

1 THE WITNESS: Many of those materials were
2 specifically designed for particular applications.
3 Whether they were appropriate for use in different
4 applications really falls into the application
5 engineering area.

6 BY MR. VALLAS:

7 Q Okay. That would be a question I would need to ask
8 of them, true?

9 A Yes, I believe so.

10 Q Okay. Do you know the first year-- With regard to
11 those engineering materials, do you know the first
12 year that Dana Victor started manufacturing that
13 product as a gasket?

14 A I can't be absolutely specific as to year.

15 Q Okay. Do you know the last year, or do they still?

16 A Some of those materials are still in use today.

17 Q Okay. I think the other thing you mentioned-- that
18 you mentioned that at some-- at some point there was
19 some graphite containing product or graphite-- that
20 graphite was used in gaskets. Do you remember
21 mentioning that as well?

22 A Yes, I do.

23 Q That graphite at some point was used in gaskets that
24 had applications-- in gaskets? Actually, did I just
25 say gaskets twice? Strike the question. Tell me as

1 THE WITNESS: Yes, they were.

2 BY MR. VALLAS:

3 Q They were, okay. I'm sorry, let me bounce back to
4 the graphite containing gaskets once again. Do you
5 happen to know, or do you know whether or not those
6 graphite containing gaskets were compatible with or
7 not compatible with exhaust manifold applications or
8 head gasket applications, or, again, would that be a
9 question for the engineer?

10 A They are used extensively in head gasket
11 applications. Beyond that, I think you probably
12 ought to ask an application engineer.

13 Q All right. Would there be anything about the
14 graphite containing gaskets that when removed, would
15 any part of them perhaps have to be scraped off or
16 wire brushed off, or were they such that they came
17 off intact?

18 MR. CELBA: Object to from.

19 THE WITNESS: There again, it would be very
20 much specific to the particular application.

21 BY MR. VALLAS:

22 Q Okay. So I'm just trying to figure out here-- So the
23 graphite it was-- Let's see, do you know what
24 percentage graphite it was, those gaskets were?

25 A Nearly 100 percent.

1 you understand it what the graphite brought to the
2 gasket, so to speak? Why was the graphite added to
3 the gasket, if you know?

4 MR. CELBA: Object to form.

5 THE WITNESS: Graphite gaskets have great
6 conformability and good heat resistance.

7 BY MR. VALLAS:

8 Q Okay. Do you know when the first year is that Dana
9 Victor started manufacturing gaskets for high heat
10 application that contained graphite?

11 MR. CELBA: Object to form.

12 THE WITNESS: No, I can't be specific as to
13 the year the first one came out.

14 BY MR. VALLAS:

15 Q Okay. Do you know whether it came out at any time
16 prior to 1987?

17 A No, I can't be certain.

18 Q Okay. I don't know if I asked you that same question
19 with regard to the engineering facing materials. Do
20 you know if those engineering facing materials that
21 we were talking about a couple minutes ago, do you
22 know if Dana Victor was manufacturing gaskets made of
23 those materials for high heat applications at any
24 time prior to 1987?

25 MR. CELBA: Object to form.

1 Q Okay. If you just held it in your hand and played
2 with it, was it a soft material, or was it an
3 extremely hard material?

4 A No, it was a soft material.

5 Q Okay. Let me get back to where we were a little
6 while ago. We were talking about the material that
7 you had reviewed in the case and what other materials
8 prior to your deposition today or you brought with
9 you today, other than those that we've already
10 attached, what else do you have with you?

11 A Nothing.

12 Q Okay.

13 A I'm sorry, I did mention the depositions, correct?

14 Q Yes, the two Longeau depositions?

15 A Yes. That's all I have.

16 Q Okay. You're right, we did not attach those, but we
17 discussed them. Other than those, there is nothing
18 else we haven't either attached or discussed, true?

19 A That's correct.

20 Q You haven't reviewed the deposition-- You haven't
21 reviewed any other depositions in this case, correct;
22 is that right, Mr. Austin?

23 A That's correct.

24 Q Let me ask you this question, when I took your
25 deposition in the Gerald Pyle case last week or a