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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

EARL FAIR and EILEEN FAIR, his wife) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0129
WILLIAM E. CARPENTER and ROSE) CIVIL ACTION
CARPENTER, his wife)
vs.) NO. 84-0356
GAF CORPORATION, et al.)
HARRY H. McCRACKEN, and ELLA)
H. McCRACKEN, his wife) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0351
ELIZABETH BIDER, Executrix of)
the Estate of GEORGE HULMES) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0351
HARRY COLBERT) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0102
DAVID BROWN) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0357
LEONARD ELLER and GERTRUDE ELLER) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0132
LEROY HALL) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0130
CHARLES A. and MADELINE HIRST) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0135
WILLIE and RUTH OWENS) CIVIL ACTION
vs.)
GAF CORPORATION, et al.) NO. 84-0134

The deposition of SUZANNE PURRINGTON,
taken on August 25, 1986.

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SUZANNE PURRINGTON,
being first duly sworn, was examined and testified as
follows:

DIRECT EXAMINATION

BY MR. WALKER:

Q. Would you state your name, please?

A. Suzanne Purrington.

Q. By whom are you employed?

A. The National Organization for Women Chicago
Chapter.

Q. Where is their office?

A. 53 West Jackson, Room 924, 60604.

Q. How long have you worked for NOW?

A. Since September of 1981.

Q. Who did you work for before that?

A. From 1978 to 1980 I worked for State
Representative Carol Mosley Braun. And in the second
half of 1980 I worked for State Representative Susan
Catania. And I was unemployed from January of 1981
until September of 1981.

Q. Did you ever work for Continental Products?

A. I don't think I did. I may have gotten one
paycheck. I went back into my records to see if I had

PURRINGTON - Direct

gotten a paycheck from them. I did not find it, but those files I had thrown away. I think I must have for perhaps November, December of 1977 or December, January. I resigned the end of January, 1978 I believe.

MR. POLAK: December, 1977?

THE WITNESS: I resigned in January of 1978. I mean I have a vague recollection that I might have gotten something at the very end of 1977 or the beginning of 1978. So it was one or two paychecks I received I think.

BY MR. WALKER:

Q. When did you first work for North American Asbestos Corporation?

A. 1962 I believe.

Q. Did you work for them continuously until 197

A. Yes, I did.

Q. Would you normally work a 40-hour week?

A. Yes.

Q. Did you normally work at wherever their general headquarters were?

A. Yes, I did, always.

Q. Did you ever work at the Mundelein plant?

PURRINGTON - Direct

A. No.

Q. Were you ever at the Mundelein plant?

A. I think I was once. I remember riding with someone, Joan Holtze, to the Mundelein plant. I don't know when that was.

Q. Was your trip to the Mundelein plant at a time when people were actually doing something inside the plant as opposed to either setting it up or phasing it out?

A. I was there at a time when it was in operation. I only went in one room. I think I was asked to come along for the ride to accompany someone. So I remember going into one room, and it was in operation at the time. I don't remember if there were people around. I mean the place was functioning at the time.

Q. Do you remember the names of any of the people who worked at the Mundelein plant?

A. I believe very late in the 1960s, I don't know when the Mundelein plant was put in operation, but there was someone named James someone who worked for North American Asbestos, Hill, who I think went to the Mundelein plant. He is the only person I would

PURRINGTON - Cross

Johns-Manville various plants; to Fibreboard; to Unarco Company; to U.S. Gypsum; to Pittsburgh-Corning, but I am not sure it was called Pittsburgh-Corning. That's all I remember. There were a variety of Johns-Manville plants.

Q. I think I cut you off to another answer that I probably didn't ask. There were other manufacturers or other companies that you shipped to other than the ones you named?

A. Yes.

Q. A variety of plants for Johns-Manville?

A. Yes.

Q. What about Celotex?

A. There were a couple of plants for Celotex.

Q. Do you remember where those were?

A. I remember one in the Midwest I believe. And there was another plant, I don't know where that was. I don't remember now.

Q. Unarco, do you remember what plants you dealt with there?

A. I want to say Bloomington, but I am not exactly sure that it was Bloomington. I am not sure. I mean Unarco is associated with Bloomington. So it

PURRINGTON - Cross

may be that that's what I remember. I know we shipped to Unarco.

Q. What was it you shipped?

A. We shipped asbestos.

Q. Do you know what kinds of asbestos?

A. The fiber.

Q. Do you know what kind of fiber?

A. Amosite fiber, crisilite. That's what I remember.

Q. You handled both of those?

A. Yes.

Q. Did you know who was the biggest customer of North American in the United States? Who did you ship most to?

A. Johns-Manville primarily. Dow Chemical was another one. U.S. Gypsum was another one.

Q. What was your reason for leaving North American?

A. I had finished my Bachelor's Degree and decided I wanted to do something else.

Q. Where did you get your Bachelor's Degree?

A. Roosevelt.

Q. What was it in?

PURRINGTON - Cross

A. Sociology.

MR. MOORE: That's all I have.

MR. WALKER: Mark this as 101515.

(Document marked as Purrington Deposition
Exhibit No. 101515 for identification.)

REDIRECT EXAMINATION

BY MR. WALKER:

Q. Do you see the exhibit the reporter has marked
as 101515?

A. Yes, I do.

Q. I am going to show you the most original copy
which is available to me. And as to Page 101515, that
is an onionskin which was provided to me by the
receiver of the North American Asbestos Corporation
liquidating trust, and which North American Asbestos
Corporation's lawyer described in documents filed with
the Court as being the original records of the North
American Asbestos Corporation. Do you see this
onionskin copy which has stamped in the lower
right-hand corner 101515?

A. Yes.

Q. Is it the same as the Exhibit 101515?

A. Yes, it is.