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STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND DISTRICT

PERSONAL INJURY/ASBESTOS

Court File No.: 62-CV-18-169

ROBERT E. BENSON and
SUZANNA BENSON, His Wife,
Plaintiffs

3M COMPANY, ET AL,
Defendants

VIDEOTAPED DEPOSITION OF: RAYMOND A. ANDERSON, JR.
Pursuant to Minnesota Rule of Civil Procedure 30.02(a)
for Sporting Goods Properties and
E.I. du Pont de Nemours & Company
taken at
Law Offices of Murtha Cullina
CityPlace I
185 Asylum Street
Hartford, Connecticut
July 18, 2018

Raymond A. Anderson, Jr.
7/18/2018

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1 APPEARANCES (Continued): 2 3 Representing the Defendant, Union Carbide Corporation: ELLIOTT LAW OFFICES 2409 West 68th Street 4 Minneapolis, MN 55423 BY: PATRICK H. ELLIOT, ESQ. 5 (612) 466-7192 pat@elliottlaw.net 6 7 Representing the Defendant, Federal Cartridge: LITTLETON PARK 8 141 West Front Street, Suite 120 Red Bank, NJ 07701 9 BY: CHRISTINE DELANEY, ESQ. (732) 530-9108 christine.delaney@littletonpark.com 10 11 Representing the Defendants, IMO Industries and Warren Pumps: 12 MEAGHER & GEER 33 South Sixth Street, Suite 4400 13 Minneapolis, MN 55402 (612) 371-1321 emugaas@meagher.com 14 15 Representing the Defendant, Mine Safety Appliance: JARDINE, LOGAN & O'BRIEN 8519 Eagle Point Boulevard, Suite 100 16 Lake Elmo, MN 55042 BY: ELISA HATLEVIG, ESQ. 17 (651) 290-6504 ehatlevig@jlolaw.com 18 19 IN ATTENDANCE: 20 Rocco Leone, videographer 21 22 23 24 25	1 VIDEOGRAPHER: Good morning. Today's date 2 is July 18, 2018. We going on the record at 3 10:18 a.m. This is the videotaped deposition of 4 Ray Anderson being taken at Murtha Cullina, 185 5 Asylum Street, Hartford, Connecticut, in the 6 matter of Robert E. Benson and Suzanna Benson, 7 his wife, versus 3M Company, et al. This is the 8 Plaintiff's second amended notice for du Pont. 9 It is also the Plaintiff's second amended notice 10 for Sporting Goods Properties, Inc. This 11 deposition is being taken on behalf of the 12 Plaintiffs, filed in district court, second 13 judicial district, personal injury/asbestos, 14 State of Minnesota, County of Ramsey, docket 15 number 62-CV-18-169. 16 My name is Rocco Leone, cameraman and legal 17 video technician from VIP Studios, located in 18 Waterbury, Connecticut, with Keli McGilton, 19 certified court reporter. 20 Counsel, please state your appearances for 21 the record and whom you represent. Then the 22 court reporter will swear in the Witness. 23 MR. KARST: This is Erik Karst for the 24 Plaintiffs. 25 MR. von OISTE: Doug von Oiste for the

Raymond A. Anderson, Jr.
7/18/2018

6 1 Plaintiffs. 2 MR. MORTL: Andrew Mortl for the 3 defendants, du Pont, Sporting Goods and the 4 witness, Mr. Anderson. 5 MS. TRATTLES: Gloria Trattles for the 6 defendant, du Pont and Sporting Goods 7 Properties, Inc. 8 MR. KARST: If we can have the record 9 reflect everybody else on the phone. 10 MR. OTTO: Jackson Otto appearing for the 11 defendant, Olin Corporation. 12 MS. DELANEY: Christine Delaney for Federal 13 Cartridge. 14 MR. WADDING: Pete Wadding for du Pont. 15 MR. ELLIOTT: Pat Elliott for Union Carbide 16 Corporation. 17 MS. MUGAAS: Emily Mugaas for Warren Pumps 18 and IMO Industries, Inc. 19 20 RAYMOND ANDERSON, Deponent, having been first duly 21 sworn, was examined and deposed as follows: 22 23 24 25	8 1 these two defendants to produce a witness on; is that 2 correct? 3 A. Yes. 4 Q. Are you currently being represented by the two 5 individuals here? 6 A. Yes. 7 Q. How long have you been represented by them? 8 A. Since yesterday. 9 Q. To prepare for your deposition today, what did 10 you do? 11 A. Well, I talked with my counsel, looked at a lot 12 of records from Remington including such things as 13 process records, meeting minutes of various sorts, 14 catalogs, price lists, a lot of memory refreshers and 15 talked with counsel. 16 Q. And where did you obtain the meeting minutes, 17 the catalogs and the price lists from? 18 A. Most of them came from counsel. 19 Q. Do you know which specific ones you reviewed? 20 A. A series of catalogs from numerous years. 21 Q. And whose catalogs were they? 22 A. Remington. 23 Q. Are they on firearms, or are they ammunition 24 catalogs? 25 A. Just ammunition catalogs.
7 1 DIRECT EXAMINATION BY MR. KARST: 2 3 Q. (By Mr. Karst) Good morning, Mr. Anderson. 4 A. Good morning. 5 Q. Before we get started, I need to make agreements 6 with your attorneys and then we can begin. 7 MR. KARST: Can we agree that this 8 deposition is being taken pursuant to the 9 Minnesota Rules of Civil Procedure and that an 10 objection by one Defendant is good for all 11 present or on the phone? 12 MR. MORTL: Agreed. 13 MR. KARST: Any other housekeeping before 14 we start? 15 MR. MORTL: No. 16 Q. (By Mr. Karst) Mr. Anderson, can you state your 17 full name for the record. 18 A. Raymond A. Anderson, Jr. 19 Q. And what is the A? What is your middle initial? 20 A. Albert. 21 Q. When were you born? 22 A. April 27, 1945. 23 Q. And you're here today, as far as I understand, 24 representing both du Pont and Sporting Goods 25 Properties, Inc., on certain topics that we've asked	9 1 Q. Do you know what the title of those catalogs is? 2 A. Generally they're known as Remington 1964 or 5 3 or whatever. 4 Q. Is it an annual publication? 5 A. Product catalog, yes. 6 Q. And the price lists, what are those? 7 A. Those are individuals sheets. They go to 8 vendors and sales operations, that sort of thing. 9 Q. So someone who would be selling either 10 ammunition or Remington products. 11 A. Uh-huh. That's right. 12 Q. And you also said you reviewed meeting minutes. 13 What meeting minutes are those? 14 A. Well, the meeting minutes. The major one was my 15 deposition in a previous legal matter. 16 Q. Is that your deposition from 2014? 17 A. That's correct. 18 Q. And that was an asbestos-related matter at that 19 time. 20 A. That's right. 21 Q. Anything else? You said meeting minutes, and 22 you mentioned deposition. What else? 23 A. I read some Remington documents that I have that 24 had to do with various products and processes and so 25 forth.

10 1 Q. You said you had. Are these document that you 2 had and not that your attorneys gave you? 3 A. My attorney showed me several documents, but 4 most of the documents that I recall off the top of my 5 head were in my first deposition, same stuff. 6 Q. They were attached as exhibits. 7 A. I believe they were. 8 MR. KARST: Do you have a copy of the 9 specific ones that he reviewed? 10 MR. MORTL: I do not, but I can represent 11 he did not review anything that has not already 12 been produced in the case. 13 MR. KARST: There's 10,000 pages. That's 14 kind of voluminous. Can you narrow it down a 15 little bit? Are they in the du Pont stuff? Are 16 they in the Sporting Goods stuff? 17 MR. MORTL: Well, I think he just told you 18 it's catalogs, it's price list and his prior 19 deposition exhibits. 20 MR. KARST: Right. But meeting minutes and 21 formulas and so I'm forth, is that stuff that 22 was in the du Pont docs or is that stuff was in 23 the Sporting Goods Properties docs? 24 MS. TRATTLES: I would say the majority was 25 in the Sporting Goods documents. There might be	12 1 Q. (By Mr. Karst) How many conversations did you 2 have with your attorneys? 3 MR. MORTL: You can give him a number, if 4 you remember. 5 THE WITNESS: A dozen. 6 Q. (By Mr. Karst) Were these on the phone, or were 7 some of them in person? 8 A. Some were in person. 9 Q. Did they come out to your house, or did you come 10 to the law firm? 11 A. Both. 12 Q. When you would come and meet in person, were 13 there documents that you would review? 14 A. Uh-huh. 15 Q. Is that yes? 16 A. Yes. 17 Q. What documents would you review at that time? 18 A. The ones I mentioned before. 19 Q. Anything different from what you've mentioned to 20 me already? 21 A. No. 22 Q. Do you have a copy of any documents related to 23 shotgun shells and asbestos-containing products in your 24 possession? 25 A. Yes.
11 1 some that came from a du Pont source, but the 2 overwhelming majority were in the Sporting Goods 3 Properties production to you. 4 MR. KARST: Okay. 5 Q. (By Mr. Karst) Mr. Anderson, when did you first 6 learn of the case that we're here today for, the Robert 7 Benson case? 8 A. Several months ago. 9 Q. And were you contacted -- I don't want to know 10 anything that you discussed with an attorney or 11 anything, but were you contacted specifically for this 12 case? 13 A. Yes. 14 Q. And do you know who contacted you? 15 A. I believe it was Gloria, Attorney Trattles. 16 Q. You said they weren't representing you at the 17 time. Can you tell me, what was the discussion that 18 you had? 19 MR. MORTL: I'm going to instruct you not 20 to answer that because you were represented by 21 us at the time. 22 We're going to assert attorney/client 23 privilege and instruct him not to answer, and 24 you and I can talk about that off line if need 25 be.	13 1 MR. MORTL: He's asking other than the 2 documents that you got from us. 3 THE WITNESS: Other than the documents -- 4 Q. (By Mr. Karst) Correct. 5 A. No, I don't think so. 6 Q. Have you ever looked? 7 A. When? 8 Q. At any point have you ever looked for any 9 documents? 10 A. No, none outside of these proceedings. 11 Q. The deposition that you gave in 2014 in the 12 Michael Taska case, have you ever given a deposition 13 besides that deposition? 14 A. No. 15 Q. Have you ever been involved in an 16 asbestos-related matter outside of this case and the 17 Michael Taska case? 18 A. No. 19 Q. Where do you live? 20 A. Eastford, Connecticut. 21 Q. And you were born in 1945. 22 A. Correct. 23 Q. So -- 24 A. 73. 25 Q. I'm assuming you graduated high school --

14 1 A. I have it memorized. 2 Q. I'm assuming you graduated high school in '63. 3 A. Yes. 4 Q. Did you work in high school? 5 A. Did I work in high school? 6 Q. Yes. 7 A. I had a summer job. 8 Q. What did you do? Anything in the 9 construction-related trades or anything like that? 10 A. No. 11 Q. Auto mechanic or anything? 12 A. I did some auto work, but not for pay. 13 Q. Just on your own stuff. 14 A. Yes. 15 Q. You graduated high school in '63. What did you 16 then do? 17 A. Went to college. 18 Q. Where? 19 A. Georgia Tech. 20 Q. Four years? 21 A. Uh-huh. 22 Q. Did you graduate in '67? 23 A. '68. 24 Q. '68. Did you work at all between graduation 25 from high school and graduation from Georgia Tech in	16 1 A. Mechanical and industrial. 2 Q. Did you have any family members who ever worked 3 at Remington? 4 A. No. 5 Q. Do you know anybody else who worked there when 6 you applied? 7 A. No, I didn't. 8 Q. Shot in the dark? 9 A. It's a big place. 10 Q. So you were hired in March of '68. 11 A. Uh-huh. 12 Q. What did you get hired as? 13 A. A research engineer. 14 Q. And what is a research engineer? 15 A. It's an engineer that does research. 16 Q. On what? 17 A. Ammunition. There were various other peripheral 18 products, product lines that I didn't get involved 19 with. 20 Q. Any specific type of ammunition? 21 A. Shotshell, centerfire. 22 Q. There's going to be a lot of terms in the 23 deposition, so I'm going to ask -- I'm sure a lot of 24 them are obviously very familiar to you, but some of us 25 are not -- can you explain what shotshell is?
15 1 '68? 2 A. Yes. Summer jobs again. 3 Q. What type of summer jobs did you have? 4 A. I worked at the Bullard Company in Bridgeport, 5 Connecticut. They make machine tools, or they used to. 6 I did some lawn service type work, that kind of thing. 7 Q. Any jobs down at Georgia Tech? 8 A. That's where the lawn work was. It was hot. 9 Q. So you graduated in, I assuming, May of '68. 10 A. March. 11 Q. March of '68. 12 A. Uh-huh. 13 Q. Is that when you started Remington? 14 A. Yes. 15 Q. How did you get your job at Remington? 16 A. I interviewed for it when I was on a vacation in 17 the winter prior, early 1968. It was kind of like a 18 job fair type of thing in Bridgeport. 19 Q. Was there a specific type of job that you were 20 interviewing for? 21 A. Engineering job. 22 Q. What type of engineer? 23 A. Mechanical. 24 Q. Did you graduate with a degree in mechanical 25 engineering?	17 1 A. A shotshell is ammunition for a shotgun. 2 Q. And centerfire? 3 A. Centerfire is ammunition for rifles and pistols 4 generally and other sorts of weapon systems in the 5 military. 6 Q. And the shotshell, is that for both target and 7 for hunting? 8 A. Yes. 9 Q. Any particular gauge that you worked on? 10 A. Well, I worked on -- at one time or another I 11 worked on all of them. 12 Q. We're talking shotshell. 13 A. 12, 16, 20, 410. 14 Q. Any others? 15 A. 8-gauge. That's an industrial shotshell. 16 Q. What is an industrial shotshell? 17 A. It's a big shotshell with -- I believe it was a 18 2 ounce slug used for studying vibrations reflected 19 back in the earth when you fire the thing for oil 20 exploration, that kind this. 21 Q. I've seen it in movies. You have a stand and 22 you fire straight down. 23 A. Yes. 24 Q. Are the 12, 16, 20 and 410 all hand-operated 25 shotguns?

18 1 A. Yes. 2 Q. Any other uses for the 12, 16, 20 and 410? 3 MR. MORTL: Vague. 4 Q. (By Mr. Karst) Besides use them in a handheld 5 shotgun. 6 A. Besides hunting and target shooting? 7 Q. Yes. 8 A. No. 9 Q. Any particular calibers of centerfire? 10 A. .308 .306 .556, some .44 mag pistol. That's 11 about it. 12 Q. In regards to the shotshell, does Remington make 13 anything besides 12, 16, 20, 410 and 8? 14 A. No. 15 MR. MORTL: Objection to form. 16 Q. (By Mr. Karst) For the period of time that you 17 worked for Remington, did Remington ever make anything 18 besides those five? 19 A. You know, they made 10-gauge. 20 Q. Throughout your time period? 21 A. Yes, I believe we made some out there. 22 Q. Does the 10-gauge have the same use as a 12, 16, 23 20 and 410? 24 A. Basically. It's known as a goose gun shell. 25 They've got a big, long barrel, long range, but it's	20 1 A. Yes. Shared one of the buildings, yes. 2 Q. So you really didn't – 3 A. I was quite familiar with the surroundings. 4 Q. How long did you stay at RemGrit? 5 A. I was there about five years, and then they sold 6 the business. 7 Q. What did you do at RemGrit? 8 A. I was the vice president of production. 9 Q. Let's step back to Remington. You were a 10 research engineer in ammunition. How long did you have 11 that title? 12 A. Now you're gonna tax me. I had a lot of titles 13 at Remington. Research engineer for three years. 14 Q. What was your next job after that? 15 A. Senior research engineer for two years, I 16 believe. 17 Q. What is the difference between a research 18 engineer and a senior research engineer in regards to 19 your job? 20 A. Complexity. 21 Q. What do you mean by that? 22 A. You get different jobs, and in some cases you 23 get some supervisory responsibility with research 24 engineers. 25 Q. Are you still doing hands on work?
19 1 basically the same as a 12-gauge shell as far as 2 operation. 3 Q. You started at Remington in March of '68. 4 A. Right. 5 Q. How long did you work there? 6 A. Until 1986. I believe it was May or June. 7 Q. And why did you leave? 8 A. The plant was closed down, and the follow-on 9 business was something I was familiar with, so they 10 hired me. 11 Q. Who did? 12 A. RemGrit Corporation. 13 Q. And what is RemGrit Corporation? 14 A. They manufactured abrasive products. 15 Q. Saws and so forth? 16 A. Yeah. Different kinds of saws, both hand and 17 machine saws. 18 Q. Was that a division of Remington? 19 A. Yes. 20 Q. So where you worked from '68 until the summer of 21 '86, that was in Bridgeport, Connecticut, correct? 22 A. Yes. 23 Q. Was RemGrit also in Bridgeport? 24 A. Yes. 25 Q. Was it one of the same buildings?	21 1 A. Yes. 2 Q. All the same duties that you had before, just 3 more. 4 A. Yes. 5 Q. After your two years as a senior research 6 engineer in ammunition, what did you do? 7 A. I became a research supervisor. 8 Q. What is a research supervisor? 9 A. Supervises research engineers and senior 10 research engineers. 11 Q. Any other type of engineers you're over? 12 A. No. 13 Q. How long did you have the title? 14 A. I think it was probably a couple years. 15 Q. Two/three years? 16 A. Yes. Probably two. 17 Q. What was your next job title? 18 A. I have to think about this. Production 19 supervisor. Production chief supervisor actually. 20 Q. What is a production chief supervisor? 21 A. Supervises the manufacturer of ammunition 22 products. 23 Q. Both centerfire and shotshell? 24 A. No. Shotshell and rimfire. 25 Q. What is rimfire?

22 1 A. 22s. It's a shell that's made with primer 2 that's inserted into the rim of the shell, and the fire 3 pin strikes the rim rather than striking the center, 4 which would be centerfire. 5 Q. Would rimfire be all shotgun related? 6 A. No. Rifle and pistol. Mostly .22 caliber. 7 Everybody says .22s, small caliber compared to 8 centerfire. 9 MR. MORTL: It's a little bullet. 10 THE WITNESS: It's a little bullet, yes. 11 Q. (By Mr. Karst) How long were you product chief 12 supervisor? 13 A. Production chief. 14 Q. Production chief supervisor. 15 A. I never had anything to do with marketing 16 proudly. I was the chief supervisor for two or three 17 years. 18 Q. What was your next title? 19 A. Chief supervisor of plant engineer. 20 Q. What does that entail? 21 A. Overseeing the maintenance and business conduct, 22 basically, of the plant, the plant operation itself, 23 the equipment and the people. 24 Q. So no longer supervising the engineering of the 25 product itself. It's engineering of the building	24 1 mechanical parts. There were other numbers assigned to 2 other buildings, some of which I don't remember. 3 Q. Sure. When you were the chief supervisor of 4 plant engineering, was that just over 875 or other 5 building numbers? 6 A. Other buildings as well. The maintenance 7 department was included in it, which was pretty big. 8 Q. Where manufacturing was performed, what building 9 number is that? 10 MR. MORTL: Objection to form. 11 Go ahead. 12 THE WITNESS: There were quite a number of 13 them, of buildings. 14 Q. (By Mr. Karst) Does it depend on the product 15 being made? 16 A. In part. 17 Q. If I asked shotshell, what building or buildings 18 is shotshell manufactured? I know there's different 19 components. 20 A. Primarily 300 series buildings. 21 Q. Is there anything else made in the 300 series 22 buildings besides shotshell and shotshell components? 23 A. Rimfire. 24 Q. When you were a chief supervisor of plant 25 engineering, was your job over the 300 series
23 1 itself. 2 A. The building and the people that maintain the 3 building. That's about it really. 4 Q. Is it just the maintenance of the building, or 5 is it also production workers? 6 A. Maintenance and production equipment, too. 7 Q. That's where I was going. 8 MR. MORTL: Slow it down a little bit for 9 the court reporter. She can't type several 10 people speaking. You know where he's going with 11 his question, but you've got to let him finish 12 his question and then give your answer. 13 THE WITNESS: Okay. 14 Q. (By Mr. Karst) When you were doing this type of 15 work as a chief supervisor of plant engineering, was 16 there a certain plant that you were in in Bridgeport? 17 A. The same one I was in in all the other jobs. 18 Q. Which is which building? 19 A. Mostly 875, but in Bridgeport, Connecticut. 20 Q. I understand the plant is -- there's different 21 sections to the plant itself. 22 A. Correct. The Barnum Avenue facility would be 23 the property. 24 Q. And the building number is 875. 25 A. 875 was the office building and part of the	25 1 buildings? 2 A. It was more within them. The 300 series 3 buildings were production buildings. When I was the 4 plant chief supervisor of plant engineering, it was 5 maintenance, slash, engineer employees, so my office 6 was not in the 300 series buildings. 7 Q. But would your job entail you going into those 8 buildings during that time? 9 A. Yes. 10 Q. Would that be for production equipment or any 11 maintenance to the building itself? 12 A. That's right, equipment and facilities. 13 Q. After you were chief supervisor of plant 14 engineering -- how long did you have that title? 15 A. Again, about two or three years, not specific. 16 Q. Sure. After that? 17 A. I was superintendent of employee relations. 18 Q. Where did that have you located out there? 19 A. I was in 875, building 875. 20 Q. What did that job entail? 21 A. Supervision of all employee relations functions. 22 Q. Did that entail you actually going out into the 23 facility itself, or would employees come to you? 24 A. Both. 25 Q. The majority of the time one versus the other?

26 1 MR. MORTL: Objection to form. 2 THE WITNESS: One or the other. 3 Q. (By Mr. Karst) Okay. Not one greater than the 4 other, in your mind. 5 A. No, not really. 6 Q. Is this dealing with issues that employees have 7 or – 8 A. Yes. That was a big issue at that time. The 9 plant was going to announce that it was going to be 10 moved. 11 Q. How long were you superintendent of employee 12 relations? 13 A. Two years. 14 Q. And you mentioned that that was the big thing 15 going on, that the plant was going to move. Do you 16 remember what year this was? 17 A. I'm just guessing 1966. 18 MR. MORTL: '66? 19 THE WITNESS: I'm sorry. '76. '66 is when 20 I got there. 21 Q. (By Mr. Karst) Somewhere around 76ish. 22 A. Actually, it's later than that, too, now that I 23 think about it. 80s. I've had a lot of jobs there. 24 Q. So you're thinking mid 80s. 25 A. Yes.	28 1 THE WITNESS: Specifically a safety issue, 2 no. They would go through the safety 3 supervisor. 4 Q. (By Mr. Karst) And who was that at that time? 5 MR. MORTL: Same objection. 6 THE WITNESS: I don't recall. 7 Q. (By Mr. Karst) At any of your tenure at 8 Remington from '68 through '86, do you remember any of 9 the people in charge of safety out at the plant, 10 whether alive or deceased? 11 A. I don't recall the names, no. 12 Q. When you got there in '68, did Remington have 13 someone in charge of safety? 14 A. Oh, yeah. 15 Q. When everything closed down in '86, did 16 Remington still have somebody in charge of safety at 17 that time? 18 A. Yes. 19 Q. After your tenure as the superintendent of 20 employee relations -- you said you had that job roughly 21 two years -- what was your next job? 22 A. I believe that was the job title I had when I 23 left Remington. 24 Q. Okay. You mentioned that shotshell was made in 25 the 300 series buildings, correct?
27 1 Q. Any other issues besides the issue with the 2 plant potentially moving that you would deal with the 3 employees? 4 A. Well, there were always other issues. 5 Q. Was safety part of the issues? 6 A. Yes. But I wasn't responsible for that. I was 7 responsible for just the employee relations part. We 8 had a separate department that handled safety and 9 security and a few other things. 10 Q. When you say you handled the employee relations 11 part of the issues, what does that mean? 12 A. That means I oversaw the activities involved 13 with people getting paid, people's benefits, people 14 getting along with each other, dealing with the union 15 that represented the people, being the go-between 16 between the plant manager, who was overall responsible 17 for the plant and the rest of the people and the rest 18 of the plant staff. 19 Q. If an employee during this period of time had a 20 safety issue regarding some equipment they were working 21 on, are you the person that they would go to or would 22 they go to somebody else? 23 A. On safety a issue? 24 Q. Yes. 25 MR. MORTL: Objection to form.	29 1 A. (Nod, yes). 2 Q. Along with rimfire. 3 A. Rimfire shells, yes. 4 Q. Is the manufacturing of shotshell quite 5 different from rimfire, or were they relatively the 6 same? 7 MR. MORTL: Objection. 8 Q. (By Mr. Karst) I understand one's centerfire 9 and one's fired on the rim, but is the manufacturing 10 relatively similar? 11 MR. MORTL: Objection to form. 12 THE WITNESS: They're quite different. 13 Q. (By Mr. Karst) Can you explain to me, when you 14 got there in '68, what were the component parts for 15 shotshell? 16 MR. MORTL: Objection to form. 17 Go ahead. 18 THE WITNESS: It would depend on what kind 19 of shotshell it was, what gauge. 20 Q. (By Mr. Karst) Let's do 12-gauge. 21 A. Okay. The major components of the shells that 22 would be manufactured when I first got there were the 23 shell body, shell cap or head, shell basewads, internal 24 wads that were in the shell, which depended on what 25 load it was, lead shot.

30 1 Q. What -- 2 A. Lead shot. 3 Q. L-E-A-D? 4 A. L-E-A-D, yes. Heavy. Depending on the load, 5 other types of wads, which would have been made out of 6 cardboard or felt as opposed to shell basewad, and the 7 primer, which was made up of subcomponents as well. 8 Q. What is a primer? 9 A. On a shotshell primer, a battery cup -- 10 MR. MORTL: Objection to form. 11 THE WITNESS: A battery cup, an anvil, a 12 primer cup and explosive mix. 13 Q. (By Mr. Karst) Outside of the explosive mix, 14 are the components metal or plastic? 15 A. They're metal, all brass. 16 Q. Are those individual parts for the primer all 17 formed or stamped out or however they're made at the 18 Remington facility the Bridgeport? 19 MR. MORTL: Form. 20 THE WITNESS: Yes, they were. 21 Q. (By Mr. Karst) You mentioned the shell body. 22 Are we talking a paper body or plastic body? 23 A. It depends on when you're talking. In 1968 they 24 were plastic bodies. 25 Q. Was there a period of transition when they were	32 1 Q. (By Mr. Karst) Is there a reason you needed 2 these notes? 3 A. Just because there's kind of a lot of dates and 4 numbers and things on them, so it gets confusing, so 5 just to keep my thinking straight. 6 Q. And this is a one-page document, one-sided. 7 A. Yes. 8 MR. KARST: I'll mark this as Exhibit 1. 9 10 (Plaintiff's Exhibit 1, handwritten notes 11 of Mr. Anderson, marked for identification) 12 13 Q. (By Mr. Karst) On the document it says the last 14 paper shell bodies was 1966. Is that correct? 15 A. That's correct. 16 Q. But prior to 1966, they had -- I can see from 17 the top line -- '61 to '63 some field loads with 18 plastic shells. 19 A. That's correct. 20 Q. So prior to 1961, were all bodies paper? 21 A. Yes. 22 Q. What is a field load? 23 A. A field load is a hunting load, primary purpose. 24 Q. Obviously, target load just for target shooting. 25 A. Target shooting.
31 1 paper bodies versus plastic? 2 A. Yes. 3 Q. Roughly when was that transition period? 4 A. Early 60s. 5 Q. After they transitioned to -- 6 A. I have a cheat sheet I should tell you about. 7 Q. I was going to ask you about it. 8 A. There's some dates and -- 9 MR. KARST: Do you mind if I see this? 10 MR. MORTL: I've got a copy for you, 11 Counsel. He made notes also on his depo notice 12 so that he knew what categories he was -- if you 13 want to mark it as an exhibit, here's an extra. 14 MR. KARST: We'll mark that one page of 15 handwritten notes. 16 Q. (By Mr. Karst) Mr. Anderson, is this your 17 handwriting? 18 A. Yes. 19 MR. MORTL: Wait. Is this your 20 handwriting? 21 THE WITNESS: No. In part it's my 22 handwriting. It's my information. I believe 23 Gloria did this for me when we were having a 24 meeting. I have pretty good arthritis in my 25 hands, and I don't write that well anymore.	33 1 Q. Can you use a target load to hunt with? 2 A. You could. 3 Q. And vice versa, can you use a field load to 4 target shoot with? 5 A. Not really. You could, but it's typically a 6 heavier shot and heavier load. You would be 7 overpowered for target shooting if you're doing target 8 shooting that's sanctioned by a body of sportsmen, they 9 call themselves. There are certain regulations for the 10 gauges that you can use for certain types of target 11 shooting, skeet, trap. 12 Q. Did those regulations exist in the 1960s? 13 A. Yes. 14 Q. Do you know what specific regulations those are, 15 what body enforces those regulations? 16 A. American Skeet Shooting Association, American 17 Trap Shooting Association, organizations like that. 18 Q. But if you're just out messing with friends, you 19 can use a field load target shooting. 20 A. Sure. 21 Q. If you have a field load and a target load 22 that's 12-gauge -- well, I'm making an assumption. 23 Remington made both, right? 24 A. Yes. 25 Q. If you have a field load and a target load

34 1 that's 12-gauge, what is the difference between the 2 two? 3 MR. MORTL: Objection to form. 4 Q. (By Mr. Karst) And if there's other factors 5 that I need to be asking you to know the difference, 6 let me know. 7 MR. MORTL: Objection to form. 8 If you can answer. 9 THE WITNESS: The major differences are the 10 weight of the load, the lead shot primarily. 11 There are also differences in the wad column, as 12 it's known, which is internal parts of the 13 shell. 14 Q. (By Mr. Karst) And which wads are you referring 15 to? 16 A. Well, it depends on which load you're talking 17 about, but typically -- 18 Q. If we're dealing with 12-gauge. 19 A. A 12-gauge would have a basewad, an over-powder 20 wad, card wad for the old-timers, power piston wads in 21 the newer shells and H wads, which I believe we started 22 making in the 50s, well before I got there, plastic 23 wads. 24 Q. And is the weight difference the wads, or is the 25 weight difference the shot?	36 1 Q. The main difference is weight. What would cause 2 the difference in weight is typically the size of the 3 shot and how much powder you need, but you also 4 mentioned that there's some type of difference in the 5 wad itself, and that's what I'm asking. 6 A. Yes. The wad column would be different. 7 Depending on the shell, you could have a separate 8 basewad, as it's known, which is the wad that you're 9 interested in here, I'm sure, or the integral base in 10 the shell, a shell all in one piece. 11 Q. And that's for -- 12 A. That could be for either target shooting or 13 field shooting. 14 Q. What's a separate basewad? 15 A. A separate basewad is a component that fills the 16 bottom of the body of the shell when the shell is a 17 plastic body or, before that, a paper body. The body 18 was a tube, and the first thing that went into the tube 19 in the manufacturing process was a basewad, and that 20 formed the base section of the shell. 21 Q. I don't want to put words in your mouth, but I 22 thought you said a separate basewad. That's why I'm -- 23 A. Yes. If it's not an integral body shell or a 24 unibody shell, there's a basewad in it, and it could be 25 made out of plastic or dry molding.
35 1 A. It's primarily the shot, but the shot weight 2 might bring on a different weight in a powder charge as 3 well. 4 Q. You might have more or less powder. 5 A. Yes. 6 Q. The wads that are internal, would they 7 differentiate at all -- 8 A. Between the field and -- 9 Q. -- the target. 10 A. Yes. 11 MR. MORTL: Objection to form. Slow down a 12 little bit. 13 Q. (By Mr. Karst) What would be that 14 differentiation -- 15 MR. MORTL: Objection to form. 16 Q. (By Mr. Karst) -- between field and target on a 17 12-gauge? 18 MR. MORTL: Same objection. 19 Q. (By Mr. Karst) Do you understand my question? 20 A. Repeat the question. 21 Q. You mentioned that a field wad and a target wad, 22 one of the main differences. 23 A. Field load and target load. 24 Q. Field load and target load. 25 A. Yes.	37 1 Q. So a unibody shell or integral shell. 2 A. Unibody and integral body is the same thing, 3 different nomenclature. 4 Q. What is that? 5 A. It's a shell made in one piece. 6 Q. Does that have a basewad in it? 7 A. No, not as such. It's not a separate component. 8 Q. Is that a target shot? 9 A. It's primarily target, but there are field loads 10 using those shells, too. 11 Q. Has there always been field loads using those, 12 or is that something newer or a specific type of gauge? 13 MR. MORTL: Objection to form. 14 THE WITNESS: The whole concept of the 15 unibody shell came into being in the early 60s, 16 earlier than 60s, and it was preferred 17 construction because it was stronger. 18 Q. (By Mr. Karst) If you had a unibody shell, it 19 does not have a basewad in it. 20 A. Correct. 21 Q. You have to put one in it when you -- 22 A. You don't put one in it. It's built into the 23 shell. That's why it's an integral body. It's a 24 unibody, one piece. 25 Q. Is it down on the bottom, or is it up on the

38 1 sides? 2 A. A section that would be analogous to a basewad 3 in the bottom. 4 Q. Is there still a primer that goes into the 5 center? 6 A. Yes. 7 Q. Is that a rim or a center? 8 A. Center. All shotshells are centerfire. 9 Q. This unibody shell, did they make it in certain 10 gauges? 11 MR. MORTL: Objection to form. 12 THE WITNESS: Yes, but primarily 12. 13 Q. (By Mr. Karst) Outside of the unibody shell, 14 did all other shotgun shells have a basewad? 15 A. Yes. 16 Q. The unibody shell that didn't have a basewad, 17 did it still have wads that – 18 A. Yes. 19 Q. I'll go back to that. I know we kind of got off 20 track. I'll go back to the unibody shell in a little 21 bit. I want to go back to the 12-gauge shell that we 22 were talking about before. We were talking about the 23 shell body, and then you also mentioned, obviously, 24 they have a basewad in there and a shell cap. 25 A. Yes.	40 1 wads. The basewad is associated with the shell. The 2 over-powder wad is a separate component. It's 3 generally made of cardboard or felt composition. The 4 shot container, sometimes known as shot protector, is a 5 wad that the shot goes into, and it's made out of 6 plastic, and that protects the shot from being formed 7 against the barrel of the shotgun to some extent. 8 Q. Is that the power piston you're referring to? 9 A. That's Remington's trade name for it. Yes. 10 Q. Do you either have the internal wads or a power 11 piston, or can you have both? 12 A. You can have both. 13 Q. Now, you mentioned the other type of wads were 14 cardboard and felt. 15 A. Uh-huh. 16 Q. How do you know that? 17 A. That's how our specifications read. The 18 catalogs can give you the rundown on what kind of wads 19 are in each particular load. 20 Q. Are there any other component parts of cardboard 21 wads besides cardboard? 22 MR. MORTL: Objection. 23 THE WITNESS: I don't know. 24 Q. (By Mr. Karst) How about the felt wads; any 25 other component parts?
39 1 Q. I think you said cap. 2 A. Cap or head. Those terms are interchangeable 3 for that. 4 Q. If I'm looking in a shotgun shell from the 5 outside, is that the metal part? 6 A. Yes. 7 Q. And then the shell basewad, where is that 8 located within the shell? 9 A. It's on the bottom of the shell. 10 Q. Meaning – 11 A. Surrounded by the cap and whatever the body is 12 made out of, paper or plastic. 13 Q. Are there different sizes of basewads? 14 A. Yes. 15 Q. And what would the size of the basewad be 16 determinate of? 17 A. The gauge of the shell. We're talking about a 18 12-gauge. It would be the same diameter, but it might 19 have a different length depending on what the shell is 20 used for. 21 Q. You mentioned there were internal wads depending 22 on the load. 23 A. Correct. 24 Q. What do you mean by that? 25 A. Well, there were several different kinds of	41 1 A. Yes. Felt wads are made up of felt fiber, 2 sometimes animal fiber, horse hair, and it has a 3 binder. I believe it's a little butyl rubber. That's 4 it for the felt wad. 5 Q. What does a felt wad look like? 6 A. A disc of varying thickness and diameter, which 7 is defined by the inside of the shell. That's it. 8 Q. An image just popped in my head. At times when 9 you have a chair on a hard surface, you put that little 10 felt buffer on there so that you don't scratch the 11 floor. 12 A. Bingo. 13 Q. Is that relatively what it looks like? 14 A. Not as big, but yeah, it looks like that. 15 Q. Just the diameter is smaller. 16 A. Yes. 17 Q. If I'm dealing with a cardboard wad, what does 18 that look like? 19 A. It looks like a piece of fairly thick cardboard 20 without the expansion chambers that cardboard typically 21 has. It, again, depends on the outside diameter of the 22 shell, and the amount of body that you want to fill up 23 in the shell determines its thickness. 24 Q. Would the felt also – would the thickness vary? 25 A. It could, yes.

42 1 Q. You also mentioned, I believe, an H wad. 2 A. Yes. An H wad is a plastic molded wad that was 3 a device that Remington invented. Quite a few other 4 manufacturers made it, too, but it's a plastic piece 5 that looks like -- instead of being flat like a 6 cardboard wad or a felt wad, it has concave sections in 7 both the front and on the back of it, so if you put -- 8 the major use for the H wad is to separate the 9 propellant package, whatever it might consist of, the 10 shot package originally. Originally I say because that 11 was used before the power piston came into existence; 12 therefore, it did not have the shot protection 13 qualities that the power piston had. It just sealed 14 off the powder chamber from the shot chamber basically. 15 Q. Which is what the power piston did when that 16 came in. 17 A. The power piston did that as well as protecting 18 the shot from the shotgun barrel. 19 Q. When the power piston came into being, was the H 20 wad used anymore? 21 A. No, I don't believe so. 22 Q. I'm sure there's a transition period. 23 A. Yes, there is. 24 Q. What was an H wad made up of? 25 A. Polyethylene, plastic.	44 1 A. No. 2 Q. What else have you seen besides -- 3 A. We had some Union Carbide polyethylene as well. 4 Q. Do you know if the polyethylene had any type of 5 a filler or an additive? 6 A. The du Pont stuff didn't, no. It was pure 7 polyethylene. 8 Q. Do you know if the Union Carbide stuff did? 9 A. I don't know. 10 MR. KARST: Do you want to take a 11 five-minute break? 12 MR. MORTL: Sure. 13 VIDEOGRAPHER: The time is 11:07 a.m. We 14 are going off the record. 15 16 * * * * * 17 18 VIDEOGRAPHER: The time is 11:23. We are 19 back on record. 20 Q. (By Mr. Karst) Mr. Anderson, looking at Exhibit 21 1, which is the handwritten notes here, you mentioned 22 that you did not write this, that your attorney did, 23 correct? 24 A. She mechanically wrote it. I told her what to 25 write.
43 1 Q. That's it? That's the only component? 2 A. That's it. 3 Q. Were they pre-made by somebody else and then 4 shipped to Remington, or did Remington -- 5 A. No. Remington made them. 6 Q. Where they molded? 7 A. Yes. 8 Q. Are they compression molded or injection molded? 9 A. Injection molded. 10 Q. Injection molded, so there would be a hopper on 11 the machine, stuff is poured in, it's injected into a 12 mold, and there comes the end product. 13 A. Correct. 14 Q. Is it just polyethylene that's poured into the 15 hopper, or are there other things poured in there? 16 A. Just polyethylene. 17 Q. And how do you know it's just polyethylene being 18 put in? 19 A. It comes out of Alathon bags. 20 Q. What's an Alathon bag? 21 A. It's a brand name from du Pont for polyethylene. 22 Q. So all the polyethylene for the H wad came from 23 du Pont itself. 24 MR. MORTL: Objection to form. 25 Q. (By Mr. Karst) From what you've seen.	45 1 Q. The first thing written on there is -- well, I 2 guess in the upper right we have plastic H wad, mid 3 1950s. Where is that information coming from? 4 A. Do you mean the H wads? 5 Q. Yes. 6 A. A catalog. I had to go through catalogs and 7 price lists to remember what these dates were and so 8 forth. 9 Q. Do you know which specific catalog you looked 10 at? 11 A. Remington's ammunition catalogs. 12 Q. Do you know what year catalogs you looked at? 13 A. Everything from 1950 or so up to the 80s or so. 14 Q. And what were you looking for? 15 A. Dates of manufacture, make sure we had the right 16 manufacture cutoff dates for things that we were 17 looking at. 18 Q. When you say plastic H wads, mid 1950s, what 19 does that mean? 20 A. That means that's when they were used. That's 21 when they came into use. 22 Q. And are you basing that off of you looked at a 23 catalog and that's the first time they appeared in a 24 catalog? How do you come up with the mid 50s from 25 looking at catalogs?

46 1 A. They're good indicators of when something came 2 into being for sale. I have all kinds of other dates 3 in my head -- because I was an R&D guy -- about what 4 the progression of those kinds of things were. 5 Q. Right. But you said the plastic H had mid 1950s 6 note came from the catalogs. 7 A. Yeah. The timing for it did. 8 Q. Right. But if you're looking at the catalogs, 9 does a catalog not give you a specific year, if you're 10 looking at a specific year of a catalog? 11 A. Well, it gives you the specific year that you're 12 reading, but if you come across something for the first 13 time in a string of catalog dates, you'll know that's 14 when it was first introduced roughly. 15 Q. That's what I was trying to understand. Why did 16 you not have your attorney write down the year of that 17 catalog as opposed to putting mid 50s? 18 A. I did for several of them or she did. 19 Q. I know. But for that one you didn't. 20 A. No reason. I don't know. 21 Q. So is this you looking at the catalogs, or is 22 this your attorney looking at the catalogs and writing 23 down a year? 24 A. Both. 25 Q. Are you looking at the catalogs together?	48 1 would say. 2 Q. Were you in this office? 3 A. No. 4 Q. Where were you? 5 A. Home. 6 Q. Who was present with you? 7 A. Some of this might have been from my first 8 deposition, too, which was four years ago. 9 Q. Might have been doesn't help me. That's why I 10 need to know that facts. 11 MR. MORTL: Hold on. I think there's some 12 confusion on what the question is, if you're 13 talking about the first deposition. I think he 14 means when was this handwritten -- 15 MR. KARST: Hold on. 16 Q. (By Mr. Karst) When this list was generated, 17 you said you were at your home. 18 A. Uh-huh. 19 Q. And the attorneys brought documents to you. 20 A. Correct. 21 Q. Who was present for that meeting? 22 A. Both of my attorneys. 23 Q. So it was just the three of you, or were there 24 more people there? 25 A. No. Just the three of us.
47 1 A. Uh-huh. 2 Q. Yes? 3 A. Yes. 4 Q. You have felt wad, around 1930s to 1968 or 1969. 5 A. Correct. 6 Q. What is that information based off of? 7 A. Once again, I'm sure we got the dates from the 8 catalogs and price lists. 9 Q. What catalogs did you look at that are from the 10 1930s? I'm unaware of any. 11 A. I don't know. I can't answer that. 12 Q. So where would the date around the 1930s come 13 from? 14 A. It might have come from our process records, 15 other things that we looked at when we started -- 16 Q. What are process records? 17 A. Process records are records of how something is 18 made, what equipment is used, what materials are used, 19 that kind of thing. 20 Q. You said it might have come from that. 21 A. Yeah. I don't recall. 22 Q. When was this list generated? Was this 23 yesterday when you met with your attorneys? 24 A. No. It was before that. We had this -- I don't 25 know -- a couple months ago. A couple months ago, I	49 1 Q. And did they literally -- what documents did 2 they have with them? 3 A. Well, they had some catalogs, and they had some 4 price lists, and we went through those. 5 Q. Are they on a computer, or are they hard copies? 6 A. Hard copies. 7 Q. So are we talking like an inch of documents? -- 8 5 feet of documents? What are we talking about? 9 A. I don't know. I didn't measure it. 10 Q. Give me an idea. 11 A. Take a fairly thin catalog for 20 years worth at 12 least, between 40s and 60s. They're catalogs. The 13 price lists are one sheet generally. 14 Q. I understand that, but in the catalogs that I 15 have I don't see any from the 30s and 40s, so that's 16 why I'm trying to understand where this comes from. 17 MR. MORTL: Objection to form. 18 THE WITNESS: I told you it might have come 19 from the process records. 20 Q. (By Mr. Karst) I just asked you what documents 21 you looked at, and you said your attorney had given you 22 catalogs to look at. 23 A. Uh-huh. 24 Q. Correct? 25 A. Yes. But not exclusively.

50 1 Q. What else did they give you? 2 MR. MORTL: Objection to form. 3 THE WITNESS: Catalogs, price lists, and I 4 don't recall the rest, but I worked there for 20 5 year, and I remember a lot of process records, 6 and I've seen those. I know the product very 7 well. 8 Q. (By Mr. Karst) Do you have an independent 9 recollection that felt wads came into existence in 10 around the 1930s? 11 MR. MORTL: Objection to form. Vague. 12 THE WITNESS: Me personally? 13 Q. (By Mr. Karst) Yes. 14 A. No. I wasn't born then. 15 Q. You have here to 1968 or 1969. Do you have an 16 independent recollection that they were used until '68 17 or '69? 18 A. I recall them being used until then. 19 Q. Pardon? 20 A. I recall them being used until then. 21 Q. On that you have an independent recollection. 22 A. I don't understand what you mean by independent 23 recollection. 24 Q. Felt wads you have around 1930s to '68 or '69, 25 correct?	52 1 remember. I really don't read them anymore. 2 Q. (By Mr. Karst) But these are catalogs that you 3 personally obtained. 4 A. These are magazines. 5 Q. Magazines that you personally get? 6 A. Yes. 7 Q. Do you still have copies of any of those? 8 A. Yes. 9 Q. What do you still have copies of? 10 A. American Rifleman. I subscribe to that. 11 Q. How far back do your copies go? 12 A. It depends which ones I threw away. 13 Q. Okay. Give me an idea. 14 A. I really can't. 15 Q. Can you give me a decade? 16 A. Two years, three years. 17 Q. What's the oldest magazine that you have in your 18 house? 19 MR. MORTL: Objection to form. 20 Q. (By Mr. Karst) Related to shotguns or rifles. 21 A. I have no idea. 22 Q. Anything before 2000? 23 A. Probably. 24 Q. Anything from the 60s? 25 A. Could be.
51 1 A. Yes. 2 Q. So I'm assuming this means that felt wads were 3 used around the 1930s until '68 or '69. 4 A. That's right. 5 Q. You do you have an independent recollection that 6 the felt wads were used until '68 or '69. 7 MR. MORTL: Objection to form. 8 THE WITNESS: I don't know what you mean. 9 Q. (By Mr. Karst) Is this your recollection, or is 10 this a recollection from the documents that your 11 attorneys gave you – 12 A. '68 to '69 is my recollection, and the early 13 stuff is from literature. 14 Q. That your attorneys gave you. 15 A. Not necessarily, but yes, in this case. I read 16 catalogs, too. 17 Q. What do you mean? You said not necessarily from 18 your attorneys, so what other catalogs? 19 A. Remington catalogs, gun magazines, anything 20 where you can learn stuff about how ammunition works 21 and is made. 22 Q. What are those other magazines? 23 MR. MORTL: Objection to form. 24 THE WITNESS: Guns and Ammo, American 25 Rifleman. There's a lot of them. I don't	53 1 Q. Prior to -- 2 A. I don't really know. I don't remember. 3 Q. So that's where I'm trying to understand the 4 basis of your knowledge, which I still don't have 5 clear. So the dates from around the 1930s, you said 6 that's not your independent knowledge, so that's 7 knowledge from who? 8 A. Catalogs, process records, recollections from my 9 employment at Remington. 10 Q. When you say that, what does that mean, 11 recollection from your employment at Remington? 12 MR. MORTL: Objection to form. 13 THE WITNESS: I don't know how to answer 14 you. You don't know what that means? 15 Q. (By Mr. Karst) Well, there's a lot of things it 16 could be mean. I want to know what it means to you. 17 A. It means things that I remember from the time 18 that I was employed at Remington. 19 Q. Documents that you read? People you talked to? 20 A. Documents, process, equipment, all that kind of 21 stuff. 22 Q. So let me ask you, the felt wads, you're saying, 23 started around the 1930s. Where is that specific 24 knowledge from? 25 MR. MORTL: Objection to form. Asked and

54 1 answered. 2 THE WITNESS: I don't know. I can't put my 3 finger on where all this stuff comes from. 4 Q. (By Mr. Karst) The felt wads were made, as your 5 attorney has written here, 1968 or 1969. Where is that 6 specific information from? 7 A. Catalogs, price lists. 8 Q. Can you give me the specific catalog it is from? 9 A. No. 10 Q. When you have the dates 1968 or 1969, are you 11 specifically looking at a catalog to get that from? 12 A. In the case of that particular one, I think we 13 probably were looking at a price list. 14 Q. Was the price list from '68 or '69? 15 A. Yes. 16 Q. Do you know where in the documents that have 17 been produced that is? 18 MR. MORTL: Objection to form. 19 Q. (By Mr. Karst) Can you show me that document? 20 A. No. 21 Q. Is there a reason that you can't show me that 22 document? 23 MR. MORTL: Objection. Argumentative. 24 THE WITNESS: I don't know where it is. 25 Q. (By Mr. Karst) Is this a document that your	56 1 A. From a vendor. 2 Q. Were they pre-made, the sheets? 3 A. The sheets were pre-made, yes. 4 Q. Do you know what vendor they came from? 5 A. No. 6 Q. Would they come from one vendor or multiple 7 vendors? 8 MR. MORTL: Objection to form. Foundation. 9 THE WITNESS: I don't know. This was 10 before my experience in the production 11 department at Remington specifically. 12 Q. (By Mr. Karst) I understand, but you said your 13 knowledge was based on your experience while working at 14 Remington, so that's why I'm asking you that. You 15 first said it was based off of the documents that your 16 attorneys specifically showed you. Then you said it 17 was based off of working at the plant. 18 A. "And" I said it was based. 19 Q. Right. So now I'm trying to understand what at 20 the plant is any basis for that information. 21 MR. MORTL: Objection. Argumentative. 22 Asked and answered. 23 Q. (By Mr. Karst) You said it came in sheets. 24 A. Uh-huh. 25 Q. What was the process? They come in sheets.
55 1 attorney gave you to review? 2 A. It's one that -- yes. It's one that she brought 3 with her. It's publically available. 4 Q. So without seeing that document, you have no 5 independent knowledge that that's '68 or '69 or what 6 year that is. 7 MR. MORTL: Objection. Misstates 8 testimony. 9 THE WITNESS: I have a recollection from my 10 experience. That was about the time it was. I 11 couldn't be specific as to whether it was date, 12 month, year or what have you, but in the late 13 60s. 14 Q. (By Mr. Karst) So what's the recollection from 15 your experience? Were they making it? Was a specific 16 machine making it and stopped making it? What's your 17 recollection when you're at the plant? 18 MR. MORTL: Objection to form. 19 THE WITNESS: My recollection is we stopped 20 using it in the late 60s. 21 Q. (By Mr. Karst) How were felt wads made? 22 A. They're punched out of a sheet of material. 23 Q. What building? 24 A. I don't recall. 25 Q. Where did the sheet come from?	57 1 What happens to them? 2 MR. MORTL: Objection to form. 3 THE WITNESS: They're punched out on what's 4 known as a punch press. 5 Q. (By Mr. Karst) One at a time? Multiple? One 6 sheet at a time? 7 A. A row of punches. 8 Q. What happens after they're punched out? 9 MR. MORTL: Objection to form. 10 THE WITNESS: They're collected in a bin. 11 Q. (By Mr. Karst) And then where do they go. 12 MR. MORTL: Objection to form. 13 THE WITNESS: To wherever they're needed. 14 Q. (By Mr. Karst) Within building 3 series or 15 somewhere else? I'm sorry. 300 series. 16 A. I don't recall specifically on the felt wads, 17 but they were made in one of the 300 buildings, and 18 they were used in one of the 300 buildings, but not 19 necessarily the same one. 20 Q. Was there a specific machine that would punch 21 these out? 22 A. Yes. 23 Q. What happened to that machine in the 1970s? 24 MR. MORTL: Objection to form. 25 If you know.

58 1 THE WITNESS: It wasn't used for felt wads 2 anymore. 3 Q. (By Mr. Karst) What was it used for? 4 A. I don't know. 5 Q. Was it used? 6 A. I don't know that either. 7 Q. Where was the machine located? 8 A. In one of the 300 buildings. 9 Q. Was there one machine or multiple machines? 10 A. No. There were two or three of them. 11 Q. Do you know who operated any of those machines? 12 A. Do you mean personally who operated them? 13 Q. Yes. 14 A. I don't recall. 15 Q. Was the diameter of the felt wad already – I 16 guess you said the punch presses punched it out. 17 A. Uh-huh. 18 Q. So they have to have something that they're 19 punching out. Was it already pre-scored or anything? 20 A. No. It was just a sheet, and it was placed over 21 a punch and die tooling set. 22 Q. So nothing done to the sheet beforehand to score 23 it or anything where the punch had to punch. 24 A. No. 25 MR. MORTL: You just need to slow down a	60 1 A. That's correct. 2 Q. Did anyone ever tell you the specific dates for 3 this line? 4 A. Other than from the catalogs that we looked at, 5 no. 6 Q. Is any of this information from catalogs other 7 than what your attorney brought to show you? 8 A. I don't know. I don't remember when we were 9 compiling the list. 10 Q. Next you have 1964, some target loads, slash, 11 power piston. 12 A. Uh-huh. 13 Q. What does that line mean? 14 A. That means that some target loads had plastic 15 body shells and then the power piston was introduced 16 around that time. 17 Q. So this is only relating to the outer shell of 18 the shell. 19 MR. MORTL: Objection to form. 20 Q. (By Mr. Karst) The outer body of the shell. 21 A. The power piston is an internal component. 22 Q. But you're talking about as it relates to 23 plastic shells. 24 A. Correct. 25 Q. So you're saying that some target loads had a
59 1 little bit. 2 THE WITNESS: Okay. 3 Q. (By Mr. Karst) Next you have on this plastic 4 body shells. You have 1961 to 1963, some field loads 5 with plastic shells. Did I read that correctly? 6 A. Yes. 7 Q. And, again, that's in your attorney's 8 handwriting and not yours. 9 A. Correct. 10 Q. Where did that information come from? 11 A. I believe we identified those dates from 12 catalogs. 13 Q. Do you know which specific catalogs they came 14 from? 15 A. No. 16 Q. Is there any way you could point me right now to 17 those catalogs? 18 MR. MORTL: Objection to form. 19 THE WITNESS: No. 20 Q. (By Mr. Karst) Do you have any independent 21 recollection of those dates without looking at the 22 catalogs? 23 A. No, not really. I had a vague recollection of 24 the timing of a lot of these things. 25 Q. This is before you even got to the plant.	61 1 power piston internally on plastic shells. 2 A. Correct. 3 Q. Starting in 1964. 4 A. Correct. Yes. 5 Q. Where is that information gleaned from? 6 A. Probably from a catalog. 7 Q. Do you know which catalog? 8 A. No. 9 Q. Is this a catalog that you have independently, 10 or is this a catalog that your attorney brought to you? 11 A. I believe it came with my attorney. 12 Q. Without looking at a catalog, do you have any 13 independent recollection of the date 1964 as it relates 14 to this? 15 A. Only what I've heard from other people that were 16 there at the time, since I wasn't. 17 Q. What other people? 18 A. Coworkers. 19 Q. What coworkers? 20 A. I don't remember. 21 Q. Can you give me any coworkers? 22 A. No. 23 Q. Were power pistons manufactured on site? 24 A. Yes. 25 Q. How were they made?

62 1 A. Injection molding. 2 Q. How many injection molding machines were out 3 there that made power pistons? 4 MR. MORTL: Form. 5 THE WITNESS: Specifically I can't tell 6 you, but I would say eight is a good number. 7 Q. (By Mr. Karst) Are these in the 300 series 8 buildings? 9 A. Yes. 10 Q. Are they located anywhere else besides the 300 11 series buildings? 12 A. No. 13 Q. Did they ever add machines while you were there 14 to make these? 15 A. Yes. 16 Q. Do you know how many machines they added? 17 A. I don't recall. They had other things made on 18 injection molding machines besides power pistons. 19 Q. What else would be made on injection molding 20 machines besides power piston? 21 MR. MORTL: Objection to form. 22 THE WITNESS: Different kinds of wads. 23 Q. (By Mr. Karst) What type of wads? 24 A. H wads are made on an injection molding machine. 25 Q. The same injection molding machines that made	64 1 Q. Okay. How long were H wads made? 2 A. I don't recall. 3 Q. Can you give me a decade? 4 A. No. Because I don't know for sure. 5 Q. Were they still being made when you left in '86? 6 A. No. 7 Q. The H wads we're talking about, just so the 8 record's clear. 9 A. Correct. 10 Q. Were power pistons still being made when you 11 left in '86? 12 A. Yes. 13 Q. 1966, last year paper shell bodies. Again, this 14 is in your attorney's handwriting and not yours. Where 15 did that specific date come from? 16 A. Once again, I believe it came from a catalog. 17 Q. Do you know which specific catalog it came from? 18 A. No. 19 Q. Anything that you can point me to? 20 A. 1966 is a clue. I don't mean to be cute with 21 you, but it is. 22 Q. Without looking at that catalog, could you give 23 me the date 1966? Would you know that independently? 24 A. I would know around that date, yes. 25 Q. When you say looking at a catalog, 1966, last
63 1 the power pistons? 2 A. Not necessarily. 3 Q. That's what I'm asking. I thought you said that 4 some injection molding machines that made power pistons 5 could also be used to make other things. 6 A. They can. You change the mold. 7 Q. That's what I'm saying. So on injection molding 8 machines power pistons were made, H wads were made, 9 correct? 10 A. I think I recall it that way, yes, but it really 11 is -- well, it's up to you to say whether it's 12 irrelevant or not, but to me it is. 13 Q. It's all relevant. What else is made on those 14 injection molding machines besides the power pistons 15 and the H wads? 16 A. Nothing. 17 MR. MORTL: Objection to form. 18 Q. (By Mr. Karst) So there's nothing else that was 19 injected molded out at Remington in the 300 series 20 buildings besides power pistons and H wads. 21 MR. MORTL: Objection to form. 22 THE WITNESS: I believe that's true, yes. 23 Q. (By Mr. Karst) And when power pistons came into 24 existence, the H wads were phased out. 25 A. No.	65 1 year paper shell bodies, what does that mean? Does 2 that mean that in 1966 they no longer appeared in the 3 catalog? Was does that mean? 4 A. That means they were no longer manufactured. 5 Q. And how would you know that looking at the 6 catalog? 7 A. You wouldn't, but you would know that was the 8 last year that they appeared in the catalog. 9 Q. That's what I'm saying. So 1966, last year 10 paper shell bodies were made, that's an assumption 11 based off a catalog that you've looked at. 12 A. Correct. 13 MR. MORTL: Objection. Form. 14 Argumentative. 15 Q. (By Mr. Karst) Do you have any independent 16 recollection that 1966 was the last year paper shell 17 bodies were made? 18 A. Independent recollection. No. I wasn't there 19 then. 20 Q. On the next line you have here 1968, AA target 21 shell, dash, 1972, replaced by -- is that RXP? 22 A. RXP unibody. 23 Q. RXP unibody, all other target shells, 24 parenthetical, 12-gauge and 20-gauge, close 25 parenthetical, plastic basewad. Did I read that

66 1 correctly? 2 A. You did. 3 Q. What does that mean? 4 A. That means in 1968 the All-American target shell 5 came out. That was a Remington trade name. That was 6 characterized by a plastic body and a plastic basewad, 7 and in 1972 the RXP unibody shell came out, which 8 replaced the All-American target shell. 9 Q. Were all target shells All-American shells in 10 1968? 11 A. No. 12-gauge only. 12 Q. And how long was it just 12-gauge only? 13 A. Forever. 14 Q. Were all 12-gauges the All-American? 15 MR. MORTL: Objection. Vague. 16 THE WITNESS: Were all 12-gauge target 17 loads All-American? 18 Q. (By Mr. Karst) Yes. The only type that you can 19 buy, or is there other types? 20 MR. MORTL: Same objection. 21 THE WITNESS: I don't recall. 22 Q. (By Mr. Karst) But the All-American target 23 shells had a plastic basewad. 24 A. Correct. 25 Q. Did the All-American target shells ever have	68 1 A. I believe we looked at it in a catalog, but it's 2 also my knowledge. 3 Q. Do you know which catalog? 4 A. No, not specifically. 5 Q. Were there multiple catalogs or one catalog? 6 A. Do you mean in any given year? 7 Q. To get this information. 8 A. Multiple catalogs, different years. 9 Q. Again, are these catalogs that your attorneys 10 gave you or catalogs that you had? 11 A. They were ones that my attorneys brought. 12 Q. Then you say in 1972 the All-American target 13 shell was replaced by the RXP unibody. Is a separate 14 line all other target shells 12-gauge and 20-gauge? 15 I'm trying to understand what these notes mean. 16 A. All other target shells, 12-gauge and 20-gauge, 17 had a plastic basewad. That's what that means. 18 Q. That were unibody? 19 A. No. Unibody and plastic basewad are 20 independent. You can't have a unibody and a plastic 21 basewad, too. 22 Q. So in 1972 what was on the market? What existed 23 for Remington? 24 MR. MORTL: Objection to form. 25 THE WITNESS: I don't know what you mean.
67 1 anything else besides a plastic basewad? 2 A. No. 3 Q. And the All-American target shells, starting in 4 1968, only came in 12-gauge. 5 A. Yes. 6 Q. And they never -- I don't want to put words in 7 your mouth. 8 A. I'm sure you don't. 9 Q. Did they ever come in any other gauge besides 10 12, the All-American shells? 11 A. Not that I recall, no. 12 Q. How long were the All-American target shells 13 made? 14 A. Well, they were replaced the by RXP unibody 15 shell in 1972, so that's four years. 16 Q. Okay. So the only year the All-American target 17 shells were made with a plastic basewad was from '68 to 18 '72 in 12-gauge only. 19 A. I believe that's right. 20 Q. Where is that information from? 21 A. Right up here. 22 Q. That comes from you. 23 A. I was there then. 24 Q. So that information is not based of a catalog. 25 That's based off of your knowledge.	69 1 A lot of things were on the market. 2 Q. (By Mr. Karst) It says in 1972 the RXP unibody 3 replaced the All-American target shell. 4 A. Correct. 5 Q. The All-American target shell was only made in 6 12-gauge. 7 A. Correct. 8 Q. So the RXP unibody, is that only 12-gauge? 9 A. Yes. 10 Q. And how long was the RXP unibody made? 11 A. A long time. I can't give you a date. I don't 12 know. 13 Q. Was it still made when you left in '86? 14 A. Yes. 15 Q. Was it only 12-gauge when you left in '86? 16 A. I believe so, yes. 17 Q. Was there a basewad in the RXP unibody? 18 A. No. 19 Q. Was there ever? 20 A. No. 21 Q. All other target shell. Does that mean the only 22 other target shells that Remington made were 12 and 23 20-gauge? 24 A. Correct. 25 Q. There's no other target shell --

70 1 A. No. I'm sorry. It was made in 410 as well. 2 Q. So target shells that Remington makes are 3 12-gauge, 20-gauge and 410. 4 A. Correct. 5 Q. Those are the only type of target shells 6 Remington makes. 7 MR. MORTL: Objection to form. 8 Q. (By Mr. Karst) Made. Sorry. 9 A. To the best of my recollection, yes. 10 Q. And the 12-gauge, did they have a basewad? 11 A. Yes. 12 MR. MORTL: Objection to form. 13 Q. (By Mr. Karst) Did the 20-gauge have a basewad? 14 MR. MORTL: Same objection. 15 THE WITNESS: Yes. 16 Q. (By Mr. Karst) Did the 410 have a basewad? 17 MR. MORTL: Objection. 18 THE WITNESS: Yes. 19 Q. (By Mr. Karst) What was the 12-gauge basewad 20 for target shells made out of? 21 A. Plastic. 22 Q. What was the 20-gauge target shell basewad made 23 out of? 24 A. Plastic. 25 Q. And what was the 410?	72 1 basewads? 2 A. They're injection molded and then cold-formed 3 when the shell is assembled. 4 Q. What cold-molding? 5 A. I didn't say cold-molding. 6 Q. Cold-formed. I'm sorry. 7 A. Cold-formed. The temperature of everything is 8 ambient temperature, and you slide the basewad in -- 9 I'm going to make this sound simpler than it is, but 10 you slide the basewad into the body, which is a plastic 11 tube, and then it's headed, which is a punch and die 12 operation. That does a couple things; it deforms the 13 basewad so that it flows into the rim of shell along 14 with the bottom of the body of the shell to lock 15 everything together. 16 Q. So at that point you have the metal, the plastic 17 and the basewad. 18 A. Correct. 19 Q. Are there multiple machines that make this? 20 A. There were. 21 Q. Are the 12 and 20-gauge and 410 made on the same 22 machine or different machines depending on the gauge? 23 A. Different machines. 24 Q. Could you make a 20-gauge and a 12-gauge 25 machine?
71 1 A. Plastic. 2 Q. How do you know that the 12-gauge were plastic 3 basewads? 4 A. Because I was around when they had the 5 development program. I saw them. 6 Q. Were you part of the development -- 7 A. I also used them. No, I was not part of the 8 development program. 9 Q. Who was part of the development program? 10 A. Other employees. 11 Q. And who are they? 12 A. I don't recall specifically, but the main one is 13 deceased. 14 Q. Who is that? What was that? 15 A. George Eckstein? 16 Q. How do spell Eckstein? 17 A. E-C-K-S-T-E-I-N. 18 Q. How do you know -- why do you state that the 19 12-gauge target shell were only plastic basewads? How 20 do you know they were only that? How do you know they 21 were not something else or they didn't make multiple 22 things? 23 A. Because I knew the product line. That's all we 24 made then. 25 Q. Can you describe the process of making plastic	73 1 A. No. 2 Q. You can't retool it to do that. 3 A. No. I guess you could if you wanted to, but we 4 didn't do it that way. 5 Q. So a machine that made 12-gauge target shells 6 with a plastic basewad, could those machines be used to 7 make anything else? 8 A. No. 9 Q. Could they be used to make 12-gauge shells with 10 a different type of wad? 11 MR. MORTL: Vague. 12 Q. (By Mr. Karst) Or is this a specific process 13 for that machine? 14 A. It could, but we didn't. 15 Q. So once the machine had its function, that was 16 the function of that machine. 17 A. Generally, yes. 18 Q. The next line you have 1968, 20-gauge shells, 19 standardized yellow. What does that mean? 20 A. That means that from 1968 Remington changed from 21 using a variety of colors for 20-gauge shells to a 22 standardized yellow. Every Remington shell that was 23 made in 1968 or later in 20-gauge was yellow. 24 Q. So the plastic component part. 25 A. The plastic component was yellow, correct.

74 1 Q. How about other gauges? 2 A. No. They were not single colors. They were the 3 classical colors for Remington, which is green and 4 blue. 5 Q. So on the 20-gauge changed. 6 A. Correct. 7 Q. And is that for target or for field? 8 A. All. 9 Q. Regardless of what it's for, if it's 20-gauge in 10 1968, it's yellow. 11 A. If it was made in 198 or earlier, yes. 12 Q. Did that color stay on until you left in '86 or 13 did it change again? 14 A. No. It was still yellow in '86 when I left. As 15 far as I know, it was still yellow. 16 Q. Where is the information that 1968 is when this 17 occurred? Where is that gleaned from? 18 A. It might be in a catalog, but I also recall 19 that. I recall that year. That's when I came there. 20 Q. To your recollection, not looking at any sheets 21 in front of you, to your recollection, did Remington 22 make asbestos-containing components in their shotgun 23 shells? 24 A. Yes. 25 Q. And what would that component or components be?	76 1 knew him at the time. 2 Q. (By Mr. Karst) Do you remember any names of any 3 of the people, the 18/19 years you were there, who 4 operated that machine? 5 A. I wasn't in production for 18 or 19 years, but I 6 do remember one. Curt Simmons. 7 Q. Is Mr. Simmons still alive? 8 A. No. 9 Q. Can you describe the process of how that machine 10 is operated and how the wad is made? 11 MR. MORTL: Objection to form. 12 THE WITNESS: There's a couple machines 13 that make the wad. One is a mixing machine with 14 the various components of the mix. 15 Q. (By Mr. Karst) What are the various components 16 of the mix? 17 A. In addition to the asbestos, there's wood flour, 18 wax and asbestos. 19 Q. Is there a certain percentage of each, or does 20 that vary? 21 A. There is a certain percentage of each, and I 22 don't recall whether it varies according to the gauge 23 of the basewad being made. I don't think it did, but 24 it was close. 25 Q. So those raw components are poured into a mixer?
75 1 A. Dry-molded basewad. 2 Q. And what is a dry-molded basewad that contains 3 asbestos? 4 A. It forms the base of a shotshell, and it's used 5 just like a plastic basewad except it's made up of 6 other components. It's molded in a different process. 7 Q. What type of molding is this? 8 A. It's compression molding, not heated compression 9 molding, just ambient temperature other than the 10 temperature that's generated by the process. 11 Q. And is that molded onsite in Bridgeport? 12 A. Yes, it was. 13 Q. And how many machines did this type of molding? 14 MR. MORTL: Objection to form. 15 THE WITNESS: Primarily one. I think we 16 had a spare, but it was primarily one machine 17 operation. 18 Q. (By Mr. Karst) Could it make the asbestos wad 19 for multiple gauges of shells? 20 A. Do you mean the dry-molded basewad? 21 Q. Yes. 22 A. Yes. 23 Q. Do you know who operated that machine? 24 MR. MORTL: Objection to form. 25 THE WITNESS: I don't recall, but yeah, I	77 1 -- a hopper? 2 A. They're poured into a mixer to start with, and 3 they're blended. There was a certain order that they 4 went into, which I believe was the wood flour and then 5 the wax -- no. The wood flour, the asbestos powder and 6 then the wax. Then they went from that mixing machine 7 to a forming machine. 8 Q. Who operated that mixing machine at any time 9 during your 18/19 years there? 10 A. Mr. Simmons did. 11 Q. Anybody else? 12 A. There was another guy, but I don't recall his 13 name. He wasn't there very long after I was there. 14 Q. After the mixing machine, what's the next step? 15 A. A forming machine, which is a machine called a 16 Colton machine. That's the company that makes the 17 machine. 18 Q. C-O-L-T-O-N? 19 A. Yes. It's basically a pill-making machine, 20 rotary dial. The material comes down and fills the 21 cavity. The platens rotate. The punches come down and 22 compress the mixture that's in each cavity real hard. 23 It generates around 15,000 PSI, that process. The dial 24 continues around, and the parts are ejected into a bin. 25 That's it. It's a simple process.

78 1 Q. So if you're looking in the bin, you literally 2 just have -- 3 A. -- a hollow cylinder. 4 Q. That's it. 5 A. Yes. 6 Q. So it kind of looks like a small doughnut, or is 7 it solid? 8 A. Well, the proportions are a little different, 9 but yes. 10 Q. Does it have a hole in the center? 11 A. Yes, it has a hole in the center. 12 Q. So is that part of the mold itself, giving it 13 that -- 14 A. There's a punch. The punch gives it the hole in 15 the center, and the die gives it the outside diameter 16 and the length. 17 Q. If it punches, that means there's excess 18 material. 19 A. Generally, no. It's all compressed. It's 20 weighed pretty accurately and dumped into each cavity. 21 There were a lot of cavities on the dial. I forget how 22 many, 28, 30 something like that. 23 Q. So now you've got all these wads in a bin. What 24 happens to them? 25 A. They get transported to the shell-making	80 1 send them off loaded? 2 A. Yes. 3 Q. Does that go to a different machine that does 4 that? 5 A. Yes. 6 Q. Okay. Just keep walking me through the process. 7 Now you have a primed shell. Where do we go next? 8 A. You go to the loading operation next. 9 Q. Okay. 10 A. The powder and the wads, which could be variable 11 depending on the load, and the crimp is made. That's 12 final -- that's it. That's the final operation. 13 Q. And it's packaged up. 14 A. Correct. 15 Q. Remington sells the component parts. 16 A. Some of them. 17 Q. What component parts does Remington sell of the 18 shotgun shells that you just described? 19 MR. MORTL: Objection to form. 20 THE WITNESS: Do you mean during this time 21 period that we're talking about or today? 22 Q. (By Mr. Karst) Back then, back in the 60s, 70s. 23 A. The power pistons were sold as components. The 24 primers were sold as components. The H wads, I 25 believe, were sold as components. The cardboard wads
79 1 operation, and that's where the shells are assembled. 2 Q. Can you describe that process? 3 A. The shell-making process? 4 Q. Yes. With these asbestos wads. 5 A. It's also done on a rotary press type operation 6 with multiple tools, what's called an assemble head and 7 prime operation because it assembled the shell, headed 8 the shell, which means it rammed it so its head would 9 be formed to its final dimensions, the basewad was 10 formed to its final dimensions, and the body was formed 11 to its final dimensions. 12 Q. When you're talking the head, what are you 13 referring to? 14 A. Steel cap or brass cap, depending on the shell. 15 Q. So when that's conformed, there's three parts, 16 the metal head, plastic body and the asbestos basewad. 17 A. And the last step is the primer, simple primer. 18 Q. But after those three areas, then the primer 19 goes in fourth. 20 A. Correct. But in the same machine. It's done in 21 the same machine. 22 Q. Once that is done, what happens to that shell? 23 A. That's now a primed shell and ready to be 24 loaded. 25 Q. And do they load the shells at Remington and	81 1 were sold as components, although their use was on the 2 wane at this time. The felt wads were also sold as 3 components. 4 Q. Then the shot and the powder. 5 A. Then the shot and the powder, right. 6 Q. Did you say the primer? 7 A. Yes. 8 Q. Were the basewads ever sold independently? 9 A. No. 10 Q. Why? 11 A. Because the end user would not have the 12 wherewithal to use them. 13 Q. What do you mean by that? 14 A. You need the machine to put it together. You 15 need the prime machine, or else the basewad is useless. 16 Q. Could the basewad be used as the cartridge wad? 17 A. The cartridge wad? 18 Q. The wad that you talked about before that you 19 described as felt or cardboard, could the basewad be 20 used as that wad? 21 A. No. 22 Q. Why? 23 A. Too big. It's not dimensionally appropriate. 24 Q. The circumference? The thickness? What do you 25 mean?

82 1 A. The thickness for sure. The inside diameter for 2 sure. The outside diameter is questionable. It's just 3 not dimensionally compatible. 4 Q. Have you ever repacked a shotgun shell before? 5 A. Repacked? 6 Q. Reloaded. I'm sorry. 7 A. Yes. Do you mean personally? 8 Q. Yes. 9 A. Yes, I have. 10 Q. When you would do that, do you have a machine at 11 your house, a reloading machine? 12 A. No. I did at Remington actually, but I have 13 operated the machines that you're probably talking 14 about. 15 Q. When you say you did it at Remington, what do 16 you mean? 17 A. We had a loading room for experimental -- I was 18 in R&D at the time, and depending upon the project 19 you're working on, you might need to load your own 20 ammunition, so I had plenty of experience doing that. 21 Q. Was this for R&D purposes or for personal? 22 A. At the time -- no. It was R&D. It was 23 business. It wasn't personal. 24 Q. Outside of work, have you reloaded shells? 25 A. Yes.	84 1 the press. You put a powder tube, usually fed in a 2 plastic tube. There's a primer -- I'm not giving you 3 these in order -- and there's a wad like a power 4 piston, or depending what you're reloading, it might be 5 a cardboard wad or a felt wad, although that's rare 6 these days. You don't see that anymore. You put them 7 in sequentially, and the last operation is the crimp, 8 and you're done. 9 Q. Now, the primer goes in from the backside where 10 the metal is. 11 A. The bottom. 12 Q. Everything else is fed through the plastic end. 13 A. Correct. 14 Q. So it seems like most things in the shell either 15 are ejected from -- when you shoot it -- is ejected 16 from the shell itself when you shoot it or needs to be 17 replaced like the primer, correct? 18 A. The primer does. 19 Q. Needs to be replaced each time. 20 A. The only thing that doesn't -- depending on the 21 shell you've got -- if it's a unibody, that's correct, 22 that's where it stops. If it's not a unibody, the 23 basewad is still in there and doesn't move. 24 Q. Why is the basewad not replaced? 25 A. It doesn't need to be replaced.
83 1 Q. For your own personal use? 2 A. Yes. 3 Q. Target? Hunting? 4 A. Just target. 5 Q. In reloading shells, based on your experience, 6 is there any big difference between reloading a target 7 shell versus a field shells? 8 MR. MORTL: Objection to form. 9 THE WITNESS: Not really, no. 10 Q. (By Mr. Karst) Before the power pistons were 11 used, did you -- strike that. 12 Have you reloaded shotgun shells without using 13 the power piston? 14 A. Yes. 15 Q. Can you describe the process of reloading? 16 A. The process of reloading? 17 Q. I'm sorry. Yes. Without the power piston. 18 A. Well, it's the same with it or without it. It's 19 just another component. You put a shell -- if you're 20 using a press, there's a small rotary press that's 21 almost universal in most places. It's made by MEC. 22 Q. M-E-K? 23 A. M-E-C. 24 Q. Do you know what that stands for? 25 A. No. Reloading. You put a shell in one spot in	85 1 Q. Why? 2 A. It's not damaged, still works, holds the shell 3 together. 4 Q. Why do you state that it's not damaged, the 5 basewad? 6 A. Just experience. 7 Q. Experience doing what? 8 A. Shooting, testing at Remington, all that kind of 9 stuff. Basewads were tough. You're talking about the 10 dry-molded basewad. 11 Q. Correct. 12 A. Yes. Very tough. 13 Q. How many uses could you get? 14 MR. MORTL: Objection to form. 15 THE WITNESS: It's not the weak part of the 16 shell, if that's what you mean. The worst 17 thing, when the dry-molded basewad was in use, 18 was the crimp of the shell. That was the weak 19 spot. You might fire a reloaded shell and shoot 20 the crimp right off of it, which is part of the 21 body. 22 Q. (By Mr. Karst) Part of the plastic. 23 A. Correct. 24 Q. But if that didn't fail or wear out, could you 25 continue to reload the same shell?

86 1 A. Yes. 2 MR. KARST: We've gone almost another hour. 3 Why don't we take a break. 4 VIDEOGRAPHER: The time is 12:10 p.m. We 5 are going off the record. 6 7 * * * * * 8 9 VIDEOGRAPHER: The time is 1:15 p.m. This 10 is tape two of the deposition of Ray Anderson. 11 We're back on record. 12 Q. (By Mr. Karst) Ready to continue? 13 A. Yes. 14 Q. Mr. Anderson, while we were at lunch, did you 15 review any documents? 16 A. No. 17 Q. Did you speak to anybody outside of your 18 attorneys over lunch period? 19 A. No. 20 Q. Did you review any of the documents that you 21 have in your folder in front of you over lunch? 22 A. No. 23 Q. The sheet that your attorney wrote for you that 24 we've marked as Exhibit 1, I have some other questions 25 on that. We were going over that on the break. You	88 1 MR. MORTL: Vague. 2 Q. (By Mr. Karst) How long was your meeting? 3 A. It didn't take very long to come up with that. 4 I don't remember. 5 Q. Can you give me an estimate? 6 A. How long was the meeting? 7 Q. Yes. 8 A. I don't know. Three or four hours. 9 Q. Who was there for that meeting? 10 A. Two attorneys. 11 Q. The two attorneys that are here. 12 A. Uh-huh. 13 Q. Yes? 14 A. Yes. 15 Q. Did the attorneys bring all of these documents 16 with them? 17 A. Yes. Or I had them already. They were mailed. 18 Q. Which one is it? 19 A. Catalogs. Some were; some were the other. 20 Q. How many documents did they bring with them? 21 A. I don't know. 22 Q. How did they bring them? Were they in a stack? 23 -- a box? 24 A. I think they brought papers. They shipped me 25 some documents.
87 1 said you put this together a couple months ago; is that 2 right? 3 MR. MORTL: Misstates testimony. 4 Q. (By Mr. Karst) When did you put it together, 5 sir? 6 MR. MORTL: This sheet? 7 Q. (By Mr. Karst) I'm sorry. When did your 8 attorney write this for you? 9 A. Yesterday, day before yesterday. 10 Q. Was this document created when you were looking 11 at catalogs and so forth at your home? 12 A. Yes. 13 Q. So now you're telling me that you were looking 14 at catalogs yesterday. 15 MR. MORTL: Objection. 16 THE WITNESS: We had some catalogs 17 yesterday. I wasn't studying them, no. 18 Q. (By Mr. Karst) But you said this list was 19 created yesterday. 20 A. Yes. 21 Q. At your home. 22 A. Correct. 23 Q. From looking at catalogs and documents. 24 A. Uh-huh. And from discussing. 25 Q. How long did that take?	89 1 Q. How many documents did they ship you? 2 A. I don't know. I didn't count them. 3 Q. Hundreds of pages? Thousands? 4 A. At least hundreds. 5 Q. Did it come in a box? 6 A. Yes. 7 Q. Did they come in a bankers box? 8 A. What's a bankers box? 9 Q. Your standard, normal bankers box. 10 A. Yes. 11 Q. Was that box full? 12 A. One was partially full, and the other one was 13 close to full, yes. Actually, one was a lot thinner 14 than a bankers box. 15 Q. You're making some indications with your hands. 16 How tall was that stack of documents? 17 A. One was 4 inches high and about the size outside 18 of a bankers box, I guess, and the other one was a 19 bankers box, and it was pretty close to full. 20 Q. So were documents in the bankers box 21 horizontally and full that way? 22 A. Yes. 23 Q. And you said the other one was 4 inches high. 24 A. Yes. They were in manilla folders that were 25 just put in there for shipping. I would say there were

90 1 4 folders in there. 2 Q. Okay. So one box was full, and the other one 3 had about 4 inches of documents. 4 A. Yes. 5 Q. When were they shipped to you? 6 A. I don't remember. 7 Q. Could you give me an estimate of when they were 8 shipped to you? 9 A. I would say the last one came a few weeks ago. 10 Q. So multiple shipments. 11 A. The first one I had gotten earlier than that. 12 Q. How much earlier? 13 A. I don't know. 14 Q. Can you give me an estimate of how much time? 15 A. No. 16 Q. Are we talking last year? -- last month? 17 A. Not last year, no. 18 Q. A couple months ago? 19 A. A couple months ago. 20 Q. And so which one came first, the box that was 21 full or the box that had only a couple inches of 22 documents? 23 A. The box that was just a couple inches of 24 documents. 25 Q. That's the one that came first.	92 1 through them with your attorneys yesterday, or did you 2 go through them with your attorneys prior to that? 3 A. No. Yesterday was the first time that we went 4 through them. 5 Q. What documents did you go through yesterday with 6 your attorneys in that three/four-hour meeting? 7 A. We looked at the catalogs and price lists. 8 Q. Were there specific ones that you looked at? 9 A. Some of the ones with the dates that we have on 10 this list. 11 Q. Why those specific ones? 12 A. We were looking for which particular loads were 13 made at which particular time, that sort of thing, 14 refreshing my memory. 15 Q. Why? 16 A. Because I couldn't remember all this stuff. 17 Q. Why would you be looking for this specific 18 information that's on this list that your attorney 19 wrote? 20 A. Because that's kind of what this is all about, 21 isn't it? 22 Q. Some is and some of it's not. That's why I'm 23 trying to understand why -- 24 MR. MORTL: Argumentative. 25 Q. (By Mr. Karst) I'm trying to understand why
91 1 A. Yes. 2 Q. What were those couple inches of documents? 3 A. I don't remember specifically. They were file 4 folders with -- there were some process records from 5 Remington. I don't remember. I don't remember. I 6 read those awhile back. I didn't read them recently. 7 Q. Then a couple weeks ago you received the full 8 bankers box. 9 A. Yes. 10 Q. And what documents were in there? 11 A. Catalogs, price lists. I think there were some 12 process records in there as well. That's really all I 13 remember. I didn't read them all. I looked at the 14 outside folder and rifled through most of them. 15 Q. So you didn't actually read all of them. 16 A. I didn't commit them to memory, that's for sure. 17 Q. Did you read all the pages of the documents? 18 A. No. 19 Q. Are those the only two shipment of documents 20 that you received from your attorneys? 21 A. Yes, sir. 22 Q. Have you received documents from any other 23 source besides those two shipments from your attorneys? 24 A. No. 25 Q. Is the first time that you physically went	93 1 some of this is written on here. For example, when 2 field loads were switched to plastic -- 3 A. I can tell you why they're written on here. 4 They're written on here because -- 5 MR. MORTL: Let him ask you a question. 6 THE WITNESS: Go ahead. 7 Q. (By Mr. Karst) Why are they written on there? 8 A. Because there's too many to remember when you're 9 73 years old, that's why. 10 Q. But why this specific information? Why not 11 other information? Why is this specific information 12 here? 13 A. Well, this is kind of what we're talking about. 14 Q. I've never asked anything about paper shell. 15 A. I wasn't talking about you. 16 Q. I understand, but why is this to you relevant 17 when last year they made paper shell bodies? 18 A. Because I didn't remember when that was off the 19 top of my head. 20 Q. Why is that relevant to this case? 21 A. Because it's a different kind of shotshell 22 construction. 23 Q. Why is that relevant to the asbestos case? Is 24 there a reason? 25 MR. MORTL: Argumentative.

94 1 If you know. 2 THE WITNESS: What's your question? 3 Q. (By Mr. Karst) Why is the last year paper shell 4 bodies -- you listed here 1966, last year paper shell 5 bodies. Why is that relevant in an asbestos-related 6 case? 7 A. Because it shows you when a shotshell that had 8 different sort of casualty considerations -- 9 Q. What does that mean? 10 A. -- went out of production. That means a paper 11 shell you shoot the crimp off if you try to reload it. 12 Q. Why is that relevant in an asbestos-related 13 case? 14 A. Because I know you're going to start talking 15 about a dry-molded basewad. 16 Q. And how is that relevant to the dry-molded 17 basewad when paper shells were last used? 18 MR. MORTL: If you know. 19 THE WITNESS: Because you're going to start 20 talking about -- I'm anticipating that you will 21 start talking about reloading again, and paper 22 shells were not very reloadable. 23 Q. (By Mr. Karst) Have you ever read my client's 24 testimony? 25 A. No.	96 1 itself of my client? 2 A. No. 3 Q. Do you know anything about what my client, Mr. 4 Benson, testified to his use of shotgun shells? 5 A. Only what came up in discussion. 6 MR. MORTL: And you're not going to get 7 into -- 8 Q. (By Mr. Karst) Any in a written form? 9 A. No. 10 Q. In an email? 11 A. No. 12 Q. So you're looking at one full bankers box of 13 documents. A bankers box of documents arguably is 14 roughly 5,000 pages of documents, and you're looking at 15 4 inches of other documents in another box, and you 16 spent three or four hours going through the documents 17 yesterday. How did you choose which information was 18 put on this sheet, or did your attorney choose for you? 19 MR. MORTL: Objection to form. 20 THE WITNESS: When I was doing it by myself 21 prior to my meeting with the attorneys, I just 22 read it in a particular order, looking at the 23 titles on the folders that they had. 24 Q. (By Mr. Karst) Right. But you didn't make the 25 list until --
95 1 Q. His deposition? 2 A. No. 3 Q. Have you ever read a summary of his testimony? 4 A. Of your client? This client? 5 Q. Mr. Benson, yes. 6 A. No. 7 Q. Your attorneys haven't given you any type of 8 summary of this case that you've read. 9 A. No. 10 MR. MORTL: Objection. Argumentative. 11 You're also starting to get into 12 attorney/client. 13 MR. KARST: If it's a document that he 14 reviewed, then I get to ask that. 15 MR. MORTL: Let's slow it down if you're 16 going to go down this route. Is there a 17 question pending? 18 Q. (By Mr. Karst) Did your attorneys ever put 19 together any type of summary, shorthand, any type of 20 document related to my client's testimony in this case 21 that you've read? 22 MR. MORTL: You can answer that yes or no. 23 Have you read a summary of the testimony? 24 THE WITNESS: No. Of the testimony, no. 25 Q. (By Mr. Karst) Have you ever read the testimony	97 1 A. Well, this list is not based on all of that 2 material. This is based on a very small amount of 3 material. 4 Q. Right. And I know your attorney put that 5 together. 6 A. Yes. With some help from me. I wasn't just 7 sitting there looking at her. 8 Q. Right. But why would you say, oh, hey, here's 9 document X, we should put that on the piece of paper? 10 MR. MORTL: Objection. Asked and answered. 11 Harassing. 12 THE WITNESS: I wouldn't have said that. 13 Q. (By Mr. Karst) How did those specific items get 14 chosen to put on the list by your attorney? 15 MR. MORTL: Same objection. Go ahead. 16 THE WITNESS: It just kind of followed the 17 conversation that we were having and some things 18 that I told the attorneys that I probably 19 wouldn't remember unless I wrote them down. 20 Q. (By Mr. Karst) Well, you said this stuff was 21 based off documents, not from conversations with your 22 attorney. 23 A. That's right. It's based on the catalogs and 24 price lists. And you are being argumentative. I agree 25 with my attorney.

98 1 MR. MORTL: That's okay. We can take a 2 break if you need to. Let's slow down. 3 MR. von OISTE: Let's take five minutes. 4 MR. KARST: Sure. 5 VIDEOGRAPHER: The time is 1:28 p.m. We 6 are going off the record. 7 8 * * * * * 9 10 VIDEOGRAPHER: The time is 1:32 p.m. We 11 are back on record. 12 Q. (By Mr. Karst) A couple other questions on the 13 topic that we were just on: The boxes that were mailed 14 to you, do you still have those at your house? Are 15 they still in your possession? 16 A. Yes, I think they are. 17 MR. MORTL: You can go with what you 18 remember. 19 THE WITNESS: Yes. 20 Q. (By Mr. Karst) So your recollection is that the 21 full box and the partial box are still in your 22 possession at your home. 23 A. You know, I had another thought when we were 24 out of the room. The big box belonged to my attorney. 25 She sent it because she was coming for a meeting. The	100 1 Q. And what is that information based off of? 2 A. Some of it is from catalogs and price lists, and 3 some of it's from my memory. 4 Q. So you're tell me that the catalogs and price 5 lists specifically list asbestos-containing dry-molded 6 basewads in 1961. 7 A. No, it doesn't it. It says dry-molded basewads. 8 Q. So how would you know when they first made an 9 asbestos-containing dry-molded basewad? 10 A. Because I knew what the composition of the 11 material was. 12 Q. How do you know the composition of the material? 13 A. Because I worked at Remington. 14 Q. You weren't working there in '61. That's why 15 I'm trying to understand the basis of your knowledge. 16 A. That's true. I knew when I got there, yes. 17 They were still making them then. 18 Q. So what specifically tells you that they started 19 making them in '61? 20 A. The advent of the dry-molded basewad. 21 Q. So when they make a dry-molded basewad, it's 22 always asbestos-containing. 23 A. Yes. 24 Q. Regardless of its use. 25 A. Uh-huh.
99 1 smaller one was mine, and it was copies of some of the 2 stuff that was in the big one. 3 MR. KARST: Objection to the nonresponsive 4 portion of the question. There was no question 5 pending. 6 Q. (By Mr. Karst) But both of them are still in 7 your possession, to your recollection. 8 A. Yes. We packed them up, but we didn't send them 9 out. 10 Q. Was everything in the boxes copies, or were some 11 of them the actual catalogs themselves in 19 whatever? 12 A. Some were catalogs. Some were catalogs. 13 Q. When did Remington first make an 14 asbestos-containing wad? 15 A. In the early 60s. 16 Q. I noticed you're looking down at your sheet. 17 A. Yes, I am. I noticed there's a lot of other 18 things on it, too. 19 Q. Where are you looking on your sheet here? 20 A. I'm looking at 1961. 21 Q. What specifically about what's on your sheet 22 answers that question? 23 A. It's under the section about the dry-molded 24 basewad, and that tells me that Remington started 25 making dry-molded basewad in 1961 or thereabout.	101 1 Q. Is that a yes? 2 A. Yes. 3 Q. Is there any document that you can point me to 4 that shows, hey, this is the exact year they started 5 making dry-mold basewads? 6 A. I don't know. I would suggest you might look at 7 a 1961 catalog. 8 Q. To your recollection -- did you look at a 1961 9 catalog? 10 A. Yes, I did. 11 Q. To your recollection, what would that 1961 12 catalog tell me? 13 A. Specifically I can't tell you, but generally I 14 would say you'd probably be looking at a cross-section 15 of a shell. 16 Q. And it would say dry-mold basewad. 17 A. No. It would show you a basewad that I happened 18 to know is dry-molded because that's the only way they 19 made them at that time. 20 Q. And you're telling me if I looked at a 1960 21 catalog, that would not be there. Are you telling me 22 that? 23 A. Maybe. I don't really know. 24 Q. That's why I'm trying to understand why you say 25 '61.

102 1 A. The dry-molded basewad is noticeably different 2 from what preceded it, which was a paper-wound basewad. 3 Q. Describe the difference. Visually if you're 4 looking at them, what's the difference? 5 A. Color. 6 Q. What's the color difference? 7 A. The paper was sort of white, whitish-looking, 8 and the dry-molded basewad is sort of tannish looking. 9 Q. Is the paper crumpled? Is it stacked? 10 A. No. It's wound. 11 Q. How is the paper wound? 12 A. Around a mandril. 13 Q. Is its density different between paper and 14 asbestos? 15 MR. MORTL: Objection to form. 16 THE WITNESS: I don't really know. 17 Q. (By Mr. Karst) If I'm looking in a catalog, 18 looking at a basewad, what am I looking at in the 19 catalog that will tell me, hey, that's a dry-mold 20 basewad or, hey, that's a paper basewad? 21 A. I don't know that they ever differentiated in a 22 catalog what the basewad was made out of. 23 Q. Then how can you look at the catalog and say 24 that's -- 25 A. Because I know they were different colors, and I	104 1 need to tell you that? 2 MR. MORTL: Sure. You can tell him who you 3 recall who worked there in '61 or when you got 4 there in '68. 5 Q. (By Mr. Karst) My question was back in the 6 early 60s. 7 A. Spencer Wildman is one. He was an R&D engineer 8 like I was. 9 Q. Wildman? 10 A. Wildman, yes. Ed Yacko was one. 11 Q. How do you spell Yacko? 12 A. Y-A-C-K-O. He's deceased. Ben Daubenspeck, 13 D-A-U-B-E-N-S-P-E-C-K. He's also deceased. Most of 14 the names that I would give you are deceased. 15 Q. And who are they? 16 A. Do still want them? 17 Q. First give me the living people, and then we'll 18 go with the deceased. 19 A. Off the top of my head, I don't know of any 20 living people. 21 Q. Is Mr. Wildman still alive? 22 A. Yes. 23 Q. Where does he live? 24 A. Kentucky. 25 Q. Do you know where in Kentucky?
103 1 know what the dimensions were roughly. 2 Q. So were these catalogs colored that you're 3 looking at? 4 A. Yes, some of them were. 5 Q. '61 is the year you chose. 6 A. Uh-huh. 7 Q. So is the '61 catalog in color? 8 A. I don't remember. 9 Q. So is '61 based on an approximation, or is it 10 actually based on a fact that it's '61? 11 A. I don't really know that either. Once again, I 12 wasn't there. 13 Q. Who would know the answer to that question as to 14 when Remington started using an asbestos-containing 15 dry-mold basewad? 16 MR. MORTL: Objection to form. 17 THE WITNESS: Somebody that was there and 18 that knew something about the process could 19 probably tell you that. 20 Q. (By Mr. Karst) Can you tell me anybody who was 21 there? 22 A. I could tell you a lot of people who were there, 23 but I don't know where they are. 24 Q. What are some of their names? 25 A. I don't know if I want to tell you that. Do I	105 1 A. No. 2 Q. When was the last time you had contact with Mr. 3 Wildman? 4 A. Probably at work at Remington, '86. 5 Q. And how do you know Mr. Wildman is still alive? 6 A. I don't. 7 Q. You're just making the assumption. You haven't 8 heard he passed. 9 A. I haven't talked to him since then, but I 10 haven't heard he passed. 11 Q. But Mr. Yacko and Mr. Daubenspeck -- 12 A. Mr. Yacko and Mr. Daubenspeck, I went to their 13 funerals. 14 Q. Who else worked there back in the early 60s 15 who's deceased now? 16 A. That come to mind right now, I can't think of 17 anybody right now. Jack Scanlon, S-C-A-N-L-O-N. 18 Q. Is Mr. Scanlon living or deceased? 19 A. He's deceased. Bill Decker, D-E-C-K-E-R, 20 deceased. That's all I can think of off the top of my 21 head. 22 Q. Did any of these individuals pass away from 23 cancer? 24 MR. MORTL: Objection to form. 25 THE WITNESS: Not that I know of.

106 1 Q. (By Mr. Karst) Do you know anybody who's worked 2 at Remington who's passed away from a lung-related 3 disease, cancer or any type of lung-related disease? 4 MR. MORTL: Objection to form. 5 THE WITNESS: No. 6 Q. (By Mr. Karst) How long were 7 asbestos-containing basewads made? Until what year? 8 A. I believe 1971. That's one of the dates on 9 here. '81. I'm sorry. '61 to '81, 20 years. 10 Q. And you're again referring to the sheet that 11 your attorney wrote. 12 A. Correct. 13 Q. And where does the 1981 year come from? 14 A. That was the last year, I believe, of the 15 dry-molded basewad. 16 Q. And how do you know that? 17 A. Memory. 18 Q. So that date comes from your personal memory, 19 not a catalog. 20 A. I believe so, yes. It might have come from a 21 catalog as well. 22 Q. During the time when dry-mold basewads contained 23 asbestos, were basewads made out of any other material 24 besides asbestos? 25 A. Plastic.	108 1 asbestos-containing outside of the AA target shells 2 from '68 to '72 which were replaced by the RXP unibody? 3 MR. MORTL: Vague. Form. 4 THE WITNESS: Could you do that again? 5 Q. (By Mr. Karst) I'm trying to understand. 6 There's asbestos-containing basewad, and you said there 7 were some things that are made during this time frame, 8 '61 to '81, that do not have the asbestos-containing 9 basewad. 10 A. Plastic. 11 Q. And there's plastic. 12 A. No. That was plastic. The ones that were not 13 asbestos-containing, that was plastic. 14 Q. So where would those plastic ones specifically 15 be used? What shells would they be on? 16 A. All-American. 17 Q. Okay. 18 A. 20-gauge target. I think some 20-gauge field 19 loads. 20 Q. What's the basis for your information on the 21 20-gauge field loads? 22 A. My memory or lack thereof. 23 Q. And what's that memory based off of? 24 A. Experience. I worked for a company that made 25 shotshells among other things.
107 1 Q. And that's what we discussed earlier. 2 A. Uh-huh. 3 Q. Correct? 4 A. Correct. 5 Q. And outside of those specific instances that we 6 spoke of earlier, all of the other basewads would be 7 asbestos-containing. 8 MR. MORTL: Objection to form. Vague. 9 THE WITNESS: Earlier than 1961 or 10 thereabouts? Is that what you're talking about? 11 Q. (By Mr. Karst) We spoke of the plastic basewads 12 for the AA target shell and then replaced by the RXP 13 unibody, correct? 14 A. Correct. 15 Q. And those were the plastic basewads. 16 A. The unibody was not a basewad, not a separate 17 basewad. It was integral with the shell. 18 Q. Besides those two instances, are there any other 19 instances where there would be a basewad that was not 20 asbestos-containing? 21 A. Yes. 22 Q. What would that be? 23 A. Paper before that for years. 24 Q. During the time frame -- I'll use your years of 25 '61 to '81 -- are there any other basewad besides	109 1 Q. Would you see a document that said that? 2 A. No, I don't think so. 3 Q. Were you working in R&D and experimenting on any 4 of these? 5 A. No. I was working in production at that time. 6 Q. So can you tell me for a fact that any of the 7 field loads that were 20-gauge had the plastic basewad? 8 A. Yes. 9 Q. What's that fact based off of? 10 MR. MORTL: Asked and answered. 11 Q. (By Mr. Karst) Can you point me to any 12 document? 13 A. No. 14 Q. Was it a specific type of 20-gauge field load? 15 MR. MORTL: Objection. 16 THE WITNESS: I don't recall. 17 Q. (By Mr. Karst) What do you recall about it? 18 A. That's kind of broad, isn't it? No, I don't 19 recall anything else about it. 20 Q. So how could I look at a 20-gauge field load 21 that is a plastic basewad and a 20-gauge field load 22 that's an asbestos basewad and know the difference? 23 How do you tell the difference? 24 A. One is a target load, and one's a field load. 25 Q. But I thought you said some of the field loads

110 1 that are 20-gauge had the plastic basewad. 2 A. I think one or two of them did, yes, but I don't 3 recall which ones, and you can't tell from the outside 4 of the shell. You would have to tear it down. 5 Q. What would be the purpose of having a couple 6 oddball ones versus everything else that has the 7 asbestos basewad? 8 MR. MORTL: Objection to form. 9 THE WITNESS: I don't know. I didn't 10 design them. 11 Q. (By Mr. Karst) Who did? 12 MR. MORTL: Objection. Overbroad. 13 THE WITNESS: I don't know. 14 Q. (By Mr. Karst) Who would have worked on those 15 oddballs? 16 A. Other engineers or production employees. 17 MR. MORTL: Objection. 18 Q. (By Mr. Karst) What years were they made, those 19 20-gauge field shells? 20 A. Let me look at my list again here. I would say 21 late 60s, but I'm not sure about that. 22 Q. What are you basing that on? 23 A. Because that's when the change to the yellow 24 shell across the line was put in place, and I believe 25 at least one of those had a plastic basewad.	112 1 right. 2 A. Sorry. 3 Q. So, therefore, that's the only instance of a 4 20-gauge field shell that had a plastic basewad, which 5 one of them that was yellow. 6 MR. MORTL: Objection to form. 7 THE WITNESS: That's my belief, yes. 8 Q. (By Mr. Karst) Therefore, by that standard, 9 everything that was green that had a basewad would be 10 asbestos-containing prior to that. 11 MR. MORTL: Objection to form. Misstates 12 testimony. 13 THE WITNESS: I don't know. I couldn't 14 answer that accurately. 15 Q. (By Mr. Karst) What am I misstating here? What 16 am I missing? 17 MR. MORTL: Objection. Argumentative. 18 Q. (By Mr. Karst) I'm trying to understand. 19 You've given me the shells that did not contain 20 asbestos and had a plastic basewad, so the AA target 21 shells, '68 to '72. You said the RXP unibody from '72 22 on, correct? 23 A. Correct. 24 Q. And you also said target shell that were 25 12-gauge and 20-gauge, correct?
111 1 Q. You believe one of the 20-gauge -- 2 A. One of the specifications of the 20-gauge. 3 Q. Let me get my whole question out so we're both 4 on the same page. 5 Are you saying after 1968 one of the 20-gauge 6 field shells that was yellow had a plastic basewad 7 versus an asbestos basewad? 8 A. I believe that's right. 9 Q. So, therefore, any that were green would be 10 asbestos-containing. 11 MR. MORTL: Objection. Misstates 12 testimony. Form. 13 Q. (By Mr. Karst) That are 20-gauge -- 14 A. I don't know. Yellow didn't happen all of a 15 sudden. It was kind of phased in. 16 Q. I understand. But you just told me that the 17 20-gauge field shell -- 18 A. A 20-gauge field shell. 19 Q. A 20-gauge field shell that had a plastic 20 basewad versus an asbestos one, and that was when there 21 was yellow plastic versus green, correct? 22 A. Uh-huh. 23 Q. Is that correct? 24 A. Yes. 25 Q. If you say uh-huh, it doesn't come on the record	113 1 A. Uh-huh. Yes. 2 Q. And then you also said one 20-gauge field shell 3 after they switched to yellow. 4 A. I believe that's right. Okay. Next question. 5 Q. Are there any others, or is that it? 6 A. That's it, to my knowledge. 7 Q. If I had a 20-gauge field shell that was a 8 plastic basewad versus an asbestos one, what would be 9 the difference? 10 MR. MORTL: Objection. Vague. Form. 11 THE WITNESS: Just the basewad would be 12 different. 13 Q. (By Mr. Karst) I understand that, but would I 14 as a consumer notice a difference in using them? Is 15 the quality of the shot different? 16 A. The size of the shot. 17 MR. MORTL: Objection to form. 18 Q. (By Mr. Karst) Well, they're both 20-gauge, 19 right? 20 A. That's the size of the shell. That has nothing 21 to do with the shot. 22 Q. Okay. That's what I'm trying understand. 23 A. You might have a different size shot in them. A 24 target load had a number 9 shot invariably for 25 20-gauge. A field load could have anywhere from -- a

114 1 20-gauge could have anywhere from probably number 6 2 shot on up, smaller. 3 Q. So I think we've got our world. We've got our 4 AA target shells, '68 to '72, replaced by the RXP 5 unibody in '72. We have target shell, 12-gauge and 6 20-gauge, and one type of field shot, 20-gauge after 7 they switched to yellow, and that's it that would have 8 the plastic basewad. 9 A. I believe so. 10 Q. I'm sorry. I don't think I wrote this down. If 11 you have -- I'm kind of switching topics a little bit. 12 We're done with that one. 13 Target shells come in 12-gauge, 20-gauge and -- 14 A. 410. 15 Q. -- 410. And hunting come in 12, 16, 20 and 410. 16 A. Do you mean field loads? 17 Q. Field loads, yes. I call them hunting, but 18 we're on the same page, hunting and field loads. 19 A. Yes, pretty much. 20 Q. And then 8 was industrial, and then you 21 mentioned the 10. Yes? 22 A. I did, yes. 23 Q. Outside of work, have you -- well, let me start 24 with in work. Did you ever shoot a shell with an 25 asbestos-containing basewad?	116 1 MR. MORTL: Objection to form. 2 THE WITNESS: Shot, a wad, not a basewad, a 3 power piston wad in all likelihood, possibly a 4 felt wad depending on the load and shot size. 5 Q. (By Mr. Karst) Why do you say possibly a felt 6 wad? 7 A. Felt wads were in and out of combinations with H 8 wads and that sort of thing. There was a lot of 9 combinations. 10 Q. You're not saying sometimes a felt wad, if they 11 had it, might stay in. It would always be expelled. 12 A. No. Anything in front of the basewad comes out. 13 That's a loose piece to start with. 14 Q. Then what happens to the shell itself with the 15 basewad in it when you shoot? 16 A. It gets ejected from the gun. 17 Q. Falls on the ground. 18 A. Yes, if you're outside. I did a lot of shooting 19 inside. 20 Q. When you shoot inside, are you under different 21 conditions? 22 MR. MORTL: Vague. Form. 23 THE WITNESS: With respect to what? 24 Q. (By Mr. Karst) I said if the spent shell would 25 fall on the ground, you said yes, if I was outside.
115 1 A. Yes. 2 Q. How do you know that you have shotshells that 3 had an asbestos-containing basewad? 4 A. Say it again, please. 5 Q. How did you know they were an 6 asbestos-containing basewad? 7 A. Because of the type of shell they were. 8 Q. Were they field shells? 9 A. Yes. 10 Q. And why would you be shooting them at work? 11 A. As part of a project I was on. 12 Q. R&D? 13 A. Yes, R&D. 14 Q. What gauge were you shooting or have you shot? 15 A. Probably 12. 16 Q. So if you're shooting -- 17 A. I don't recall specifically. 18 Q. If you're shooting a 12-gauge field shell at 19 work, you pull the trigger, what happens? 20 A. It goes bang. 21 Q. Yes. 22 A. What do you mean what happens? I don't 23 understand the question. 24 Q. What comes out of the end? What comes out? 25 A. Shot.	117 1 A. Yes. If I was inside, it would fall on the 2 floor. 3 Q. Okay. There's not any type of collection system 4 when you shoot it. 5 A. Generally, no. 6 Q. What happens with the spent shell then? 7 MR. MORTL: Overbroad. Vague. 8 THE WITNESS: It depends what you're 9 shooting it in. 10 Q. (By Mr. Karst) Are they tested? Are they 11 repacked? What happens? 12 A. They're not repacked if they're fired, if that's 13 what you mean. 14 Q. Yes. 15 A. What happens to it after you fire it? It gets 16 collected and put in probably a scrap container or 17 possibly goes back to R&D for inspection of some kind 18 or another. 19 Q. It's not used again. 20 A. No, it's not. 21 MR. MORTL: You're talking about 20 H field 22 loads. 23 THE WITNESS: I thought you were talking 24 about 12-gauge. 25 Q. (By Mr. Karst) 12-gauge.

118 1 A. They could be reloaded, but generally we did it 2 inside. I thought you were talking about the inside 3 shooting that I did because I mentioned that. 4 Q. Do you know if Remington – strike that. 5 You were talking about people who worked at the 6 plant, and I wanted to ask you about a couple different 7 names. Do you know an M.W. Kordas? 8 A. Yes. 9 Q. Who is Mr. Kordas? 10 A. An R&D engineer. 11 Q. Did you ever work with Mr. Kordas? 12 A. Not directly. 13 Q. Do you know roughly the time period Mr. Kordas 14 worked at Remington? 15 A. He was there when I got there, and I believe he 16 worked for another five years or so and transferred to 17 marketing. 18 Q. At Remington? 19 A. At Remington, yes. 20 Q. Was that still in Bridgeport, the marketing 21 department? 22 A. Yes. Different location, but Bridgeport still, 23 yes. 24 Q. Not physically, but the same building. 25 A. Correct.	120 1 prior workers for any asbestos-related injury or lung 2 disease? 3 A. Individually employees, I don't believe so, but 4 there was a lot of monitoring for asbestos. 5 Q. When did that start? 6 A. It was underway when I got there. 7 Q. When you got there in March of '68, they were 8 already monitoring for asbestos. 9 A. Yes, they were. 10 Q. How were they monitoring for asbestos? 11 A. With asbestos monitoring equipment, which is 12 some sort of device. I'm not all that familiar with 13 the procedure, but it's area monitoring or personal 14 monitoring. 15 Q. People have, like, a monitor on themselves. 16 A. Correct. 17 Q. And there's also one in the general area itself 18 that's not attached to an individual. 19 A. An area monitor, right. 20 Q. And what are they testing? 21 MR. MORTL: Objection to form. 22 Speculation. 23 THE WITNESS: They were testing the air. 24 Q. (By Mr. Karst) And how do you know they were 25 testing the air for asbestos?
119 1 Q. Do you know if he stayed in marketing or what 2 happened to him? 3 A. I don't beyond the fact that he just worked in 4 marketing because I left not too long after that. 5 Q. What would be roughly his job duties? 6 MR. MORTL: Objection to form. 7 Speculation. 8 If you know. 9 THE WITNESS: He was in a research group 10 that was known as applied research, and he, for 11 the most part, did not work on ammunition, 12 though he did at times. He had some projects 13 that were involved in ammunition, but they had 14 exploratory research, they called it. They 15 looked at all kind of things. You probably 16 wouldn't believe some of the things they looked 17 at. 18 Q. (By Mr. Karst) Did they have an in-house 19 medical department at Remington? 20 A. Yes. 21 Q. And what was the purpose of the medical 22 department? 23 A. Physicals, injuries, you know, take care of 24 documentation, health records, safety. 25 Q. Do you know if they ever examined workers or	121 1 A. I think they made that plain. There wasn't any 2 secret that we had asbestos in the plant among the 3 employees. 4 Q. You mentioned earlier that the asbestos that was 5 used to make the basewad came into the plant, correct? 6 A. Yes. 7 Q. How did that come to the plant? 8 A. Either truck or rail car. 9 Q. And how was it packaged? 10 MR. MORTL: Objection to form. Overbroad. 11 THE WITNESS: Bag. 12 Q. (By Mr. Karst) Do you know how big the bags 13 were? 14 A. I believe they were 50 or 100 pounds. 15 Q. Do you know who the asbestos bags came from? 16 A. Johns Manville. 17 Q. And how do you know they were Johns Manville? 18 A. I saw them. 19 Q. And how would -- I know this sounds -- 20 A. I was supervisor of production. 21 Q. How do you know they were Johns Manville bags? 22 A. It said so on the bags. 23 Q. On any of the bags did you ever see any type of 24 warning? 25 A. I don't recall specifically.

122 1 Q. Were there any other suppliers of the asbestos 2 to Remington besides John Manville? 3 MR. MORTL: Objection to form. 4 THE WITNESS: I don't know. 5 Q. (By Mr. Karst) How often would asbestos come to 6 the plant? 7 MR. MORTL: Objection to form. Broad. 8 THE WITNESS: As we used to say at 9 Remington all the time, that's not my 10 department; however, it was probably monthly. 11 Most of our materials were monthly. 12 Q. (By Mr. Karst) Was it stored then? 13 A. Yes. 14 Q. Where was it stored? 15 MR. MORTL: Objection to form. 16 Go ahead. 17 THE WITNESS: One of the 300 buildings. 18 Q. (By Mr. Karst) 300 series buildings. 19 A. Yes. 20 Q. If they were monitoring for asbestos and, 21 obviously, they knew they were getting in raw asbestos, 22 did they issue warnings to employees about asbestos? 23 A. Individual warnings to people or handouts, no. 24 Q. Did they put signs up in the building warning 25 asbestos?	124 1 Q. (By Mr. Karst) Did they make 2 asbestos-containing basewads in Arkansas at the plant? 3 MR. MORTL: If you know. 4 THE WITNESS: I don't know. 5 Q. (By Mr. Karst) When you said they moved the 6 operation down to Arkansas, what do you mean? 7 A. They moved the manufacturing operation, but I 8 don't recall whether the dry-molded basewad was still 9 in production. As a matter of fact, I think the RXP 10 shell had taken over by then. 11 Q. Do you have any knowledge one way or another 12 whether asbestos-containing basewads were manufactured 13 at the Arkansas plant or not? 14 A. No. 15 Q. Do you know who would know the answer to that 16 question? Who would you go to? 17 A. I would probably dial up the Arkansas plant. 18 Q. Is it still there? 19 A. Yes. 20 Q. Is it still in operation? 21 A. Yup. 22 Q. When did it start operation? 23 MR. MORTL: Objection. Foundation. Form. 24 THE WITNESS: '71, I think, somewhere 25 around there.
123 1 A. There were some signs. 2 Q. When were there signs? 3 A. Caution asbestos. During the time we were using 4 it. 5 Q. Was there signs there when you got there in 6 March of '68? 7 A. I believe so, yes. 8 Q. Were they still there when you left in '86? 9 A. I don't recall. The shotshell operation was 10 removed sequentially from that plant. It went down to 11 the Lonoke plant in Arkansas. I don't know during what 12 period of time the Colton operation might have gone 13 down there. They made the basewads. During that time, 14 we were pretty much out of it. 15 Q. That's where I was kind of going. When they 16 moved some of the asbestos operation down to 17 Arkansas -- and it was eventually completely gone from 18 Bridgeport, correct? 19 A. Uh-huh. Yes. 20 MR. MORTL: Objection to form. 21 THE WITNESS: That's right. In fact, I 22 think it might have happened before they moved 23 to Arkansas. 24 MR. MORTL: Objection to form. Misstates 25 the record as to Lonoke.	125 1 Q. (By Mr. Karst) Did they make ammunition there? 2 A. Yes. 3 Q. Did they only make ammunition there? 4 A. Yes. 5 Q. Did they make ammunition for shotgun and pistol 6 and rifle? 7 A. Not at the same time. They started at different 8 times. The first thing was centerfire rifle. The 9 second was centerfire pistol. I believe the third was 10 shotshell. And the last was rimfire. 11 Q. Shotshell, was there a specific gauge or gauges 12 they were doing? 13 MR. MORTL: Objection. Form. Foundation. 14 THE WITNESS: I really don't know the 15 specific -- 16 Q. (By Mr. Karst) Were they taking -- 17 A. -- schedule. 18 Q. Were they taking the business from Bridgewater 19 down there -- 20 A. Bridgeport. 21 Q. -- or were they producing it at both locations 22 at the same time? 23 A. There was slight overlap, but I couldn't tell 24 you which specifications were overlapped. I was out of 25 that by then.

126 1 MR. MORTL: You said Bridgewater, but he 2 corrected you. It was Bridgeport, but that's 3 fine. 4 MR. KARST: Sorry. 5 Q. (By Mr. Karst) Do you know a Dr. John Zapp, 6 Z-A-P-P? 7 A. No, not that I recall. 8 Q. A Dr. D'Alonzo? 9 A. No. 10 Q. C.A. D'Alonzo? 11 A. No. 12 Q. The products that were manufactured in 13 Bridgeport, the shotshells that had the 14 asbestos-containing basewad, when they were packaged up 15 and shipped off to Remington's customers, did they ever 16 contain any type of a warning regarding asbestos? 17 A. I don't believe so. 18 Q. Is there any reason why they would have warning 19 signs and air monitoring in the plant itself, but not 20 warn their customers that the product contains 21 asbestos? 22 MR. MORTL: Objection to form. 23 THE WITNESS: Sure. The employees were in 24 the environment where the asbestos was being 25 used, and very few, by the way, could be exposed	128 1 from time to time on the job, and they were well 2 trained and equipped and so on and so forth and 3 monitored. 4 Q. (By Mr. Karst) Are you saying, in your belief, 5 you would have to have been doing that job to have been 6 exposed to asbestos? 7 PHONE: Calls for expert opinion. 8 THE WITNESS: I don't know that I would say 9 that, but I can't tell you why not. 10 Q. (By Mr. Karst) Because the signs in the plant 11 were warnings for all employees, correct? 12 A. Generally, yes, but people in the plant were 13 also assigned to specific areas. 14 Q. Sure. 15 A. So there would be no reason for them, for 16 example, to go into the area where the Colton machine 17 was operated. 18 Q. But it's there for everybody. 19 A. But it's there. The safety program is there for 20 everybody, yes. 21 Q. Have you ever heard the term friable? 22 A. Yes. 23 Q. How would you define the word friable? 24 A. It's a property of substance which makes it 25 break apart on impact.
127 1 to it. 2 Q. (By Mr. Karst) And why do you say that? 3 A. Because there were only two people on the job. 4 Q. Two people on what job? 5 A. On the dry-molded basewad manufacturing job. 6 Q. So you gave me one individual's name earlier. 7 A. Curt Simmons. 8 Q. And who was the other? 9 A. I don't recall. I tried to think of it when I 10 was out of the room. 11 Q. So do you believe that those were the only two 12 that could have been in danger regarding any asbestos? 13 MR. MORTL: Objection. Misstates 14 testimony. 15 THE WITNESS: I don't believe they were in 16 danger. There was a very thorough safety 17 program and personal protective equipment and 18 monitoring and the whole nine yards. It was 19 very conscientiously done. 20 Q. (By Mr. Karst) But those are the only two 21 people that you think could ever be involved with 22 anything. 23 MR. MORTL: Objection. Overbroad. 24 THE WITNESS: I don't know specifically of 25 other people, but I know other people filled in	129 1 Q. Would you consider friable dusty? 2 A. Not necessarily. 3 Q. What would you consider it? 4 A. Friable? 5 Q. Yes. 6 MR. MORTL: Vague. Calls for expert 7 opinion. 8 Just give your general understanding, sir. 9 THE WITNESS: Something that breaks up in 10 clean pieces. It would not be dusty, but it 11 might be friable. 12 Q. (By Mr. Karst) Breaks up in clean pieces, but 13 would not be friable. 14 A. I said maybe. It might be called friable. 15 Q. When you shoot a shotshell, obviously, like you 16 said, the projectile comes out as intended, the other 17 side of the gun, correct? The shotgun. 18 A. I'd prefer you use the word ejecta. 19 Q. But also where you're shooting there's -- some 20 call it gunshot residue and so forth that comes out the 21 other side, correct? 22 A. A small amount, yes, gunshot residue. 23 Q. Is that typical? 24 A. Gunpowder residue would be the proper term, not 25 gunshot.

130 1 Q. Is that a typical experience that you've had? 2 A. Yes. 3 Q. I'm going to show you what I'll mark as Exhibit 4 2. 5 6 (Plaintiff's Exhibit 2, 2/17/71 document 7 regarding toxicity of primer and projectile 8 in rimfire ammunition, marked for 9 identification) 10 11 MR. KARST: I'll give this to your 12 attorney. 13 MR. MORTL: Is this the only copy? 14 MR. KARST: It's your all's document. 15 Q. (By Mr. Karst) I'll let you read this document, 16 but I'm just going ask you, have you ever seen this 17 document before? Does it look familiar to you? 18 MR. MORTL: Take a minute to -- 19 Q. (By Mr. Karst) I'll let you read the whole 20 thing, but I'm just asking you generally speaking. 21 A. No, I don't think I've seen it before. 22 Q. I'll let you read this document. The document, 23 for the record, is dated February 17, 1971. The upper 24 left says M.W. Kordas, Jr., supervisor, applied 25 research, Remington Arms Company, Inc., Bridgeport,	132 1 attention in recent years. The American Conference of 2 Governmental Industrial Hygienists now recommends a 3 threshold limit value of 5 fibers per milliliter of 4 air, fibers greater than 5 microns in length counted by 5 a phase contrast method following collection by a 6 membrane filter technique. This low level of 7 concentration reflects the concern that is felt for the 8 health effects of inhaling asbestos fibers. In 9 addition to the fibrotic disease called asbestosis, 10 which has long been recognized. It is now known that 11 persons who acquired the disease asbestosis are more 12 likely to develop lung cancer than rates for the 13 general population would predict. It would be well to 14 seek a suitable substitute for asbestos in the friable 15 projectile. In the building construction industry, 16 where asbestos-containing insulation has been sprayed 17 on steel structural members, it has been necessary to 18 seek substitutes for asbestos. Various compositions 19 containing asbestos from steel mill slag have been used 20 in the insulating of steel members of buildings. This 21 might be a starting point in the search for an adequate 22 substitute for asbestos in the friable projectiles. 23 My question for you, sir, is, when did Remington 24 begin to look for a substitute for asbestos in their 25 shells?
131 1 Connecticut, 06602, entitled Toxicity of the Primer and 2 the Projectile in Rim Fryer Ammunition. 3 MR. MORTL: It's rimfire, not rim fryer. 4 THE WITNESS: This is not an easy document 5 to read. 6 MR. MORTL: Take your time. 7 THE WITNESS: Okay. 8 Q. (By Mr. Karst) It's signed James F. Morgan. Do 9 you know Mr. Mortgage? 10 A. No. I know Mr. Kordas. 11 Q. Okay. He's the gentleman you mentioned earlier 12 in applied research. 13 A. Correct. 14 Q. It talks about here on the first page asbestos 15 in the projectile. The weight of the projectile is not 16 given in your letter. On the basis of 36 percent by 17 weight of asbestos in the projectile, we estimate, 18 assuming projectile weight of 1 gram, that 250 rounds 19 would probably contain 50 to 100 grams of asbestos at a 20 minimum. The projectile is described as friable. We 21 judge from this description that the asbestos could be 22 reduced by friability to discrete fibers and dispersed, 23 at least to a partial extent, in the air of the 24 enclosure in which the firing is done. The danger of 25 inhaling asbestos fibers has received a lot of	133 1 A. Well, let me first comment that -- 2 Q. That's my question, sir. 3 A. Okay. 4 MR. MORTL: Well, he can answer your 5 question however he wants to answer it. 6 THE WITNESS: I don't know. 7 Q. (By Mr. Karst) Was there ever a program that 8 you're aware of where Remington began a phaseout 9 program of asbestos-containing wads? 10 A. Yes. For basewads. 11 Q. When was that? 12 A. I don't recall specifically. In the 60s 13 somewhere. 14 Q. They began a phaseout the program in the 60s. 15 A. I believe so, yes. 16 Q. Why did it take until, at least according to 17 what you told me earlier, '81 to phase it out? 18 MR. MORTL: Objection to form. 19 Q. (By Mr. Karst) Why would it have taken that 20 long? 21 MR. MORTL: Objection to form. Foundation. 22 If you know. 23 THE WITNESS: Ammunition is a very tricky 24 thing to manufacture. You don't make changes 25 lightly. That would be my short answer. You

134 1 would have to test and test and test, make sure 2 that everything's okay with the ammunition from 3 a performance standpoint. 4 Q. (By Mr. Karst) They had a viable substitute 5 before they had asbestos. As you said, they had paper. 6 A. Uh-huh. 7 Q. Is that correct? 8 A. Paper preceded asbestos-containing, yes. 9 Q. Why couldn't they just go back to using paper if 10 they're looking for a substitute, if they knew asbestos 11 was dangerous? 12 MR. MORTL: Objection to form. 13 THE WITNESS: The shells were highly 14 non-reloadable. 15 Q. (By Mr. Karst) Which ones were not? 16 A. The paper-based ones. 17 Q. You also told me for some specific shells they 18 had a plastic basewad. 19 A. Uh-huh. 20 Q. Why could they not use that as a substitute for 21 asbestos? 22 MR. MORTL: Objection to the form. 23 Go ahead. 24 THE WITNESS: I would have to speculate a 25 little bit, but there's a lot of reasons for	136 1 Q. So you just said the basewad goes out the end of 2 the barrel. 3 MR. MORTL: Objection to form. 4 THE WITNESS: No. I said I'm surprised you 5 haven't said that yet, quite frankly. 6 Q. (By Mr. Karst) You've told me that it didn't. 7 A. I did tell you it didn't. 8 Q. Right. 9 A. Yes. 10 MR. KARST: We've gone a little more than 11 an hour. Why don't we take a break. 12 VIDEOGRAPHER: The time is 2:22 p.m. We're 13 going off the record. 14 15 * * * * * 16 17 VIDEOGRAPHER: The time is 2:38 p.m. We're 18 back on record. 19 Q. (By Mr. Karst) Mr. Anderson, the document I 20 read you, Exhibit 2, in this letter they're talking 21 about the friability of the projectiles. Since this 22 came out in '71, which you said they were already 23 testing asbestos or warning about asbestos in '68, when 24 you got there, are you aware of any testing that was 25 done to see the amount of asbestos expelled from the
135 1 going to a plastic basewad in a shotshell. One 2 of them is that it's very easy to adjust the 3 internal of the shell, which bears on what kind 4 of shots you use, what kind of other wads you 5 need to use, what you're trying to use the shell 6 for, and all that takes time to figure out, and 7 it's not the same for each shell or each load. 8 You might have one set of problems to deal with 9 with a plastic basewad, all other things being 10 equal, and totally different ones if it was an 11 asbestos or a dry-molded basewad, whether it had 12 asbestos in it or not. 13 Q. (By Mr. Karst) Why did they use asbestos in the 14 first place? 15 MR. MORTL: Objection to form. 16 THE WITNESS: Because it's a perfect 17 material for that kind of application. It's 18 very hard. It's very a wearable, you might say. 19 Q. (By Mr. Karst) Even though it's dangerous. 20 A. It's very strong. Yes, it is dangerous. 21 Gunpowder's dangerous, too. It forms well. It's very 22 tough once it's formed. I assume that's probably why 23 you haven't talked about the basewad going out the 24 barrel yet. That's pretty much it. It's a good 25 material for that application.	137 1 gun when it was fired? 2 A. No. 3 Q. Either from what came out the end or, as you 4 said, from -- 5 A. I would seriously question the assumption that 6 any asbestos came out the end. 7 Q. But you're not aware of any testing. 8 A. No. 9 Q. In your attorney's handwriting, the document 10 that you had given me this morning, Exhibit 1, the last 11 line on there has 1964 to 1967. I'm assuming that says 12 some target loads. 13 A. Yes, it does. 14 Q. What does that reference? What does that mean? 15 A. That means there were target loads that had a 16 dry-molded basewad in them. 17 Q. Between '64 and '67? 18 A. Uh-huh. That's what it says. 19 Q. And what is that based off of? 20 A. I'm thinking it's a catalog item that shows that 21 it's the dry-molded basewad shell. 22 Q. Why would target shells have a dry-molded 23 basewad? 24 MR. MORTL: Objection to form. 25 THE WITNESS: It can only be because the

138 1 dry-molded basewad shell was more suitable for 2 the particular load than the RXP shell was, 3 although the RXP shell wasn't available at that 4 time, so I can't answer the question. 5 Q. (By Mr. Karst) The notation that's here is 6 SGPI. Do you know what that stands for? 7 A. Yes. That's a code on the bottom of a 8 Remington. I think probably a price list, but I'm not 9 sure. 10 Q. Do you think this is from a price list? 11 A. That would be my guess, yes. 12 Q. Do you know what that code means, SGPI? 13 A. No, not off the top of my head. 14 Q. Is that something that the attorney would have 15 written down? 16 A. No. I believe that's the form of the codes that 17 appear at the bottom of the catalog and the price 18 lists. 19 MR. MORTL: They're bates numbers. 20 THE WITNESS: That's the kind of numbers 21 that are on there. 22 MR. KARST: I'm asking him. 23 MR. MORTL: Sure. Just to help you. 24 MR. KARST: I know what they are. I'm just 25 asking him if he knows, since it was, he said,	140 1 MR. MORTL: I don't, no. 2 MR. KARST: How can you find out? 3 MR. MORTL: Do you have anymore questions 4 for the Witness? We can do this off the record. 5 MR. KARST: We can do this off the record, 6 but I'm asking you right now, do you have them? 7 MR. MORTL: We can do this off the record. 8 Do you have anymore questions for the Witness? 9 MR. KARST: Can you look or not? 10 MR. MORTL: Do you have anymore questions 11 for the Witness? 12 MR. KARST: Of course, I do. 13 MR. MORTL: Okay. Ask them. 14 MR. KARST: Wow. You're a piece. 15 Q. (By Mr. Karst) Mr. Anderson, are you aware of 16 any patents that Remington possesses or had possessed 17 for asbestos-containing products? 18 A. No. 19 Q. You've never seen any. 20 A. Nope. 21 Q. Do you know an Edward Rickey? 22 A. I knew him, yes. 23 Q. Who is Mr. Rickey? 24 A. I believe he was a production supervisor, Ed 25 Rickey, probably in the park production unit, but I'm
139 1 from him. 2 Q. (By Mr. Karst) Do you know what specific target 3 loads had an asbestos-containing basewad from '64 to 4 '67? 5 A. No, I don't. 6 Q. Any idea how I would find the answer to that, 7 which ones did and which ones did not, during that time 8 period? 9 A. I don't know. You could go look up that code 10 number on the price list and see if you saw any other 11 ones. 12 Q. Honestly, I'm trying to find if I have been 13 given those documents or not. 14 MR. KARST: Do you guys have those? 15 MR. MORTL: They've been produced. 16 MR. KARST: Do you guys have those? 17 MR. MORTL: I don't have them. 18 MR. KARST: You guys don't have a copy of 19 the documents that you've produced in this case. 20 MR. MORTL: Counsel, ask your questions. 21 MR. KARST: I understand, but you guys 22 brought this to the deposition. I didn't bring 23 this to the deposition. You guys made notations 24 on here. Do you have these documents for those 25 pages?	141 1 guessing. 2 Q. In which unit? 3 A. Park production. 4 Q. What is park production? 5 A. Rimfire and explosives. 6 Q. Do you know roughly what years he worked for 7 Remington? 8 A. No. He was there before I was. If I'm not 9 mistaken, he's deceased. 10 Q. When you arrived in '68, was Mr. Ricky still 11 working there, to your knowledge? 12 A. Yes. 13 Q. And you also mentioned a gentleman, Ben 14 Daubenspeck. 15 A. Yes. 16 Q. What was his job at Remington? 17 A. He was a research manager. He was my first 18 boss, twice removed. 19 Q. How long did he work at Remington? 20 A. A long time. I would guess 30, 40 years. 21 Q. Was he there when you arrived in '68? 22 A. Yes. 23 Q. Was he still there when you left in '86? 24 A. No. He retired. 25 Q. Okay. He didn't move on to another company or

142 1 anything. 2 A. No. 3 Q. He was pretty much a Remington lifer for the 4 most part. 5 A. For the most part he was, yes. A lot of them 6 were. 7 Q. I'll show you a patent. In the upper right-hand 8 corner it says United States Patent Office, patented, 9 September 6, 1666, number 3270671, title of the patent 10 is Cartridge Wad and Process for the Manufacture 11 Thereof by Benjamin Daubenspeck and Edward A. Rickey, 12 Stafford, Connecticut, as signers to Remington Arms 13 Company, Inc, Bridgeport, Connecticut, a corporation of 14 Delaware. I'll hand this to your attorney, and we can 15 mark this as Exhibit 3. 16 17 (Plaintiff's Exhibit 3, United States 18 patent, marked for identification) 19 20 Q. (By Mr. Karst) I'll give you a couple minutes 21 if you want to peruse that. It's a two-page patent. 22 A. It might be more than a couple minutes. 23 Q. Have you had a chance to read this? 24 A. I have. It's tough to read. 25 Q. It's a patent.	144 1 asbestos listed there says 40 percent asbestos. If you 2 look right here in the next paragraph, it starts with 3 However, it must be appreciated that the preferred 4 percentages are not limiting in the exercise of the 5 present invention. For example, basewads can be 6 produced at 100 percent asbestos plus binder or 100 7 percent wood fiber plus binder. If you continue on 8 down that paragraph right there -- 9 A. It has been found. 10 Q. Yes. It has been found that acceptable basewads 11 for most general uses can be produced by varying the 12 asbestos not substantially less than 30 percent and not 13 substantially more than 60 percent. 14 However, when you look deeper into this patent, 15 where I'm point right here on the first page, the 16 paragraph that starts, the following discussion, which 17 is the patent itself. The following discussion will 18 refer mostly to the manufacturer of molded basewad; 19 however, it must be appreciated that the discussion is 20 not intended to be limited to basewads only. 21 A. Uh-huh. 22 Q. Do you know what else they would be referring 23 to, Mr. Anderson? 24 A. No, I don't. 25 Q. Well, if we peruse a little bit farther into
143 1 A. Yes. 2 Q. As you can see from the first page of that, as I 3 mentioned, the date, September 6, 1966, in the upper 4 right-hand corner of page one, but as you can see by 5 the writing right in the beginning of the document it 6 says, This application is a continuation in part of 7 co-pending application serial number 211108 filed July 8 19, 1962, now abandoned. Do you see where I'm reading? 9 A. Yes. 10 Q. And this is, as they call it, a patent for a 11 cartridge wad, correct? 12 A. Uh-huh. That's what it says, yes. 13 Q. That's what they're terming it at least. 14 A. Yes. 15 Q. Do you have any disagreements with anything 16 that's in this patent? 17 MR. MORTL: Objection to form. 18 THE WITNESS: None that I see, but I'm 19 probably not qualified to make such a judgment 20 in some of these things, in chemistry in 21 particular. 22 Q. (By Mr. Karst) As you can see on the first 23 page -- I wish each line was numbered. I apologize. 24 If you look up -- I'll point to your copy. As you can 25 see right here where I'm pointing, the amount of	145 1 this on the second page, you'll see the big four up 2 here, and then when you get into this column, it says 3 what is claimed, and it has numbers one through seven 4 listed of what is claimed, and when you look at these, 5 they talk about basewad, the cartridge basewad. I'll 6 give you a chance to look at it. You can look through. 7 Several of them refer to the cartridge basewad. Are 8 you okay with that? 9 A. Yes. 10 Q. Number seven, however, specifically says a 11 cartridge wad consisting essentially of an individually 12 cold-molded mixture of 30 to 60 percent of asbestos 13 fibers, 70 to 40 percent of ligneous cellulose fibers 14 and a wax binder present in the amount equal to 15 to 15 20 percent of the weight of the fibers and so forth. 16 So this patent is not only for asbestos-containing 17 basewads, but also wads made of asbestos within the 18 cartridge itself. 19 MR. MORTL: Objection to form. Mistakes 20 the document. Calls for a legal conclusion. 21 If you know. 22 THE WITNESS: What is your question? 23 Q. (By Mr. Karst) Am I correct in reading this 24 that paragraph seven does not relate to basewads and it 25 specifically relates to a different wad they're calling

146 1 a cartridge wad? 2 MR. MORTL: Same objections. 3 THE WITNESS: I don't know what a cartridge 4 wad is. 5 Q. (By Mr. Karst) It's not a basewad, correct? 6 A. Yes. 7 Q. Is that fair? 8 A. Yes. 9 Q. Because throughout the other paragraphs they 10 specifically labeled it cartridge basewad, but in 11 paragraph seven it's called a cartridge wad. What is 12 the cartridge of a shotgun shell? 13 MR. MORTL: Objection. Foundation. Form. 14 If you know. 15 THE WITNESS: That's lawyer language. 16 That's not ammunition manufacturing language. 17 You don't call fat shells cartridges. I don't 18 know what that means. 19 Q. (By Mr. Karst) You don't know what a cartridge 20 is. 21 A. I know what a cartridge is. 22 Q. What is a cartridge? 23 A. In ammunition? 24 Q. Yes. 25 A. It's a brass case, usually centerfire or	148 1 are back on the record. 2 Q. (By Mr. Karst) Mr. Anderson, I'm going to give 3 you what we're marking as Exhibit 4. This is a 4 document that's bates stamped SGPI 1001353 through 5 bates number SGPI 1001367. 6 A. Got it. 7 Q. Have you had a chance to review this? 8 A. Not in detail, no. 9 Q. If you want to take a minute or two and look at 10 this document. 11 Have you had a chance to review it? 12 A. Yes. It's pretty voluminous, isn't it? 13 Q. This is a document produced by your attorneys. 14 I'm asking you -- first of all, on Exhibit 1, these are 15 the numbers that were referenced under 1964 to 1967, 16 some target loads under dry-mold basewads. I'm trying 17 to understand this document. First of all, what is 18 this? 19 A. It looks to me like a list of all specifications 20 for shotshell ammunition. By specifications I mean 21 components. 22 Q. All or just some? 23 A. I would have to study it more to say all or 24 some, but there's a lot in there. Those are all the 25 gauges.
147 1 possibly rimfire. Shotshells are called shotshells. 2 They're not called cartridges, not in the business, so 3 to speak, or among users. I don't know that I've ever 4 heard a shooter call a shotshell a cartridge. 5 Q. This patent is written by -- 6 A. Lawyers. 7 Q. -- the two gentlemen who their names are on it, 8 one of them you know. Actually, the two gentlemen you 9 know, Mr. Daubenspeck and Mr. Rickey. 10 A. Right. 11 Q. Do you have any idea what those two gentlemen 12 were referring to when they talked about a cartridge 13 wad? 14 A. No. 15 MR. KARST: Off the record. 16 VIDEOGRAPHER: The time is 3:04 p.m. We 17 are going off the record. 18 19 * * * * * 20 21 (Plaintiff's Exhibit 4, specifications for 22 shotshell ammunition, marked for 23 identification) 24 25 VIDEOGRAPHER: The time is 3:15 p.m. We	149 1 Q. On the first page there's several names, lower 2 left corner, J.J. Capasso. 3 A. Yes. Jimmy Capasso. 4 Q. Is Mr. Capasso still with us? 5 A. No. 6 Q. What was his job? 7 A. He was chief supervisor of park production when 8 I was there. 9 Q. Parts for -- 10 A. Park manufacturing facility, rimfire, 11 explosives. That's it, firing and explosives. 12 Q. In the lower right we've got several other 13 names. There's R.M. Malcom. 14 A. Yes. Ralph Malcom. 15 Q. What was his job? 16 A. I don't really recall. I'm not even sure I 17 could point him out in a picture. 18 Q. How about W.L. Penn? 19 A. Bill Penn. I knew him well. 20 Q. What did Mr. Penn do? 21 A. He was the superintendent of process engineering 22 when I first went to Remington. 23 Q. Process engineering of what? 24 A. Of the plant. 25 Q. Is Mr. Penn still with us?

150 1 A. No. 2 Q. Then there's Mr. Capasso again and F.J. 3 Montague. 4 A. Frank Montague, yes. 5 Q. Is Mr. Montague still with us? 6 A. I don't believe so. I don't know what his 7 specific position was either. He was getting up there 8 when I was there. 9 Q. And then there are the letters VRV. Do you know 10 what that means? 11 A. No. 12 Q. Do you know if they're initials or not sure? 13 A. No, I don't know at all. 14 Q. Is that a department? Would that stand for a 15 department? 16 A. Not that I can think of. 17 Q. Because it's under the cc. 18 A. I don't know what that is. 19 Q. I see the date in the lower left-hand corner of 20 July 12, 1968, correct? 21 A. That's right. 22 Q. Looking at this document, do you see any other 23 date on this document anywhere on any page? Any dates? 24 A. No. Did I miss one? 25 Q. No. I didn't see one either. So where I'm	152 1 on there for different loads. 2 Q. But none of that has any data on it prior to 3 July 12, 1968, which is why I'm asking. On Exhibit 1 4 it says '64 to '67. That's what I'm trying to 5 understand. They just don't seem to comport to me, and 6 I don't know if I'm missing something. 7 A. I can't help you. 8 Q. Where did this information then for these two 9 lines on this sheet of Exhibit 1 come from then that 10 your attorney wrote down? 11 MR. MORTL: Objection to form. 12 THE WITNESS: I'm guessing from a catalog 13 or an interpretation of a catalog. I don't 14 know. I can't say. 15 Q. (By Mr. Karst) Could this information be 16 incorrect, the '64 to '67? 17 MR. MORTL: Objection to form. 18 THE WITNESS: I don't know. I don't know 19 whether it is or not. 20 Q. (By Mr. Karst) That's what I'm asking. You 21 don't know one way or another whether that's a correct 22 statement or not. 23 A. Yes. 24 Q. Let's look at this document so I can understand 25 at least trying to generically read this. If you look
151 1 going with that is, on Exhibit 1 there's listed some 2 target loads, '64 to '67, and it lists this set of 3 documents under that. 4 A. Down here some target loads. Okay. 5 Q. Right. So I'm trying to figure out how this 6 document purports to say '64 to '67, some target loads, 7 dry-mold basewads. 8 MR. MORTL: Objection to form. 9 THE WITNESS: What is the question? 10 Q. (By Mr. Karst) Exhibit 1 says that from '64 to 11 '67 some target loads have dry-molded basewads, and 12 they're referencing this document. 13 A. Down here. 14 Q. Right. So what I'm asking is, how does this 15 document give me any of that information? 16 A. I don't see anything on there that would give 17 you that. 18 Q. He can't answer. 19 A. He can't answer. Okay. 20 Q. On Exhibit 1, would that -- is Exhibit 1 correct 21 or incorrect then? Exhibit 1 is the yellow piece of 22 paper. 23 A. I can't tell you that there's not an error on it 24 or an omission insofar as you accept those things. It 25 looks accurate to me. There's a lot of specification	153 1 at page two, obviously there's a line across the top, 2 cap, body, wad, product and remarks. It's page two of 3 the document. It's page one of the chart. 4 A. All right. 5 Q. So the last four bates numbers are 1354. 6 A. Yes. 7 Q. The cap would be the metal part of the exterior 8 of the shell. 9 A. That's right. 10 Q. The body would be the plastic part. 11 A. Correct. 12 Q. The wad is the basewad. 13 A. Correct. Unless is said otherwise. 14 Q. If I'm looking at this -- and please correct me 15 if I'm wrong because I may be -- it says Remington 16 industrial number 260 brass. Can you tell what gauge 17 that is or what that is for? 18 A. Yes. It's an 8-gauge. 19 Q. And how do you determine that? 20 A. It's in the product column, SP8. 21 Q. Okay. What does SP mean? 22 A. It usually means plastic shell, shell plastic. 23 Q. Okay. And it has SP8 standard, SP, and there's 24 magnum, standard zinc, magnum zinc. 25 A. Uh-huh.

154 1 Q. What is the different -- standard, magnum, what 2 does that all mean? 3 A. Ordinarily -- I'm not all that familiar with the 4 8-gauge. That was an industrial load, basically, but 5 generally what those mean -- standard means there's one 6 type of powder in it, one weight of load, and magnum 7 usually is a higher powder charge and a heavier load. 8 Q. And if it says zinc afterwards, does that 9 literally mean there's zinc in there? 10 A. It could mean there's a zinc head on it instead 11 of brass, or it could mean that there's a zinc slug in 12 it. 13 Q. If we go to the next page, bates number 1355, 14 this would be 10-gauge. 15 A. Yes. 16 Q. Now, can you tell from this whether this is -- 17 strike that. 18 Is this target or is this field? 19 A. This would be field. There were no 10-gauge 20 target loads. 21 Q. Okay. Let's go to the next page. That might be 22 a little easier. Bates page last four 1356. This is a 23 12-gauge. Is this field or target? 24 A. There are some of both. 25 Q. How can you tell which is which?	156 1 next page. 2 A. Yes. They're all 12-gauge. 3 Q. And the body, I'm assuming, is 2 3/4 inches. 4 A. Correct. 5 Q. And some are green, blue, white, green, blue 6 again. 7 A. Yes. 8 Q. But all of them have the notation -- I'm sorry. 9 Some have different numbers -- 58.0GR. 10 A. Grain. 11 Q. And 45.0GR. 12 A. Uh-huh. 13 Q. Green again? 14 MS. TRATTLES: Grain. 15 THE WITNESS: Grain. It's a weight. 16 Q. (By Mr. Karst) Grain. Okay. Is it grams. 17 A. It weighs 58 grains. 18 Q. And these all would -- on these two pages, 1356 19 and 1357 bates numbers, would all have a dry-mold 20 basewad that would contain asbestos; is that correct? 21 A. Yes. 22 Q. So that we don't have to go through each one of 23 these, anytime it would say DMBW on this, that would be 24 a dry-molded basewad, which would be 25 asbestos-containing.
155 1 A. One says International target. 2 Q. Right. If it doesn't say International target 3 -- 4 A. If it doesn't say target, you can assume it's a 5 field load. 6 Q. Okay. And, again, SP12 would be shell plastic. 7 A. 12-gauge plastic shell, yes. 8 Q. Under product, third one down, it has SP12, 9 dash, 00, dash, BK, dash, 9. What does all that mean? 10 A. Buck shot, double 00 buck shot, 9 pellet. 11 Q. Number seven under that, SP12, dash, RS. 12 A. Rifle slug. 13 Q. And number ten under that, SP12, dash, 6, SAAMI 14 -- 15 A. Sporting Arms and Ammunition Manufacturers 16 Association standards, which means it has all the 17 standard dimensions on the drawing. 18 Q. I'm sorry. That would be a field because it 19 doesn't say the word target. 20 A. Yes. But it was used as a standard that was 21 used from time to time to compare with other types of 22 ammunition, different loads or different 23 specifications. That's the standard that you always 24 come back to. 25 Q. It looks like this one continues on until the	157 1 A. That's right. 2 Q. Bates number 1359, here it has a 12-gauge 3 target, plastic basewad, 52 grains. 4 A. Yes. 5 Q. What does the -- now, obviously, this would be a 6 plastic basewad, according to this, and therefore not 7 asbestos. 8 A. Correct. 9 Q. Under the product on the first line it says 10 RPA12L. Do you know what that means? 11 A. RPA12L. It doesn't come back to me. There's a 12 12M. No, I don't know what that is. I don't know what 13 that is. The answer to your question is no, I can't 14 tell you. 15 Q. A little further down it says PPA12L. Any idea? 16 A. No. 17 Q. We'll continue going through the document. 18 Everything is DMBW, dry-molded basewad, until you get 19 to bates 1365. 20 A. Okay. Got it. 21 Q. So this would be 20-gauge target, and, again, 22 the body, as you mentioned, yellow at this time period, 23 and I assume that would be a plastic basewad. 24 A. Correct. 25 Q. Do you know what RP20 stands for?

158 1 A. The only thing comes to mind is 2 Remington-Peters. 3 Q. And PP20. 4 A. I don't know what that is. 5 Q. And the next page, again, dry-molded basewad, 6 and then the last page of the document, 1367, has the 7 410-gauge that you were talking about, and that looks 8 like it has -- it says CONV. paper. Does that mean it 9 still has a paper wad? 10 A. Paper basewad, yes. 11 Q. So all in all, if this document as of July 12, 12 1968, purports to show the shotshells that Remington 13 was making as of this date, the only two -- I'm sorry. 14 The only three that are not listed as dry-molded 15 basewads are the 12-gauge target on page 1359, the 16 20-gauge target listed on 1365 and the 410-gauge paper 17 listed on 1367. 18 A. Uh-huh. 19 Q. Is that correct? 20 A. Yes, I believe it is. 21 MR. MORTL: Objection to form. 22 Q. (By Mr. Karst) Therefore, everything else would 23 be an asbestos-containing dry-molded basewad, correct? 24 MR. MORTL: Object to the form. 25 THE WITNESS: I really can't answer that.	160 1 Q. That might be on the 1969 one. 2 A. Might be or might not be. Maybe it got 3 forgotten. Do you see how many specifications are on 4 here? I know that's happened before. I've had 5 personal experience with that. That was not with 6 shotshell, though. That was centerfire. That was a 7 document like this. 8 Q. Do you mean a product was supposed to be in a 9 document and it didn't list it? 10 A. I can't remember which way it went, but 11 something was missing or something was superfluous. 12 Q. But looking at this, there isn't anything that 13 you could think of that's missing off the top of your 14 head. 15 A. No. But I wouldn't bet money on it, to tell you 16 the truth. 17 Q. These are the documents from the company. This 18 is all I have to go on. 19 A. I understand that. 20 Q. Do you have any document that would refute any 21 of this, what's in this document? 22 A. No. 23 MR. KARST: I know we're at the end of the 24 tape, so we're going to stop for today. If I 25 have some other questions, I'll pick up in the
159 1 I would have to look at this for a lot longer. 2 Q. (By Mr. Karst) Are there any other shotshells 3 that you're aware of not listed here in this document 4 that existed on September 12, 1968? 5 MR. MORTL: July 12. 6 Q. (By Mr. Karst) I'm sorry. July 12. 7 A. I can't really say. We had specifications from 8 time to time that went in and out of production. Some 9 might have made this list that were never even 10 produced. 11 Q. Do you mean there are some that might be on this 12 list that were never produced? 13 A. Or the converse. There might have been some 14 produced that aren't on this list. There may be some 15 that were not produced that are on this list, and there 16 may be some that were produced that were not on this 17 list. 18 Q. Why would something be -- if this is showing the 19 chart of component products for shotshells, why would 20 it not list the different shotshells? 21 A. The only thing I could say about that -- and 22 this is pure supposition -- is that it's between 23 publications. You might not have a specification on 24 this 12 months of the year if a specification came into 25 being during the year, didn't get put on the chart.	161 1 morning so we can be done for the day and the 2 tape easily. 3 MR. MORTL: Agreed. 4 VIDEOGRAPHER: The time 3:43 p.m. We're 5 suspending the deposition of Ray Anderson for 6 today and going off the record. 7 MR. KARST: For the record, guys, everyone 8 on the phone, we'll start tomorrow at 10:00 9 eastern time, same call-in, same everything, I 10 assume. 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

Raymond A. Anderson, Jr.
7/18/2018

162

1 STATE OF CONNECTICUT

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3 I, Keli McGilton, a Notary Public in and for the
4 State of Connecticut, do hereby certify that there came
5 before me on the 18th day of July, 2018, at the Law
6 Offices of Murtha Cullina, CityPlace I, 185 Asylum
7 Street, Hartford, Connecticut, the following named
8 person, to wit: RAYMOND A. ANDERSON, JR., who was by me
9 duly sworn to testify to the truth and nothing but the
10 truth as to his knowledge touching and concerning the
11 matters in controversy in this cause, that he was
12 thereupon examined upon his oath and said examination
13 reduced to writing by me; and that the statement is a
14 true record of the testimony given by the witness, to
15 the best of my knowledge and ability.
16

17 I further certify that I am not a relative or
18 employee of counsel/attorney for any of the parties, nor
19 a relative or employee of such parties; nor am I
20 financially interested in the outcome of the action.
21

22 WITNESS MY HAND this 22nd day of July, 2018
23
24

25 _____
Keli McGilton
Notary Public

My Commission expires:
July 31, 2022

A
a.m 5:3 44:13
AA 65:20 107:12 108:1
112:20 114:4
abandoned 143:8
ability 162:9
abrasive 19:14
accept 151:24
acceptable 144:10
accurate 151:25
accurately 78:20 112:14
acquired 132:11
action 162:12
activities 27:12
actual 99:11
add 62:13
added 62:16
addition 76:17 132:9
additive 44:5
adequate 132:21
adjust 135:2
advent 100:20
ago 11:8 47:25,25 48:8
87:1 90:9,18,19 91:7
agree 7:7 97:24
Agreed 7:12 161:3
agreements 7:5
ahead 24:11 29:17 93:6
97:15 122:16 134:23
air 120:23 25 126:19
131:23 132:4
al 1:8 5:7
Alathon 43:19,20
Albert 7:20
alive 28:10 76:7 104:21
105:5
all's 130:14
All-American 66:4,8,9,14
66:17,22,25 67:3,10,12
67:16 68:12 69:3,5
108:16
ambient 72:8 75:9
amended 5:8,9
American 33:16,16 51:24
52:10 132:1
Ammo 51:24
ammunition 4:9,11 8:23
8:25 9:10 16:17,20 17:1
17:3 20:10 21:6,21
45:11 51:20 82:20
119:11,13 125:1,3,5
130:8 131:2 133:23
134:2 146:16,23 147:22
148:20 155:15,22
amort@glynnfinley.com
2:12
amount 41:22 97:2 129:22
136:25 143:25 145:14
analogous 38:2
Anderson 1:12 4:3,7 5:4
6:4,20 7:3,16,18 11:5
31:16 32:11 44:20 86:10
86:14 136:19 140:15
144:23 148:2 161:5
162:5
Andrew 2:11 6:2
animal 41:2
announce 26:9
annual 9:4
answer 11:20,23 23:12
34:8 47:11 53:13 95:22
103:13 112:14 124:15
133:4,5,25 138:4 139:6
151:18,19 157:13
158:25
answered 54:1 56:22
97:10 109:10
answers 99:22
anticipating 94:20
anvil 30:11
anybody 16:5 77:11 86:17
103:20 105:17 106:1
anymore 31:25 42:20 52:1
58:2 84:6 140:3,8,10
anytime 156:23
apart 128:25
apologize 143:23
appear 138:17
appearances 2:1,17 3:1
5:20
appeared 45:23 65:2,8
appearing 6:10
Appliance 3:15
application 135:17,25
143:6,7
applied 16:6 119:10
130:24 131:12
appreciated 144:3,19
appropriate 81:23
approximation 103:9
April 7:22
area 120:13,17,19 128:16
areas 79:18 128:13
arguably 96:13
argumentative 54:23
58:21 65:14 92:24 93:25
95:10 97:24 112:17
Arkansas 123:11,17,23
124:2,6,13,17
Arms 130:25 142:12
155:15
arrived 141:10,21
arthritis 31:24
asbestos 75:3,18 76:17
76:18 77:5 79:4,16
93:23 102:14 106:23,24
109:22 110:7 111:7,20
112:20 113:8 120:4,8,10
120:11,25 121:2,4,15
122:1,5,20,21,22,25
123:3,16 126:16,21,24
127:12 128:6 131:14,17
131:19,21,25 132:8,14
132:18,19,22,24 134:5
134:10,21 135:11,12,13
136:23,23,25 137:6
144:1,1,6,12 145:12,17
156:20 157:7
asbestos-containing
12:23 74:22 99:14 100:5
100:9,22 103:14 106:7
107:7,20 108:1,6,8,13
111:10 112:10 114:25
115:3,6 124:2,12 126:14
132:16 133:9 134:8
139:3 140:17 145:16
156:25 158:23
asbestos-related 9:18
13:16 94:5,12 120:1
asbestos/132:9,11
asked 7:25 24:17 49:20
53:25 56:22 93:14 97:10
109:10
asking 13:1 34:5 36:5
56:14 63:3 130:20
138:22,25 140:6 148:14
151:14 152:3,20
assemble 79:6
assembled 72:3 79:1,7
assert 11:22
assigned 24:1 128:13
associated 40:1
Association 33:16,17
155:16
assume 135:22 155:4
157:23 161:10
assuming 13:25 14:2 15:9
51:2 131:18 137:11
156:3
assumption 33:22 65:10
105:7 137:5
Asylum 1:15 5:5 162:4
attached 10:6 120:18
ATTENDANCE 3:20
attention 132:1
attorney 10:3 11:10,15
44:22 46:16,22 49:21
54:5 55:1 60:7 61:10,11
86:23 87:8 92:18 96:18
97:4,14,22,25 98:24
106:11 130:12 138:14
142:14 152:10
attorney's 59:7 64:14
137:9
attorney/client 11:22
95:12
attorneys 7:6 10:2 12:2
47:23 48:19,22 51:11,14
51:18 56:16 68:9,11
86:18 88:10,11,15 91:20
91:23 92:1,2,6 95:7,18
96:21 97:18 148:13
auto 14:11,12
available 55:3 138:3
Avenue 2:10,14 23:22
aware 133:8 136:24 137:7
140:15 159:3
awhile 91:6
B
back 17:19 20:9 38:19,20
38:21 42:7 44:19 52:11
80:22,22 86:11 91:6
98:11 104:5 105:14
117:17 134:9 136:18
148:1 155:24 157:11
backside 84:9
bag 43:20 121:11
bags 43:19 121:12,15,21
121:22,23
bang 115:20
Bank 3:8
bankers 89:7,8,9,14,18,19
89:20 91:8 96:12,13
Barnum 23:22
barrel 18:25 40:7 42:18
135:24 136:2
base 36:9,20 75:4
based 47:6 56:13,15,17,18
65:11 67:24,25 83:5
97:1,2,21,23 100:1
103:9,10 108:23 109:9
137:19
basead 30:6 34:19 36:8
36:14,15,19,22,24 37:6
37:19 38:2,14,16,24
39:7,15 40:1 65:25 66:6
66:23 67:1,17 68:17,19
68:21 69:17 70:10,13,16
70:19,22 72:8,10,13,17
73:6 75:1,2,5,20 76:23
79:9,16 81:15,16,19
84:23,24 85:5,10,17
94:15,17 99:24,25 100:9
100:20,21 101:16,17
102:1,2,8,18,20,22
103:15 106:15 107:16
107:17,19,25 108:6,9
109:7,21,22 110:1,7,25
111:6,7,20 112:4,9,20
113:8,11 114:8,25 115:3
115:6 116:2,12,15 121:5
124:8 126:14 127:5
134:18 135:1,9

42:6 80:25 81:19 84:5 care 119:23 Carondelet 2:19 cartridge 3:7 6:13 81:16 81:17 142:10 143:11 145:5,7,11,18 146:1,3 146:10,11,12,19,21,22 147:4,12 cartridges 146:17 147:2 case 10:12 11:6,7,12 13:12,16,17 51:15 54:12 93:20,23 94:6,13 95:8 95:20 139:19 146:25 cases 20:22 casualty 94:8 catalog 9:5 45:6,9,23,24 46:9,10,13,17 49:11 54:8,11 61:6,7,9,10,12 64:16,17,22,25 65:3,6,8 65:11 67:24 68:1,3,5 74:18 101:7,9,12,21 102:17,19,22,23 103:7 106:19,21 137:20 138:17 152:12,13 catalogs 8:14,17,20,21,24 8:25 9:1 10:18 40:18 45:6,11,12,25 46:6,8,21 46:22,25 47:8,9 49:3,12 49:14,22 50:3 51:16,18 51:19 52:2 53:8 54:7 59:12,13,17,22 60:4,6 68:5,8,9,10 87:11,14,16 87:23 88:19 91:11 92:7 97:23 99:11,12,12 100:2 100:4 103:2 categories 31:12 cause 36:1 162:7 Caution 123:3 cavities 78:21 cavity 77:21,22 78:20 cc 150:17 cellulose 145:13 center 2:10 22:3 38:5,7,8 78:10,11,15 centerfire 16:21 17:2,3 18:9 21:23 22:4,8 29:8 38:8 125:8,9 146:25 160:6 certain 7:25 23:16 33:9,10 38:9 76:19,21 77:3 certified 5:19 certify 162:3,10 chair 41:9 chamber 42:14,14 chambers 41:20 chance 142:23 145:6 148:7,11 change 63:6 74:13 110:23 changed 73:20 74:5 changes 133:24 characterized 66:6 charge 28:9,13,16 35:2 154:7 chart 153:3 159:19,25 cheat 31:6 chemistry 143:20 chief 21:19,20 22:11,13,14 22:16,19 23:15 24:3,24 25:4,13 149:7 choose 96:17,18 chose 103:5 chosen 97:14 Christine 3:9 6:12 christine.delaney@little... 3:10 circumference 81:24	CityPlace 1:15 162:4 Civil 1:12 7:9 claimed 145:3,4 classical 74:3 clean 129:10,12 clear 53:5 64:8 client 95:4,4 96:1,3 client's 94:23 95:20 close 65:24 76:24 89:13 89:19 closed 19:8 28:15 clue 64:20 co-pending 143:7 code 138:7,12 139:9 codes 138:16 cold-formed 72:2,6,7 cold-molded 145:12 cold-molding 72:4,5 collected 57:10 117:16 collection 117:3 132:5 college 14:17 color 74:12 102:5,6 103:7 colored 103:2 colors 73:21 74:2,3 102:25 Colton 77:16 123:12 128:16 column 34:11 36:6 145:2 153:20 combinations 116:7,9 come 12:9,9,12 25:23 45:24 46:12 47:12,14,20 49:18 55:25 56:6,25 59:10 64:15 67:9 77:21 88:3 89:5,7 105:16 106:13,20 111:25 114:13,15 121:7 122:5 152:9 155:24 157:11 comes 43:12,19 49:16 54:3 67:22 77:20 106:18 115:24,24 116:12 129:16,20 158:1 coming 45:3 98:25 comment 133:1 Commission 162:24 commit 91:16 company 1:8,13 2:8 5:7 15:4 77:16 108:24 130:25 141:25 142:13 160:17 compare 155:21 compared 22:7 compatible 82:3 compiling 60:9 completely 123:17 Complexity 20:20 component 29:14 36:15 37:7 40:2,20,25 43:1 60:21 73:24,25 74:25 80:15,17 83:19 159:19 components 24:19,22 29:21 30:14 74:22,25 75:6 76:14,15,25 80:23 80:24,25 81:1,3 148:21 comport 152:5 composition 40:3 100:10 100:12 compositions 132:18 compress 77:22 compressed 78:19 compression 43:8 75:8,8 computer 49:5 concave 42:6 concentration 132:7 concept 37:14 concern 132:7	concerning 162:6 conclusion 145:20 conditions 116:21 conduct 22:21 Conference 132:1 conformed 79:15 confusing 32:4 confusion 48:12 Connecticut 1:16 5:5,18 13:20 15:5 19:21 23:19 131:1 142:12,13 162:1,3 162:5 conscientiously 127:19 consider 129:1,3 considerations 94:8 consist 42:9 consisting 145:11 construction 37:17 93:22 132:15 construction-related 14:9 consumer 113:14 contact 105:2 contacted 11:9,11,14 contain 112:19 126:16 131:19 156:20 contained 106:22 container 40:4 117:16 containing 132:19 contains 75:2 126:20 continuation 143:6 continue 85:25 86:12 144:7 157:17 Continued 3:1 continues 77:24 155:25 contrast 132:5 controversy 162:7 CONV 158:8 conversation 97:17 conversations 12:1 97:21 converse 159:13 copies 49:5,6 52:7,9,11 99:1,10 copy 10:8 12:22 31:10 130:13 139:18 143:24 corner 142:8 143:4 149:2 150:19 corporation 2:18 3:2 6:11 6:16 19:12,13 142:13 correct 8:2 9:17 13:4,22 19:21 23:22 28:25 32:14 32:15,19 37:20 39:23 43:13 44:23 47:5 48:20 49:24 50:25 59:9 60:1 60:24 61:2,4 63:9 64:9 65:12 66:24 69:4,7,24 70:4 72:18 73:25 74:6 79:20 80:14 84:13,17,21 85:11,23 87:22 106:12 107:3,4,13,14 111:21,23 112:22,23,25 118:25 120:16 121:5 123:18 128:11 129:17,21 131:13 134:7 143:11 145:23 146:5 150:20 151:20 152:21 153:11 153:13,14 156:4,20 157:8,24 158:19,23 corrected 126:2 correctly 59:5 66:1 counsel 5:20 8:11,15,18 31:11 139:20 counsel/attorney 162:11 count 89:2 counted 132:4 County 1:2 5:14 couple 21:14 47:25,25	72:12 76:12 87:1 90:18 90:19,21,23 91:2,7 98:12 110:5 118:6 142:20,22 course 140:12 court 1:1,4 5:12,19,22 23:9 coworkers 61:18,19,21 created 87:10,19 Creek 2:10,11 crimp 80:11 84:7 85:18,20 94:11 CROSS 4:2 cross-section 101:14 CROWELL 2:13 crumpled 102:9 Cullina 1:14 5:4 162:4 cup 30:9,11,12 currently 8:4 Curt 76:6 127:7 customers 126:15,20 cute 64:20 cutoff 45:16 cylinder 78:3	56:11 118:21 119:19,22 122:10 150:14,15 depend 24:14 29:18 depended 29:24 depending 30:4 36:7 39:19,21 72:22 79:14 80:11 82:18 84:4,20 116:4 depends 30:23 34:16 41:21 52:12 117:8 depo 31:11 Deponent 6:20 deposed 6:21 deposition 1:12 5:3,11 7:8 8:9 9:15,16,22 10:5,19 13:11,12,13 16:23 48:8 48:13 86:10 95:1 139:22 139:23 161:5 describe 71:25 76:9 79:2 83:15 102:3 described 80:18 81:19 131:20 description 131:21 design 110:10 detail 148:8 determinate 39:16 determine 153:19 determines 41:23 develop 132:12 development 71:5,6,8,9 device 42:3 120:12 dial 77:20,23 78:21 124:17 diameter 39:18 41:6,15,21 58:15 78:15 82:1,2 die 58:21 72:11 78:15 difference 20:17 34:1,5,24 34:25 36:1,2,4 83:6 102:3,4,6 109:22,23 113:9,14 differences 34:9,11 35:22 different 12:19 19:16 20:22 23:20 24:18 29:5 29:12 35:2 36:6 37:3 39:13,19,25 62:22 68:8 72:22,23 73:10 75:6 78:8 80:3 93:21 94:8 102:1,13,25 113:12,15 113:23 116:20 118:6,22 125:7 135:10 145:25 152:1 154:1 155:22,22 156:9 159:20 differentiate 35:7 differentiated 102:21 differentiation 35:14 dimensionally 81:23 82:3 dimensions 79:9,10,11 103:1 155:17 DIRECT 4:2 7:1 directly 118:12 disagreements 143:15 disc 41:6 discrete 131:22 discussed 11:10 107:1 discussing 87:24 discussion 11:17 96:5 144:16,17,19 disease 106:3,3 120:2 132:9,11 dispersed 131:22 district 1:1,2 5:12,13 division 19:18 DMBW 156:23 157:18 docket 5:14 docs 10:22,23 document 4:8 10:1 32:6 32:13 54:19,22,25 55:4
---	--	--	--	--

148:2 151:1 157:17 160:24 161:6 gonna 20:12 good 5:1 7:3,4,10 31:24 46:1 62:6 135:24 Goods 1:13 2:8 5:10 6:3,6 7:24 10:16,23,25 11:2 goose 18:24 gotten 90:11 Governmental 132:2 graduate 14:22 15:24 graduated 13:25 14:2,15 15:9 graduation 14:24,25 Grain 156:10,14,15,16 grains 156:17 157:3 gram 131:18 grams 131:19 156:16 greater 26:3 132:4 green 74:3 111:9,21 112:9 156:5,5,13 ground 116:17,25 group 119:9 grattles@crowell.com 2:16 guess 45:2 58:16 73:3 89:18 138:11 141:20 guessing 26:17 141:1 152:12 gun 18:24 51:19 116:16 129:17 137:1 Gunpowder 129:24 Gunpowder's 135:21 Guns 51:24 gunshot 129:20,22,25 guy 46:3 77:12 guys 139:14,16,18,21,23 161:7 H H 3:4 34:21 42:1,2,8,19,24 43:22 45:2,4,18 46:5 62:24 63:8,15,20,24 64:1,7 80:24 116:7 117:21 hair 41:2 hand 19:16 142:14 162:13 hand-operated 17:24 handheld 18:4 handled 27:8,10 handouts 122:23 hands 20:25 31:25 89:15 handwriting 31:17,20,22 59:8 64:14 137:9 handwritten 4:7 31:15 32:10 44:21 48:14 happen 111:14 happened 57:23 101:17 119:2 123:22 160:4 happens 57:1,8 78:24 79:22 115:19,22 116:14 117:6,11,15 Harassing 97:11 hard 41:9 49:5,6 77:22 135:18 Hartford 1:16 5:5 162:5 HATLEVIG 3:17 head 10:5 29:23 39:2 41:8 46:3 79:6,8,12,16 93:19 104:19 105:21 138:13 154:10 160:14 headed 72:11 79:7 health 119:24 132:8 heard 61:15 105:8,10 128:21 147:4 heated 75:8	heavier 33:6,6 154:7 Heavy 30:4 help 48:9 97:6 138:23 152:7 hey 97:8 101:4 102:19,20 high 13:25 14:2,4,5,15,25 89:17,23 higher 154:7 highly 134:13 Highway 2:3 hired 16:10,12 19:10 HKM 2:23 Hold 48:11,15 holds 85:2 hole 78:10,11,14 hollow 78:3 home 48:5,17 87:11,21 98:22 Honestly 139:12 hopper 43:10,15 77:1 horizontally 89:21 horse 41:2 hot 15:8 hour 86:2 136:11 hours 88:8 96:16 house 12:9 52:18 82:11 98:14 housekeeping 7:13 Houston 2:4 hundreds 89:3,4 hunt 33:1 hunting 17:7 18:6 32:23 83:3 114:15,17,18 HUSCH 2:18 Hygienists 132:2 I idea 49:10 52:13,21 139:6 147:11 157:15 identification 32:11 130:9 142:18 147:23 identified 59:11 image 41:8 IMO 3:11 6:18 impact 128:25 in-house 119:18 inch 49:7 inches 89:17,23 90:3,21 90:23 91:2 96:15 156:3 included 24:7 including 8:12 incorrect 151:21 152:16 independent 50:8,16,21 50:22 51:5 53:6 55:5 59:20 61:13 65:15,18 68:20 independently 61:9 64:23 81:8 indications 89:15 indicators 46:1 individual 30:16 120:18 122:23 individual's 127:6 individually 120:3 145:11 individuals 8:5 9:7 105:22 industrial 16:1 17:15,16 114:20 132:2 153:16 154:4 Industries 3:11 6:18 industry 132:15 information 31:22 45:3 47:6 54:6 56:20 59:10 60:6 61:5 67:20,24 68:7 74:16 92:18 93:10,11,11 96:17 100:1 108:20 151:15 152:8,15	inhaling 131:25 132:8 initial 7:19 initials 150:12 injected 43:11 63:19 injection 43:8,9,10 62:1,2 62:18,19,24,25 63:4,7 63:14 72:2 injuries 119:23 injury 120:1 injury/asbestos 1:3 5:13 inserted 22:2 inside 41:7 82:1 116:19,20 117:1 118:2,2 insofar 151:24 inspection 117:17 instance 112:3 instances 107:5,18,19 instruct 11:19,23 insulating 132:20 insulation 132:16 integral 36:9,23 37:1,2,23 107:17 intended 129:16 144:20 interchangeable 39:2 interested 36:9 162:12 internal 29:23 34:12 35:6 39:21 40:10 60:21 135:3 internally 61:1 International 155:1,2 interpretation 152:13 interviewed 15:16 interviewing 15:20 introduced 46:14 60:15 invariably 113:24 invented 42:3 invention 144:5 involved 13:15 16:18 27:12 119:13 127:21 irrelevant 63:12 issue 26:8 27:1,20,23 28:1 122:22 issues 26:6 27:1,4,5,11 item 137:20 items 97:13 J J.J 149:2 Jack 105:17 Jackson 2:20 6:10 jackson.otto@huschbl... 2:21 James 131:8 JARDINE 3:16 Jimmy 149:3 job 14:7 15:15,18,19,21 20:14,19 21:17 24:25 25:7,20 28:20,21,22 119:5 127:3,4,5 128:1,5 141:16 149:6,15 jobs 15:2,3,7 20:22 23:17 26:23 John 122:2 126:5 Johns 121:16,17,21 Jr 1:12 4:3 7:18 130:24 162:5 judge 131:21 judgment 143:19 judicial 5:13 July 1:16 5:2 143:7 150:20 152:3 158:11 159:5,6 162:4,13,25 June 19:6 K K 2:20	Karst 2:3,4 5:23,23 6:8 7:1 7:3,7,13,16 10:8,13,20 11:4,5 12:1,6 13:4 18:4 18:16 22:11 23:14 24:14 26:3,21 28:4,7 29:8,13 29:20 30:13,21 31:9,14 31:16 32:1,8,13 34:4,14 35:13,16,19 37:18 38:13 40:24 43:25 44:10,20 48:15,16 49:20 50:8,13 51:9 52:2,20 53:15 54:4 54:19,25 55:14,21 56:12 56:23 57:5,11,14 58:3 59:3,20 60:20 62:7,23 63:18,23 65:15 66:18,22 69:2 70:8,13,16,19 73:12 75:18 76:2,15 80:22 83:10 85:22 86:2 86:12 87:4,7,18 88:2 92:25 93:7 94:3,23 95:13,18,25 96:8,24 97:13,20 98:4,12,20 99:3,6 102:17 103:20 104:5 106:1,6 107:11 108:5 109:11,17 110:11 110:14,18 111:13 112:8 112:15,18 113:13,18 116:5,24 117:10,25 119:18 120:24 121:12 122:5,12,18 124:1,5 125:1,16 126:4,5 127:2 127:20 128:4,10 129:12 130:11,14,15,19 131:8 133:7,19 134:4,15 135:13,19 136:6,10,19 138:5,22,24 139:2,14,16 139:18,21 140:2,5,9,12 140:14,15 142:20 143:22 145:23 146:5,19 147:15 148:2 151:10 152:15,20 156:16 158:22 159:2,6 160:23 161:7 keep 32:5 80:6 Keli 5:18 162:3,17 Kentucky 104:24,25 kind 10:14 15:6,17 17:20 29:18 32:3 38:19 40:18 47:19 53:20 78:6 85:8 92:20 93:13,21 97:16 109:18 111:15 114:11 117:17 119:15 123:15 135:3,4,17 138:20 kinds 19:16 39:25 46:2,4 62:22 knew 31:12 71:23 76:1 100:10,16 103:18 122:21 134:10 140:22 149:19 know 8:19 9:1 11:9,14 16:5 18:19 23:10 24:18 33:14 34:5,6 38:19 40:16,23 43:17 44:4,8,9 45:9,12 46:13,19,20 47:11,25 48:10 49:9 50:6 51:8 53:2,13,14,16 54:2,16,24 56:4,9 57:25 58:4,6,11 59:13 60:8 61:7 62:16 64:4,17,23 64:24 65:5,7 68:3,25 69:12 71:2,18,20,20 74:15 75:23 83:24 88:8 88:21 89:2 90:13 94:1 94:14,18 96:3 97:4 98:23 100:8,12 101:6,18 101:23 102:16,21,25	103:1,11,13,23,25 104:19,25 105:5,25 106:1,16 109:22 110:9 110:13 111:14 112:13 115:2,5 118:4,7,13 119:1,8,23,25 120:24 121:12,15,17,19,21 122:4 123:11 124:3,4,15 124:15 125:14 126:5 127:24,25 128:8 131:9 131:10 133:6,22 138:6 138:12,24 139:2,9 140:21 141:6 144:22 145:21 146:3,14,18,19 146:21 147:3,8,9 150:6 150:9,12,13,18 152:6,14 152:18,18,21 157:10,12 157:12,25 158:4 160:4 160:23 knowledge 53:4,6,7,24 55:5 56:13 67:25 68:2 100:15 113:6 124:11 141:11 162:6,9 known 9:2 14:24 34:12 36:8 40:4 57:4 119:10 132:10 knows 138:25 Kordas 118:7,9,11,13 130:24 131:10 L L-E-A-D 30:3,4 labeled 146:10 lack 108:22 Lake 3:17 language 146:15,16 late 55:12,20 110:21 law 1:14 3:3 12:10 162:4 lawn 15:6,8 lawyer 146:15 Lawyers 147:6 lead 29:25 30:2 34:10 learn 11:6 51:20 leave 19:7 left 28:23 64:5,11 69:13,15 74:12,14 119:4 123:8 130:24 141:23 149:2 left-hand 150:19 legal 5:16 9:15 145:20 length 39:19 78:16 132:4 Leone 3:20 5:16 Let's 20:9 29:20 95:15 98:2,3 152:24 154:21 letter 131:16 136:20 letters 150:9 level 132:6 lifer 142:3 lightly 133:25 ligneous 145:13 likelihood 116:3 limit 132:3 limited 144:20 limiting 144:4 line 11:24 32:17 60:3,13 65:20 68:14 71:23 73:18 110:24 137:11 143:23 153:1 157:9 lines 16:18 152:9 list 10:18 47:22 48:16 54:13,14 60:9 87:18 92:10 18 96:25 97:1,14 100:5 110:20 138:8,10 139:10 148:19 159:9,12 159:14,15,17,20 160:9 listed 94:4 144:1 145:4 151:1 158:14,16,17
--	--	---	---	---

159:3 lists 8:14,17 9:6 45:7 47:8 49:4,13 50:3 54:7 91:11 92:7 97:24 100:2,5 138:18 151:2 literally 49:1 78:1 154:9 literature 51:13 little 10:15 22:9,10 23:8 35:12 38:20 41:3,9 59:1 78:8 114:11 134:25 136:10 144:25 154:22 157:15 LITTLETON 3:7 live 13:19 104:23 living 104:17,20 105:18 load 29:25 30:4 32:22,23 32:23,24 33:1,3,6,19,21 33:21,25,25 34:10,16 35:23,23,24,24 39:22 40:19 79:25 80:11 82:19 109:14,20,21,24,24 113:24,25 116:4 135:7 138:2 154:4,6,7 155:5 loaded 79:24 80:1 loading 80:8 82:17 loads 32:17 37:9,11 59:4 60:10,14,25 66:17 92:12 93:2 108:19,21 109:7,25 114:16,17,18 117:22 137:12,15 139:3 148:16 151:2,4,6,11 152:1 154:20 155:22 located 5:17 25:18 39:8 58:7 62:10 location 118:22 locations 125:21 lock 72:14 LOGAN 3:16 long 8:7 18:25,25 19:5 20:4,10 21:13 22:11 25:14 26:11 64:1 66:12 67:12 69:10,11 77:13 87:25 88:2,3,6 106:6 119:4 132:10 133:20 141:19,20 longer 22:24 65:2,4 159:1 Lonoke 123:11,25 look 41:5,18 47:9 49:22 101:6,8 102:23 109:20 110:20 130:17 132:24 139:9 140:9 143:24 144:2,14 145:4,6,6 148:9 152:24,25 159:1 looked 8:11 13:6,8 45:9 45:12,22 47:15 49:21 60:4 65:11 68:1 91:13 92:7,8 101:20 119:15,16 looking 39:4 44:20 45:14 45:17,25 46:8,10,21,22 46:25 54:11,13 59:21 61:12 64:22,25 65:5 74:20 78:1 87:10,13,23 92:12,17 96:12,14,22 97:7 99:16,19,20 101:14 102:4,8,17,18,18 103:3 134:10 150:22 153:14 160:12 looks 41:13,14,19 42:5 78:6 148:19 151:25 155:25 158:7 loose 116:13 lot 8:11,14 16:22,23 20:12 26:23 32:3 50:5 51:25 53:15 59:24 69:1 78:21 89:13 99:17 103:22 116:8,18 120:4 131:25	134:25 142:5 148:24 151:25 159:1 Louis 2:19 low 132:6 lower 149:1,12 150:19 lunch 86:14,18,21 lung 120:1 132:12 lung-related 106:2,3 M M-E-C 83:23 M-E-K 83:22 M.W 118:7 130:24 machine 15:5 19:17 43:11 55:16 57:20,23 58:7,9 62:24 72:22,25 73:5,13 73:15,16 75:16,23 76:4 76:9,13 77:6,7,8,14,15 77:15,16,17,19 79:20,21 80:3 81:14,15 82:10,11 128:16 machines 58:9,11 62:2,13 62:16,18,20,25 63:4,8 63:14 72:19,22,23 73:6 75:13 76:12 82:13 mag 18:10 magazine 52:17 magazines 51:19,22 52:4 52:5 magnum 153:24,24 154:1 154:6 mailed 88:17 98:13 main 35:22 36:1 71:12 maintain 23:2 maintenance 22:21 23:4,6 24:6 25:5,11 major 9:14 29:21 34:9 42:8 majority 10:24 11:2 25:25 making 33:22 34:22 55:15 55:16,16 71:25 89:15 99:25 100:17,19 101:5 105:7 158:13 Malcom 149:13,14 manager 27:16 141:17 mandril 102:12 manilla 89:24 manufacture 45:15,16 133:24 142:10 manufactured 19:14 24:18 29:22 61:23 65:4 124:12 126:12 manufacturer 21:21 144:18 manufacturers 42:4 155:15 manufacturing 24:8 29:4 29:9 36:19 124:7 127:5 146:16 149:10 Manville 121:16,17,21 122:2 March 15:10,11 16:10 19:3 120:7 123:6 mark 31:13,14 32:8 130:3 142:15 marked 32:11 86:24 130:8 142:18 147:22 market 68:22 69:1 marketing 22:15 118:17 118:20 119:1,4 marking 148:3 MARTINEZ 2:15 material 55:22 77:20 78:18 97:2,3 100:11,12 106:23 135:17,25 materials 47:18 122:11	matter 5:6 9:15,18 13:16 124:9 matters 162:7 McGilton 5:18 162:3,17 MEAGHER 3:12 mean 20:21 39:24 45:4,19 50:22 51:8,17 53:10,16 58:12 60:13 64:20 65:1 65:2,3 66:3 68:6,15,25 69:21 73:19 75:20 80:20 81:13,25 82:7,16 85:16 94:9 114:16 115:22 117:13 124:6 137:14 148:20 153:21 154:2,5,9 154:10,11 155:9 158:8 159:11 160:8 Meaning 39:10 means 27:12 45:20 48:14 51:2 53:14,16,17 60:14 65:4 66:4 68:17 73:20 78:17 79:8 94:10 137:15 138:12 146:18 150:10 153:22 154:5 155:16 157:10 meant 27:11 measure 49:9 MEC 83:21 mechanic 14:11 mechanical 15:23,24 16:1 24:1 mechanically 44:24 medical 119:19,21 meet 12:12 meeting 8:13,16 9:12,13 9:14,21 10:20 31:24 48:21 88:2,6,9 92:6 96:21 98:25 members 16:2 132:17,20 membrane 132:6 memorized 14:1 memory 8:14 91:16 92:14 100:3 106:17,18 108:22 108:23 mentioned 9:22 12:18,19 26:14 28:24 30:21 35:21 36:4 38:23 39:21 40:13 42:1 44:21 114:21 118:3 121:4 131:11 141:13 143:3 157:22 messing 33:18 met 47:23 metal 30:14,15 39:5 72:16 79:16 84:10 153:7 method 132:5 Michael 13:12,17 microns 132:4 mid 26:24 45:2,18,24 46:5 46:17 middle 7:19 military 17:5 mill 132:19 milliliter 132:3 mind 26:4 31:9 105:16 158:1 mine 3:15 99:1 minimum 131:20 Minneapolis 3:4,13 Minnesota 1:1,12 5:14 7:9 minute 130:18 148:9 minutes 8:13,16 9:12,13 9:14,21 10:20 98:3 142:20,22 missing 112:16 152:6 160:11,13 Misstates 55:7 87:3 111:11 112:11 123:24	127:13 misstating 112:15 mistaken 141:9 Mistakes 145:19 mix 30:12,13 76:14,16 mixer 76:25 77:2 mixing 76:13 77:6,8,14 mixture 77:22 145:12 MN 2:24 3:4,13,17 MO 2:19 mold 43:12 63:6 78:12 molded 42:2 43:6,8,8,9,10 63:19 72:2 75:6,11 144:18 molding 36:25 62:1,2,18 62:19,24,25 63:4,7,14 75:7,8,9,13 money 160:15 monitor 120:15,19 monitored 128:3 monitoring 120:4,8,10,11 120:13,14 122:20 126:19 127:18 Montague 150:3,4,5 month 55:12 90:16 monthly 122:10,11 months 11:8 47:25,25 87:1 90:18,19 159:24 Morgan 131:8 MORING 2:13 morning 5:1 7:3,4 137:10 161:1 Mortgage 131:9 Mortl 2:11 6:2,2 7:12,15 10:10,17 11:19 12:3 13:1 18:3,15 22:9 23:8 24:10 26:1,18 27:25 28:5 29:7,11,16 30:10 30:19 31:10,19 34:3,7 35:11,15,18 37:13 38:11 40:22 43:24 44:12 48:11 49:17 50:2,11 51:7,23 52:19 53:12,25 54:18,23 55:7,18 56:8,21 57:2,9 57:12,24 58:25 59:18 60:19 62:4,21 63:17,21 65:13 66:15,20 68:24 70:7,12,14,17 73:11 75:14,24 76:11 80:19 83:8 85:14 87:3,6,15 88:1 92:24 93:5,25 94:18 95:10,15,22 96:6 96:19 97:10,15 98:1,17 102:15 103:16 104:2 105:24 106:4 107:8 108:3 109:10,15 110:8 110:12,17 111:11 112:6 112:11,17 113:10,17 116:1,22 117:7,21 119:6 120:21 121:10 122:3,7 122:15 123:20,24 124:3 124:23 125:13 126:1,22 127:13,23 129:6 130:13 130:18 131:3,6 133:4,18 133:21 134:12,22 135:15 136:3 137:24 138:19,23 139:15,17,20 140:1,3,7,10,13 143:17 145:19 146:2,13 151:8 152:11,17 158:21,24 159:5 161:3 mouth 36:21 67:7 move 26:15 84:23 141:25 moved 26:10 123:16,22 124:5,7 movies 17:21	moving 27:2 Mugaas 6:17,17 multiple 56:6 57:5 58:9 68:5,8 71:21 72:19 75:19 79:6 90:10 Murtha 1:14 5:4 162:4 N N 4:1 name 5:16 7:17 40:9 43:21 66:5 77:13 127:6 named 162:5 names 28:11 76:2 103:24 104:14 118:7 147:7 149:1,13 narrow 10:14 necessarily 51:15,17 57:19 63:2 129:2 necessary 132:17 need 7:5 11:24 34:5 36:3 48:10 58:25 81:14,15 82:19 84:25 98:2 104:1 135:5 needed 32:1 57:13 needs 84:16,19 Nemours 1:13 2:8,22 never 22:15 67:6 93:14 140:19 159:9,12 newer 34:21 37:12 nine 127:18 NJ 3:8 Nod 29:1 nomenclature 37:3 non-reloadable 134:14 nonresponsive 99:3 Nope 140:20 normal 89:9 Notary 162:3,17 notation 138:5 156:8 notations 139:23 note 46:6 notes 4:7 31:11,15 32:2 32:10 44:21 68:15 notice 5:8,9 31:11 113:14 noticeably 102:1 noticed 99:16,17 number 5:15 12:3 23:24 24:9,12 62:6 113:24 114:1 139:10 142:9 143:7 145:10 148:5 153:16 154:13 155:11 155:13 157:2 numbered 143:23 numbers 24:1,5 32:4 138:19,20 145:3 148:15 153:5 156:9,19 numerous 8:20 NW 2:14 O O'BRIEN 3:16 oath 162:7 Object 158:24 objection 7:10 18:15 24:10 26:1 27:25 28:5 29:7,11,16 30:10 34:3,7 35:11,15,18 37:13 38:11 40:22 43:24 49:17 50:2 50:11 51:7,23 52:19 53:12,25 54:18,23 55:7 55:18 56:8,21 57:2,9,12 57:24 59:18 60:19 62:21 63:17,21 65:13 66:15,20 68:24 70:7,12,14,17 75:14,24 76:11 80:19
--	---	--	---	--

83:8 85:14 87:15 95:10 96:19 97:10,15 99:3 102:15 103:16 105:24 106:4 107:8 109:15 110:8,12,17 111:11 112:6,11,17 113:10,17 116:1 119:6 120:21 121:10 122:3,7,15 123:20,24 124:23 125:13 126:22 127:13 127:23 133:18,21 134:12,22 135:15 136:3 137:24 143:17 145:19 146:13 151:8 152:11,17 158:21 objections 146:2 obtain 8:16 obtained 52:3 obviously 16:24 32:24 38:23 122:21 129:15 153:1 157:5 occurred 74:17 oddball 110:6 oddballs 110:15 office 23:25 25:5 48:2 142:8 Offices 1:14 3:3 162:4 oh 28:14 97:8 oil 17:19 Oiste 2:3,5 5:25,25 98:3 okay 11:4 23:13 26:3 28:24 29:21 52:13 59:2 64:1 67:16 80:6,9 90:2 98:1 108:17 113:4,22 117:3 131:7,11 133:3 134:2 140:13 141:25 145:8 151:4,19 153:21 153:23 154:21 155:6 156:16 157:20 old 93:9 old-timers 34:20 oldest 52:17 Olin 2:18 6:11 omission 151:24 once 47:7 64:16 73:15 79:22 103:11 135:22 one's 29:8,9 109:24 one-page 32:6 one-sided 32:6 ones 8:19 10:9 12:18 52:12 68:11 92:8,9,11 108:12,14 110:3,6 134:15,16 135:10 139:7 139:7,11 onsite 75:11 operated 58:11,12 75:23 76:4,10 77:8 82:13 128:17 operation 19:2 22:22 72:12 75:17 79:1,5,7 80:8,12 84:7 123:9,12 123:16 124:6,7,20,22 operations 9:8 opinion 128:7 129:7 opposed 30:6 46:17 order 77:3 84:3 96:22 Ordinarily 154:3 organizations 33:17 originally 42:10,10 Otto 2:20 6:10,10 ounce 17:18 outcome 162:12 outer 60:17,20 outside 13:10,16 30:13 38:13 39:5 41:21 78:15 82:2,24 86:17 89:17	91:14 107:5 108:1 110:3 114:23 116:18,25 over-powder 34:19 40:2 overall 27:16 Overbroad 110:12 117:7 121:10 127:23 overlap 125:23 overlapped 125:24 overpowered 33:7 oversaw 27:12 Overseeing 22:21 overwhelming 11:2 P P 2:4 P.A 2:23 p.m 86:4,9 98:5,10 136:12 136:17 147:16,25 161:4 package 42:9,10 packaged 80:13 121:9 126:14 packed 99:8 page 4:5 31:14 111:4 114:18 131:14 143:2,4 143:23 144:15 145:1 149:1 150:23 153:1,2,3 154:13,21,22 156:1 158:5,6,15 pages 10:13 89:3 91:17 96:14 139:25 156:18 paid 27:13 paper 30:22 31:1 32:14,20 36:17 39:12 64:13 65:1 65:10,16 93:14,17 94:3 94:4,10,17,21 97:9 102:7,9,11,13,20 107:23 134:5,8,9 151:22 158:8 158:9,10,16 paper-based 134:16 paper-wound 102:2 papers 88:24 paragraph 144:2,8,16 145:24 146:11 paragraphs 146:9 Pardon 50:19 parenthetical 65:24,25 park 3:7 140:25 141:3,4 149:7,10 part 23:25 24:16 27:5,7,11 31:21 39:5 71:6,7,9 73:24 78:12 85:15,20,22 115:11 119:11 142:4,5 143:6 153:7,10 partial 98:21 131:23 partially 89:12 particular 17:9 18:9 40:19 54:12 92:12,13 96:22 138:2 143:21 parties 162:11,11 parts 24:1 29:14 30:16 34:12 40:20,25 77:24 79:15 80:15,17 149:9 pass 105:22 passed 105:8,10 106:2 Pat 6:15 pat@elliottlaw.net 3:5 patent 4:10 142:7,8,9,18 142:21,25 143:10,16 144:14,17 145:16 147:5 patented 142:8 patents 140:16 PATRICK 3:4 Paul 2:24 pay 14:12 pellet 155:10 pending 95:17 99:5	Penn 149:18,19,20,25 Pennsylvania 2:14 people 22:23 23:2,10 27:13,13,15,17 28:9 48:24 53:19 61:15,17 76:3 103:22 104:17,20 118:5 120:15 122:23 127:3,4,21,25,25 128:12 people's 27:13 percent 131:16 144:1,6,7 144:12,13 145:12,13,15 percentage 76:19,21 percentages 144:4 perfect 135:16 performance 134:3 performed 24:8 period 18:16,20 27:19 30:25 31:3 42:22 80:21 86:18 118:13 123:12 139:8 157:22 peripheral 16:17 person 12:7,8,12 27:21 162:5 personal 1:3 5:13 82:21 82:23 83:1 106:18 120:13 127:17 160:5 personally 50:12 52:3,5 58:12 82:7 persons 132:11 peruse 142:21 144:25 Pete 6:14 PETER 2:24 phase 132:5 133:17 phased 63:24 111:15 phaseout 133:8,14 phone 6:9 7:11 12:6 128:7 161:8 physically 91:25 118:24 Physically 119:23 pick 160:25 picture 149:17 piece 36:10 37:5,24 41:19 42:4 97:9 116:13 140:14 151:21 pieces 129:10,12 pill-making 77:19 pin 22:3 pistol 18:10 22:6 125:5,9 pistols 17:3 piston 34:20 40:8,11 42:11,13,15,17,19 60:11 60:15,21 61:1 62:20 83:13,17 84:4 116:3 pistons 61:23 62:3,18 63:1,4,8,14,20,23 64:10 80:23 83:10 place 16:9 110:24 135:14 placed 58:20 places 83:21 plain 121:1 Plaintiff's 4:6 5:8,9 32:10 130:6 142:17 147:21 Plaintiffs 1:6 2:2 5:12,24 6:1 plant 19:8 22:19,22,22 23:15,16,20,21 24:4,24 25:4,4,13 26:9,15 27:2 27:16,17,18 28:9 55:17 56:17,20 59:25 118:6 121:2,5,7 122:6 123:10 123:11 124:2,13,17 126:19 128:10,12 149:24 plastic 30:14,22,24 31:1 32:18 34:22 36:17,25 39:12 40:6 42:2,4,25	45:2,18 46:5 59:3,5 60:14,23 61:1 65:25 66:6,6,23 67:1,17 68:17 68:19,20 70:21,24 71:1 71:2,19,25 72:10,16 73:6,24,25 75:5 79:16 84:2,12 85:22 93:2 106:25 107:11,15 108:10,11,12,13,14 109:7,21 110:1,25 111:6 111:19,21 112:4,20 113:8 114:8 134:18 135:1,9 153:10,22,22 155:6,7 157:3,6,23 platens 77:21 Plaza 2:19 please 5:20 115:4 153:14 plenty 82:20 plus 144:6,7 point 3:16 13:8 59:16 64:19 72:16 101:3 109:11 132:21 143:24 144:15 149:17 pointing 143:25 polyethylene 42:25 43:14 43:16,17,21,22 44:3,4,7 Pont 1:13 2:8,22 5:8 6:3,6 6:14 7:24 10:15,22 11:1 43:21,23 44:6 popped 41:8 population 132:13 portion 99:4 position 150:7 possessed 140:16 possesses 140:16 possession 12:24 98:15 98:22 99:7 possibly 116:3,5 117:17 147:1 potentially 27:2 pounds 121:14 poured 43:11,14,15 76:25 77:2 powder 35:2,4 36:3 42:14 77:5 80:10 81:4,5 84:1 154:6,7 power 34:20 40:8,10 42:11,13,15,17,19 60:11 60:15,21 61:1,23 62:3 62:18,20 63:1,4,8,14,20 63:23 64:10 80:23 83:10 83:13,17 84:3 116:3 PP20 158:3 PPA12L 157:15 pre-made 43:3 56:2,3 pre-scored 58:19 preceded 102:2 134:8 predict 132:13 prefer 129:18 preferred 37:16 144:3 prepare 8:9 present 7:11 48:6,21 144:5 145:14 president 20:8 press 57:4 79:5 83:20,20 84:1 presses 58:16 pretty 24:7 31:24 78:20 89:19 114:19 123:14 135:24 142:3 148:12 previous 9:15 price 8:14,17 9:6 10:18 45:7 47:8 49:4,13 50:3 54:7,13,14 91:11 92:7 97:24 100:2,4 138:8,10 138:17 139:10	primarily 24:20 34:10 35:1 37:9 38:12 75:15,16 primary 32:23 prime 79:7 81:15 primed 79:23 80:7 primer 4:8 22:1 30:7,8,9 30:12,16 38:4 79:17,17 79:18 81:6 84:2,9,17,18 130:7 131:1 primers 80:24 Pringle 2:10 prior 10:18 15:17 32:16,20 53:1 92:2 96:21 112:10 120:1 152:2 privilege 11:23 probably 21:14,16 52:23 54:13 61:6 82:13 97:18 101:14 103:19 105:4 114:1 115:15 117:16 119:15 122:10 124:17 131:19 135:22 138:8 140:25 143:19 problems 135:8 procedure 1:12 7:9 120:13 proceedings 13:10 process 8:13 36:19 47:14 47:16,17 49:19 50:5 53:8,20 56:25 71:25 73:12 75:6 10 76:9 77:23,25 79:2,3 80:6 83:15,16 91:4,12 103:18 142:10 149:21,23 processes 9:24 produce 8:1 produced 10:12 54:17 139:15,19 144:6,11 148:13 159:10,12,14,15 159:16 producing 125:21 product 9:5 16:18 22:11 22:25 24:14 43:12 50:6 71:23 126:20 153:2,20 155:8 157:9 160:8 production 11:3 20:8 21:18,19,20 22:13,14 23:5,6 25:3,10 56:10 76:5 94:10 109:5 110:16 121:20 124:9 140:24,25 141:3,4 149:7 159:8 products 9:10,24 12:23 16:18 19:14 21:22 126:12 140:17 159:19 program 71:5,8,9 127:17 128:19 133:7,9,14 progression 46:4 project 82:18 115:11 projectile 4:8 129:16 130:7 131:2,15,15,17,18 131:20 132:15 projectiles 132:22 136:21 projects 119:12 propellant 42:9 proper 129:24 Properties 1:13 2:8 5:10 6:7 7:25 10:23 11:3 property 23:23 128:24 proportions 78:8 protecting 42:17 protection 42:12 protective 127:17 protector 40:4 protects 40:6 proudly 22:16 PSI 77:23 Public 162:3,17
---	--	--	--	--

publically 55:3 publication 9:4 publications 159:23 pull 115:19 Pumps 3:12 6:17 punch 57:4,20 58:16,21 58:23,23 72:11 78:14,14 punched 55:22 57:3,8 58:16 punches 57:7 77:21 78:17 punching 58:19 pure 44:6 159:22 purports 151:6 158:12 purpose 32:23 110:5 119:21 purposes 82:21 pursuant 1:12 7:8 put 36:21 37:21,22 41:9 42:7 43:18 54:2 67:6 81:14 83:19,25 84:1,6 87:1,4 89:25 95:18 96:18 97:4,9,14 110:24 117:16 122:24 159:25 putting 46:17	reason 32:1 46:20 54:21 93:24 126:18 128:15 reasons 134:25 recall 10:4 28:6,11 47:21 50:4,18,20 55:24 57:16 58:14 62:17 63:10 64:2 66:21 67:11 71:12 74:18 74:19 75:25 76:22 77:12 104:3 109:16,17,19 110:3 115:17 121:25 123:9 124:8 126:7 127:9 133:12 149:16 received 91:7,20,22 131:25 recognized 132:10 recollection 50:9,16,21,23 51:5,9,10,12 53:11 55:9 55:14,17,19 59:21,23 61:13 65:16,18 70:9 74:20,21 98:20 99:7 101:8,11 recollections 53:8 recommends 132:2 record 5:2,21 6:8 7:17 44:14,19 86:5,11 98:6 98:11 111:25 123:25 130:23 136:13,18 140:4 140:5,7 147:15,17 148:1 161:6,7 162:8 record's 64:8 records 8:12,13 47:14,16 47:17,17 49:19 50:5 53:8 91:4,12 119:24 RECROSS 4:2 Red 3:8 REDIRECT 4:2 reduced 131:22 162:8 refer 144:18 145:7 reference 137:14 referenced 148:15 referencing 151:12 referring 34:14 40:8 79:13 106:10 144:22 147:12 reflect 6:9 reflected 17:18 reflects 132:7 refreshers 8:14 refreshing 92:14 refute 160:20 regarding 4:8 27:20 126:16 127:12 130:7 Regardless 74:9 100:24 regards 18:12 20:18 regulations 33:9,12,14,15 relate 145:24 related 12:22 22:5 52:20 95:20 relates 60:22 61:13 145:25 relating 60:17 relations 25:17,21 26:12 27:7,10 28:20 relative 162:10,11 relatively 29:5,10 41:13 relevant 63:13 93:16,20 93:23 94:5,12,16 reload 85:25 94:11 reloadable 94:22 reloaded 82:6,24 83:12 95:19 118:1 reloading 82:11 83:5,6,15 83:16,25 84:4 94:21 remarks 153:2 remember 12:4 24:2 26:16 28:8 45:7 50:5 52:1 53:2 53:17 60:8 61:20 76:2,6	88:4 90:6 91:3,5,5,13 92:16 93:8,18 97:19 98:18 103:8 160:10 RemGrit 19:12,13,23 20:4 20:7 Remington 8:12,22 9:2,10 9:23 15:13,15 16:3 18:12,17,17 19:3,18 20:9,13 28:8,12,16,23 30:18 33:23 42:3 43:4,4 43:5 51:19 53:9,11,18 56:11,14 63:19 66:5 68:23 69:22 70:2,6 73:20,22 74:3,21 79:25 80:15,17 82:12,15 85:8 91:5 99:13,24 100:13 103:14 105:4 106:2 118:4,14,18,19 119:19 122:2,9 130:25 132:23 133:8 138:8 140:16 141:7,16,19 142:3,12 149:22 153:15 158:12 Remington's 40:9 45:11 126:15 Remington-Peters 158:2 removed 123:10 141:18 repacked 82:4,5 117:11 117:12 Repeat 35:20 replaced 65:21 66:8 67:14 68:13 69:3 84:17,19,24 84:25 107:12 108:2 114:4 reporter 4:12 5:19,22 23:9 represent 5:21 10:10 represented 8:4,7 11:20 27:15 representing 2:2,8,18,22 3:2,7,11,15 7:24 11:16 research 16:13,14,15 20:10,13,15,17,18,23 21:5,7,8,9,10 119:9,10 119:14 130:25 131:12 141:17 residue 129:20,22,24 respect 116:23 responsibility 20:23 responsible 27:6,7,16 rest 27:17,17 50:4 retained 4:12 retired 141:24 retool 73:2 review 10:11 12:13,17 55:1 86:15,20 148:7,11 reviewed 8:19 9:12 10:9 95:14 Rickey 140:21,23,25 142:11 147:9 Ricky 141:10 rifle 22:6 125:6,8 155:12 rifled 91:14 Rifleman 51:25 52:10 rifles 17:3 52:20 right 9:11,20 10:20 19:4 25:12 33:23 45:2,15 46:5,8 51:4 56:19 59:16 67:19,21 81:5 85:20 87:2 96:24 97:4,8,23 105:16,17 111:8 112:1 113:4,19 120:19 123:21 136:8 140:6 143:5,25 144:2,8,15 147:10 149:12 150:21 151:5,14 153:4,9 155:2 157:1 right-hand 142:7 143:4 rim 22:2,3 29:9 38:7 72:13	131:2,3 rimfire 4:8 21:24,25 22:5 24:23 29:2,3,5 125:10 130:8 131:3 141:5 147:1 149:10 Robert 1:5 2:2 5:6 11:6 Rocco 3:20 5:16 room 82:17 98:24 127:10 rotary 77:20 79:5 83:20 rotate 77:21 roughly 28:20 31:3 46:14 96:14 103:1 118:13 119:5 141:6 rounds 131:18 route 95:16 row 57:7 RP20 157:25 RPA12L 157:10,11 RS 155:11 rubber 41:3 Rule 1:12 Rules 7:9 rundown 40:18 RXP 65:21,22,23 66:7 67:14 68:13 69:2,8,10 69:17 107:12 108:2 112:21 114:4 124:9 138:2,3	senior 20:15,18 21:5,9 sent 98:25 separate 27:8 36:7,14,15 36:22 37:7 40:2 42:8 68:13 107:16 September 142:9 143:3 159:4 sequentially 84:7 123:10 serial 143:7 series 8:20 24:20,21,25 25:2,6 28:25 57:14,15 62:7,11 63:19 122:18 seriously 137:5 service 15:6 set 58:21 135:8 151:2 seven 145:3,10,24 146:11 155:11 SGPI 138:6,12 148:4,5 Shared 20:1 sheet 31:6 49:13 55:22,25 57:6 58:20,22 86:23 87:6 96:18 99:16,19,21 106:10 152:9 sheets 9:7 56:2,3,23,25 74:20 shell 18:24 19:1 22:1,2 29:23,23,24 30:6,21 32:14 34:13 36:7,10,10 36:16,16,20,23,24 37:1 37:1,5,15,18,23 38:9,13 38:16,20,21,23,24 39:4 39:7,8,9,17,19 40:1 41:7 41:22,23 60:17,18,20 64:13 65:1,10,16,21 66:4,7,8 67:15 68:13 69:3,5,21,25 70:22 71:19 72:3,13,14 73:22 79:7,8,14,22,23 80:7 82:4 83:7,19,25 84:14 84:16,21 85:2,16,18,19 85:25 93:14,17 94:3,4 94:11 101:15 107:12,17 110:4,24 111:17,18,19 112:4,24 113:2,7,20 114:5,24 115:7,18 116:14,24 117:6 124:10 135:3,5,7 137:21 138:1 138:2,3 146:12 153:8,22 153:22 155:6,7 shell-making 78:25 79:3 shells 12:23 29:3,21 32:18 34:21 37:10 38:14 59:4 59:5 60:15,23 61:1 65:23 66:9,9,23,25 67:3 67:10,12,17 68:14,16 69:22 70:2,5,20 73:5,9 73:18,21 74:23 75:19 79:1,25 80:18 82:24 83:5,7,12 94:17,22 96:4 108:1,15 110:19 111:6 112:19,21 114:4,13 115:8 132:25 134:13,17 137:22 146:17 ship 89:1 shipment 91:19 shipments 90:10 91:23 shipped 43:4 88:24 90:5,8 126:15 shipping 89:25 shoot 33:4 84:15,16 85:19 94:11 114:24 116:15,20 117:4 129:15 shooter 147:4 shooting 18:6 32:24,25 33:7,8,11,16,17,19 36:12,13 85:8 115:10,14
---	---	---	---	--

115:16,18 116:18 117:9 118:3 129:19 short 133:25 shorthand 95:19 shot 16:8 29:25 30:2 33:6 34:10,25 35:1,1 36:3 37:8 40:4,4,5,6 42:10,12 42:14,18 81:4,5 113:15 113:16,21,23,24 114:2,6 115:14,25 116:2,4 155:10,10 shotgun 12:23 17:1 18:5 22:5 38:14 39:4 40:7 42:18 74:22 80:18 82:4 83:12 96:4 125:5 129:17 148:12 shotguns 17:25 52:20 shots 135:4 shotshell 4:11 16:21,25 17:1,6,12,15,16,17 18:12 21:23,24 24:17,18 24:22,22 28:24 29:4,15 29:19 30:9 75:4 93:21 94:7 123:9 125:10,11 129:15 135:1 147:4,22 148:20 160:6 shotshells 38:8 108:25 115:2 126:13 147:1,1 158:12 159:2,19,20 show 54:19,21 60:7 101:17 130:3 142:7 158:12 showed 10:3 56:16 showing 159:18 shows 94:7 101:4 137:20 side 129:17,21 sides 38:1 signed 131:8 signers 142:12 signs 122:24 123:1,2,5 126:19 128:10 similar 29:10 Simmons 76:6,7 77:10 127:7 simple 77:25 79:17 simpler 72:9 single 74:2 sir 87:5 91:21 129:8 132:23 133:2 site 61:23 sitting 97:7 Sixth 3:13 size 36:2 39:15 89:17 113:16,20,23 116:4 sizes 39:13 skeet 33:11,16 slag 132:19 slash 25:5 60:10 slide 72:8,10 slight 125:23 slow 23:8 35:11 58:25 95:15 98:2 slug 17:18 154:11 155:12 small 22:7 78:6 83:20 97:2 129:22 smaller 41:15 99:1 114:2 sold 20:5 80:23,24,25 81:1 81:2,8 solid 78:7 somebody 27:22 28:16 43:3 103:17 sorry 26:19 57:15 70:1,8 72:6 82:6 83:17 87:7 106:9 112:2 114:10 126:4 155:18 156:8 158:13 159:6	sort 9:8 92:13 94:8 102:7 102:8 116:8 120:12 sorts 8:13 17:4 sound 72:9 sounds 121:19 source 11:1 91:23 South 3:13 SP 153:21,23 SP12 155:6,8,11,13 SP8 153:20,23 spare 75:16 speak 86:17 147:3 speaking 23:10 130:20 specific 8:19 10:9 15:19 16:20 25:15 33:14 37:12 45:9 46:9,10,11 53:23 54:6,8 55:11,15 57:20 59:13 60:2 64:15,17 73:12 92:8,11,17 93:10 93:11 97:13 107:5 109:14 125:11,15 128:13 134:17 139:2 150:7 specifically 11:11 28:1 54:11 56:11,16 57:16 62:5 68:4 71:12 91:3 99:21 100:5,18 101:13 108:14 115:17 121:25 127:24 133:12 145:10 145:25 146:10 specification 151:25 159:23,24 specifications 4:11 40:17 111:2 125:24 147:21 148:19,20 155:23 159:7 160:3 speculate 134:24 Speculation 119:7 120:22 spell 71:16 104:11 Spencer 104:7 spent 96:16 116:24 117:6 speak 107:6,11 Sporting 1:13 2:8 5:10 6:3 6:6 7:24 10:16,23,25 11:2 155:15 sportsmen 33:8 spot 83:25 85:19 sprayed 132:16 St 2:19,24 stack 88:22 89:16 stacked 102:9 staff 27:18 Stafford 142:12 stamped 30:17 148:4 stand 17:21 150:14 standard 89:9 112:8 153:23,24 154:1,5 155:17,20,23 standardized 73:19,22 standards 155:16 standpoint 134:3 stands 83:24 138:6 157:25 start 7:14 77:2 94:14,19 94:21 114:23 116:13 120:5 124:22 161:8 started 7:5 15:13 19:3 34:21 47:15 53:23 99:24 100:18 101:4 103:14 125:7 starting 61:3 67:3 95:11 132:21 starts 144:2,16 state 1:1 2:3 5:14,20 7:16 71:18 85:4 162:1,3 statement 152:22 162:8	States 4:10 142:8,17 stay 20:4 74:12 116:11 stayed 119:1 steel 79:14 132:17,19,20 step 20:9 77:14 79:17 stiling 100:17 stop 160:24 stopped 55:16,19 stops 84:22 stored 122:12,14 straight 17:22 32:5 Street 1:15 2:23 3:3,8,13 5:5 162:5 strike 83:11 118:4 154:17 5:5 162:5 strikes 22:3 striking 22:3 string 46:13 strong 135:20 stronger 37:17 structural 132:17 Studios 5:17 study 148:23 studying 17:18 87:17 stuff 10:5,15,16,21,22 14:13 43:11 44:6,8 51:13,20 53:21 54:3 85:9 92:16 97:20 99:2 subcomponents 30:7 subscribe 52:10 substance 128:24 substantially 144:12,13 substitute 132:14,22,24 134:4,10,20 substitutes 132:18 sudden 111:15 suggest 101:6 suitable 132:14 138:1 Suite 2:10,19,23 3:8,13,16 summary 95:3,8,19,23 summer 14:7 15:2,3 19:20 superfluous 160:11 superintendent 25:17 26:11 28:19 149:21 Supervises 21:9,21 supervising 22:24 Supervision 25:21 supervisor 21:7,8,19,19 21:20 22:12,14,16,19 23:15 24:3,24 25:4,13 28:3 121:20 130:24 140:24 149:7 supervisory 20:23 suppliers 122:1 supposed 160:8 supposition 159:22 sure 16:23 24:3 25:16 33:20 36:9 42:22 44:12 45:15 47:7 64:4 67:8 82:1,2 91:16 98:4 104:2 110:21 126:23 128:14 134:1 138:9,23 149:16 150:12 surface 41:9 surprised 136:4 Surrounded 39:11 surroundings 20:3 suspending 161:5 Suzanna 1:6 2:2 5:6 swear 5:22 switched 93:2 113:3 114:7 switching 114:11 sworn 6:21 162:6 system 117:3 systems 17:4	T T 2:11 take 44:10 49:11 86:3 87:25 88:3 98:1,3 119:23 130:18 131:6 133:16 136:11 148:9 taken 1:14 5:4,11 7:8 124:10 133:19 takes 135:6 talk 11:24 145:5 talked 8:11,15 53:19 81:18 105:9 135:23 147:12 talking 17:12 30:22,23 34:16 38:22,22 39:17 48:13 49:7,8 60:22 64:7 79:12 80:21 82:13 85:9 90:16 93:13,15 94:14,20 94:21 107:10 117:21,23 118:2 136:20 158:7 talks 131:14 tall 89:16 tannish 102:8 tape 86:10 160:24 161:2 target 17:6 18:6 32:24,24 32:25 33:1,4,7,7,10,19 33:21,25 35:9,16,21,23 35:24 36:12 37:8,9 60:10,14,25 65:20,23 66:4,8,9,16,22,25 67:3 67:12,16 68:12,14,16 69:3,5,21,22,25 70:2,5 70:20,22 71:19 73:5 74:7 83:3,4,6 107:12 108:1,18 109:24 112:20 112:24 113:24 114:4,5 114:13 137:12,15,22 139:2 148:16 151:2,4,6 151:11 154:18,20,23 155:1,2,4,19 157:3,21 158:15,16 Taska 13:12,17 tax 20:12 tear 110:4 Tech 14:19,25 15:7 technician 5:17 technique 132:6 teleconference 2:17 tell 11:17 31:6 60:2 62:5 93:3 100:4 101:12,13 102:19 103:19,20,22,25 104:1,2 109:6,23 110:3 125:23 128:9 136:7 151:23 153:16 154:16 154:25 157:14 160:15 telling 87:13 101:20,21 tells 99:24 100:18 temperature 72:7,8 75:9 75:10 ten 155:13 tenure 28:7,19 term 128:21 129:24 terming 143:13 terms 16:22 39:2 test 134:1,1,1 tested 117:10 testified 96:4 testify 162:6 testimony 55:8 87:3 94:24 96:3,20,23,24,25 111:12 112:12 127:14 162:8 testing 85:8 120:20,23,25 136:23,24 137:7 thereabout 99:25 thereabouts 107:10 thereof 108:22 142:11 thick 41:19	thickness 41:6,23,24 81:24 82:1 thin 49:11 thing 9:8 15:6,18 17:19 26:14 36:18 37:2 45:1 47:19 84:20 85:17 92:13 116:8 125:8 130:20 133:24 158:1 159:21 things 8:12 27:9 32:4 43:15 45:16 46:4 47:15 53:15,17 59:24 62:17 63:5 69:1 71:22 72:12 84:14 97:17 99:18 108:7 108:25 119:15 16:13 5:9 143:20 151:24 think 10:17 13:5 21:14,18 26:23 39:1 48:11,13 54:12 63:10 75:15 76:23 88:24 91:11 98:16 105:16,20 108:18 109:2 110:2 114:3,10 121:1 123:22 124:9,24 127:9 127:21 130:21 138:8,10 150:16 160:13 thinking 26:24 32:5 137:20 thinner 89:13 third 125:9 155:8 thorough 127:16 thought 36:22 63:3 98:23 109:25 117:23 118:2 Thousands 89:3 three 20:13 22:16 25:15 48:23,25 52:16 58:10 79:15,18 88:8 96:16 158:14 threefour-hour 92:6 threshold 132:3 threw 52:12 time 9:19 11:17,21 12:17 17:10 18:16,20 25:8,25 26:8 27:19 28:4,17 44:13,18 45:23 46:13 53:17 55:10 57:5,6 60:16 61:16 69:11 76:1 77:8 80:20 81:2 82:18 82:22 84:19 86:4,9 90:14 91:25 92:3,13 98:5,10 101:19 105:2 106:22 107:24 108:7 109:5 118:13 122:9 123:3,12,13 125:7,22 128:1,1 131:6 135:6 136:12,17 138:4 139:7 141:20 147:16,25 155:21,21 157:22 159:8 159:8 161:4,9 times 41:8 119:12 125:8 timing 46:7 59:24 title 9:1 20:11 21:13,17 22:18 25:14 28:22 142:9 titles 20:12 96:23 today 7:23 8:9 11:6 80:21 160:24 161:6 Today's 5:1 told 10:17 44:24 49:18 97:18 111:16 133:17 134:17 136:6 tomorrow 161:8 tooling 58:21 tools 15:5 79:6 top 10:4 32:17 93:19 104:19 105:20 138:13 153:1 160:13 topic 98:13 topics 7:25 114:11
--	---	--	--	---

totally 135:10 touching 162:6 tough 85:9,12 135:22 142:24 toxicity 4:8 130:7 131:1 track 38:20 trade 40:9 66:5 trades 14:9 trained 128:2 transferred 118:16 transition 30:25 31:3 42:22 transitioned 31:5 transported 78:25 trap 33:11,17 Trattles 2:15 6:5,5 10:24 11:15 156:14 tricky 133:23 tried 127:9 trigger 115:19 truck 121:8 true 63:22 100:16 162:8 truth 160:16 162:6,6 try 94:11 trying 46:15 49:16 53:3 56:19 68:15 92:23,25 100:15 101:24 108:5 112:18 113:22 135:5 139:12 148:16 151:5 152:4,25 tube 36:18,18 72:11 84:1 84:2 twice 141:18 two 8:1,4 20:15 21:5,16 22:16 25:15 26:13 28:21 34:2 52:16 58:10 86:10 88:10,11 91:19,23 107:18 110:2 127:3,4,11 127:20 147:7,8,11 148:9 152:8 153:1,2 156:18 158:13 two-page 142:21 Two/three 21:15 TX 2:4 type 15:3,6,18,19,22 16:20 21:11 23:9,14 36:4 37:12 40:13 44:4 62:23 66:18 70:5 73:10 75:7 75:13 79:5 95:7,19,19 106:3 109:14 114:6 115:7 117:3 121:23 126:16 154:6 types 30:5 33:10 66:19 155:21 typical 129:23 130:1 typically 33:5 34:17 36:2 41:20 U uh-huh 9:11 12:14 14:21 15:12 16:11 40:15 47:1 48:18 49:23 56:24 58:17 60:12 87:24 88:12 100:25 103:6 107:2 111:22,25 113:1 123:19 134:6,19 137:18 143:12 144:21 153:25 156:12 158:18 unaware 47:10 understand 7:23 23:20 29:8 35:19 46:15 49:14 49:16 50:22 53:3 56:12 56:19 68:15 92:23,25 93:16 100:15 101:24 108:5 111:16 112:18 113:13,22 115:23	139:21 148:17 152:5,24 160:19 understanding 129:8 underway 120:6 unibody 36:24 37:1,2,15 37:18,24 38:9,13,16,20 65:22,23 66:7 67:14 68:13,18,19,20 69:2,8 69:10,17 84:21,22 107:13,16 108:2 112:21 114:5 union 3:2 6:15 27:14 44:3 44:8 unit 140:25 141:2 United 4:10 142:8,17 universal 83:21 upper 45:2 130:23 142:7 143:3 use 18:4,22 33:1,3,10,19 42:8 45:21 81:1,12 83:1 85:17 96:4 100:24 107:24 129:18 134:20 135:4,5,5,13 useless 81:15 user 81:11 users 147:3 uses 18:2 85:13 144:11 usually 84:1 146:25 153:22 154:7 V vacation 15:16 vague 18:3 50:11 59:23 66:15 73:11 88:1 107:8 108:3 113:10 116:22 117:7 129:6 value 132:3 variable 80:10 varies 76:22 variety 73:21 various 8:13 9:24 16:17 76:14,15 132:18 vary 41:24 76:20 varying 41:6 144:11 vendor 56:1,4,6 vendors 9:8 56:7 versa 33:3 versus 5:7 25:25 31:1 83:7 110:6 111:7,20,21 113:8 viable 134:4 vibrations 17:18 vice 20:8 33:3 video 5:17 videographer 3:20 5:1 44:13,18 86:4,9 98:5,10 136:12,17 147:16,25 161:4 videotaped 1:12 5:3 VIP 5:17 Visually 102:3 voluminous 10:14 148:12 von 2:3,5 5:25,25 98:3 VRV 150:9 W W 2:24 W.L. 149:18 wad 34:11,20,20 35:21,21 36:5,6,8 40:2,5 41:4,5 41:17 42:1,2,2,6,6,8,20 42:24 43:22 45:2 46:5 47:4 58:15 73:10 75:18 76:10,13 81:16,17,18,20 84:3,5,5 99:14 116:2,3,4	116:6,10 142:10 143:11 145:11,25 146:1,4,11 147:13 153:2,12 158:9 Wadding 6:14,14 wads 29:24 30:5 34:14,20 34:21,23,24 35:6 38:17 39:21 40:1,10,13,18,21 40:24 41:1 45:4,18 50:9 50:24 51:2,6 53:22 54:4 55:21 57:16 58:1 62:22 62:23,24 63:8,15,20,24 64:1,7 78:23 79:4 80:10 80:24,25 81:2 116:7,8 133:9 135:4 145:17 Wait 31:19 walking 80:6 Walnut 2:10,11 wane 81:2 WANNING 2:24 want 11:9 31:13 36:21 38:21 41:22 44:10 53:16 67:6 103:25 104:16 142:21 148:9 wanted 73:3 118:6 wants 133:5 warn 126:20 warning 121:24 122:24 126:16,18 136:23 warnings 122:22,23 128:11 Warren 3:12 6:17 Washington 2:14 wasn't 27:6 50:14 58:1 61:16 65:18 76:5 77:13 82:23 87:17 93:15 97:6 103:12 121:1 138:3 Waterbury 5:18 wax 76:18 77:5,6 145:14 way 59:16 63:10 73:4 89:21 101:18 124:11 126:25 152:21 160:10 we'll 31:14 104:17 157:17 161:8 we're 11:6,22 17:12 34:18 39:17 64:7 80:21 86:11 93:13 111:3 114:12,18 136:12,17 148:3 160:23 160:24 161:4 we've 7:25 86:2,24 114:3 114:3 136:10 149:12 weak 85:15,18 weapon 17:4 wear 85:24 wearable 135:18 weeks 90:9 91:7 weighed 78:20 weights 158:17 weight 34:10,24,25 35:1,2 36:1,2 131:15,17,18 145:15 154:6 156:15 went 14:17 36:18 49:4 77:4,6 91:25 92:3 94:10 105:12 123:10 149:22 159:8 160:10 weren't 11:16 100:14 West 3:3,8 wherewithal 81:12 white 102:7 156:5 whitish-looking 102:7 wife 1:6 5:7 Wildman 104:7,9,10,21 105:3,5 winter 15:17 wish 143:23 wit 162:5 witness 4:2 5:22 6:4 8:1	12:5 13:3 22:10 23:13 24:12 26:2,19 28:1,6 29:12,18 30:11,20 31:21 34:9 37:14 38:12 40:23 49:18 50:3,12 51:8,24 53:13 54:2,24 55:9,19 56:9 57:3,10,13 58:1 59:2,19 62:5,22 63:22 66:16,21 68:25 70:15,18 75:15,25 76:12 80:20 83:9 85:15 87:16 93:6 94:2,19 95:24 96:20 97:12,16 98:19 102:16 103:17 105:25 106:5 107:9 108:4 109:16 110:9,13 112:7,13 113:11 116:2,23 117:8 117:23 119:9 120:23 121:11 122:4,8,17 123:21 124:4,24 125:14 126:23 127:15,24 128:8 129:9 131:4,7 133:6,23 134:13,24 135:16 136:4 137:25 138:20 140:4,8 140:11 143:18 145:22 146:3,15 151:9 152:12 152:18 156:15 158:25 162:8,13 wood 76:17 77:4,5 144:7 word 128:23 129:18 155:19 words 36:21 67:6 work 14:4,5,12,24 15:6,8 19:5 20:25 23:15 82:24 105:4 114:23,24 115:10 115:19 118:11 119:11 141:19 worked 15:4 16:2,5 17:9 17:10,11 18:17 19:20 50:4 100:13 104:3 105:14 106:1 108:24 110:14 118:5,14,16 119:3 141:6 workers 23:5 119:25 120:1 working 27:20 56:13,17 82:19 100:14 109:3,5 141:11 works 51:20 85:2 world 114:3 worst 85:16 worth 49:11 wouldn't 65:7 97:12,19 119:16 160:15 wound 102:10,11 Wow 140:14 write 31:25 44:22,25 46:16 87:8 writing 46:22 143:5 162:8 written 45:1 54:5 93:1,3,4 93:7 96:8 138:15 147:5 wrong 153:15 wrote 44:24 86:23 92:19 97:19 106:11 114:10 152:10 X X 4:1 97:9 Y Y-A-C-K-O 104:12 Yacko 104:10,11 105:11 105:12 yards 127:18 yeah 19:16 28:14 41:14	46:7 47:21 75:25 year 26:16 45:12 46:9,10 46:11,16,23 50:5 55:6 55:12 64:13 65:1,8,9,16 67:16 68:6 74:19 90:16 90:17 93:17 94:3,4 101:4 103:5 106:7,13,14 159:24,25 years 8:20 14:20 20:5,13 20:15 21:5,14,15 22:17 25:15 26:13 28:21 48:8 49:11 52:16,16 67:15 68:8 76:3,5 77:9 93:9 106:9 107:23,24 110:18 118:16 132:1 141:6,20 yellow 73:19,22,23,25 74:10,14,15 110:23 111:6,14,21 112:5 113:3 114:7 151:21 157:22 yesterday 8:8 47:23 87:9 87:9,14,17,19 92:1,3,5 96:17 Yup 124:21 Z Z-A-P-P 126:6 Zapp 126:5 zinc 153:24,24 154:8,9,10 154:11 0 00 155:9,10 06602 131:1 07701 3:8 1 1 4:7 32:8,10 44:21 86:24 131:18 137:10 148:14 151:1,10,20,20,21 152:3 152:9 1:15 86:9 1:28 98:5 1:32 98:10 10 114:21 10-gauge 18:19,22 154:14 154:19 10,000 10:13 10:00 161:8 10:18 5:3 100 2:10 3:16 121:14 131:19 144:6,6 1001 2:14 1001353 148:4 1001367 148:5 11:07 44:13 11:23 44:18 12 17:13,24 18:2,13,22 38:12 67:10 69:22 72:21 114:15 115:15 150:20 152:3 158:11 159:4,5,6 159:24 12-gauge 19:1 29:20 33:22 34:1,18,19 35:17 38:21 39:18 65:24 66:11 66:12,16 67:4,18 68:14 68:16 69:6,8,15 70:3,10 70:19 71:2,19 72:24 73:5,9 112:25 114:5,13 115:18 117:24,25 154:23 155:7 156:2 157:2 158:15 12-gauges 66:14 12:10 86:4 120 3:8 12M 157:12
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7/18/2018

Page 172

130 4:9 1354 153:5 1355 154:13 1356 154:22 156:18 1357 156:19 1359 157:2 158:15 1365 157:19 158:16 1367 158:6,17 141 3:8 142 4:10 147 4:11 15 145:14 15,000 77:23 16 17:13,24 18:2,13,22 114:15 1666 142:9 17 130:23 18 1:16 5:2 76:5 18/19 76:3 77:9 185 1:15 5:4 162:4 18th 162:4 19 76:5 99:11 143:8 190 2:19 1930s 47:4,10,12 50:10,24 51:3 53:5,23 1945 7:22 13:21 1950 45:13 19500 2:3 1950s 45:3,18 46:5 1960 101:20 1960s 33:12 1961 32:20 59:4 99:20,25 100:6 101:7,8,11 107:9 1962 143:8 1963 59:4 1964 9:2 60:10 61:3,13 137:11 148:15 1966 26:17 32:14,16 64:13 64:20,23,25 65:2,9,16 94:4 143:3 1967 137:11 148:15 1968 15:17 30:23 47:4 50:15 54:5,10 65:20 66:4,10 67:4 73:18,20 73:23 74:10,16 111:5 150:20 152:3 158:12 159:4 1969 47:4 50:15 54:5,10 160:1 1970s 57:23 1971 106:8 130:23 1972 65:21 66:7 67:15 68:12,22 69:2 198 74:11 1981 106:13 1986 19:6 2 2 4:8 17:18 130:4,6 136:20 156:3 2/17/71 4:8 130:6 2:22 136:12 2:38 136:17 20 17:13,24 18:2,13,23 49:11 50:4 106:9 114:15 117:21 145:15 20-gauge 65:24 68:14,16 69:23 70:3,13,22 72:21 72:24 73:18,21,23 74:5 74:9 108:18,18,21 109:7 109:14,20,21 110:1,19 111:1,2,5,13,17,18,19 112:4,25 113:2,7,18,25 114:1,6,6,13 157:21 158:16 2000 52:22	20004-2595 2:14 2014 9:16 13:11 2018 1:16 5:2 162:4,13 202 2:15 2022 162:25 211108 143:7 22 22:6 227-9411 2:25 22nd 162:13 22s 22:1,7 2409 3:3 250 131:18 260 153:16 27 7:22 28 78:22 281 2:5 290-6504 3:18 3 3 4:10 57:14 142:15,17 3/4 156:3 3:04 147:16 3:15 147:25 3:43 161:4 30 2:23 78:22 141:20 144:12 145:12 30.02(a) 1:12 300 24:20,21,25 25:2,6 28:25 57:15,17,18 58:8 62:7,10 63:19 122:17,18 306 18:10 308 18:10 30s 49:15 31 162:25 314 2:20 32 4:7 3200 2:23 3270671 142:9 33 3:13 36 131:16 371-1321 3:14 3M 1:8 5:7 4 4 4:11 89:17,23 90:1,3 96:15 147:21 148:3 40 141:20 144:1 145:13 40s 49:12,15 410 17:13,24 18:2,13,23 70:1,3,16,25 72:21 114:14,15,15 410-gauge 158:7,16 44 18:10 4400 3:13 45.0GR 156:11 466-7192 3:5 480-1835 2:20 5 5 9:2 49:8 132:3,4 5,000 96:14 50 121:14 131:19 500 2:10 50s 34:22 45:24 46:17 52 157:3 530-9108 3:9 55042 3:17 55101 2:24 55402 3:13 55423 3:4 556 18:10 58 156:17 58.0GR 156:9	6 6 114:1 142:9 143:3 155:13 60 144:13 145:12 600 2:19 60s 31:4 37:15,16 49:12 52:24 55:13,20 80:22 99:15 104:6 105:14 110:21 133:12,14 61 32:17 100:14,19 101:25 103:5,7,9,10 104:3 106:9 107:25 108:8 612 3:5,14 62-CV-18-169 1:4 5:15 624-2601 2:15 63 14:2,15 32:17 63105 2:19 64 137:17 139:3 151:2,6 151:10 152:4,16 651 2:25 3:18 66 26:18,19 66th 3:3 67 14:22 137:17 139:4 151:2,6,11 152:4,16 68 14:23,24 15:1,9,11 16:10 19:3,20 28:8,12 29:14 50:16,24 51:3,6 51:12 54:14 55:5 67:17 104:4 108:2 112:21 114:4 120:7 123:6 136:23 141:10,21 69 50:17,24 51:3,6,12 54:14 55:5 7 7 4:3 70 145:13 70s 80:22 71 124:24 136:22 72 67:18 108:2 112:21,21 114:4,5 73 13:24 93:9 732 3:9 76 26:19 76ish 26:21 77070 2:4 7th 2:23 8 8 18:13 114:20 8-gauge 17:15 153:18 154:4 80s 26:23,24 45:13 81 106:9,9 107:25 108:8 133:17 8519 3:16 86 19:21 28:8,15 64:5,11 69:13,15 74:12,14 105:4 123:8 141:23 875 23:19,24,25 24:4 25:19,19 9 9 113:24 155:9,10 945-1974 2:12 94596 2:11 952 2:12 970-9988 2:5
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