

Page 62 1 90 percent would be asbestos and 10 percent ceramic. 2 MR. SMITH-GEORGE: Objection, 3 nonresponsive. 4 Q. And you also have attached a letter as an 5 exhibit dated June 1983 that -- to Ford that confirms 6 using nonasbestos clutches from that date forward; is 7 that correct? 8 A. Let me find it. 9 The letter is specifically directed towards 10 remanufactured clutches, but it's also true -- I mean, 11 the January 19 -- 1, 1984 date was good for production 12 as well. 13 MR. GRIMALDO: Sir, that's all the 14 questions I have for you. Thank you. 15 THE WITNESS: Thank you. 16 MR. RADCLIFFE: Anybody else on the phone 17 with questions? 18 MR. SMITH-GEORGE: I've got one follow-up 19 if nobody else has questions. 20 MR. RADCLIFFE: I've got a couple. You 21 might want to withhold your follow-up. 22 MR. SMITH-GEORGE: Okay. 23 MR. KATZ: Yeah, I've got a couple 24 questions, too. 25 MS. HENDRICKSON: So do I.	Page 64 1 Q. And do you remember what year that was? 2 A. I can't put a year on it, but I believe it 3 would be in the late 70's -- 4 Q. Okay. 5 A. -- as their standard product. 6 MR. KATZ: I believe those are all the 7 questions I have for you. Thanks for your time, 8 Mr. Dickson. 9 EXAMINATION OF THOMAS G. DICKSON 10 BY MS. HENDRICKSON: 11 Q. This is Cathy Hendrickson representing Borg 12 Warner. I have a few questions for you. Have you 13 ever spoken with any -- with anyone from Borg Warner 14 or any of its divisions? 15 A. I have. I can't tell you who or when, but I 16 have. 17 Q. Okay. Can you -- can you tell me what was 18 said? 19 A. No. It would probably be at trade shows, 20 just general conversation. 21 Q. Do you remember any discussion whatsoever 22 regarding asbestos? 23 A. No, I don't. 24 Q. Okay. How about any asbestos products 25 contained in any clutch assemblies? Do you recall
Page 63 1 MR. RADCLIFFE: Go ahead. People on the 2 phone, go ahead. 3 EXAMINATION OF THOMAS G. DICKSON 4 BY MR. KATZ: 5 Q. Hi, Mr. Dickson. This is Jason Katz. I 6 represent Paccar. I just have a few questions for 7 you. 8 You don't have any personal knowledge of what 9 products were sent to Peterbilt or Kenworth, do you? 10 A. I don't have personal knowledge of all the 11 products that were sent to Peterbilt or Kenworth, but 12 I know that we sent ceramic and nonceramic product to 13 Peterbilt and Kenworth. 14 Q. But you -- you can't testify that you know 15 whether the clutches sent to Peterbilt or Kenworth 16 were asbestos-containing or not? 17 MR. SMITH-GEORGE: Object to form. 18 A. I can testify that we had sent 19 asbestos-containing product to Peterbilt and Kenworth 20 prior to 1984. 21 Q. Okay. 22 A. I will say Peterbilt -- or Kenworth, I 23 believe it was, was one of the truck manufacturers 24 that changed to a ceramic-type facing very early in 25 the game.	Page 65 1 ever discussing that with any Borg Warner 2 representative? 3 A. No, I don't. 4 Q. Okay. Would you agree that there's no need 5 to sand or grind the surface of a new clutch lining 6 prior to installing it on a vehicle? 7 MR. SMITH-GEORGE: Object to form. 8 A. Correct. 9 Q. Okay. Other than in this suit, have you ever 10 heard of any mechanics engaging in this practice of 11 grinding or sanding? 12 MR. SMITH-GEORGE: Object to form. 13 A. No, I haven't. 14 Q. Okay. What impact would sanding or grinding 15 the surface of a new clutch lining have on the 16 clutch's performance, if you know? 17 A. It would probably throw the driven disc out 18 of balance. 19 Q. Would that be a practice that Dana would 20 recommend for its new clutches? 21 MR. SMITH-GEORGE: Object to form. 22 A. No, Dana did not recommend doing anything 23 but installing the product as it came to them in the 24 box. 25 Q. Okay. Thank you. And I apologize if you