What warnings did it put on a 4 precipitator? 5 A. Danger high voltage. 6 Q. When did it first put a danger high 7 voltage warning on a precipitator? 8 A. Probably year number one. 9 Q. Did it ever put a warning on a 10 precipitator indicating there could be a danger from 11 coming into contact with asbestos? 12 A. No. 13 Q. I want to ask you to look at what's been 14 marked as Plaintiff's KOP-1 for identification. 15 I ask you to just look through that 16 briefly. 17 A. Okay. 18 Q. Is that something that you have seen 19 before? 20 A. Yes. 21 Q. Is this one of the documents that you 22 referred to prior to your deposition? 23 A. Yes. 24 Q. Let me just take that back. 25 Are you familiar with Dr. Anna Baetajr?	1 A. With what respect? 2 Q. Did it test its precipitators prior to 3 selling them to a customer? 4 A. No. 5 Q. Explain to me how it would insure then 6 that the precipitator worked. It is not meant to sound 7 argumentative. It is meant to get an explanation. 8 A. The precipitators are large machines 9 that are fabricated in a fabrication facility, and then 10 erected at the customer's facility, all right. After 11 they were erected, there were performance guaranties that 12 had to be verified. Sometimes Koppers did the testing in 13 the stack to make sure that the removal efficiency of the 14 precipitator met the guaranty. Sometimes the customer or 15 the owner he did that test. Sometimes a third party was 16 hired to do that test. 17 Q. You said that Koppers had an erection 18 facility. Where was that? 19 MR. McNAMARA: You mean a 20 fabricating facility? 21 Q. Fabricating facility. 22 A. Yes. 23 MR. ROMANELLI: Off the 24 record. 25 (Discussion held off the record.)

Page 50 1 Q. Where was Koppers fabrication facility? 2 A. The one that I am familiar with was in 3 Baltimore. 4 Q. How much of the precipitator would be 5 fabricated at that facility? 6 A. Time dependent. In today's market, not 7 very much. Years ago market, very much. 8 Q. But, in the years ago market, just 9 explain to me how they determined -- just exactly what 10 the construction process was? Would they fabricate 11 pieces at the fabrication facility and just bring the big 12 pieces over to the customer or was there certain stuff 13 that got fabricated at the fabrication facility, you 14 know, let's say, electrical components? I am just trying 15 to understand the concept. 16 A. The steel fabrication was generally done 17 in Baltimore by the metal products division's fabrication 18 shops in Baltimore. Then, it was put on trucks or rail 19 cars and shipped to the facility where it would be 20 erected. Electrical equipment was primarily purchased 21 outside from electrical specialty houses that made 22 transformer rectifiers per se. 23 Q. Did Koppers sell replacement parts to 24 its customers? 25 A. Yes.	Page 52 1 Q. Did the -- were the metal products 2 division and the engineering construction division 3 separated by the type of products that they made, then? 4 A. Yes. They were separate divisions of 5 the Koppers Company. 6 Q. What I am just trying to understand is 7 whether engineering construction had anything to do with 8 precipitators? 9 A. Metal products would. In projects where 10 a precipitator was included in the engineering and 11 construction division's facility that they were building, 12 they would take bids from metal products division to 13 supply that precipitator. They also took bids from our 14 competitors. 15 Q. So, your division was the only division 16 that dealt with precipitators at Koppers, correct? 17 A. In the design and manufacture, yes. 18 Q. What else, if anything -- what other 19 divisions would have anything to do with precipitators? 20 A. Within Koppers Company? 21 Q. Right. 22 A. Generally, just the metal products 23 division or if the corporation had a manufacturing 24 facility that needed a precipitator for air pollution 25 control.
Page 51 1 Q. What types of replacement parts did it 2 sell? 3 A. It had a spare parts department that 4 sold parts that wore out. 5 Q. Well, what about parts that had to -- 6 when you say "wore out," does that include having to be 7 replaced during routine maintenance? 8 A. Yes. 9 Q. Would it ever sell asbestos gaskets to 10 companies, its customers? 11 A. Asbestos-containing, yes. 12 Q. Did it ever provide insulation to -- 13 external insulation to any of its customers as a 14 replacement part? 15 A. No. 16 Q. Did you specifically work for the 17 engineering and construction division of Koppers Company? 18 A. No. 19 Q. You worked directly for Koppers Company? 20 A. I worked for the metal products division 21 of Koppers Company. 22 Q. What did the engineering and 23 construction division do? 24 A. They are a big engineering -- a company 25 that built steel mill and other industrial facilities.	Page 53 1 Q. Just so I am clear, the engineering 2 construction division, is the only way that it dealt with 3 precipitators was through the metal products division, if 4 at all? 5 A. As a supplier or as a 6 purchaser-contractor type, purchaser-vendor type 7 relationship. 8 Q. So, was it -- okay. 9 What type of paperwork did Koppers 10 provide to customers as part of its provision of a 11 precipitator? 12 A. General arrangement drawings, so that 13 the customer could maintain the equipment and recommended 14 operating procedures and safety procedures manual. 15 Q. Did each customer get an operating and 16 safety procedures manual? Is that standard practice? 17 A. Standard practice. 18 Q. Okay. 19 Is there any medical -- were there any 20 medical staff personnel at Koppers while you were there, 21 let's say, in the period up to -- at any time? 22 A. Metal products division had a nurse on 23 staff and a doctor on call. 24 Q. When did the metal products division 25 first have a nurse on staff?

Page 54 1 A. She was there when I went to work there. 2 Q. When did they first have a doctor on 3 call? 4 A. He was there when I went to work there. 5 Q. Who would write the operating and safety 6 procedures manuals at Koppers when you first started? 7 A. It was a joint venture between the 8 engineering department and the test and service 9 department. 10 Q. Did Koppers have a purchasing department 11 that purchased parts for the erection of a precipitator? 12 A. Yes. 13 Q. What department was that? 14 A. The purchasing department. 15 Q. Would the purchasing department purchase 16 items for Koppers in its entirety or was there a separate 17 department that purchased stuff only for precipitators? 18 A. The precipitators were all done at the 19 metal products division in Baltimore, and there was a 20 purchasing department for the metal products division in 21 Baltimore. 22 Q. Okay. 23 Who worked at the metal products 24 division purchasing department when you first started? 25 A. Pete Denning was the manager,	Page 56 1 A. Correct. 2 Q. Are you aware of any precipitators ever 3 being abated for asbestos? 4 A. Personally, no. 5 Q. Are you aware in any way of any asbestos 6 being abated from a precipitator? 7 A. No. 8 Q. When you said "personally," I mean, was 9 there any other source? 10 A. I have seen other areas of plant that 11 have signs that say asbestos-free or contains asbestos on 12 pipes that are not associated with the precipitator. 13 Q. Just so I am clear, you have never seen 14 any of the precipitators at 14th Street Con Ed 15 powerhouse? 16 A. Correct. 17 Q. You have never seen -- have you ever 18 been to the Con Ed 14th Street powerhouse? 19 A. No. 20 Q. Have you ever been to any Con Ed 21 powerhouse? 22 A. No. 23 MR. ROMANELLI: Okay. 24 I don't have any other 25 questions for you.
Page 55 1 D-E-N-N-I-N-G. He was the manager of the products 2 department and he had, you know, a half a dozen buyers 3 and clerical staff that worked with him. 4 Q. How long were precipitators designed to 5 last? 6 A. It varied with the application. 7 Q. Power generation facility. 8 A. It should be 20 years. There are some 9 old clunkers still out there. 10 Q. What do you mean by old clunkers? 11 A. Older than I am. 12 MR. ROMANELLI: Off the 13 record. 14 (Discussion held off the record.) 15 Q. What would cause a precipitator to -- 16 what determines the life span of a precipitator? 17 A. How well it's maintained, the corrosion 18 issues, whether the facility is still in operation or not 19 or has been shut down for one reason or another. 20 Q. Do some of them just become dated as far 21 as the amount of dust that could be removed from the air? 22 A. Yes. 23 Q. And does it become dated in terms of 24 emission standards, they could no longer get dust out to 25 meet the current emission standards?	Page 57 1 I appreciate your time. 2 Does anybody else have 3 questions? 4 MR. McNAMARA: Anybody else? 5 Okay, thank you. 6 (Deposition concluded at 11:12 a.m.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

	Page 58		Page 60
1	REPORTER'S CERTIFICATE	1	REPORTER'S CERTIFICATION OF CERTIFIED COPY
2		2	
3	I, Kerry D. Halpern, Shorthand Reporter,	3	I, KERRY D. HALPERN, Shorthand Reporter in the
4	certify;	4	State of New York, certify that the foregoing pages 1
5	That the foregoing proceedings were taken	5	through 59, constitute a true and correct copy of the
6	before me at the time and place therein set forth, at	6	original deposition of LEWIS BRINGMAN, taken on December
7	which time the witness was put under oath by me;	7	20, 2005.
8	That the testimony of the witness and all of	8	I declare under the penalty of perjury under
9	the objections made at the time of the examination were	9	the laws of the State of New York that the foregoing is
10	recorded stenographically by me and were thereafter	10	true and correct.
11	transcribed;	11	Dated the 20th day of December, 2005.
12	That the foregoing is a true and correct	12	
13	transcript of my shorthand notes so taken.	13	
14	I further certify that I am not a relative or	14	KERRY D. HALPERN, Shorthand Reporter
15	employee of any attorney or of any of the parties, nor	15	
16	financially interested in the action.	16	
17	I declare under penalty of perjury under the	17	
18	laws of the State of New York that the foregoing is true	18	
19	and correct.	19	
20	Dated this 20th day of December, 2005.	20	
21		21	
22		22	
23	KERRY D. HALPERN, Shorthand Reporter	23	
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25		25	

	Page 59	
1	STATE OF)	
2	COUNTY OF) SS.	
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5	I, the undersigned, declare under penalty of	
6	perjury that I have read the foregoing transcript, and I	
7	have made any corrections, additions, or deletions that I	
8	was desirous of making; that the foregoing is a true and	
9	correct transcript of my testimony contained therein.	
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17	WITNESS:	
18	LEWIS BRINGMAN	
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