

ROGER HOBBIE

Page 38 1 Q Do you know if, in fact, what you are looking at in 2 that exhibit is the first time Eaton developed such a training 3 program? 4 A I don't know that for sure. 5 Q Are you familiar with the potential hazards of 6 asbestos, breathing in asbestos dust? 7 A Sure. 8 Q Do you recall the first time you became aware of 9 what some of the potential hazards of breathing in asbestos 10 dust were? 11 A Approximate dates or years? 12 Q The best you can. 13 A I would say probably back in late -- mid to late 14 '60s, probably. 15 Q Can you describe for me how you first became aware 16 that there might be a problem for someone breathing in 17 asbestos dust? 18 A I think it just sort of was an industry awareness 19 that was published in various communications and things like 20 that as far as industry magazines and articles, that type of 21 stuff. 22 Q Do you recall ever attending any kind of meeting at 23 Eaton prior to 1980 where the subject of the potential hazards 24 of asbestos were discussed by other Eaton employees? 25 A No.	Page 40 1 A I can't specifically say that I was, no. 2 Q Do you recall anyone at Eaton ever advising you that 3 breathing in asbestos dust could possibly cause a cancer 4 called mesothelioma? 5 A No. 6 Q Do you recall anyone at Eaton ever advising you that 7 breathing asbestos dust and smoking cigarettes combined could 8 potentially lead to a greater incidence of lung cancer? 9 A No. 10 Q Did Eaton ever advise its individuals who were 11 potentially handling asbestos not to smoke while handling 12 products that contained asbestos? 13 A Not that I'm aware of. 14 Q Do you know during the time frame between -- well, 15 prior to 1983, what was the official position of Eaton 16 regarding the potential hazards of asbestos? 17 A I would say basically it evolved into what OSHA 18 basically presented to us, the way the regulations evolved. 19 We didn't really generate any of our own knowledge of the 20 problems, per se. 21 Q With respect to this exhibit, Hobbie Exhibit 5, is 22 it your understanding that this was a document that was 23 prepared by Eaton for its employees? 24 A It looks like it, yes, just by the title, employee 25 training program for asbestos and it is specifically aimed at
Page 39 1 Q Do you recall ever receiving any sort of interoffice 2 correspondence or interoffice memorandum or reports prior to 3 1980 wherein the hazards of breathing in asbestos dust were 4 discussed? 5 A No. 6 Q What is your understanding of the hazards of 7 asbestos? What could possibly happen if you breathed enough 8 asbestos dust in? 9 MR. QUICK: Objection. Go ahead and answer if 10 you know. 11 A It was always my understanding that the hazard was 12 primarily in the raw asbestos, that generally after the brakes 13 had been used, any of the dust was not harmful. But as was 14 always our standard practice, you just never blew dust around 15 to breathe any kind of dust, you know, even if it was road 16 dust that was on the vehicle. So from that standpoint, we 17 never considered the dust on a used brake assembly as 18 something that was hazardous, but we treated it as we did not 19 want to inhale it anyway. 20 Q The name in the upper right-hand corner, 21 Roger Reell, are you familiar with that name? 22 A No, I'm not familiar with that individual. He may 23 be somebody who was at the plant. 24 Q Were you ever told by anyone at Eaton that breathing 25 in asbestos dust could cause lung cancer?	Page 41 1 the Gallatin, Tennessee plant where the brakes were assembled. 2 Q You agree that the information within that document 3 actually lays out the potential hazards of asbestos? 4 MR. QUICK: Objection. He is not qualified to 5 answer that question. You can go ahead and make a guess if 6 you want to. 7 A I would say offhand it looks like it to me. 8 Q In other words, there are statements in there that 9 seems to be informing whoever is reading it that asbestos can 10 cause certain kinds of problems? 11 A Yes. 12 Q This was intended for Eaton employees, it appears? 13 A At that plant as far as I know. 14 Q You agree with me that, well, let me see, under the 15 section Health Effects Associated with Asbestos Exposure, and 16 I will read the first sentence, second paragraph, it reads, 17 the inhalation of asbestos fibers has been clearly associated 18 with three clinical conditions, asbestosis, mesothelioma and 19 lung cancer. Did I read that correctly? 20 A Looks like it, yes. 21 Q It also says there are many studies that have also 22 observed increased gastrointestinal cancer risks, correct? 23 A Yes. 24 MR. QUICK: I thought this was a discovery 25 deposition. Why are you trying to nail him with a document

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