

Page 18 1 A I've read portions of it. 2 Q How did you select the portions that you wanted to 3 read versus those that you didn't read? 4 A In scanning through the documents looking for things 5 that would have been of particular interest to me in 6 my knowledge. 7 Q Okay. Did you see anything in there that you just 8 disagreed with? Do you have any criticisms of the 9 deposition as far as those excerpts of it that you 10 did read? 11 A No, I do not. 12 Q Any highlighting or underlining or turned down 13 corners or anything along those lines in that 14 deposition? 15 A Yes. 16 Q Which pages, a lot of pages or a few pages? 17 MR. CELBA: I just want to voice an 18 objection to the previous question, the form of it. 19 THE WITNESS: Just a few pages. 20 BY MR. VALLAS: 21 Q Can you look in there and tell me who was the 22 plaintiff's firm that took that deposition? Should 23 be in the first couple pages. 24 A Appearances, Mr. Brent Coon. 25 Q Okay. That's all I need to know. I appreciate it.	Page 20 1 A Louis Forbes and Diana Forbes versus Acands, 2 A-C-A-N-D-S, Inc. 3 Q Okay. If you could just pop open the first couple 4 pages and tell me who the plaintiff's lawyer was on 5 that one? 6 A Appearances, Clapper & Patty. 7 Q Can you tell me who the name, what the name of the 8 lawyer was that appeared for the plaintiff's firm, if 9 you can tell? 10 A Represented by Steven Patty, attorney at law. 11 Q Does it have the phone number of his law firm there? 12 A No, it does not. 13 Q Okay. Does it have the city where they were? 14 A Yes, sir. 15 Q Where is that? 16 A Sausalito, California. 17 Q Okay. I appreciate it. Pages 22 through 26, if you 18 can, just kind of give me an idea of why those pages 19 were of interest to you from that deposition, I would 20 appreciate it. 21 A Discusses tests that were done and conclusions in 22 regard to asbestos or asbestos air monitoring. 23 Q Having anything to do with gaskets or no? 24 A It specifically relates to Victor. 25 Q Okay. Any disagreements or criticisms of any
Page 19 1 And-- Excuse me just one second. What pages of that 2 deposition did you either mark or highlight or turn 3 down? Just give me the page numbers. 4 A Page 97 and 98. 5 Q Okay. If you can-- Obviously, I don't want you to 6 read them. Were those the only two pages? 7 A Yes, they were. 8 Q I don't want you to read me all of it, but just kind 9 of tell me the gist of why you selected those pages, 10 what you saw on those pages that was of interest to 11 you? 12 A It dealt with the release of asbestos fibers in the 13 installation and removal of engine gaskets. 14 Q All right. What else have you brought with you to 15 the deposition? 16 A I have a second deposition by Dr. Longeau. 17 Q Okay. Did you just read again selected excerpts of 18 that deposition? 19 A Yes, I did. 20 Q Do you know which pages you read? 21 A Yes, I do. 22 Q Which pages were those? 23 A Portion of 22, 23, 24, 25 and 26. 24 Q Okay. What's the name of that case or the 25 plaintiff's name in that case?	Page 21 1 portions of that testimony that you read of 2 Dr. Longeau from that second deposition that you 3 we're talking about? 4 MR. CELBA: Object to form. 5 THE WITNESS: No, sir. 6 BY MR. VALLAS: 7 Q What's the next item that you brought with you to the 8 deposition? 9 A I don't have it with me but I did review the med tox 10 study and the Spencer study. 11 Q I'm sorry, I heard med tox study and then your voice 12 dropped or the speaker phone dropped or something. 13 A Spencer. 14 Q Spencer? 15 A Right. 16 Q Let me back up just a little bit and get back to that 17 just one second. You mentioned a little while ago 18 that Dana Victor asbestos containing gaskets started 19 all containing asbestos warning labels, you believe 20 in late 1985, perhaps early 1986, and I was 21 wondering-- I think you told me the basis for the 22 belief was just a position that you had with the 23 company at the time, correct? 24 MR. CELBA: Object to form. Go ahead. 25 THE WITNESS: Yes, sir, that is correct.