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Q. What type of trucks?
A. Medium and heavy-duty. The smallest transmission I recall them manufacturing was for the deuce-and-a-half size military vehicle.
Q. And the largest?
A. The largest would go in the 18-wheelers.
Q. Would Dana sell these transmissions to entities that would incorporate them into vehicles that were sold in the commercial market?
MR. RADCLIFFE: Object to form. Go ahead.
A. Could you repeat that question?
Q. Were these transmissions sold directly to the manufacturers of the trucks?
A. Yes.
Q. And whom did they sell their transmissions to?
A. I could not give you all of the manufacturers, but the major ones would be Mack Truck -- or -- yeah, Mack Truck, Ford, Peterbilt, Kenworth, Freightliner, International Harvester or Navistar, White Motor, GM. I think that's it.
Q. Do you know if they were the exclusive supplier of transmissions for those entities?
A. No, they were not.
MR. RADCLIFFE: When you say -- when you

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say "they," you are talking -- Mr. Smith-George, you are talking Dana, right?
MR. SMITH-GEORGE: Correct.
MR. RADCLIFFE: Okay.
Q. When the transmissions -- the manual transmissions were manufactured, did they incorporate asbestos-containing clutch discs?
MR. RADCLIFFE: Object to the form.
DEFENSE COUNSEL: Object to form.
MR. RADCLIFFE: Go ahead.
A. They did not contain clutch discs that I knew of.
Q. Did any of the parts of the transmission contain asbestos that were manufactured by Dana?
A. Not to my knowledge.
MR. RADCLIFFE: I don't want you to be confused here, Mr. Smith-George. Do you understand that a clutch is a completely different piece of equipment than a transmission?
MR. SMITH-GEORGE: I do and I don't.
MR. RADCLIFFE: Okay.
MR. SMITH-GEORGE: Why don't -- I see what you're saying.
Q. Did the transmission have any gaskets?
A. Yes.

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Q. And what type of material were the gaskets made out of?
A. I don't know.
Q. Do you have any knowledge of Dana Corporation, during the time that you worked for them, selling asbestos-containing gaskets?
A. Not to my knowledge.
Q. Did any of your job duties during the course of your employment at Dana Corporation involve asbestos-containing gaskets?
A. Not to my knowledge.
Q. Do you have any knowledge of what parts Dana manufactured under the Victor trade name?
A. I know they manufactured gaskets, but that's about the extent of it.
Q. And are you aware that they manufactured manifold gaskets and head gaskets?
A. Yes.
Q. And were you aware that those gaskets were made with a blend of elastomers and long asbestos fibers --
MR. RADCLIFFE: Object to the form.
Q. -- combined in a patented process to make a gasket that gives you total sealing under the toughest racing conditions?

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MR. RADCLIFFE: Object to the form.
A. No.
Q. Are you aware of whether Dana Corporation or any of the entities under their control ever manufactured brakes?
A. No, not to my knowledge.
Q. Are you aware of whether Dana Corporation or any of the entities under their control sold brakes?
MR. RADCLIFFE: Object to the form. Go ahead.
A. I believe they sold some attached to axle products.
Q. Okay. And did they manufacture the axle products, "they" meaning Dana?
A. They manufactured the -- the axle components, but the brake components were purchased and attached.
Q. And do you know whom the brake components were purchased from?
A. No, I don't.
Q. Do you know anybody in the corporation who would have that knowledge?
A. No, I don't.
Q. Do you know how long Dana Corporation manufactured axle components?
A. No, I couldn't give you the exact time frame.