

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION

WALTER OWENS, et al.,
Plaintiffs,

VS.

MONSANTO COMPANY,
Defendant.

CASE NO. CV-96-P-0440-E

DEPOSITION OF DONALD CURRY,

Taken pursuant to stipulation and
agreement before SAMANTHA E. NOBLE, a Court
Reporter and Commissioner for Alabama at Large, at
Fite & Miller, 1000 Quintard Avenue, Suite 400,
Anniston, Alabama, on the 21st day of March, 2001,
commencing at approximately 2:10 p.m.

A P P E A R A N C E S

HONORABLE LAURA RUTH, Attorney at Law, 111 Congress
Avenue, Suite 1010, Austin, TX, 78701, appearing
for and on behalf of The Plaintiffs.

P.O. BOX 544 CHATCHEE, AL 36271 (256)892-0591

SAMANTHA E. NOBLE NOBLE & ASSOCIATES

HONORABLE DAVID M. MOORE, III, of The Law Firm of
SMITH, HELMS, MULLISS & MOORE, Attorneys at Law,
Suite 1400, 300 North Greene Street, Greensboro,
North Carolina, 27401, appearing for and on behalf
of The Defendant.

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S T I P U L A T I O N

1
2
3 IT IS STIPULATED between the
4 parties hereto that this deposition is being taken
5 for the purpose of discovery or for use as evidence
6 in the action or for both purposes.
7 IT IS FURTHER STIPULATED between
8 the parties this deposition may be taken before
9 SAMANTHA E. NOBLE, a Court Reporter of Anniston,
10 Alabama, at this time and place without the formal
11 requirement of notice.
12 IT IS FURTHER STIPULATED that
13 neither party need make any objections to any of
14 the questions asked during the taking of the
15 deposition, nor make any motion to exclude any
16 answers, except as to form and leading questions;
17 but both parties may later object to any questions
18 or make a motion to exclude any answers during the
19 trial of the action, and said failure to so object
20 or move to exclude during the taking of this
21 deposition shall not result in a waiver of the
22 right to make objections or move to exclude.
23 IT IS FURTHER STIPULATED between

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1 the parties that all requirements as to
 2 examination, reading, signing, or notice of filing
 3 the deposition are waived.
 4 -----
 5 DONALD CURRY,
 6 having been first duly sworn by the court
 7 reporter, was examined and testified under oath as
 8 follows:
 9 MS. RUTH:
 10 Q Hi, Mr. Curry, how are you?
 11 A I'm fine. Thank you.
 12 Q I introduced myself to you a little bit
 13 before, but let me just remind you or tell you for
 14 the record, my name is Laura Ruth and I'm an
 15 attorney for the Plaintiffs in a lawsuit called
 16 Owens V Monsanto. And I'm going to ask you a few
 17 questions here today. And I want you to do me a
 18 favor; if you do not understand a question that I
 19 ask you, I hope you'll let me know. I need you to
 20 let me know, because if you otherwise answer it,
 21 I'll assume you understood the question that was
 22 asked of you. Okay?
 23 A Okay.

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1 Q In Michigan?
 2 A Yeah.
 3 Q Do you remember how long ago that was?
 4 A Fifteen or twenty years ago.
 5 Q Do you remember what the subject matter
 6 of that lawsuit was?
 7 A It --
 8 Q What the subject matter of your
 9 testimony was?
 10 A -- had to do with some -- it was on a
 11 dairy farm. Somebody had used some anoclor
 12 products or something that contained PCBs and -- in
 13 a silo, and apparently, they claimed that it
 14 contaminated the feed that the cows ate and somehow
 15 contaminated the milk or something of that nature.
 16 I was involved in that deposition. My dad was an
 17 employee of Monsanto and he was more --
 18 Q More involved?
 19 A -- informed --
 20 Q Informed?
 21 A -- about that than I was and -- but, at
 22 his age, at that time, they involved me, because
 23 they wanted him to come to, I believe it was

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1 Q And the second thing is -- and you're
 2 doing this so far, you're doing it really well --
 3 when you answer a question, if you would answer it
 4 out loud, as opposed to shaking your head yes or
 5 no --
 6 A Yes.
 7 Q -- that would make life a little easier
 8 for the court reporter to keep track --
 9 A I understand.
 10 Q -- on how things are going.
 11 Are there any medications that you're on
 12 today that you think would impair your ability to
 13 give a deposition today, to answer questions?
 14 A No, ma'am.
 15 Q Let me just ask you first: Have you
 16 ever given another deposition?
 17 A Yes, ma'am.
 18 Q Can you tell me in what cases?
 19 A In another Monsanto case.
 20 Q Just one other case?
 21 A Yes.
 22 Q What case would that be?
 23 A It had to do with a lawsuit in Michigan.

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1 Bad Axe, Michigan.
 2 Q Bad Axe?
 3 A Yeah.
 4 Q As opposed to Good Axe?
 5 A Yeah, Bad Axe, Michigan is where that
 6 took place, a little town in Michigan. And that
 7 was the deposition.
 8 Q What was the nature of your testimony,
 9 do you recall?
 10 A Mostly just history of the plant and my
 11 work experience and my dad's work experience.
 12 Q Do you --
 13 A Neither one of us were used in the
 14 trial, but we were there.
 15 Q Do you remember giving a deposition on
 16 behalf of Monsanto in a case that was filed in
 17 Delaware, an insurance case, back in the early
 18 '90s?
 19 A I may have.
 20 Q May have?
 21 A I may have. I don't know. It's hard to
 22 recollect all -- I may have given more than one
 23 deposition, I don't know, but I don't recall the

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1 particulars of the case, if it was an insurance
 2 case.
 3 Q Because what I do have here is a
 4 deposition that Monsanto produced to us that you
 5 gave in 1993 for a case titled Monsanto V Aetna
 6 Insurance.
 7 A Who?
 8 Q Aetna Insurance.
 9 A Well, if you've got the deposition, I --
 10 Q I think --
 11 A Like I said, there may have been more
 12 than one case --
 13 Q Sure.
 14 A -- that I just didn't recall.
 15 Q Sure, that's fine.
 16 A Does it say where that took place?
 17 Q It took place at the Victoria Inn.
 18 A Yeah, I remember being there.
 19 Q You do remember being there?
 20 A Yeah.
 21 Q And then I've got another deposition
 22 that you'd given, actually not that long ago, and
 23 it looks like it took place here in this office

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1 about or you haven't remembered up until now?
 2 A No. I think that's probably -- to the
 3 best of my recollection --
 4 Q Sure.
 5 A -- that's all that I've been involved
 6 in.
 7 I've been a -- I've been on a jury in
 8 some cases. I've -- I was on the county commission
 9 in our county and I've been in court as a result of
 10 going -- it going along with my job. So, been
 11 involved in a number of things and it's hard to get
 12 them all separated --
 13 Q Sure.
 14 A -- in my mind. But I think that that
 15 probably --
 16 Q So, you think --
 17 A -- wraps it up.
 18 Q -- the only three times in your life
 19 that you've ever given a deposition has probably
 20 been on behalf of Monsanto?
 21 A Yeah, I think that's -- I think that
 22 would be a safe statement.
 23 Q Now, has Monsanto paid you to come give

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1 space, about -- in January of 1999.
 2 A I gave one across the hall over there in
 3 that conference room.
 4 Q Down the long hall, in that kind of
 5 crusty room?
 6 A Just --
 7 Q Or in this suite?
 8 A In this suite of offices.
 9 Q Do you remember --
 10 A That's probably it.
 11 Q Do you remember what the testimony in
 12 that case would have been about? Do you remember
 13 giving your testimony?
 14 A Yeah, I remember, I remember answering
 15 the questions. Now, I don't -- I don't know
 16 exactly what the -- it was probably about the PCBs,
 17 and again, my work history at the plant.
 18 Q Well, after talking about those two
 19 additional depositions, do you now, does that jog
 20 your memory maybe --
 21 A Yeah.
 22 Q -- are there any other depositions that
 23 maybe you might have given that I haven't asked you

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1 this deposition today?
 2 A No.
 3 Q Why don't I give you an overview of what
 4 we're going to do today, and then that way, if
 5 you're starting and want to move on or get out of
 6 here, you'll know where we are in the process.
 7 A Okay. Do it.
 8 Q I think what we'll do is we'll go
 9 through your residential history, your educational
 10 background, family, work, and we might go into a
 11 little bit of detail, more detail when we're
 12 talking about your work history, since that's
 13 primarily why you're here. I'm hoping that this
 14 doesn't take too long. David won't speak to me if
 15 it takes too long, because he has to make his
 16 flight.
 17 MR. MOORE: Whatever it takes is
 18 fine.
 19 BY MS. RUTH:
 20 Q We'll try and move through this. But
 21 you need to let me know, if you get to a point you
 22 want to take a break or anything like that, please,
 23 just raise your hand and tell me --

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- 1 A Well, as bashful as I am, I'll tell you.
 2 Q Okay, good. Let's first run through
 3 your residential history. Have you lived in
 4 Calhoun County your whole life?
 5 A Yeah.
 6 Q Where in Calhoun County have you lived?
 7 Where were you born?
 8 A I was born about four or five blocks
 9 down this -- down the street on Leighton Avenue at
 10 what was then the old Garner Hospital.
 11 Q The Old Goner Hospital?
 12 A G-A-R-N-E-R.
 13 Q Oh, Garner?
 14 A Garner.
 15 Q I thought you said Old Goner. I thought
 16 that was a really bad sense of humor for a
 17 hospital.
 18 A Before we had the Regional Medical
 19 Center, which sits right over there.
 20 Q And where did your mamma and daddy take
 21 you home to, once you were born?
 22 A 1402 Einstein Avenue.
 23 Q 1402 Einstein. Now, Einstein's familiar

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- 1 Q Anniston High?
 2 A (Witness nods head.)
 3 Q Where did you move after you lived at
 4 Einstein?
 5 A Well, that parcel of property right
 6 there was -- my grand-dad lived next door to where
 7 we lived. When my dad and my mom got married, my
 8 grand-dad built my dad a house. He had told him,
 9 if you do thus and so, when you decide to get
 10 married, I'll build you a house, and he did.
 11 And --
 12 Q Did he actually build it with his own
 13 hands? Did they build it together?
 14 A Well, I wasn't there, you know, I didn't
 15 see him actually swing the hammer, but he built my
 16 dad a house.
 17 And then when my grand-dad died about
 18 1944, my dad bought that plot of property and
 19 then --
 20 Q He bought the plot that had at one point
 21 belonged to your grand-dad?
 22 A Had my grand-dad's house on it. And, of
 23 course, he owned the house next to it. And then he

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- 1 to me. Is that east or west of Quintard?
 2 A It's west of Quintard.
 3 Q West of Quintard. What's another nearby
 4 cross street for Einstein?
 5 A It was 14th Street.
 6 Q Sure.
 7 A West 14th Street.
 8 Q I'm trying to remember. Gosh, I just
 9 know it. But anyway, I could find it later. And
 10 how long did you live at Einstein?
 11 A Lived there a long time, till about
 12 1950.
 13 Q Till about 1950?
 14 A Yeah.
 15 Q And what year were you born?
 16 A 1930.
 17 Q Actually, what's your birth date?
 18 A November the 10th, 1930.
 19 Q So, 1950. Did you graduate high school
 20 then while you were living there?
 21 A Yes.
 22 Q Yes. Where did you go to high school?
 23 A Anniston High School.

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- 1 built a house on the property for my oldest
 2 brother. And then my oldest brother --
 3 Q Now, did your grandma still live in your
 4 grandpa's old house? I mean, when your grand-dad
 5 died and your dad bought both lots --
 6 A Yeah.
 7 Q -- did your grandma continue to live in
 8 that house?
 9 A Yeah, my grandma was there until she got
 10 to the point she was not able to take care of
 11 herself and then she lived with some of her
 12 daughters and what have you.
 13 But the property became my dad's. And
 14 he built my brother a house. And my brother,
 15 before it reached time for him to move in there, he
 16 was transferred to a job in Selma.
 17 Q Who did he work for?
 18 A He was working for the theater, at that
 19 time. And so my dad and my mother just moved into
 20 that house.
 21 Q Oh, I see.
 22 A It was never and what have you. And he
 23 rented out that house we were living in. But on

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1 that plot of property right there is where I was
 2 until I was drafted in service.
 3 Q Really?
 4 A Uh-huh.
 5 Q And what war were you drafted into?
 6 A During the Korean War.
 7 Q Korean. You were testing my history
 8 there. I thought maybe from old Mash episodes that
 9 that's what that was. And how long did you --
 10 A What if I had said the Civil War?
 11 Q I'm not that bad. How long did you
 12 spend in the Korean War?
 13 A Two years in the service.
 14 Q Two years in service?
 15 A (Witness nods head.)
 16 Q And where were you stationed?
 17 A Oh, several places. I took my basic
 18 training at Fort Jackson and went to Camp Polk,
 19 Louisiana. And assigned to a division that they
 20 had activated, a National Guard division from Ohio.
 21 And then from there, I went to
 22 Fort Benning, Georgia, to school for four months.
 23 And then back to Camp Polk.

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1 to Korea. And I went to Korea with them, the 24th
 2 Infantry. Stayed there until the Armistice was
 3 signed.
 4 I was at Ko-go-do when the Armistice was
 5 signed. Ko-go-do had prisoner of war camps. It
 6 was an island out in the -- south of Pusan. And we
 7 transported prisoners of war --
 8 Q Back home or back to --
 9 A From Ko-go-do to Inchon and back and
 10 forth and back and forth, until my service time got
 11 close to the end, and they sent me home. And I --
 12 Q And home was Anniston, Alabama?
 13 A Yeah.
 14 Q And where did you live when you came
 15 back to Anniston? Did you move back in with your
 16 folks on Einstein?
 17 A Well, my dad had sold that property then
 18 while I was gone in service and had bought a house
 19 at 1700 West 11th Street. That's on the corner of
 20 11th and Clydesdale.
 21 Q Sure.
 22 A And that's where my parents were living
 23 when I came back in 1953, November of '53.

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1 And then I got orders for the Far East.
 2 Went to Japan for four or five months. And was
 3 assigned to the 24th Infantry Division.
 4 Q What did you do in Japan?
 5 A Huh?
 6 Q What were you doing in Japan? Were you
 7 in the Army?
 8 A Yeah.
 9 Q Is that right, you were drafted by the
 10 Army?
 11 A I was in the Army. And I was doing what
 12 I was told, which is what you do in the Army.
 13 Q Right. It's probably why I never signed
 14 up.
 15 A After about five months there, we were
 16 filling up the 24th Infantry Division, because they
 17 had rotated that outfit off the line in Korea,
 18 because they had more line time than anybody over
 19 there, and was rotating guys home that had enough
 20 points to come home, and filling it up with new --
 21 new blood.
 22 And after about four or five months, we
 23 had enough new people that they sent the 24th back

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1 Q There's no homes over there now, is --
 2 oh, yeah, there are. I'm thinking --
 3 A Yeah. Well, there's not a -- that house
 4 is not there anymore.
 5 Q Not there?
 6 A There is a meat -- Quality Meat place --
 7 Q Right.
 8 A -- right there on that -- but that's the
 9 corner my dad was living. And I got home in
 10 November of '53 and I got married in February of
 11 '54.
 12 Q To? Who did you marry?
 13 A Married Rosa Lee LeFast, my high school
 14 sweetheart. Well, she was my girl from the time
 15 she was fifteen years old until eighteen months ago
 16 when she died.
 17 Q Oh, I'm very sorry for you, sir. Did
 18 your wife grow up near you?
 19 A Yeah.
 20 Q Around you?
 21 A She grew up, up the street, a block and
 22 a half from 1700 West 11th Street. She lived at
 23 1818 West 11th Street.

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- 1 Q Is that right? And where did you say
2 you moved? Where did you and your wife move to
3 when you got married?
4 A When we married, I had rented us an
5 apartment on McKelroy, 2306 McKelroy Avenue in a
6 duplex, a three-room apartment. And we had it
7 furnished before we ever married.
8 Q How did you get it furnished before you
9 got married?
10 A We started -- I knew a long time --
11 Q She was the one?
12 A -- ago that was going to be the girl
13 that I was going to spend my life with. And I was
14 two years ahead of her in school, so I went to work
15 at Monsanto in 1950 and I drew a payday every
16 week, so we started buying a few things.
17 Q So, you went to work for Monsanto before
18 you had actually left for the war; is that right?
19 A Oh, yeah, I worked about -- a little
20 over a year before I was drafted in the service.
21 Q I see.
22 A I finished high school in '49, went to
23 work at the plant in May of 1950, and was drafted

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- 1 But so I found -- as a boy, I would hunt
2 things to do and I worked and I worked at a number
3 of things and I worked -- my first year of work
4 after I finished high school, I worked for
5 S. H. Kress & Company in the stockroom.
6 Q So, that's before you went to Monsanto?
7 A That's where I was working when I had an
8 opportunity to go to work at Monsanto.
9 Q Which I imagine was much better pay?
10 A Oh, heck, yeah. That folks -- Monsanto
11 was one of the better places to work in
12 Calhoun County.
13 Q As far as salary went?
14 A Yeah.
15 Q Yeah.
16 A Working conditions and a lot of other
17 things, it was just a good place to work. A lot of
18 folks wanted to work there. And I got to work
19 there.
20 And, of course, when I got drafted and
21 came back, the law says you can go back to work, so
22 I went back to work.
23 Q Let me --

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- 1 in November of '51.
2 Q So, save your military experience, is
3 Monsanto the only place you've ever worked --
4 A No.
5 Q -- as an adult?
6 A Oh, no, no. That's -- listen, this is
7 really not my fault --
8 Q I'm sure it's not.
9 A -- that I'm -- but it -- this is what's
10 happened to me; you know, I wake up every morning,
11 I'm a day older, and it's not my fault, but I like
12 it better than the other option.
13 Q That's right.
14 A And I'm seventy years old, nearly
15 seventy and a half, and when I was coming along,
16 you know, we -- it wasn't like it has been for the
17 past three or four years, everything was on the
18 upswing. Of course, it's tailed off a little now,
19 Mr. Greenspan is trying to help that.
20 But I was born right in the middle of
21 the depression. Okay? And times were tough and
22 didn't really get a lot better till I guess after
23 the war, World War II.

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- 1 A But during high school and what have
2 you, I worked on the weekends in a grocery store.
3 During the war I delivered automobile parts the
4 summer of '44 and summer of '45. I rode a bicycle
5 that had a big basket on the front and a little
6 wheel and a big -- delivering automobile parts as a
7 fourteen year old boy all over Anniston to the
8 garages and things from one of the parts places
9 here.
10 Q Can I ask you a quick question, going
11 back to where you grew up, because you grew up on
12 14th and Einstein?
13 A Yeah.
14 Q And if you could answer, if you know the
15 answer to this for both yourself and your wife,
16 when you were growing up, did you all keep a
17 vegetable garden in your backyards?
18 A We had a garden.
19 Q You did?
20 A Yeah.
21 Q Do you know if your wife's family had
22 had one when you were courting her?
23 A I'm sure they did. Mostly -- listen,

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- 1 most everybody had a vegetable garden and raised
2 something.
3 Q Raised some kind of --
4 A Oh, yeah.
5 Q -- vegetables you mean or some kind of
6 animal?
7 A To supplement the grocery bill. You did
8 what you had to do to stay alive and put food on
9 the table.
10 Q Did y'all have chickens or cows or hogs
11 or any of those --
12 A We had a cow. We raised hogs. We
13 had -- we killed hogs every November or December.
14 My grand-daddy -- my grand-dad had mules and plowed
15 the fields and planted corn, potatoes, and peas,
16 and were just -- yeah, we did what we had to do to
17 sustain ourselves.
18 Q Sure. I lost track now, because we kind
19 of got a little bit sidetracked.
20 You ended up -- you first married home
21 was then over on McKelroy; is that right?
22 A Yeah.
23 Q And that was an apartment?

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- 1 child --
2 A Yeah.
3 Q -- when you moved over there? And how
4 old is your son now?
5 A Be forty-one the 18th of May.
6 Q Forty-one the 18th of May. And what
7 does your son do for a living?
8 A What you do.
9 Q Is he really?
10 A He's an attorney.
11 Q Is he an attorney?
12 A He's an attorney in Tacoma, Washington.
13 Works for the State of Washington in the state
14 court system.
15 Q Is that right? Is he a criminal lawyer
16 or a civil lawyer or a trial lawyer, at all, or do
17 you know or --
18 A He's a -- he's going to take the bar
19 exam in July.
20 Q So, this is a second career for him; is
21 that right?
22 A Yes, yes.
23 Q What was his original career?

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- 1 A Yeah, three-room apartment.
2 Q Three-room apartment. Was it in an
3 apartment building or like --
4 A It was in --
5 Q -- a duplex?
6 A -- a duplex house.
7 Q So, you had a yard and stuff?
8 A Yeah.
9 Q Did you keep a garden and things there?
10 A No.
11 Q Did you all --
12 A I lived there eleven months.
13 Q Oh, eleven months?
14 A (Witness nods head.)
15 Q Were you saving up for a house?
16 A Yeah.
17 Q Was that the plan? All right.
18 So, where did you buy your first home?
19 A At 3330 Eulaton Road.
20 Q 3330 Eulaton Road. And that's where you
21 and your wife -- did you have children?
22 A One boy.
23 Q One boy. Is that where you had your

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- 1 A He was a -- he was in the ministry.
2 Q He was in the ministry?
3 A (Witness nods head.)
4 Q And then did he find a lady love and --
5 A He did. And --
6 Q Was he in Washington State earlier or --
7 A Yeah, he was in Washington State
8 earlier. He was out there about seven, eight
9 years, I guess, and came back home. He decided he
10 wanted to get his law degree.
11 Q Where did he get that degree?
12 A At the University of Alabama Law School.
13 Q I see. Well, I guess that would have
14 been a hike if he lived with you when he went
15 there, huh?
16 A Yeah.
17 Q He did live with you?
18 A Yeah. He came back from Seattle and
19 reestablished his residence in Alabama and went to
20 school as an in-state resident at the University of
21 Alabama.
22 Q Well, good for him. That's great. I
23 applaud people who go to law school. I'm a proud

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1 lawyer, not an ashamed lawyer.
 2 So, presumably you and your wife spent a
 3 long time at the 3303, was it Eulaton?
 4 A We -- 3330 Eulaton Road.
 5 Q 30.
 6 A We lived there from 1955, I believe it
 7 was May of '55 till the summer of 1972.
 8 Q Nearly twenty years?
 9 A Yeah. Seventeen, eighteen years,
 10 something like that.
 11 Q Did you say you kept a vegetable garden
 12 there?
 13 A I didn't, no. I didn't keep a garden
 14 there.
 15 Q No?
 16 A No.
 17 Q Not a big gardener? Did your wife keep
 18 one? I mean, y'all just didn't have one?
 19 A She had flowers and things of that
 20 nature, but I didn't plant a garden. I worked
 21 shift work --
 22 Q Sure.
 23 A -- at Monsanto and I didn't -- I was

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1 interstate down there.
 2 Q Well, I drive that interstate so often,
 3 I'll wave to you one morning when you're having
 4 your coffee.
 5 A Well, it's the Coldwater, Munford,
 6 Anniston Army Depot exit right there.
 7 Q Okay, I know exactly where you mean.
 8 I've spent quite a lot of time here in Anniston.
 9 And then you've been there since?
 10 A That's right. That's where I'll be, I
 11 guess, till it's over for me.
 12 Q It's a nice house then?
 13 A Well, I enjoy living there. It's a
 14 quiet, dead-end street.
 15 Q Is it a part of a -- this is absolutely
 16 just curiosity -- is it a part of a development or
 17 is it kind of a little bit more rural?
 18 A It's -- there is a lot of development
 19 going on right there, now.
 20 Q Sure.
 21 A They've cleaned off about nineteen acres
 22 that adjoins the back of my property and we don't
 23 know what's going in there. They -- could be

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1 doing well enough that I didn't have to --
 2 Q Well, some people just like it.
 3 A I know, and I like that.
 4 Q Yeah.
 5 A Where I live now, I -- about every year
 6 I've had a garden there. I've lived there since
 7 '72.
 8 Q And where is that?
 9 A 229 Allendale Road.
 10 Q Is that still here in Anniston or
 11 your --
 12 A Well --
 13 Q You're in Oxford?
 14 A It's in the Coldwater Community, if you
 15 know where the Coldwater Community is.
 16 Q Yes.
 17 A I live, do you know where Exit 179 is --
 18 Q Sure.
 19 A -- off the interstate?
 20 Q Of course, yeah.
 21 A I live just off the interstate. I can
 22 see the interstate from sitting in my breakfast
 23 room, looking out the bay window, see the

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1 anything. Probably be a motel or a strip mall or
 2 something of that nature.
 3 Q I think we've basically covered your
 4 educational history, because from what I gather,
 5 you finished high school and went right to work.
 6 But let's just run through real quick where you
 7 went to elementary, if there was a middle school,
 8 and high school. Did you go to elementary school?
 9 A I went to elementary and junior high
 10 school at Mechanicsville.
 11 Q Mechanicsville, does that still exist?
 12 A Huh?
 13 Q Is that school still there?
 14 A No, that school's not there anymore.
 15 Q Trying to stump me on that. I know that
 16 neighborhood, so Mechanicsville --
 17 A Wellborn School took the Mechanicsville
 18 students. But Mechanicsville was there -- there
 19 was no Wellborn School until 1954, so
 20 Mechanicsville School was there. And that's where
 21 I went to school for nine years.
 22 Q Okay. And --
 23 A And then I went to Anniston High School.

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1 Q -- Anniston High School?
 2 A For high school, yeah.
 3 Q And you graduated from high school
 4 there.
 5 So, we get to check one whole item of
 6 the list with that quick answer. Pretty good, huh?
 7 Let's talk just briefly about your
 8 family. I gather from what you've said -- and
 9 actually I had some -- can't pretend I didn't know
 10 this before we sat down -- your dad worked for
 11 Monsanto, as well?
 12 A Yes.
 13 Q Was he instrumental in getting you the
 14 job? Pull a string or two?
 15 A I wouldn't be a bit surprised if he
 16 didn't put a good word in for me.
 17 Q Did your mom work, at all?
 18 A No. My mother was a homemaker.
 19 Q And --
 20 A And a great one.
 21 Q Really?
 22 A Yes.
 23 Q That's wonderful.

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1 A He was -- he was three months and twelve
 2 days in -- he was ninety-nine years, three months
 3 and twelve days --
 4 Q Oh, I see.
 5 A -- old.
 6 Q I see.
 7 A He was into his hundredth year.
 8 Q And if I may ask: Do you know what the
 9 cause of his death was? Was it just old age or --
 10 A That was it, 'hon. It was his time.
 11 Q Things just got tired, I guess?
 12 A Uh-huh. It was time for dad to go.
 13 He -- three months and -- three months and a half
 14 prior to his death, we were still carrying him to
 15 church with us.
 16 Q Is that right?
 17 A That's right.
 18 Q Where are y'all members?
 19 A At Eulaton United Methodist Church.
 20 Q Was he still living independently at the
 21 time or did he --
 22 A Well, he lived alone. My mother died in
 23 '86. My dad lived alone and -- but the -- the last

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1 Now, I believe your dad has passed; is
 2 that right?
 3 A Died the 4th of January.
 4 Q Just this past January?
 5 A (Witness nods head.)
 6 Q Well, God bless him. I'm so sorry for
 7 you; you've had a tough year and a half.
 8 A Well, we can't -- we can't change those
 9 things. And that's not our call to make. Listen,
 10 my dad had a great life. He was three months and
 11 twelve days into his one hundredth year, 'hon.
 12 Q Did he get on Willard Scott?
 13 A Huh?
 14 Q Did he get on Willard Scott? You know
 15 Willard Scott on the Today Show does those hundred
 16 year old things. Did anybody --
 17 A Well, his doctor told me, said, I
 18 believe your dad's going to make it to a hundred,
 19 and said, if he does, if he does, Willard Scott's
 20 going to hear about it. And said, I want you to be
 21 sure and tell them who his doctor is.
 22 Q So, your daddy was over a hundred years
 23 old when he passed?

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1 few months, maybe six months that he lived, me or
 2 my brother one was there with him. He -- he didn't
 3 walk well, he used a walker to get around in the
 4 house. His knees were a problem for him and -- but
 5 he was mentally alert. He was a -- an
 6 extraordinary specimen.
 7 Q I have no doubt.
 8 A He surprised us many, many times,
 9 with -- with his ability to cope with life. I --
 10 Q Did he --
 11 A I thought when my -- if my mother had
 12 lived about two more weeks, my dad and my mother
 13 would have been married sixty-five years.
 14 Q Wow.
 15 A And when my mother died, I -- we -- we
 16 as a family, felt like it wouldn't be long till
 17 daddy folded up and go, but he surprised all of us.
 18 And my brother and I had a little automobile parts
 19 business here in town and daddy just started coming
 20 up there and --
 21 Q Working?
 22 A -- working.
 23 Q Don't even tell me.

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- 1 A Work, delivering parts and doing
2 whatever.
3 Q He had to be in his late eighties.
4 A What?
5 Q He's in his late eighties at that time?
6 A Oh, yeah.
7 And then after that, when we sold the
8 business and got out of the business -- we kept the
9 business for twenty-five years -- my dad
10 volunteered for the Meals-On-Wheels Program here to
11 deliver meals to old people that couldn't --
12 Q Were younger than he was?
13 A Huh?
14 Q Old people that were younger than he
15 was?
16 A Old people that were housebound and what
17 have you. Old people means folks my age or --
18 Q Sure.
19 A But my dad delivered Meals-On-Wheels and
20 drove into his ninety-sixth year and didn't want to
21 quit then, but it was time. We just had to -- we
22 had to make him quit.
23 Q Now, did your dad have any health

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- 1 butter and about five biscuits.
2 Q And your daddy didn't ever gain a pound.
3 Oh, Lord, bless him.
4 A And he wore a size thirty-four pants.
5 Q I think you come from some good genetic
6 stock, that's for darn sure.
7 A So, he was a --
8 Q How about your mamma, how did your --
9 A My mom was a -- she had a pretty healthy
10 life and a long life. She was eighty-four years
11 old when she died, but she did have a heart problem
12 and she died of congestive heart failure in 1986.
13 Q Had she had heart problems sort of for
14 many years before that --
15 A Yeah, yeah.
16 Q -- that she was tracking with a doctor
17 and kind of --
18 A That's what killed my mamma.
19 Q I guess any other illnesses that maybe
20 went along with the heart problems? I mean, did
21 she have --
22 A Mamma had, she had suffered with
23 arthritis some and was treated for that. But her

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- 1 problems, at all, over the years? I mean --
2 A Oh, my dad -- my dad had a great life, a
3 healthy life, a happy life.
4 Q Sure.
5 A In 1950 my dad had an attack of
6 appendicitis and had his appendix taken out. In
7 1964 my dad had a heart attack, got over it, and
8 never had to take medication for his heart after
9 that. In 1992 or '93 -- and he was ninety-two
10 years old -- he had to have his gallbladder out,
11 and he got past that and lived seven more years,
12 you know.
13 Q Never --
14 A And that's the extent.
15 Q No high blood pressure issues or --
16 A Well, he was -- he had sugar and he took
17 a Glucotrol tablet every morning to control his
18 sugar and to -- you know, he used the sweetener
19 instead of sugar in his coffee and -- but he could
20 eat about anything he wanted. He eat the same
21 thing for breakfast every morning; he had a -- he
22 had two eggs, he had two sausage patties, he had a
23 big gob of jelly or jam or something and some

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- 1 problem was her heart.
2 Q Okay.
3 A It took her in her sleep one night.
4 Q Hopefully she was not aware.
5 A Huh?
6 Q Hopefully, she just slept --
7 A She died in her sleep.
8 Q And then there is just you and your
9 brother; is that right? Are those the only two
10 children?
11 A There was five of us children.
12 Q Oh, there's five of y'all?
13 A Four boys and a girl.
14 Q Four boys and a girl?
15 A (Witness nods head.)
16 Q Can we go through them from oldest to
17 youngest?
18 A Yes.
19 Q Who is the oldest?
20 A Ralph.
21 Q Ralph. How old is Ralph?
22 A Ralph's dead.
23 Q Ralph --

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- 1 A Ralph was born in 1923.
 2 Q Born 1923. How did Ralph pass, if I
 3 could ask?
 4 A Huh?
 5 Q How did your brother die?
 6 A He died with bone cancer.
 7 Q Bone cancer. Now, was this a family
 8 affair? Did your brother work at Monsanto, as
 9 well?
 10 A For a short time. He worked there maybe
 11 a couple of years, just back in the early '50s.
 12 Q Early '50's for a couple of years. I'm
 13 sorry to be talking about all these difficult
 14 things. What year did your brother --
 15 A Listen, death is a part of life, 'hon.
 16 Let me tell you something, statistics prove -- do
 17 you believe in statistics?
 18 Q Depends on who's generating them.
 19 A Statistics prove that one out of one
 20 die.
 21 Q That's right.
 22 A Okay. So --
 23 Q That's right.

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- 1 A Excuse me?
 2 Q Selma, is he the --
 3 A He's the one that went and moved to
 4 Selma, right.
 5 Q Is that where he remained or --
 6 A No.
 7 Q -- did he come back and --
 8 A No, he didn't stay. That was when he
 9 was working with the theater group, managing the
 10 theater. And he came back here. He worked -- he
 11 worked for a few years for the National Gypsum
 12 Company down there close to where my house is. He
 13 was the store keeper in the -- for that plant.
 14 Maybe five years he worked there. And then he went
 15 to work at the Postal Service.
 16 Q Postal Service. And where did he live?
 17 A He lived out at Weaver.
 18 Q Weaver, he lived in Weaver?
 19 A Yeah.
 20 Q Okay, next?
 21 A Next one is my brother, Bill.
 22 Q Bill?
 23 A Yeah.

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- 1 A -- we're not here -- we're not here
 2 forever. We're here for a season. And when the
 3 good Lord says it's enough, it will be enough --
 4 Q That's right.
 5 A -- and he'll take us.
 6 Q Okay. Well, what year did Ralph pass
 7 away?
 8 A In 1987.
 9 Q 1987.
 10 A He was sixty-three years old. He was a
 11 World War II veteran. He was hit twice in the
 12 Battle of the Bulge and in Belgium.
 13 Q I know that you said he worked briefly
 14 at Monsanto. What other --
 15 A He worked for the theater system, but he
 16 was a -- he was a rural mail carrier for the
 17 United States Postal Service was his primary work.
 18 And he retired from that.
 19 Q Did he primarily stay here? He's the
 20 one that went to Selma; is that right?
 21 A Do what?
 22 Q Did he move to Selma or was that
 23 somebody else?

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- 1 Q What year was Bill born?
 2 A 1927.
 3 Q And does Bill still live here in town?
 4 A Bill's dead.
 5 Q Bill's also passed. How did Bill pass?
 6 A Bill died in December of 1997 with
 7 Alzheimers.
 8 Q Was Bill living here at the time?
 9 A Yeah.
 10 Q Here in Calhoun -- had he ever moved out
 11 of Anniston?
 12 A No.
 13 Q No?
 14 A Well, no, he was in the service in World
 15 War II and went off. He didn't -- it was toward
 16 the end of the war. He didn't go overseas, but he
 17 did go to Texas to cook and baker school and he
 18 wound up coming back to Fort McClellan. So, Bill
 19 had a --
 20 Q What was his career?
 21 A He was in automobile parts, in the
 22 automobile parts business.
 23 Q Is he the one your daddy came and worked

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- 1 with?
- 2 A Yeah.
- 3 Q The two of you?
- 4 A Yeah.
- 5 Q Where was that business again?
- 6 A At 113 East 9th Street.
- 7 Q Next?
- 8 A Huh?
- 9 Q The next person in line?
- 10 A That's me. I'm the middle child of
- 11 five.
- 12 Q Well, we'll come back to you. However,
- 13 you're still here. So, next?
- 14 A And then my brother, Jerry.
- 15 Q Jerry. Jerry was born in what year?
- 16 A 1934.
- 17 Q And is Jerry still alive?
- 18 A Yeah.
- 19 Q Here in Anniston?
- 20 A Yes. Well, he lives in Oxford.
- 21 Q Okay. He retired --
- 22 A It's all Anniston area.
- 23 Q He's retired?

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- 1 Monsanto?
- 2 A Listen, that -- they just -- they needed
- 3 a Curry in the plant or more.
- 4 Q Well, a little curry to spice it up, so
- 5 to speak?
- 6 A Right.
- 7 Q Get it? You get what I mean?
- 8 A Couldn't get --
- 9 Q Curry powder. All right, maybe that
- 10 wasn't funny.
- 11 A Looking for good folks and found them.
- 12 Q I have no doubt on that one. And then I
- 13 guess your sister's the baby?
- 14 A She's the baby.
- 15 Q So, was your mamma looking for a little
- 16 baby princess, was that what that was about, I
- 17 think?
- 18 A She was -- she'll tell you in a minute
- 19 right now that she was the -- petted to death,
- 20 yeah.
- 21 Q Now, what's your sister's name?
- 22 A Ann.
- 23 Q Ann.

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- 1 A Retired.
- 2 Q From?
- 3 A U. S. Postal Service.
- 4 Q Was he also a postal carrier?
- 5 A Mailman.
- 6 Q Is that pretty much all he did or did he
- 7 have some jobs before he got into being a postal
- 8 carrier?
- 9 A He worked for a TV repair place and --
- 10 Q Was he ever at Monsanto?
- 11 A Huh?
- 12 Q Did he work at Monsanto?
- 13 A Yeah, he spent one summer there as a
- 14 vacation-relief operator.
- 15 Q And --
- 16 A Everybody in my family worked at
- 17 Monsanto at one time or another.
- 18 Q Oh, they did?
- 19 A Ralph worked there for a couple of
- 20 years, Bill worked there for about three years, I
- 21 worked there for thirty-five and a half years,
- 22 Jerry worked there for three months.
- 23 Q So, there is a lot of family loyalty to

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- 1 A She lives in Mobile.
- 2 Q Did she get married and move down there?
- 3 A Yeah.
- 4 Q So, she's been down there, I guess,
- 5 awhile?
- 6 A She's been down there about twenty years
- 7 now.
- 8 Q Twenty years. Up until then, did she
- 9 live here in Anniston?
- 10 A Yes. She worked -- worked for a doctor
- 11 here.
- 12 Q Now, let me ask you, Jerry and Ann -- I
- 13 shouldn't make any assumption. Has Ann had a
- 14 career?
- 15 A Yes.
- 16 Q Which was?
- 17 A Ann is the -- she's the secretary to the
- 18 CEO at the biggest hospital in Mobile.
- 19 Q How long has she been with -- is it a
- 20 him or a her, the CEO?
- 21 A She's been with the hospital for the --
- 22 all the time she's been in Mobile, probably twenty
- 23 years or better.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 Q Did she have a job before that?
- 2 A Yeah, she worked for doctor --
- 3 Dr. Judge.
- 4 Q He's passed; is that right?
- 5 A One block up the street here for --
- 6 Q Sure.
- 7 A -- maybe ten, twelve years before she --
- 8 Q Dr. Judge has passed; is that right?
- 9 A Yeah.
- 10 Q And your sister, Ann, was born in what
- 11 year?
- 12 A 1942.
- 13 Q She's a spring chicken.
- 14 A Huh?
- 15 Q She's a spring chicken.
- 16 A Well --
- 17 Q She's still a baby.
- 18 A No, she's not a spring chicken, she's
- 19 fifty-eight, and I don't let her forget it.
- 20 Q Actually, my parents were really young
- 21 parents and they like to tease me that we'll be
- 22 middle aged at the same time. They'll be a brief
- 23 window of about two years where we're actually

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 maybe he had pneumonia or -- I'm just thinking
- 2 about something serious that might have
- 3 hospitalized him or --
- 4 A (Witness shakes head.)
- 5 Q No?
- 6 A Jake's had a good life.
- 7 Q How about Ann?
- 8 A Ann's had a good life.
- 9 Q No health problems of which you're
- 10 aware?
- 11 A She was kind of like my mother; my
- 12 mother had -- she was prone to have headaches, and
- 13 Ann has headaches every now and then, but that's --
- 14 Q Headaches like migraine-type headaches?
- 15 A Ann's are and she takes the -- she's
- 16 right there with a --
- 17 Q And your mom had migraine headaches?
- 18 A Yeah, from time to time.
- 19 Q Did she go sit in a dark room with no
- 20 noise or --
- 21 A No.
- 22 Q I guess moms don't have that luxury.
- 23 A Mamma wouldn't get in no dark room and

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 middle aged at the same time. That gives my father
- 2 great joy.
- 3 Q So, I guess, let me ask you about the
- 4 health of Jerry and Ann. What do you think about
- 5 Jerry's health? Does he have any health problems
- 6 or health issues?
- 7 A He has no problems.
- 8 Q None that you know of, no high blood
- 9 pressure, no --
- 10 A No.
- 11 Q -- diabetes or --
- 12 A He's a --
- 13 Q He doesn't see a doctor for any reason
- 14 on a regular basis, other than a --
- 15 A Well, he had a back -- little -- some
- 16 kind of a back surgery here a few years ago, but
- 17 that's a -- that's the extent of his -- he's -- if
- 18 he was sitting here where David's sitting, he would
- 19 look just about like me, you know.
- 20 Q So, he's never had any even -- what's
- 21 the word I'm looking for -- like health problems
- 22 that have resolved themselves? In other words, you
- 23 know, not a chronic problem, but something where

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 sit. Mamma would get busy and -- you know, she
- 2 wasn't -- she was a doer, not a sitter.
- 3 Q All right. Now, let's get back to you.
- 4 Let me ask you about your health. How about we do
- 5 that real quick. How's your health?
- 6 A I'm in pretty good shape for the shape
- 7 I'm in.
- 8 Q Is that right?
- 9 A Yeah.
- 10 Q Any diagnosed problems, anything you see
- 11 a doctor for?
- 12 A Oh, yeah, I go annually to see him.
- 13 Q Do you take any medications --
- 14 A Oh, yeah.
- 15 Q -- regularly? Are you going to share
- 16 with me?
- 17 A Huh?
- 18 Q Are you going to share with me what
- 19 they're for?
- 20 A Well, yeah. I take a little Vasotec
- 21 pill every morning for -- to control my blood
- 22 pressure.
- 23 Q Vasotec?

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HARTOLDMON0035783

1 A I was a borderline blood pressure
 2 problem, but that controls it. I'll -- I got a
 3 under active thyroid. I take a little Synthroid.
 4 Q What's it, Synthroid?
 5 A Synthroid pill for my thyroid, take one
 6 of them every day.
 7 And just because somebody said it was
 8 good for you, I take an aspirin every day. And
 9 it's worked so far, so I'm going to keep doing
 10 that.
 11 Q That's not diagnosed or anything, that's
 12 just something you --
 13 A Huh?
 14 Q That's not something the doctor told you
 15 to do?
 16 A No.
 17 Q I mean, that's not something that's
 18 prescribed?
 19 A No, but I take one every day.
 20 Q Let me ask you this: So, we've moved
 21 through your family you grew up with?
 22 A Right.
 23 Q Now, let me just ask you about your wife

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1 A He went to Alabama.
 2 Q Alabama?
 3 A (Witness nods head.)
 4 Q Are you an Alabama football or sports
 5 family then?
 6 A He didn't play -- he was a sports fan,
 7 but he didn't play at the University of Alabama.
 8 He played high school ball at Wellborn and --
 9 Q See, I've never seen anything like the
 10 Auburn, Alabama deal, until I came down to Alabama
 11 and realized that that's really actually a
 12 distinguishing characteristic for a person here, it
 13 actually can be within the first fifteen minutes of
 14 conversation, somebody needs to feel you out and
 15 find out who you support, right?
 16 A Right.
 17 Q So, are you all Alabama fans, I guess?
 18 A Well, yeah, I was before Greg went
 19 there. I've always liked Alabama.
 20 Q And after that Greg went into the
 21 ministry; is that right, after college?
 22 A He -- no, he didn't get his -- he went
 23 to Birmingham Southern for four years.

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1 and your son. And I think that once we get through
 2 that, we'll be done with family health history, if
 3 that's okay. Do you have a preference on who we
 4 start with?
 5 A It's your call to make.
 6 Q Okay. Let me ask you about your son.
 7 Your son grew up at the 3330 Eulaton home?
 8 A Yeah, that's where we were living when
 9 he was born.
 10 Q What year was he born?
 11 A He was born in 1960.
 12 Q So, he was twelve --
 13 A And we lived there for twelve years.
 14 And we moved down to the Coldwater place. I built
 15 a new house down there.
 16 Q Did you tell me your son's name? Have I
 17 asked you --
 18 A Greg.
 19 Q Greg, okay.
 20 A And he lived there until he went off to
 21 school.
 22 Q Where did he do his undergrad for
 23 college?

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1 Q Okay.
 2 A Okay. And then he went to the
 3 University of Alabama and started law school.
 4 Okay. And he finished his first year of law school
 5 and was into his second year, just started, and he
 6 felt like that God had called him into the
 7 ministry. And he came and talked to me about that.
 8 And we -- I told him that, you'll have to make that
 9 decision. That's not my decision to make. If you
 10 feel like God wants you in the ministry, you and
 11 God work that out.
 12 So, he dropped out of law school and
 13 went to Emory and got a degree in theology. And
 14 then he went into full-time ministerial church
 15 work. And was in that for -- while he was in
 16 school at Emory, he was -- he was youth director at
 17 churches in and around Atlanta and what have you.
 18 He was youth director at Allgood United Methodist,
 19 Allgood Road United Methodist Church two or more
 20 years. And he was the youth director at another
 21 church somewhere.
 22 And then he was a full-fledged minister
 23 in the United North Alabama Conference of the

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1 United Methodist Church. He served three years as
2 associate pastor at Florence First United Methodist
3 Church.

4 And while he was in Florence, at that
5 church, was -- he got married to a minister's
6 daughter who was -- he was the pastor of the First
7 United Methodist Church of Madison, Alabama. Her
8 name was Suzanne Estes. Suzanne was a little
9 younger than Greg and she was still having some
10 school opportunities and had some scholarship --

11 Q That's how I ended up going to
12 Washington.

13 A -- possibilities to go to school, and
14 she chose to -- she wanted to go to the west coast
15 and that's how they wound up --

16 Q In Washington?

17 A -- in Washington, she was going to
18 school out there. So, that's how they -- how he
19 got --

20 Q Are they still married?

21 A No.

22 Q No?

23 A They stayed married three years and --

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1 the first year over and then moved along. And he
2 agreed to that. And that's what he did and he did
3 well.

4 Q Well, good. And how is Greg's health?

5 A Good.

6 Q Greg has no health issues or anything
7 like that?

8 A Listen --

9 Q Does he take medication for anything?

10 A No. He'll try anything. It wouldn't
11 surprise me to hear that he was bungie jumping or
12 anything. He's climbed Mount Ranier. And I'm
13 going out there in August, so I'm going to check on
14 him pretty good. But I talk to him regular. He's
15 in good shape. Health is good.

16 Q He's never been hospitalized for
17 anything?

18 A Well, when he -- yeah, oh, yeah, when he
19 was five years old he had surgery. He had polyps
20 in his colon that they went in and got and what
21 have you. And they checked him every year for five
22 years after that.

23 Q He was five years old and he had polyps

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1 Q Is that how he ended up coming back to
2 Alabama to live with you was --

3 A No, he stayed out there probably another
4 four or five years after he and Suzanne --

5 Q And I guess -- and he's moved back there
6 since he got his law degree?

7 A He moved back to re-establish his
8 residence and go to school.

9 Q Here?

10 A Yeah.

11 Q But now subsequently he's moved back --

12 A He didn't know whether or not he was
13 going to get credit for that first year. But it
14 had been twelve years since he had been down there.

15 Q Sure.

16 A So, he went down and talked to them at
17 the school and they told him that, we can give you
18 credit for it, but it's going to be tough for you
19 to come back and pick up beginning in the second
20 year after twelve years. Said, a lot has changed.

21 Q Sure.

22 A Said, it would be to your advantage and
23 ours, too, but, yours mostly, if you just repeated

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1 in his colon?

2 A (Witness nods head.)

3 Q They were benign?

4 A Yeah.

5 Q Thank heavens.

6 A Benign. But we didn't know that until
7 they got them out.

8 Q Sure.

9 A That's my whole crop crapped up in that
10 one old harry-legged boy and that scared me good.

11 Q Sure. I know it did. And it --

12 A But other than that --

13 Q Those polyps never came back, I guess?

14 A No. We kept -- we kept a good check on
15 him.

16 Q Oh, I bet you did. Any other reason he
17 might have been hospitalized?

18 A Do what?

19 Q Was there any other time that he might
20 have been hospitalized?

21 A Not that I'm aware of.

22 Q Well, I guess we'll move on to your wife
23 and I will try to move through this as quickly as

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1 possible. You said that your wife passed away
 2 eighteen months ago; is that right?
 3 A Yeah.
 4 Q How old was your wife at the time?
 5 A She was born in 1932, she died in 1999.
 6 She was sixty-seven, I think, sixty-six or
 7 sixty-seven.
 8 Q Do you know what her birth date was?
 9 A Huh?
 10 Q Do you know what her birth date was?
 11 A December the 13th, she was born in '32
 12 and died August the 19th of '99.
 13 Q Can I ask you what the cause of her
 14 death was?
 15 A Yeah.
 16 Q What was --
 17 A She died from lung cancer.
 18 Q Lung cancer?
 19 A (Witness nods head.)
 20 Q Was she a smoker?
 21 A Nope, didn't smoke and didn't drink,
 22 never. Mesothelioma caused 100 percent from
 23 asbestos exposure.

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1 it's a renovated courthouse.
 2 Q Renovated.
 3 A She was chief clerk in the commissioner
 4 of licenses office. She had twenty-nine and a half
 5 years service with the county and retired.
 6 She was a fanatic about her
 7 conditioning, her health, she was -- she walked
 8 every day. She exercised every day. She would go
 9 to Oxford Lake, she would walk four miles and
 10 sometimes six every day.
 11 And that's where she got sick. She was
 12 walking one day down there on around the lake and
 13 she came home and she told me, said, there is
 14 something the matter with me. I said, what do you
 15 mean? She said, I -- I was about halfway around
 16 the lake and she said, I couldn't get my breath.
 17 And she said, I thought I was going to die.
 18 And she said, I didn't know if I was
 19 going to be able to get back to the car. And she
 20 said, I just asked God to give me strength to make
 21 it back to the car. And she said, I made it back
 22 to the car. And she said, I don't know what it is,
 23 but there is something the matter with me.

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1 Q Was she exposed to -- knowingly exposed
 2 to asbestos at any time in her life?
 3 A You've been, you've been, you've been,
 4 I've been, he's been. If you ever stood out on the
 5 corner of a busy intersection where there was a red
 6 light, from fifteen years ago, and cars stopped and
 7 put on their brakes, you got exposed to asbestos,
 8 because all brake lining was made from asbestos.
 9 When a car puts on the brake and microscopic fibers
 10 come off of those brake shoes and they're in the
 11 air. Everybody's been --
 12 Q Was she exposed more than most people,
 13 though?
 14 A Probably.
 15 Q She spent a lot of time outside or
 16 around brake pads or --
 17 A She was an employee of the county. And
 18 you know where the courthouse is right down the
 19 street?
 20 Q Sure. The new one?
 21 A Huh?
 22 Q The new courthouse?
 23 A The old courthouse down there. Well,

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1 I said, let's go. We're going to the
 2 doctor, now. So, I carried her to her doctor. And
 3 he determined that there was something in her lung,
 4 just by listening to her breathe and putting his
 5 hand on her back and tapping on her.
 6 So, he sent us immediately from his
 7 office out there at -- beyond the plant, out there
 8 down at -- next to Downey Drugs, where Dr. Cook
 9 was, at that time. Called --
 10 Q What year is this happening in?
 11 A This was in June of '98, summertime,
 12 pretty weather, she's doing what she had always
 13 done, exercising, walking.
 14 He called Dr. Ferguson, who is a chest
 15 doctor, lungs and that sort of stuff. And we
 16 went -- he met us at the emergency room. And he
 17 determined that her left lung was full of fluid.
 18 And he took a big needle and went in her -- into
 19 her back, between her rib cage, into her lung, and
 20 he got a container about this -- (witness
 21 demonstrating) -- tall and about that -- about a
 22 quart of fluid out of her left lung.
 23 And they started running tests on that

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1 stuff. And before they got --
 2 Q Just take your time, sir.
 3 A Before they got through testing her,
 4 they had to do that three or four times.
 5 Q They had to take the fluid out of her
 6 lung?
 7 A Draw the fluid off that lung.
 8 MR. MOORE: Is this really
 9 necessary?
 10 MS. RUTH: No.
 11 MR. MOORE: Do you need to know
 12 anything else about Ms. Curry?
 13 MS. RUTH: I just actually would
 14 like to ask a little bit more about where she grew
 15 up, if that's okay.
 16 MR. MOORE: Why don't we take just
 17 a short break.
 18 MS. RUTH: I'm happy to take a
 19 break.
 20 (WHEREUPON, there was a brief recess.)
 21 BY MS. RUTH:
 22 Q All right, I think we finished all the
 23 headings except for your work history at Monsanto,

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1 I don't know who the customers were for the stuff,
 2 I was just -- I was just running samples on it to
 3 be sure that the grit in the different batches was
 4 like it was supposed to be.
 5 Q I don't want to get bogged down in it,
 6 but can you give me a brief overview of the way
 7 abrasives are made, if you remember, at all?
 8 A Abrasives came from -- they came off of
 9 a ferrosilicon furnace that --
 10 Q What's a ferrosilicon furnace?
 11 A A ferrosilicon furnace is --
 12 Q A furnace filled with ferrosilicon?
 13 A Just off from -- an electric furnace.
 14 You've seen them, a type of furnace at the steel
 15 mill and the iron that came out -- the steel came
 16 out of it.
 17 Q Uh-huh.
 18 A Well, that's the way they tap the
 19 furnace. And that stuff would come out just red
 20 hot and it would be in big blocks.
 21 And they'd take those big blocks, and we
 22 had a crusher-type thing, a hammermill-type thing,
 23 and it busts that up. And then it would go

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1 so that's where we're at.
 2 A Good.
 3 Q And I had six headings. So, five are
 4 down, five down, one to go.
 5 You said I believe in 1950, before you
 6 left to go to war, you started to work at Monsanto;
 7 is that right?
 8 A May the 8th, 1950.
 9 Q May the 8th?
 10 A 1950.
 11 Q And what did you start doing at that
 12 point?
 13 A I hired in -- my first job was -- I was
 14 running samples on abrasive.
 15 Q And what's abrasive?
 16 A Abrasive is the material that's used
 17 in -- a grinding rock, abrasive material. It's
 18 a --
 19 Q Who do you sell it to? Who would buy
 20 it?
 21 A I think the steel producing folks
 22 bought -- was the -- I think that. Now, I don't
 23 know. I was eighteen, nineteen, twenty years old.

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1 through --
 2 Q So, it came out as a solid or it came
 3 out kind of molten?
 4 A It came out as a -- it came out as a red
 5 hot molten material.
 6 Q Is it a --
 7 A And then they let it sit up and cool.
 8 Q Is it in a mold of some sort?
 9 A Yeah, yeah. When it cooled, it hardened
 10 like concrete or something like concrete. Then
 11 they would take those big chunks and throw them in
 12 a crusher and crush it up. And then they'd run
 13 the -- into smaller lumps. Then they would run
 14 those lumps through another crusher and crush that
 15 up. And then it -- then right on through different
 16 things to crush it, till it would be different
 17 sizes, particles.
 18 Q Is it like a powder?
 19 A Yeah. And then they'd screen it, run it
 20 through screens. And the screens would shake and
 21 the different particles -- the bigger screens were
 22 at the top and the smaller screens at the bottom
 23 and you'd get five or six different sizes,

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1 particle-wise, of the abrasive material that came
 2 from those chunks being -- all that being done to
 3 those chunks.
 4 That's -- and then that material, which
 5 would be put in wooden kegs with a paper liner in
 6 them. And they -- and it was heavy. And then
 7 we -- what I would do, the folks running the
 8 screens would get the -- get the product off of the
 9 screens into the barrels and they'd line the
 10 barrels up. My job was to go out there with a
 11 thief and take a sample out of every barrel of the
 12 abrasive material sitting on the floor, for that
 13 particular batch.
 14 Q Did you call it a thief?
 15 A Huh?
 16 Q You went around with a thief?
 17 A A thief. It was kind of like a -- one
 18 pipe and a smaller pipe down in it. And the outer
 19 pipe had holes where it could come into the inner
 20 pipe and you could take a handle and push it down
 21 all the way to the bottom of the keg so you'd get a
 22 sample, you would get a good sample of the whole
 23 keg at every level down through there. And pull

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1 real slick, put the primer on it and sand that.
 2 That's what the different grits --
 3 Q Were the crushers closed systems or open
 4 systems? In other words, did it kind of -- could
 5 you see it actually -- could you see the crushing
 6 taking place or did it go into a closed system,
 7 everything shut down and you didn't --
 8 A You asked me to tell you the process.
 9 Q Yes.
 10 A I've told you the process. I didn't
 11 follow the process and look at it. My job was to
 12 go out there and get a sample out of every one of
 13 them barrels and run that sample, and that's what I
 14 did.
 15 And as far as following it all the way
 16 through, it was enclosed and you couldn't see what
 17 was going on. Those crushers were doing their job,
 18 but when it got to the end and come over in the --
 19 Q Stuff just --
 20 A -- hopper, it was a bunch of different
 21 sizes and had to come through the screens and be
 22 shook and screened and separated. And then once
 23 the material was separated and in the barrel, I was

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1 that out and you'd pour it up in a sample jar and
 2 you'd carry it in there to a little shaker and
 3 you'd pour it in and it would shake, shake
 4 everything, to be sure that there wasn't more than
 5 a trace of oversized particles --
 6 Q I see.
 7 A -- in that keg of stuff.
 8 Q So, there were actually different -- was
 9 each size a different product, essentially?
 10 A Oh, yeah, different grits. They called
 11 it different grits, like sand paper.
 12 Q Uh-huh.
 13 A Sand paper, you can buy sand paper
 14 that's real course or you can buy sand paper that's
 15 extra fine that you just -- you know, you can --
 16 this table has been sanded with good, fine sand
 17 paper, and a finish put on it. And I'm working on
 18 a '35 Ford car right now and I use real --
 19 Q A '35, did you say 1935?
 20 A Yeah, 1935 four door, slant back with a
 21 spare tire on the back, rebuilding it, or having
 22 it -- and painting it. In order to get a good
 23 paint job on it, you've got to sand it and make it

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1 the guy that run the samples.
 2 Q I see. Do you know -- and you may not
 3 know this, since you were on the outside
 4 sampling -- do you know if the guys who worked on
 5 the inside part who were actually working the -- I
 6 guess they were operators --
 7 A Yeah.
 8 Q -- who were working the machines, did
 9 they wear masks?
 10 A Yes.
 11 Q Yes?
 12 A Yes. They were -- it was diaper
 13 cloth-type masks that the fellows running the
 14 screens wore.
 15 Q Okay. Like a cloth diaper-type thing?
 16 A Huh?
 17 Q Like a cloth diaper, is that what you
 18 said?
 19 A Yeah, it was diaper -- it was diaper
 20 material. Of course, it wasn't like the Huggies
 21 today. Now, diapers have changed, 'hon.
 22 Q Sure.
 23 A Everything changes.

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- 1 Q Sure.
- 2 A From -- that was 1950 now. And they
- 3 were -- they were utilizing the -- the equipment
- 4 that was state-of-the-art for that particular job
- 5 and --
- 6 Q I'm going to object, that's
- 7 non-responsive, but, thank you.
- 8 Do you know, are they still making
- 9 abrasives over there?
- 10 A No.
- 11 Q Do you know --
- 12 A The furnaces left -- the furnaces in the
- 13 Anniston plant shut down probably before 1960 and
- 14 were gone. But you asked me what did I start out
- 15 doing and that was my first job there.
- 16 Q Did you go right from there to the
- 17 military or did you work in another department?
- 18 A I didn't go -- I did that for, I don't
- 19 know, a few months. And then I was a pilot plant
- 20 operator in the research department.
- 21 Q Pilot plant?
- 22 A Uh-huh.
- 23 Q What, in the research department?

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- 1 up with new products maybe?
- 2 A Yeah.
- 3 Q And then this was sort of the next step
- 4 in trials about whether or not it made it to an
- 5 actual product?
- 6 A Yes.
- 7 Q And how long did you work in that group?
- 8 A Well, I was doing that, I was running
- 9 pilot plants for the research department, I guess
- 10 when I got drafted in service in 1951.
- 11 Q Do you remember any of the products that
- 12 you worked on?
- 13 A Yeah, yeah.
- 14 MR. MOORE: Are you talking about
- 15 before he was drafted?
- 16 MS. RUTH: Yes.
- 17 THE WITNESS: One of them was
- 18 called HCL-80. And it turned out to be something
- 19 of a bleach maybe. I don't know what the -- what
- 20 the trade name wound up being, but it was a -- it
- 21 may have been Clorox or Purex or something of that
- 22 nature or it was in that family of products. And I
- 23 worked -- I ran an isocyanate operation at --

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- 1 A Yes.
- 2 Q Really, what does that mean?
- 3 A Well, at that particular time, we had a
- 4 research department in the Anniston plant.
- 5 Q Do you know what they were researching?
- 6 A Huh? 1950?
- 7 Q I mean, do you know what they were
- 8 researching, what was --
- 9 A I don't -- I couldn't tell you all the
- 10 things that they were researching, but any time
- 11 that they came up with a -- a product that they --
- 12 that they thought was going to work and that they
- 13 wanted to try it in something bigger than a beaker
- 14 with a Bunsen burner or whatever in the lab, we'd
- 15 build a little pilot plant or they would and we
- 16 would -- we would run it on a little larger scale
- 17 than what they could run it in a laboratory.
- 18 Q I see.
- 19 A To see what -- see what we was going
- 20 to -- see what it was going to do and what -- you
- 21 know, how it was going to turn out.
- 22 Q So, let me see if I understand and you
- 23 tell me if I'm misstating this. They were coming

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- 1 BY MS. RUTH:
- 2 Q I'm sorry, what kind of --
- 3 A TDI, tri-diethyl isocyanate, I believe.
- 4 What it was, was it was foam insulation is what it
- 5 wound up being. I was the -- I ran the pilot plant
- 6 on that.
- 7 Q Do you know if either one of these
- 8 became final products that --
- 9 A Yeah.
- 10 Q -- they ended up producing there?
- 11 A Yeah, we produced -- we produced that
- 12 product --
- 13 Q The foam --
- 14 A -- on a larger scale.
- 15 Q The foam insulation one you mean or
- 16 both?
- 17 A As a regular -- after we moved it from
- 18 the research, we moved it out in the plant. And I
- 19 ran it -- I ran it, after I came back from service,
- 20 I ran that job on a larger scale out in the plant
- 21 as an operator.
- 22 Q And that's the foam insulation --
- 23 A Yes.

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- 1 Q -- one?
- 2 A It is.
- 3 Q Do you know if that HCL-80, if I have
- 4 that right, as the name?
- 5 A I don't know what that turned out to be.
- 6 It was a -- it was a part of or a derivative or a
- 7 contributing product that went into the making of
- 8 something like Clorox, because it had -- it had
- 9 that smell.
- 10 Q Do you know, though, did Monsanto end up
- 11 making that as a final product?
- 12 A I don't know.
- 13 Q Do you know if they made it out of the
- 14 pilot plant?
- 15 A But one other product that I worked
- 16 on -- and I don't remember the -- what we called it
- 17 at that particular time, but the off-the-shelf name
- 18 for it, when it was -- when it was sold to the
- 19 public was detergent ALL.
- 20 Q ALL?
- 21 A Yeah, I was -- I ran that on a pilot
- 22 plant.
- 23 Q Did you run that before you left for the

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- 1 there.
- 2 Q Okay. How about, if you would, just
- 3 give me a quick explanation, since you ran the
- 4 pilot plant you probably can do that, on the foam
- 5 insulation product that you ran the pilot for. And
- 6 then you said when you came back from the service,
- 7 you ran the production?
- 8 A We ran it and we called it TDI.
- 9 Q TDI?
- 10 A And now, don't hold me to this --
- 11 Q Okay.
- 12 A -- but the best of my remembrance, it
- 13 was tri-diethyl isocyanate, I believe, something of
- 14 that -- it was an isocyanate.
- 15 Q Isocyanate?
- 16 A And it turned out to be a foam-type
- 17 material used in insulation.
- 18 Q Okay. Did it start out as a liquid or
- 19 were the ingredients, raw materials, liquid? Why
- 20 don't you just run through real quick how you made
- 21 it for me.
- 22 A We started with orthene as the solvent.
- 23 We would make a -- we would make up a little amine

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- 1 service?
- 2 A Yeah, that was first. And it's hard to
- 3 remember every little --
- 4 Q Sure.
- 5 A Because we had a lot of chemists working
- 6 on different things and --
- 7 Q Do you know how long y'all produced ALL?
- 8 A We didn't produce -- we didn't mass
- 9 produce ALL at the Anniston plant.
- 10 Q I see.
- 11 A That's what that -- it -- it went to
- 12 Krummrich or one --
- 13 Q I see.
- 14 A -- of the other Monsanto plants.
- 15 Q Once you figured out it worked?
- 16 A But it was a Monsanto product,
- 17 ultimately, that was sold on the open market to the
- 18 public.
- 19 Q But it wasn't produced in Anniston in
- 20 the end, when it --
- 21 A It was --
- 22 Q Once it got out of the pilot --
- 23 A It was researched and it got its start

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- 1 mix in a little mix tank. Amine was a flake-type
- 2 material you would add to a heated orthene. Then
- 3 we had a primary and secondary reactor. The
- 4 primary reactor, you'd put orthene in the reactor
- 5 and you'd feed phosgene gas into that reactor?
- 6 Q Phosene (phonetic).
- 7 A Phosgene.
- 8 Q Phosgene?
- 9 A P-H-O-S-G-E-N-E, kind of gas that they
- 10 used in World War I and what have you, that and
- 11 chlorine.
- 12 Q Did they use it in World War I?
- 13 A Yeah.
- 14 Q For what?
- 15 A The Germans did.
- 16 Q Oh, okay. And you add --
- 17 A But we didn't make phosgene gas.
- 18 Q I understand.
- 19 A That was a raw material that we bought.
- 20 Q I understand.
- 21 A It came in cylinders just like acetylene
- 22 and oxygen and what have you.
- 23 Q The gas can?

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- 1 A Yeah. And argon and ammonia and all
2 those gases come in cylinders.
3 Q Just out of curiosity, how do you get it
4 all -- does it have like a tap on it that you put a
5 hose into or how do you get the gas out of the
6 container?
7 A You pipe it up.
8 Q Pipe it with?
9 A With pipe fitting.
10 Q With pipe fittings. Does it have like
11 a -- does the container it comes in have a -- oh,
12 it comes in on the tank cars; is this right?
13 A Comes in in cylinders.
14 Q Cylinders?
15 A Yeah. You ever seen a welder weld?
16 Q Yes.
17 A And you see his tanks for his cutting
18 torch?
19 Q Yes.
20 A What have you?
21 Q Yeah.
22 A Acetylene tank and an oxygen tank.
23 Q I see.

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- 1 Q Cooking it? Does the reactor cook it,
2 essentially? Or what does the reactor do? What is
3 a reactor's function?
4 A It's just like a -- it's a glass-lined
5 vessel, like a big pot.
6 Q I know you think I'm crazy. I'm
7 actually interested, I'm not just asking for the
8 sake of asking. I like to get a visual picture.
9 A And then you put the gas, the phosgene
10 into the primary reactor, just into the orthere.
11 And then the excess would be piped over below the
12 liquid level into the secondary reactor. That
13 would be the batch that I'd already had the amines
14 added to it. And it went through a chemical
15 reaction there.
16 And then, the excess phosgene and some
17 HCL that was -- that come off of it, was carried by
18 piping out to a scrubber that had a caustic mix
19 material in the scrubber that circulated, pumping
20 through in the -- into a scrubber-type operation.
21 And it dropped down through there. And the excess
22 gas and HCL would go out to the scrubber and that
23 caustic solution would neutralize that.

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- 1 A It came in cylinders, just like that.
2 Q Okay. And then I guess there is a
3 closed -- is there a --
4 A There is a valve on top of every
5 cylinder. And you -- (witness demonstrating)
6 Q I'm sorry.
7 A We had the fittings to hook up and we'd
8 add phosgene to the orthere and then it would come
9 out of the primary reactor over into the secondary
10 reactor. The secondary reactor would be a batch
11 of -- we'd add -- we'd add that amine mix to that
12 primary reactor, and phosgenate it and then
13 transfer it to the secondary reactor. And then
14 we'd start phosgenating another batch of orthere in
15 the primary reactor and it would bubble out and go
16 over into and down below the liquid level in the
17 secondary reactor, and we'd get a chemical reaction
18 there.
19 Q Is the reactor --
20 A You asked how we made it, now that's --
21 Q Now, I'm going to ask you this: Is the
22 reactor basically cooking?
23 A Huh?

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- 1 Q And then would you --
2 A And then --
3 Q Did you vent after it went through the
4 scrubber? Was it --
5 A Then we'd transfer it to the still and
6 we'd distill it.
7 Q What's --
8 A That's where you'd -- that's kind of
9 like putting a tea kettle on a stove. And you --
10 but you pipe the spout up and enclose it. You have
11 a vacuum, you've got a jet and all of that, and a
12 vacuum on it, and you pull a vacuum on it and turn
13 the heat on it, use the steam coil in the vessel to
14 heat it up, and then it -- it would come up that
15 column, go into a condenser, it would condense into
16 a liquid and come off as a liquid. And you have --
17 and we got
18 Q And that would --
19 A That was the finished product that was
20 isocyanate, it was in a liquid.
21 Q So, that's your finished product?
22 A Yeah.
23 Q And it's a liquid. And how do you make

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1 it foam?
 2 A They added something else to it
 3 somewhere else to make it foam.
 4 Q Right there at the plant --
 5 A Isocyanate.
 6 Q -- or you -- no?
 7 A No, no.
 8 Q That got shipped off and somebody
 9 else --
 10 A That would go to the folks that were
 11 making the foam. I don't know what -- I don't know
 12 what the other product was, but the isocyanate was
 13 the primary product that went into the making of
 14 the foam.
 15 Q And was there any waste? Did the
 16 process of making this product generate any waste?
 17 A No. We didn't have any -- the waste --
 18 the waste went to the scrubber and was neutralized
 19 by the caustic water and what have you.
 20 Q And then how did -- and that was --
 21 A That was just -- that was a gas, it
 22 went -- it went out there in a gas form and it was
 23 all neutralized and --

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1 A I was the man, 'hon, I was the man. And
 2 it was -- it was just out of the pilot plant stage.
 3 It was -- it was not a great big -- you know, it
 4 was not a thousand gallon vessel.
 5 Q I see.
 6 A It was maybe -- the vessels we were
 7 making it in was probably -- it was a little bigger
 8 than a fifty-five gallon drum maybe, less than a
 9 hundred gallons.
 10 Q Okay.
 11 A So, it was not -- it's not huge, it was
 12 just another step past the pilot plant.
 13 Q I see. Wasn't a full commitment yet --
 14 A No, it was not --
 15 Q -- and making it in use?
 16 A -- yet a full -- it was still in the
 17 experimental stage.
 18 Q I see.
 19 A And I was still working for the research
 20 folks, but just on a little larger scale than the
 21 pilot plant.
 22 Q I see. Well, then I guess we can
 23 probably wrap up that discussion in a few

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1 Q And then vented?
 2 A Huh?
 3 Q Then it was vented after it was
 4 neutralized or then it --
 5 A Yeah.
 6 Q And just maintenance-wise, how did you
 7 maintain your -- you ran this. I mean; is that
 8 right?
 9 A I was the operator on the job.
 10 Q You were the operator. Were you the
 11 chief operator?
 12 A No, I was just an operator.
 13 Q Just an operator. At the end of every
 14 shift, was there like a clean-up protocol or
 15 anything like that? You know, were there three
 16 shifts a day; is that right?
 17 A Yeah.
 18 Q You know, how did you end your shift
 19 before the next crew came in?
 20 A Well, it was a one-man operation.
 21 Q Oh, it was?
 22 A Yes.
 23 Q So, you were the man on your shift?

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1 questions.
 2 Did you, periodically, have to clean
 3 that plant out? I mean, the tanks that you kept
 4 the -- what do you call them, the reactors, did you
 5 have to wash out the reactors ever or --
 6 A There wasn't -- there wasn't anything
 7 left.
 8 Q I see.
 9 A Once we transferred it -- they were
 10 glass-lined vessels. And you moved the batch
 11 along. It all went. And when you --
 12 Q There was no residue?
 13 A And when you looked in the vessel you
 14 saw, you know, slick, blue glass lining. So, there
 15 was -- we didn't have the -- there was no waste
 16 from it; it's all product.
 17 Q I see. So, there was no residue that
 18 you're aware of --
 19 A No.
 20 Q -- in the --
 21 A We recovered --
 22 THE WITNESS: Do I need to tell her
 23 about the --

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1 BY MS. RUTH:
 2 Q Go ahead and tell me. Now that you've
 3 started, yeah, go ahead and tell me.
 4 A We had a chief operator in our plant
 5 that was a one-legged man. He lost a leg in a
 6 motorcycle wreck when he was a young man. And he
 7 was a -- he was a married man, but him and his wife
 8 never had children, but he was a unique character.
 9 Q Okay.
 10 A I mean, he was -- everybody knew Red.
 11 Red Haynes was his name.
 12 Q Okay.
 13 A And, Red, from time to time, over the
 14 life of my working life at the plant in Anniston,
 15 we'd have an open house for the families of the
 16 Monsanto folks and some visitors.
 17 Q You and your wife, at your house?
 18 A Annually, for several years, we had an
 19 open house every year and invited folks to come and
 20 see where we worked, you know, and what we did.
 21 Q Oh, Monsanto had an open house?
 22 A Monsanto.
 23 Q Oh, I see. I thought you meant that you

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1 hog, they recover everything but the squeal and
 2 that --
 3 Q That was your --
 4 A That was it. And that's the way he
 5 explained the operation of his department --
 6 Q I see.
 7 A -- was, we get a raw material in here in
 8 that tank car down there and we start with that.
 9 Q I see.
 10 A And it goes through the whole process
 11 and said, we recover everything but the squeal.
 12 And that's the way -- that's the way many of the
 13 operations and jobs are in a chemical plant, you
 14 start with a given and you wind up with nothing
 15 left, it's all product or what have you.
 16 Q Okay. Let me ask you this: Did they --
 17 what is it? TDI, did that ever become a full-blown
 18 manufactured product there at the plant or did
 19 eventually they stop producing it there in
 20 Anniston?
 21 A They stopped producing it, eventually.
 22 Or if they produced it, they were producing it at
 23 another plant or something. We --

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1 and --
 2 A When I say "we" --
 3 Q You mean you and the company?
 4 A I'm Monsanto, we, we. And Red was one
 5 of the fellows that was a spokesperson for the
 6 department he worked in, explaining to the mamas
 7 and the children and the guests what went on in
 8 that part of the chemical plant. Because a lot of
 9 folks just don't understand. If you never worked
 10 in a chemical plant, it's an experience and it's
 11 different and --
 12 Q Well, you can tell I never did. The
 13 questions I'm asking, it's pretty clear I never
 14 did.
 15 A But Red would explain the operation of
 16 his department and he said --
 17 Q What was his department?
 18 A He worked in the biphenyl and aroclor.
 19 He said, the best way I can explain this where you
 20 can understand it is, is like the stockyards in
 21 Chicago, he said, they get a load of hogs in there.
 22 And the hog is the raw material, so, they start
 23 with the hog. And when they get through with the

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1 Q They didn't produce it in Anniston?
 2 A No.
 3 Q Do you know what year they stopped
 4 producing it in Anniston?
 5 A I don't know where -- I don't know where
 6 they produced it.
 7 Q No, I'm asking you in Anniston, not as a
 8 company, just at the Anniston plant.
 9 A Ask me the question again.
 10 Q I'm sorry. Do you know what year they
 11 stopped producing at the Anniston plant --
 12 A Oh, what year?
 13 Q -- the TDI?
 14 A It was some time in the mid '50s.
 15 Q In the mid '50s?
 16 A I couldn't tell you exactly.
 17 Q So, probably, they only produced it for
 18 about five years?
 19 A Yeah, something like that.
 20 Q What did they do with the manufacturing
 21 portion, you know, the equipment? Did they turn it
 22 over to produce something else or did they just --
 23 A Yeah.

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1 Q Yeah, they did?

2 A Glass-lined vessels, those -- we used

3 them for several different products. There was two

4 or three different lines of isocyanates, TDI was

5 what I told was tri-diethyl isocyanate or something

6 like that. Then there was an ODI, it was an

7 octadecyl isocyanate. And the only difference in

8 the two products was that there was the solvent

9 that you used. We used orthene and TDI, we used

10 toluene and ODI. So --

11 Q Did you always --

12 A But eventually that all did get torn

13 down and something else built there.

14 Q What did they typically do with

15 equipment when they tore something down? Did it go

16 to the landfill or did it --

17 A Well, that that was usable --

18 Q -- get --

19 A -- and that they could use in another

20 operation of the --

21 Q They did?

22 A -- they'd salvage that.

23 MR. MOORE: Are we talking about

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1 A No, the TDI was -- that was the product.

2 Q I know, but when they stopped

3 manufacturing TDI -- I guess what I'm just asking

4 you is: Do you know one way or the other -- as I

5 understand it, what you've told me thus far -- and

6 you can correct me if I'm wrong -- as I understand

7 it, manufactured TDI until like the mid '50s. In

8 the mid '50s you stopped manufacturing TDI?

9 A Yeah.

10 Q In the mid '50s, some of the equipment

11 that was used to manufacture TDI went to other

12 isocyanate or isocyanate product --

13 A Yeah.

14 Q -- manufacturing lines or --

15 A Possibly other products --

16 Q -- scrapped --

17 A -- that --

18 Q -- or other products or scrapped. And

19 you're not sure, if it didn't meet one of those

20 three criteria and it was waste, you're not sure

21 where that waste went; is that right?

22 A There's always waste, 'hon. There's

23 always -- there's always -- we're a waste society

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1 the early '50s time frame?

2 MS. RUTH: Yes.

3 THE WITNESS: Yes.

4 BY MS. RUTH:

5 Q And anything else, if it wasn't usable,

6 did it go to the landfill; is that right?

7 A Mostly --

8 Q Or the dump or --

9 A If it was -- if it had scrap value to

10 it, if it had scrap value to it, it was cleaned up

11 and scrapped.

12 Q Sure.

13 A I don't -- that's the best of my

14 recollection. You know, I was a young employee in

15 the early '50s and what have you; I don't know

16 exactly what happened to all that stuff, I just

17 know that we were evolving as a plant. We were

18 growing. Things were changing. And I knew about

19 what was going on in the areas that I was working

20 in.

21 Q Sure. So, you don't know if any of that

22 stuff went to the landfill or not when they tore it

23 down, the TDI --

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1 and we all create some --

2 Q Sure.

3 A -- every day. So, there was some there.

4 The pipes, the pipes were insulated, because you're

5 dealing with hot material.

6 Q Sure.

7 A When you dismantle an operation or a

8 plant or something, there's old insulation and what

9 have you that was on the pipe. I'm sure that

10 that -- that waste wound up at the landfill or the

11 dump, as we called it.

12 Q Sure. But you don't have any

13 firsthand --

14 A But for me to sit here and tell you

15 what - what particular thing wound up there, I

16 can't -- I can't recall that.

17 MR. MOORE: Why don't you ask a

18 couple of questions to clarify whether the

19 isocyanate products were manufactured in commercial

20 quantities or whether they were large pilot plant

21 kind of operations, just so the record will be

22 clear?

23 MS. RUTH: For you? You can ask

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1 that question when it's your turn, if you would
 2 like.
 3 MR. MOORE: It would be much
 4 easier if you did it right now.
 5 MS. RUTH: Is that right?
 6 BY MS. RUTH:
 7 Q Actually, I had another question that I
 8 wanted to ask you first. On the isocyanate
 9 products, you were saying that some used orthene,
 10 some used toluene, and I don't remember what else.
 11 Some used --
 12 A That was essentially the two --
 13 Q The two --
 14 A -- solvents --
 15 Q -- orthene and toluene?
 16 A -- that were used in the manufacturing
 17 of isocyanate.
 18 Q And then all of them used the phosgene
 19 gas?
 20 A Yeah.
 21 Q And to make David happy, were they
 22 manufacturing these -- were all of them a step up
 23 from -- how many isocyanate products do you think

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1 A Yeah.
 2 Q So --
 3 A But when we was running both -- both
 4 operations at the same time, I would run one or the
 5 other.
 6 Q And who would be the other person
 7 running?
 8 A Another operator.
 9 Q I mean, do you know who that would have
 10 been? Was it generally the same person?
 11 A Buster Kenerley was an operator for the
 12 research department. Harold Forbes was an operator
 13 that ran isocyanates. That's two that I remember
 14 right off.
 15 Q Were they about your age?
 16 A Harold Forbes went to work three days
 17 after I did. Buster had been there -- Buster
 18 was -- he'd been there a long time when I went
 19 there. He was -- he was of my dad's generation,
 20 so --
 21 Q Do you know if either one --
 22 A My dad had been there twenty-five years
 23 when I went to work there, so --

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1 that they were being manufactured?
 2 A Those are the two that I remember.
 3 Q There were two?
 4 A That I worked with.
 5 Q Were they being manufactured about the
 6 same time?
 7 A Yeah.
 8 Q Were they being manufactured in
 9 facilities of about equal size?
 10 A Yes.
 11 Q In separate facilities?
 12 A Yes.
 13 Q Did they cease manufacturing both types
 14 at the same time?
 15 A Pretty close.
 16 Q Pretty close?
 17 A But maybe not in the same week or the
 18 same month. But sometimes we would be running one
 19 of them and not the other one, and then we'd shut
 20 that one down and we'd run this one for awhile.
 21 Q Now, were you involved in running both?
 22 A I ran them both.
 23 Q You ran them both?

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1 Q Do you know if either one of them is
 2 still alive?
 3 A Forbes is.
 4 Q Forbes is.
 5 A Buster's dead.
 6 Q Do you know how Buster died?
 7 A Got killed in a car wreck.
 8 Q Okay. So, if they shut down the toluene
 9 isocyanate product shortly after the orthene one,
 10 which is the one that started out with; is that
 11 right?
 12 A (Witness nods head.)
 13 Q Would it have made sense to send the
 14 materials you were using in the orthene product to
 15 the toluene product line or do you think they
 16 probably disposed of those materials? In other
 17 words, when you ceased manufacturing -- orthene was
 18 the first one to shut down; is that right? I'm
 19 just going to call it by the distinguishing
 20 thing --
 21 A Okay. They -- I think it was within --
 22 in the same year --
 23 Q Within the same year?

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1 A -- both products were -- they quit
 2 making them.
 3 Q And when orthene was shut down, did they
 4 make the toluene production line bigger?
 5 A No.
 6 Q Did they replace any of the reactors
 7 with some of the reactors from --
 8 A No.
 9 Q So where, if they didn't dispose of the
 10 reactors that were used in the orthene production
 11 line --
 12 A They were still sitting there all during
 13 the time that --
 14 Q They were just sitting there?
 15 A -- that the ODI plant was running.
 16 Q The ODI?
 17 A Octidecyl isocyanate --
 18 Q So, they stayed --
 19 A With the toluene as the carrier.
 20 Q So, they didn't break down one plant
 21 until they broke down both plants?
 22 A Right.
 23 Q We're running a little low on time, so

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1 BY MS. RUTH:
 2 Q Would they have taken --
 3 A I think that they had scrap value and if
 4 they were, you know, cleaned up and decontaminated
 5 with the proper -- with the proper procedure, they
 6 were probably -- had scrap value and were sold for
 7 scrap. I don't know.
 8 Q Do you know where they would store them
 9 until they were sold for scrap?
 10 MR. MOORE: Object to the form.
 11 THE WITNESS: Do what?
 12 BY MS. RUTH:
 13 Q Do you know where they would have stored
 14 them, if they were to have stored them?
 15 MR. MOORE: Same objection.
 16 BY MS. RUTH:
 17 Q If they were going to be sold for scrap?
 18 A Well, we had a -- we had an area where
 19 we kept spare -- spare things and -- over sort of
 20 in the middle of the plant, after -- after the
 21 furnaces shut down in the middle '50s, that area in
 22 there was used as a storage area for rebuilt pumps
 23 and motors and --

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1 let's move along here. Actually, let me just
 2 finish that thought.
 3 When they broke those down, broke both
 4 of those plants down, you're not clear what
 5 happened to the materials?
 6 A (Witness shakes head.)
 7 MR. MOORE: Materials, you mean
 8 the --
 9 MS. RUTH: Equipment.
 10 MR. MOORE: -- equipment?
 11 THE WITNESS: The equipment, I'm --
 12 I couldn't tell you exactly where that wound up.
 13 BY MS. RUTH:
 14 Q So, you don't know if it was reused or
 15 if it was disposed of?
 16 A I don't know.
 17 Q If it was disposed of, you think it
 18 would have gone to the landfill, but you're not
 19 sure?
 20 MR. MOORE: Object to the form.
 21 THE WITNESS: No, I don't think --
 22 I don't think they would have buried vessels at the
 23 landfill.

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1 Q Is that a --
 2 A -- spare parts and vessels and coils
 3 that went in vessels and -- out -- stuff that could
 4 be stored outside.
 5 Q Okay, you've answered my question. I
 6 was going to ask you if it was covered over.
 7 A No, it was in an --
 8 Q Just an open --
 9 A -- outside storage area.
 10 Q And was it lined or concrete? Was there
 11 concrete under it or was it basically just like a
 12 field area?
 13 A It was a field area.
 14 Q Okay. We'll move along now. Hopefully,
 15 I don't have too many more stops.
 16 Where did you go from the pilot plant?
 17 Or, I'm sorry, from the step up from the pilot
 18 plant, which was the TDI/ --
 19 MR. MOORE: I think you might have
 20 had it right the first time.
 21 THE WITNESS: I probably -- '50s,
 22 middle '50s or so. I ran several more, several
 23 more jobs. I worked in an area called special

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- 1 products for four or five years, and was making a
 2 number of different -- different things. Made
 3 ferric orthophosphate on a press.
 4 BY MS. RUTH:
 5 Q Is that a solid product?
 6 A Yeah.
 7 Q Yeah?
 8 A Yeah. Well, it was a liquid going
 9 through into the press, came out as a solid. I
 10 made monopotassium phosphate on a calciner, what
 11 have you, made some TSP, trisodium phosphate on a
 12 calciner, made some micronet in a crusher bomb.
 13 Ran the sterox plant, which was a liquid --
 14 Q Run -- I'm sorry?
 15 A S-T-E-R-O-X, sterox plant, which was a
 16 liquid soap.
 17 Q Real soap, the kind of soap -- was it
 18 the kind of soap that you keep next to your sink?
 19 A Dishwashing soap. That's --
 20 Q All this is under special products?
 21 A You know, a lot of folks use -- use
 22 products that I helped --
 23 Q Sure. This is all special products,

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- 1 Q I understand.
 2 A -- in the research and the aroclor and
 3 biphenyls, over to that --
 4 Q I get it. So, you actually went back to
 5 the same --
 6 A I went back over to the other side of
 7 the plant --
 8 Q I see.
 9 A -- and worked --
 10 Q Is this about 1960 then maybe?
 11 A This was -- no. This was probably in
 12 the beginning of '56, because -- and the reason I
 13 know that is because when -- in '57, they built the
 14 niran plant to make parathion, and I left the
 15 biphenyl aroclor area and went and I was in the
 16 start-up crew and worked till '59 in the niran
 17 department. So, it had to be '56. I went back to
 18 the other side of the plant in the biphenyl aroclor
 19 for about a year.
 20 Q Okay. So, you were only in the biphenyl
 21 aroclor area for about a year?
 22 A As an operator.
 23 Q Did you go back there again as something

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- 1 though?
 2 A Yeah.
 3 Q All the things you're working on?
 4 A Yeah.
 5 Q How many years -- are there more? I'm
 6 sorry.
 7 A I probably -- I probably did that
 8 till -- three or four years.
 9 Q And then where did you go? And we may
 10 have to come back to some of this in more detail,
 11 but let's just go ahead and get through what you
 12 did there and that way we can work on --
 13 A I went back -- I went back to the -- for
 14 about a year to the aroclor biphenyl operations.
 15 Q What do you mean you went back to it?
 16 Had you worked there before?
 17 A Well, no, I -- but I -- that's where I
 18 went.
 19 Q And this is about 1960?
 20 A When I say I went back, special products
 21 was on the other side of the plant.
 22 Q I see what you're saying.
 23 A So, I went back over --

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- 1 else?
 2 A Yes, later on.
 3 Q When would that have been?
 4 A Well, I worked two years in the
 5 parathion department.
 6 Q Is that --
 7 A From '57 to '59.
 8 Q And that's as an operator?
 9 A That's as an operator. In '59, I bided
 10 into the maintenance department and worked nine
 11 years in the electrical department as electrician.
 12 Q So, nine years you worked as an
 13 electrician?
 14 A Yeah.
 15 Q Had you gone to school to be an
 16 electrician or did you apprentice on the side?
 17 A I did apprentice on the job and went to
 18 school, also. Plant sent me to school.
 19 Q They sent you to school?
 20 A Huh?
 21 Q Did Monsanto send you to school?
 22 A Yeah.
 23 Q And all you did was electrical work at

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1 that time?
 2 A Yeah.
 3 Q So, that brings us to like '68, about
 4 1968?
 5 A Yeah.
 6 Q What did you do in 1968?
 7 A That -- that took -- that's when I -- I
 8 was -- that was about the first half of my working
 9 career right there at the plant. Then I moved into
 10 the planning and scheduling on the maintenance
 11 department.
 12 Q So, you stayed in the maintenance
 13 department --
 14 A Yes.
 15 Q -- but you moved from being an
 16 electrician to --
 17 A Yeah, I stayed in the maintenance
 18 department and I worked as a -- worked as a
 19 planner, planning and scheduling maintenance work
 20 for about two years.
 21 Q Let me ask you: Was this a combination
 22 of -- anticipating -- I mean, were you anticipating
 23 work that would need to get done or dealing with

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1 A I was planning the work.
 2 Q I see.
 3 A I was not, at that time, a hands-on
 4 mechanic. I was just a -- I did the planning and
 5 gave a written job plan to the maintenance foreman
 6 and he would take it from there.
 7 Q Was someone else deciding when they
 8 would shut the plant down and then you were
 9 coordinating what would get done in that shutdown?
 10 A Yeah, yeah. The production folks --
 11 Q The production folks?
 12 A -- they're the ones that just told you
 13 when they was going to shut it down. But you
 14 use --
 15 Q How did they know? I mean, was somebody
 16 telling them, we're having some stuff that needs
 17 maintenance or was that their job to know stuff
 18 needed maintenance or --
 19 A How do you know when to get your oil
 20 changed?
 21 Q A little light goes on that says, go get
 22 your oil changed.
 23 MR. MOORE: That's too late.

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1 people calling in and saying, we have a problem,
 2 can we get it scheduled to get fixed?
 3 A Some of both of -- my primary job
 4 function -- see, that plant ran seven days a week,
 5 twenty-four hours a day.
 6 Q Right.
 7 A We maintained the plant -- you know, if
 8 you had an emergency breakdown, you fixed that
 9 first. But in those cases where we could plan the
 10 work and schedule the work and schedule a shutdown
 11 and know what we was going to have to do while the
 12 plant was down, then that -- that's where my job
 13 came. I had to have the materials ready. I had to
 14 coordinate with the production department to get it
 15 shut down and cleaned out and ready for maintenance
 16 to work on. And then we had -- we had to have the
 17 material to do the repairs or replacing the pumps
 18 or whatever, whatever we had to replace, replace a
 19 vessel or replace a pump, replace whatever or
 20 repair them, take them down and rebuild them and
 21 put them back.
 22 Q You weren't actually doing any of the
 23 repairs?

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1 THE WITNESS: But you usually know
 2 between three and five thousand miles, every three
 3 to five thousand miles, you need to get your oil
 4 changed.
 5 BY MS. RUTH:
 6 Q Yeah.
 7 A Common sense. The same -- the same
 8 thought process goes into equipment that runs
 9 twenty-four hours a day, seven days a week; there
 10 comes a time when you've got to shut it down and do
 11 maintenance on it. And so the production folks
 12 knew about how long --
 13 Q So, that was part of your --
 14 A From experience.
 15 Q Was that experience or --
 16 A They knew about how long they needed to
 17 go and let their equipment go before they turned it
 18 over to maintenance to get a overhaul and what have
 19 you.
 20 Q Is that experience or was there written
 21 procedures in place about how often you had to do
 22 overhauls?
 23 A It was experience.

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1 Q Experience?

2 A I don't think there was a written

3 procedure that told us that. It was -- it was a

4 feel for what -- how it had happened in the past.

5 If you know -- if you know a -- that you're going

6 to -- that you're going to get forty thousand miles

7 out of a set of tires, when you get forty thousand,

8 you start looking at them pretty good, you start

9 looking pretty good at your tires, because you know

10 that about -- if you buy a tire that's -- they say

11 is guaranteed for forty thousand miles, at forty

12 thousand miles, you better -- you better take a

13 look -- I'd start looking at thirty-five.

14 Q Right.

15 A And so that's experience.

16 Q I see.

17 A And that's kind of the way it is with a

18 plant operation; if it's been in operation for any

19 length of time, you've got -- you've got a -- you

20 apply common sense and your experience, too, and

21 you come up with a pretty close to the time -- time

22 to shut this thing down and do what needs to be

23 done.

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1 Q So, were you in maintenance when -- were

2 you still in maintenance in '72 then?

3 A I was maintenance.

4 Q Were you a maintenance foreman in '72?

5 A I was a --

6 Q Were you a maintenance foreman when they

7 had expanded the aroclor department?

8 A I don't recall.

9 Q You don't recall?

10 A I don't recall whether I was or wasn't.

11 You're talking about -- when you say "expanded,"

12 what are you talking -- what do you mean?

13 Q Well, as I understand it, there was a

14 big expansion in production capability in the

15 aroclor.

16 MR. MOORE: Object to the form.

17 THE WITNESS: Huh?

18 MR. MOORE: If there is a question

19 there.

20 MS. RUTH: That is -- I mean, he

21 asked me what I mean and I said, what I mean is

22 that, as I understand it, there was an expansion of

23 production capabilities.

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1 Q Okay, I've got a couple of questions.

2 First of all: How long did you stay in the

3 planning, scheduling crew?

4 A Two years.

5 Q Two years?

6 A Yeah, it was about --

7 Q So, you were out of it in about 1970,

8 '71?

9 A About that. Took a job as a maintenance

10 foreman.

11 Q Were you involved, at all, when Monsanto

12 stopped producing the aroclors?

13 A I was a maintenance foreman in the --

14 with maintenance responsibilities for maintaining

15 that area when that happened.

16 Q And so did you -- well, did anyone ever

17 discuss with you why they were stopping production

18 or shutting down --

19 A That stopped in '72, I believe.

20 Q It stopped in 1972 was when the

21 production there stopped at the plant?

22 A I believe quit making -- I believe it

23 was '72.

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1 MR. MOORE: Object to the form.

2 BY MS. RUTH:

3 Q Does that clarify my question? Do you

4 know what time period I'm talking about?

5 MR. MOORE: Same objection.

6 THE WITNESS: I don't -- I know

7 that we went from a batch-type operation to a

8 continuous chlorination thing on the chlorinators,

9 if that's what you're referring to. I don't know

10 the time frame when that took place.

11 BY MS. RUTH:

12 Q Okay. So, you don't remember a time

13 when the plant was able to produce more aroclors

14 than it had been able to produce?

15 A Yes, I remember the time.

16 Q Do you remember if you were a

17 maintenance foreman at that time?

18 A I don't remember whether I was a

19 maintenance foreman at that time or if I was still

20 in the planning and scheduling, at that time.

21 Q Did you participate in -- let's call it

22 an upgrade -- did you participate at that time?

23 A I don't recall having specifically

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1 participated. If I was a maintenance foreman at
2 that time, it was my job to maintain that
3 department, along with several other departments,
4 too.

5 Q What does maintaining a department
6 include, usually?

7 A Well, it means -- it -- anything that
8 had to do with the piping systems, that had to do
9 with pumping systems, that had to do with the
10 vessels.

11 Q So, did you do --

12 A Like rebuilding pumps, compressors,
13 blowers, piping systems, all of that, whether it
14 was carrying water or carrying steam or carrying
15 product or whatever, was my responsibility to
16 maintain those systems. If there was a -- if we
17 had steam leaks or what have you, it was my job to
18 send pipe fitters into the area to fix the steam
19 leaks and that's --

20 Q And you would shut down the steam while
21 you were --

22 A You cut the steam off, had valves and
23 things you cut the steam off, and we placed a

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1 people. We had -- of course, the electrical
2 foreman handled the electrical aspects of it.

3 Q What would be typical maintenance-type
4 things you'd do in the aroclor department? Some of
5 the stuff you, I guess, mentioned?

6 A Well, if -- we'd rebuild pumps. Pumps
7 wear out. You take a pump out of -- out of
8 service, put another pump in service, carry that
9 pump to the shop, and rebuild that pump. Put a new
10 impeller, a new shaft, new bearings, a new seal in
11 the pump, just a rebuild -- just rebuild the pump.
12 Maybe all you'd have that was of the pump was just
13 the pump casing, itself, everything else is new.
14 Those are the kinds of things -- see, you know --
15 you know pumps are going to wear out. Your water
16 pump on your car wears out. That -- these pumps
17 wear out. It's just a -- it's just a fact of life
18 and --

19 Q Now, is it true, the pumps were built to
20 leak; is that right?

21 A Well, the pump manufacturers wouldn't
22 tell you that. But there's going to be some, at
23 best, some microscopic leakage on just about any

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1 tracing on the piping system, what have you and --
2 Q Did you monitor it, yourself, or did you
3 do it sort of in conjunction with maybe a chief
4 operator or somebody who maybe kind of kept you
5 abreast of things that might be --

6 A We had a maintenance request system, an
7 MRO system, they would call in an MRO to the
8 maintenance secretary and she would type it out and
9 it -- I would pick up my maintenance request
10 order --

11 Q Request?

12 A -- from the maintenance office, and I
13 would work out a time and assign my mechanics to do
14 that at -- we had -- we had -- at one time, we had
15 pipe fitters as a classification, we had
16 millwrights as a classification, we had welders as
17 a classification, we had painters as a
18 classification, we had carpenters as a
19 classification. All these folks in maintenance,
20 so --

21 Q Were you actually hands-on yourself or
22 you were directing people to do --

23 A I assigned the jobs to the different

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1 pump. But --

2 Q Would you describe the leakage as
3 microscopic in the aroclor department?

4 A No. Listen, in the beginning, when I
5 went to work there, pump seals hadn't even been
6 thought of. Okay? We had packed pumps.

7 Q Right.

8 A Packed pumps. The material being
9 pumped, whether it's water or whether it's
10 glycerine or whether it's coffee or whether it's
11 aroclor or whether it's acid or whatever it is, is
12 the lubricant; it provides the lubricant for the
13 pump --

14 Q I see.

15 A -- in the pump shaft, because there is
16 friction and friction produces heat and you -- and
17 it has to be cooled.

18 Q I see.

19 A So, there has to be -- you know, that's
20 the design of a pump is to cool itself with the
21 pumpage. So, yeah, that -- that was --

22 Q Did they stop using packing when they
23 got seals? Is that what you're saying?

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1 A No --
 2 Q Did seals --
 3 A -- I didn't --
 4 Q -- replace packing?
 5 A -- say that.
 6 Q Okay, I'm sorry.
 7 A I said seals had not been even thought
 8 of then. When seals came along, they were
 9 proclaimed as being much better, probably the
 10 savior of the pumping industry, what have you. But
 11 they -- there are certain things that a seal just
 12 don't work on. They is still packed pumps --
 13 Q I see.
 14 A -- pumps with packing in them that are
 15 in operation today, so --
 16 Q And were there drip pans underneath the
 17 pumps; is that right?
 18 A Oh, yes, there were drip pans there,
 19 certainly was.
 20 Q Were you aware of how the area was kept
 21 clean, the aroclor department, how it was kept
 22 clean?
 23 A It was kept clean by the folks that

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1 A Okay? And that meant whatever the
 2 foreman told --
 3 Q Told you?
 4 A -- you needed to be done to keep your
 5 work area clean. And we were told that and that's
 6 what we did.
 7 And at the end of each shift, they said,
 8 when -- you keep your work area clean, at the end
 9 of the shift, if it -- you be sure that it's clean
 10 when you hand it off to the next shift coming on.
 11 Q To the next guy. Do you know what the
 12 cleaning protocol or procedure was in the aroclor
 13 department? I know you had worked there back in
 14 '56 and you were maintaining it, it looks like, at
 15 least around 1970, you started, it was under your
 16 watch.
 17 A Well, you know, if it was in the control
 18 room or something where folks had thrown cigarette
 19 butts and what have you down, you swept the control
 20 room floor and cleaned it up before it --
 21 especially at shift change time.
 22 If it was out in the work area where
 23 the -- where the pumps were running and the drip

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1 worked in the department.
 2 Q Do you know what they did to keep it
 3 clean? Do you know what the clean-up procedures
 4 included?
 5 A Well, it's called housekeeping.
 6 Q Yeah. What did they do for
 7 housekeeping?
 8 A Housekeeping --
 9 Q And I'm actually jumping into this,
 10 assuming that -- I don't want to have to lay the
 11 groundwork of, was there housekeeping and all that
 12 stuff, because I would like for us to be able to
 13 move through this a little more quickly.
 14 A Okay.
 15 Q And I've heard from many people --
 16 A When I went to work --
 17 Q -- that there was housekeeping at the
 18 end of every shift.
 19 A -- at Monsanto in 1950, and everybody
 20 that went to work there, we were told from the day
 21 I went to work that part of your job
 22 responsibilities is to keep your work area clean.
 23 Q Okay.

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1 pans and buckets and things were, you emptied all
 2 the -- all of the buckets and all the drip pans
 3 into the bucket, empty the buckets into the
 4 trappings --
 5 Q Drum?
 6 A -- drum and that -- and the trappings
 7 drum into the blowing tank and put the -- put the
 8 drippings back into the system, because that's
 9 product.
 10 Q Right.
 11 A And --
 12 Q Then how did you wash the pans or the
 13 buckets, hose them down?
 14 A Yeah, yeah, you hosed down, washed down
 15 around the pumps and everything. After you did all
 16 those things.
 17 Q I see.
 18 A That was -- that was pretty much --
 19 Q First you tried to --
 20 A That was --
 21 Q You tried to salvage as much product as
 22 you could?
 23 A That was SOP for that particular --

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1 Q And then you hosed it down. And was
 2 there a drain?
 3 A There were drains.
 4 Q Did you use soap or just water?
 5 A Sometimes we used powdered soap and
 6 sometimes you'd just wash it down with water.
 7 Q Was that --
 8 A Depending on just how antiseptic you
 9 thought you wanted -- that's not a good word,
 10 really, because we didn't eat off the floors and --
 11 but the gist of the -- of what I'm saying is: We
 12 maintained our housekeeping standards with the
 13 standards that were the acceptable standards --
 14 Q Sure.
 15 A -- at the time.
 16 Q And you -- well, I'm going to object to
 17 the last part of what you said as -- well, you're
 18 not claiming to be an expert, are you? I'm going
 19 to say it's non-responsive. You don't claim that
 20 you are an expert on standards for maintenance, do
 21 you?
 22 MR. MOORE: We're not presenting
 23 him as an expert, but his answer stands. You may

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1 have your objection.
 2 MS. RUTH: I have my objection.
 3 BY MS. RUTH:
 4 Q Let's see, moving right along. At the
 5 time that you were working in maintenance, as the
 6 foreman, in like 1970, you didn't actually
 7 participate in housekeeping in the biphenyl area,
 8 did you? Did you participate at that point?
 9 A Yeah.
 10 Q You did participate in housekeeping?
 11 A Well, I had a shop, and I had mechanics
 12 working out of the shop and working in the shop.
 13 They'd bring pumps and -- yeah. I had a little
 14 office in the shop. I -- I participated in the
 15 housekeeping of the shop in my office. I felt like
 16 that was part my job.
 17 Q Was your shop actually in the PCB
 18 manufacturing building?
 19 A No.
 20 Q Was it -- no?
 21 A It was separate and apart from that.
 22 Q Okay.
 23 A Up across the railroad.

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1 Q So, you did your own housekeeping in
 2 your own office, in your own --
 3 A We kept our shop clean.
 4 Q Kept your shop clean.
 5 A And I -- from time to time, I helped
 6 sweep up and take a rag --
 7 Q Sure.
 8 A I -- kind of a doer, like my mamma, I do
 9 things.
 10 Q How long were you a maintenance foreman?
 11 A From the time I took the maintenance
 12 foreman's job until I retired in 1985.
 13 Q So, you were --
 14 A Something like fifteen years.
 15 Q Okay. So, you were actually a
 16 maintenance foreman over the biphenyl or aroclor
 17 department when they did stop producing the
 18 aroclors; is that correct?
 19 A I think I was the maintenance foreman in
 20 the south plant, at that time.
 21 Q Did anyone talk to you --
 22 A Listen, I say I think that. I think I
 23 was because Wiley Tumlin was the maintenance

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1 foreman in the north shop. We had two maintenance
 2 shops, not counting the carpenter shop and the
 3 electrical shop and the central shop where the
 4 machinists and welders were. And I had the south
 5 shop and Wiley had the north shop. I was the
 6 foreman at that -- I'm pretty sure I was the
 7 foreman in the south shop, at that time. I did
 8 wind up in the north shop and was foreman in the
 9 north plant when I retired.
 10 Q Okay. Do you recall there ever being
 11 any talk or anyone talking to you about why they
 12 were going to stop producing the aroclors?
 13 A I recall -- you want to know the first
 14 time that I ever --
 15 Q Sure.
 16 A -- heard that the -- that there was a
 17 problem about aroclors?
 18 Q Yes.
 19 A I don't know the year, but it was -- the
 20 first -- the first time I ever heard a reference to
 21 PCB, I read something in the paper about some bird
 22 eggs that wouldn't hatch and the shell was soft or
 23 something and somebody had said that the -- that

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 that was -- that PCBs was the cause of that.
 2 Q And at the time did you know PCBs were
 3 what went into aroclor, to make aroclor?
 4 A Do what?
 5 Q Did you know that PCBs were used to make
 6 aroclor?
 7 A I knew that biphenyl and chlorine and --
 8 was used to make aroclor.
 9 Q Okay. Do you know what year --
 10 A But the term "PCBs", it was aroclor to
 11 us.
 12 Q Yes.
 13 A That was -- that was -- that was all we
 14 knew it to be --
 15 Q Sure.
 16 A It was an aroclor, a dielectric fluid
 17 that we made for electrical companies to use in
 18 transformers, that was --
 19 Q Do you know when the first time was,
 20 though, that you read about the eggs having trouble
 21 hatching?
 22 A It was about '69.
 23 Q About '69?

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 A -- were going to make those kind of
 2 changes.
 3 Q Did you hear --
 4 A So, I --
 5 Q Did you hear why?
 6 A Huh?
 7 Q I'm sorry. Finish your answer. I
 8 apologize.
 9 A So, I -- you know, we got told somehow.
 10 I don't -- I can't tell you --
 11 Q You can't remember the mechanism?
 12 A -- exactly whether it was the written
 13 word or the spoken word or mouth to ear from
 14 different ones of us in the plant, I don't
 15 remember.
 16 Q Do you remember if you heard why they
 17 were shutting it down?
 18 MR. MOORE: Object.
 19 BY MS. RUTH:
 20 Q I mean, was there any talk about why
 21 they were shutting it down?
 22 MR. MOORE: Objection, make a
 23 foundation.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 A Yeah.
 2 Q When was the first time you heard that
 3 they were going to shut down production of aroclors
 4 at the Anniston plant?
 5 A It was probably in the same year that
 6 they shut it down.
 7 Q The same year that they shut it down --
 8 A Yes.
 9 Q -- was the same year you first heard
 10 about it?
 11 A (Witness nods head.)
 12 Q Do you remember who told you about it?
 13 A I don't know. It was just --
 14 Q Maybe talk?
 15 A Just talking.
 16 Q Just talk?
 17 A I'm sure they probably announced it or
 18 put a memo on the bulletin board or something the
 19 year that they shut it down, because it affected
 20 some hourly employees and we had a union in the
 21 plant and you had to communicate with the union
 22 when you --
 23 Q Sure.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 BY MS. RUTH:
 2 Q You can answer.
 3 A I don't recall. I don't recall.
 4 Q You don't recall hearing if they --
 5 A I -- I know there were -- like I said, I
 6 read that -- in the paper that there was a problem
 7 with PCBs, and then they found out that was aroclor
 8 with the bird eggs. I don't know, stork eggs or
 9 something, or ostrich or some kind of birds
 10 somewhere, the shells got soft and wouldn't hatch.
 11 Q So, did you --
 12 A But it was aroclor to us.
 13 Q Right. When you heard that they were
 14 shutting down the PCB plant, when you --
 15 A I was sad about that.
 16 Q You were sad?
 17 A Yeah.
 18 Q Did you have any thoughts about why they
 19 might, just a personal opinion about why they might
 20 be shutting it down?
 21 A I guess everybody that worked there had
 22 a personal opinion about why.
 23 Q Would you share with us what yours was?

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1 A I didn't know why. But I had a personal
2 opinion about -- and my personal was that I didn't
3 think it was anything harmful.
4 Q No, no, I object as non-responsive. I'm
5 not asking --
6 MR. MOORE: I think it's very
7 responsive. You asked him for his personal opinion
8 and what he thought --
9 MS. RUTH: No, what I asked him, if
10 he heard why they were shutting it down, if he had
11 an opinion as to why they were shutting it down. I
12 did not ask him his opinion about how he felt about
13 being shut down.
14 THE WITNESS: You asked me --
15 MR. MOORE: No, wait a minute.
16 What you asked him was, when he heard, did that --
17 MS. RUTH: Would you read the
18 question back --
19 MR. MOORE: -- did that cause --
20 MS. RUTH: Would you read the
21 question back, please, as opposed to arguing about
22 it.
23 (WHEREUPON, there was discussion off the record.)

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1 your superiors told you?
2 A Yeah.
3 Q You accepted --
4 A How --
5 Q -- is that right?
6 A You know, you -- you accept what you
7 have to accept.
8 Q Sure.
9 MR. MOORE: You've answered the
10 question.
11 MS. RUTH: Yes, he did.
12 BY MS. RUTH:
13 Q When they stopped production of PCBs or
14 aroclors -- we'll just call them aroclors, try and
15 remember to for consistency sake -- did they keep
16 that facility open or did they shut it down? I
17 mean, in other words, did they use it to produce
18 something else? Did they leave it sitting there?
19 A Left it sitting there for awhile.
20 Q About how long?
21 A I don't know. I don't recall --
22 Q Sure.
23 A -- how long it sat.

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1 (WHEREUPON, the requested portion of the record was
2 read back.)
3 MR. MOORE: Let me lodge an
4 objection to form.
5 MS. RUTH: Okay.
6 BY MS. RUTH:
7 Q Mr. Curry, when we went off the record
8 briefly and went back and re-read the question --
9 let me restate it.
10 My question is: At the time they shut
11 down the aroclor department, did you form a
12 personal opinion as to why they might, not whether
13 you thought it was a right or wrong decision, but
14 did you have a personal opinion as to why it might
15 have happened?
16 MR. MOORE: Object to form.
17 THE WITNESS: I don't guess I did.
18 I don't guess I formed a personal opinion about
19 why. I accepted, whenever we were told or
20 communicated with about why it was shut down, as
21 that was the reason.
22 BY MS. RUTH:
23 Q So, you generally just accepted what

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1 Q I guess it --
2 A When you stop producing, was the term
3 you used, when you stop making it, whatever is
4 there, you've got to -- you know, you clean out --
5 you clean out the system. And it sat there for
6 awhile. I don't know how long.
7 Q Less than a year?
8 A Huh?
9 Q You think it was less than a year?
10 A I don't know if it was less than a year
11 or more than a year, but --
12 Q Less than five years?
13 A Yeah, I think it was less than five
14 years. But eventually, it -- it was dismantled.
15 Q Okay.
16 A And your question was: Did I
17 participate?
18 Q Actually, I hadn't gotten there, yet,
19 but I was leading up to that, so we'll run with it.
20 A Well, I under --
21 Q Did you participate --
22 A I understood you to use that
23 phraseology.

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1 Q Well, I did start to ask you that, and
 2 then I figured we'd better make sure that they
 3 actually did break it down.
 4 A Yeah.
 5 Q They did break it down?
 6 A Well, it's gone.
 7 Q And did you participate -- you
 8 anticipated where I was going.
 9 A To some degree, yes. When I say -- when
 10 you say did I participate, me and the folks that I
 11 was responsible for, the folks that worked for me,
 12 we -- we did the necessary things to disconnect the
 13 piping and be sure we got the equipment cleaned out
 14 and what have you, because I -- if I remember
 15 correctly -- and I may not be a hundred percent on
 16 this, but I know that there was some contract work,
 17 outside contractors that were brought into the
 18 plant to help in the dismantling of that facility.
 19 So, I don't know --
 20 MS. RUTH: Could we go off the
 21 record for --
 22 THE WITNESS: I know that me and --
 23 MS. RUTH: I'm sorry.

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1 contracting organizations, contractors?
 2 A I know we had the outside crane folks in
 3 there with a big crane to handle the heavier stuff,
 4 because our plant crane was limited to -- it
 5 wouldn't -- it wouldn't pick up what had to be
 6 picked up. So, I believe it was John Murphy Crane
 7 Service was in there on the dismantling. I know
 8 that --
 9 Q John Murphy?
 10 A I know that that was one of the
 11 contractors.
 12 Q Good Irishman.
 13 A And I couldn't tell you who the other
 14 contractors were that were in there, but there
 15 was --
 16 Q Do you know what they did with -- do you
 17 know what Monsanto did or people working on
 18 dismantling it did with the equipment once it was
 19 dismantled? In other words, I guess what I'm
 20 asking is: Was it disposed of on-site or off-site
 21 or some combination of both? And if I need to
 22 break that into two questions, I can.
 23 A Probably, a combination of both.

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1 THE WITNESS: -- the folks that
 2 worked for me didn't have the primary
 3 responsibility for dismantling the thing. We had a
 4 responsibility to do the things, to make it safe,
 5 make it clean enough to be dismantled and --
 6 MS. RUTH: Okay.
 7 THE WITNESS: -- and what have you,
 8 so the contractors could do their work.
 9 MS. RUTH: Okay. Thanks. Let's go
 10 off the record one second.
 11 (WHEREUPON, there was discussion off the record.)
 12 MS. RUTH: Back on the record.
 13 BY MS. RUTH:
 14 Q We talked about you -- I think, if we
 15 can, just as I understand it, you participated to
 16 some extent in the dismantling of the PCB or
 17 aroclor department, but you also -- there were, as
 18 you recall, although you can't recall specifically,
 19 you believe there were other contractors who also
 20 came in?
 21 A I know there were.
 22 Q Okay, there were contractors that came
 23 in. Do you recall the name of any of those

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1 Q A combination of both?
 2 A That would be my -- that would be my
 3 best answer.
 4 Q Did you --
 5 A Because a great deal of that stuff had
 6 scrap value, so I would say that -- I think I feel
 7 safe in saying it's some of both.
 8 Q Did you participate, at all, in bringing
 9 any of that material to the dump?
 10 A No.
 11 Q Did you participate, at all, in bringing
 12 any of that material to sort of -- I guess we'll
 13 call the salvage field, the field you described
 14 before as having rebuilt equipment and potentially,
 15 I guess, scrap-value equipment?
 16 A Probably. A pump's a pump. Okay? It
 17 don't know what it's pumping. So, those things
 18 that we could salvage and use, you know, clean them
 19 up and use them, I'm sure we did. Conduit --
 20 Q What are we --
 21 A -- probably, you know, we probably used
 22 conduit and some of the piping systems that was
 23 carrying steam and water, we probably used some of

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1 that in other places in the plant, some of the
 2 pipe.
 3 I -- it just -- just common sense tells
 4 me that those things that you can use, you use, and
 5 the other -- the other was scrap or waste or
 6 whatever, and I don't know where all that went.
 7 Q Let's just finish up your work history
 8 real quick and then I think I'll just have a couple
 9 of other things I want to ask you after that and
 10 then we'll be done. And there shouldn't be too
 11 much more to say, I don't think, on your work
 12 history. You said that you stayed on as a
 13 maintenance foreperson?
 14 A As a maintenance foreman until I
 15 retired, right, 1985.
 16 Q And you switched from the south plant to
 17 the north plant at some point --
 18 A I did.
 19 Q -- in that --
 20 A Uh, I was the --
 21 Q Do you have any recollection of what
 22 year that would have been that you switched from
 23 south to north?

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1 running.
 2 Q They still make PNP?
 3 A Yeah, para-nitro-phenol, goes in
 4 Tylenol.
 5 The boiler operation.
 6 Q The what operation?
 7 A Where we made our steam for our plant,
 8 the boiler.
 9 Q Boiler?
 10 A The boiler.
 11 (WHEREUPON, there was discussion off the record.)
 12 BY MS. RUTH:
 13 Q So, in the boiler and --
 14 A And the shipping department.
 15 Q -- shipping department?
 16 A That was -- that was about it.
 17 Q When you were working in the maintenance
 18 for the northern plant -- when you switched there,
 19 is that where you retired from then?
 20 A Yeah.
 21 Q You stayed there until you retired? And
 22 so the first half of your career as a maintenance
 23 foreperson was in the south plant?

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1 A I'd say it was probably some time
 2 around -- between '78 and '80, somewhere in that
 3 two-year period right in there, because I was in
 4 the north plant probably six or seven years.
 5 Q What product manufacturing lines or
 6 what, you know, manufacturing groups did you -- I
 7 guess you know what I'm getting at. The
 8 building --
 9 A What was in the north plant?
 10 Q Yes, I guess that probably --
 11 A Yes.
 12 Q You ask a better question.
 13 A Production-wise?
 14 Q Yes.
 15 A That I had maintenance responsibility
 16 for?
 17 Q Yes. Thank you for helping me out with
 18 it.
 19 A Parathion department.
 20 Q And is that in the niran group?
 21 A Yeah, it was niran. The PNP plant.
 22 Q Is that separate from niran?
 23 A Yeah, that's -- it's still there, still

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1 A Right.
 2 Q And then you moved to the north plant in
 3 about '78 or '80 and then that's where you retired
 4 from? Was the niran plant still operating or
 5 parathion when you retired?
 6 A I believe it was.
 7 Q You believe it was still operating?
 8 A Yeah, I believe it was still running.
 9 Q Do you know, has it subsequently shut
 10 down?
 11 A Oh, yeah, yeah. It's been shut down and
 12 dismantled and forever disappeared. It was running
 13 when I left.
 14 MR. MOORE: You've answered her
 15 question.
 16 BY MS. RUTH:
 17 Q Yes. And that's all I need.
 18 A I --
 19 Q That really is all I need.
 20 A You got it. I was -- for my own self, I
 21 was trying --
 22 Q David is so dying to go, he's --
 23 MR. MOORE: We'll stay here as long

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 as we need to.
 2 MS. RUTH: He keeps wanting to get
 3 that on the record.
 4 MR. MOORE: That's right.
 5 BY MS. RUTH:
 6 Q So, the niran plant and all that was
 7 still running when you left?
 8 A (Witness nods head.)
 9 Q And you participated, to some extent, on
 10 the dismantling of the PCB or aroclor department.
 11 What other areas were you still covering in the
 12 south plant until you moved to the north plant
 13 after aroclor had been dismantled?
 14 Well, let me ask you this question
 15 first: Was aroclor fully dismantled by the time
 16 that you left for the north plant, left to work at
 17 the north plant?
 18 A I don't remember.
 19 Q You don't remember?
 20 A I don't remember. I've been gone
 21 sixteen years, now.
 22 Q Sure.
 23 A And a lot has happened in that sixteen

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 the Monsanto plant?
 2 A I did.
 3 Q Can you name a few of them for me?
 4 A Yeah.
 5 Q Okay. Don't worry, I'm not going to
 6 call them. Go ahead.
 7 A Why don't I just get a seniority list
 8 and give it to you? We were like family almost.
 9 Q You were almost like family?
 10 A At the --
 11 Q Can you give me the name of let's say
 12 fifteen of them?
 13 A Yeah. Some of them's dead.
 14 Q Okay.
 15 A Bruce Voiles.
 16 Q Bruce, what's his last name?
 17 A V-O-I-L-E-S, Bruce Voiles.
 18 Q See, I would have never gotten that.
 19 How old is he?
 20 A He's in his fifties. He's probably --
 21 well, he's probably -- he's about sixty, I guess.
 22 Q About sixty?
 23 A I'm ten or eleven years older than he

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1 years that makes some of what happened prior to
 2 that sort of fuzzy. It's hard to remember, when
 3 you ask specific questions, I don't -- I just don't
 4 remember.
 5 Q Okay, that's okay.
 6 Do you remember your dad ever speaking
 7 with you about his early days in the aroclor
 8 department?
 9 A Yeah, yeah.
 10 Q You do? Okay. Do you remember him ever
 11 talking to you about workers in the aroclor
 12 department who developed a skin problem?
 13 A I don't recall anything.
 14 Q You don't recall?
 15 A No.
 16 Q Okay, that's all I need to know on that
 17 topic. We're not going to spend a thousand years
 18 on that.
 19 The second thing -- and this is -- we're
 20 really wrapping up here -- who were your closest
 21 friends during your time at the Monsanto plant, do
 22 you think? Or I'm assuming you had some. Did you
 23 make any close friends while you were working at

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1 is.
 2 Q Is he retired now?
 3 A Yeah, he's retired.
 4 Q Generally, do you have any notion of how
 5 his health is?
 6 A Good health. Motorcycle rider, deer
 7 hunter.
 8 Q Deer hunter, huh? Does he get you any
 9 deer sausage, more importantly?
 10 A Huh?
 11 Q Does he give you any deer sausage? I
 12 have been far enough south to realize deer sausage
 13 is the bomb.
 14 Next good friend?
 15 A Bill Snyder.
 16 Q Next good friend?
 17 A Louis Marshall.
 18 Q I'm sorry?
 19 A Louis Marshall.
 20 Q Louis Marshall.
 21 Next good friend?
 22 A Jerry Sanford.
 23 Q Jerry Sanford.

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HARTOLDMON0035807

1 Next good friend?
 2 A Dickie Walker.
 3 Q Dickie Walker. I believe I spoke with
 4 Mr. Walker.
 5 Next good friend? Is that possible?
 6 A Norman Madison.
 7 Q Norman Madison. Next?
 8 A Cecil Beard, he's dead.
 9 Q How old was he when he died?
 10 A He was older than me. I guess Cecil
 11 was -- he was probably fifteen years older than me.
 12 He was probably in his eighties when he died.
 13 Q How long has he been dead?
 14 A I -- about five years, I guess.
 15 Q Do you have any idea how he died?
 16 A I don't recall how he died.
 17 Q Okay.
 18 A Harris Powell?
 19 Q Harris what?
 20 A Harris Powell.
 21 Q Powell.
 22 Okay, next?
 23 A Harold Forbes.

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1 Q Edward Gibson. You called him Hoot, did
 2 you say?
 3 A Yeah. He's a little Yankee from
 4 New York.
 5 Q We're not all bad.
 6 A He's good, he's good.
 7 Q Next.
 8 A Good guy. Doug Harbin.
 9 Q Now, these are all guys you still --
 10 A Hamlin Martin.
 11 Q Hamlin Martin. Can you remember for me
 12 guys you worked with that maybe have passed on?
 13 A That has passed on?
 14 Q Yes.
 15 A Jerry Mitchell.
 16 Q Jerry Mitchell, okay. Who else?
 17 A Burn Severson.
 18 Q Burn is his name?
 19 A Yes. S-E-V-E-R-S-O-N. Mark Williams.
 20 You want folks that's passed on?
 21 Q Yes.
 22 A Joe Adcock.
 23 Q Joe Adcock?

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1 Q We've talked about Harold before, right?
 2 A Yeap. Dick Mitchell.
 3 Q Dick Mitchell, okay.
 4 A Russell Carlisle.
 5 Q Russell Carlisle, okay.
 6 A C. V. Gray
 7 Q C. V. Gray, okay.
 8 A Red Waters.
 9 Q Red Waters.
 10 A Frank Baird.
 11 Q Frank Baird.
 12 A James Whisenant.
 13 Q James what?
 14 A Whisenant, W-H-I-S-E-N-A-N-T, N-A-N-T,
 15 Whisenant.
 16 Q What was his first name? I got so
 17 caught up in his last name. Jay?
 18 A James.
 19 Q James. Next?
 20 A Edward Gibson.
 21 Q I was actually really feeling like I was
 22 on a roll there.
 23 A Hoot.

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1 A A-D-C-O-C-K.
 2 Q Okay.
 3 A Several of them that I've already give
 4 you are dead.
 5 Q Who was dead out of the ones you gave
 6 me? We knew Cecil's dead. How about let's just go
 7 through them. How about this, Louis Marshall?
 8 A Louis, Louis is not dead, yet.
 9 Q How old is he?
 10 A He's younger than I am.
 11 Q Sixties?
 12 A He's probably -- he's fifty-five,
 13 fifty-seven years old, something like that.
 14 Q And how is his health, do you know?
 15 A I don't know. He's in pretty good
 16 health, as far as I know. He just recently
 17 retired.
 18 Q Bill Snyder?
 19 A Bill Snyder's in good health. He's a
 20 good man.
 21 Q How old --
 22 A Finished high school with me.
 23 Q He's your age then?

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 A Huh?
- 2 Q He's your age?
- 3 A Yeah.
- 4 Q Okay. Jerry Sanford?
- 5 A Jerry Sanford is still living, good
- 6 health.
- 7 Q How old is he?
- 8 A Around sixty.
- 9 Q These are a bunch of young fellows you
- 10 hung out with. Dickie Walker?
- 11 A Dickie's about sixty, sixty-one.
- 12 Q I know, I met Dickie. Norman Madison?
- 13 A Norman's -- I'd say he's close to sixty.
- 14 Q Close to sixty. Are all these guys
- 15 retired?
- 16 A Yeah.
- 17 Q Do you all still get together?
- 18 A Huh?
- 19 Q You guys all still get together
- 20 sometimes?
- 21 A We've got a -- we've got a Quarter
- 22 Century Club, every --
- 23 Q Oh, I've heard about that. I think

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- 1 Q Zeb?
- 2 A Yeah.
- 3 Q That's still cool. How about
- 4 Harris Powell?
- 5 A Harris is eighty-five or eighty-six.
- 6 He's still living. He lives in Birmingham.
- 7 Q Harold, we talked about Harold Forbes.
- 8 Dick Mitchell?
- 9 A Dick Mitchell's dead.
- 10 Q Do you know how he died?
- 11 A Yeah, had a heart attack watching an
- 12 Alabama football game in a recliner.
- 13 MR. MOORE: That will do it to you.
- 14 BY MS. RUTH:
- 15 Q That doesn't surprise me.
- 16 A He was in his middle seventies or
- 17 better.
- 18 Q Is he any kin to this Jerry Mitchell?
- 19 A Who?
- 20 Q Jerry Mitchell?
- 21 A Jerry Mitchell's dead.
- 22 Q I know. Are they kin?
- 23 A Brothers.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 actually Dickie Walker's the one told me about it.
- 2 A You got twenty-five years service with
- 3 the plant, they become a member of the Quarter
- 4 Century Club. I'm the president of the Quarter
- 5 Century Club --
- 6 Q All right.
- 7 A -- and have been for the past nearly
- 8 twenty years, I guess. So, I've got a lot of
- 9 friends.
- 10 Q I guess you do.
- 11 A I've got a lot of friends that -- put
- 12 down Zenus Pettus.
- 13 Q Zenus?
- 14 A Z-E-N-U-S, P-E-T-T-U-S.
- 15 Q He's a good friend of yours?
- 16 A Yes.
- 17 Q How old is he?
- 18 A He's older than I am.
- 19 Q He's got a great name.
- 20 A Huh?
- 21 Q He's got a great name. I love that
- 22 name.
- 23 A Zenus. We called him Zeb.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 Q Brothers?
- 2 A Yeah. Their dad worked at the plant,
- 3 too, Mr. Tom Mitchell.
- 4 Q Another legacy?
- 5 A Huh?
- 6 Q Another legacy?
- 7 A Yeah.
- 8 Q Jerry Mitchell --
- 9 A Listen --
- 10 Q There is a couple legacies there, huh?
- 11 There's a core group of you all, kind of like a
- 12 fraternity, I guess.
- 13 Jerry Mitchell?
- 14 A Jerry's dead.
- 15 Q How did Jerry pass?
- 16 A Died with a heart attack.
- 17 Q Also. Was it another Alabama game or --
- 18 A No.
- 19 Q Russell Carlisle?
- 20 A Russell's still living.
- 21 Q He's how old?
- 22 A Lives out at Saks. He's older than I
- 23 am. He's a World War II veteran.

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- 1 Q Seventy-ish, sixty?
 2 A Probably in his middle seventies.
 3 Q Mid seventies?
 4 A Had a hip replaced and that kind of
 5 stuff, but he's still hopping around.
 6 Q How about this C. V. Gray?
 7 A He's dead.
 8 Q How old was he when he died?
 9 A Sixty-five.
 10 Q Do you know --
 11 A He was retired. He worked till he was
 12 sixty-five, so he was more than sixty-five when he
 13 died.
 14 Q Do you know how he passed?
 15 A I don't know what -- what he died from.
 16 I was -- he was an electrician when I was.
 17 Q Did you stay in touch up until he
 18 passed?
 19 A Huh?
 20 Q Did y'all stay in touch up until he
 21 passed?
 22 A Yeah, he was a Mason, member of the
 23 Masonic Lodge.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 time when he died. Fred -- Fred was an old man.
 2 Q How about Frank Baird?
 3 A Frank was of my dad's generation. He --
 4 old age probably killed Frank. I don't know
 5 what -- what they actually wrote on his death
 6 certificate.
 7 Q How long has he been passed?
 8 A Fifteen or twenty years. He was an
 9 electrician, too.
 10 Q James Whisenant?
 11 A James Whisenant, he was an electrician,
 12 too. He's dead.
 13 Q Do you know, how long has he been dead?
 14 A Fifteen years, I guess.
 15 Q Was he retired?
 16 A Oh, yeah.
 17 Q Do you know what caused his passing?
 18 A I don't know.
 19 Q And how about Hoot?
 20 A Hoot's still alive.
 21 Q How old is Hoot?
 22 A Hoot's about sixty, maybe a little
 23 better than sixty. He's got a daughter that's

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 Q But you don't know what the cause of his
 2 death was?
 3 A I don't remember.
 4 Q Do you remember if it was sudden or if
 5 he had been ill?
 6 A I think he was sick for awhile, but I
 7 don't know what -- what it -- it may have been
 8 cancer. I don't know.
 9 Q How about Fred Waters?
 10 A Fred Waters is dead. He was an
 11 electrician with me, too.
 12 Q How long has he been dead?
 13 A Twelve, fifteen years.
 14 Q Oh, okay, awhile. Do you know how he
 15 died?
 16 A No, I don't. I don't know if he died
 17 from a heart -- heart problem or what.
 18 MR. MOORE: Don't speculate.
 19 THE WITNESS: I don't know.
 20 BY MS. RUTH:
 21 Q Okay. Did he die relatively -- did he
 22 retire?
 23 A Oh, yeah, he had been retired a long

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

- 1 forty-two years old and she's -- she was born
 2 with -- you local folks? She's forty-two years
 3 old. She's at a hospital in Philadelphia. This
 4 don't have anything to do with --
 5 COURT REPORTER: Do you want me
 6 off?
 7 BY MS. RUTH:
 8 Q Do you not want --
 9 A She was born with some of her organs
 10 outside of her body. And she's had forty something
 11 surgeries in her lifetime. Sweet girl, pretty
 12 girl, blond headed girl like you and this lady.
 13 I've known her all her life. I knew her mother.
 14 Q Did she grow up around --
 15 A In West Anniston.
 16 Q West Anniston?
 17 A Yeah. Went to school at Wellborn.
 18 And --
 19 MR. MOORE: Her mother went to
 20 school at Wellborn. Is that what your testimony
 21 is?
 22 MS. RUTH: No, the daughter went to
 23 school.

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HARTOLDMON0035810

1 THE WITNESS: No. Edie, the
2 daughter went to school at Wellborn.
3 BY MS. RUTH:
4 Q She was --
5 A She's in -- she's got to have a total
6 replacement of her colon and most of her organs.
7 And that's the only place they do it, I think, in
8 the world, is that hospital.
9 Q So, she's been struggling with this
10 since she was born and she's forty-two, now?
11 A Well, she's been struggling with -- from
12 the day she was born, they started doing surgery on
13 her as a child and she's had forty something
14 different surgeries. And now she's going to die --
15 Q If they don't --
16 A -- if they can't do something for her.
17 And they've had a drive here in our county to help
18 her, financially.
19 Q She grew up here? She's only up in
20 Philadelphia for the surgery?
21 A She's up there waiting and being looked
22 at and seen after by the doctors up there,
23 preparing her for -- in the event that those organs

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1 Q How old is he?
2 A He's retired now.
3 Q Oh, he is?
4 A Yeah.
5 Q Do you know how old he is?
6 A He's probably in his early sixties.
7 Q Early sixties. And Hamlin Martin?
8 A He's retired. He worked for me as a
9 mechanic.
10 Q Do you know how old he is?
11 A He's probably around sixty.
12 Q And Zenus? What do we know about --
13 A Zenus Pettus, Zenus Pettus is in his
14 middle or late seventies. Good man. Lives in
15 Lineville.
16 Q Lives where? I'm sorry.
17 A Lives in Clay County, down close to
18 Lineville on Fox Creek.
19 Q Does a lot of fishing?
20 A Well, it's not -- Fox Creek is not a
21 great big creek.
22 Q Oh, it's not?
23 A But Zeb does fish and hunt, got

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1 come available, they can put them in her and she --
2 if she don't get them probably in six months, she's
3 going to die.
4 Q Well, I'm sorry to hear that.
5 A It's a sad situation.
6 Q Yes.
7 A Her mother's dead and she's an only
8 child. It's just --
9 Q How did her mamma die?
10 A I don't know. I don't know what killed
11 Wootie. We called her Wootie.
12 Q Wootie and Hoot?
13 A Wootie and Hoot.
14 Q That's great. Well, how about --
15 A My heart goes out to her.
16 Q As does, I think, all of ours. That's a
17 horrible story.
18 Doug Harbin?
19 A Doug Harbin's still -- still living. He
20 was a mechanic for me when I had the group in the
21 north shop.
22 Q Is he younger then?
23 A He's younger than me, yeah.

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1 cattle --
2 Q Oh, is he the deer hunter?
3 A Yeah, deer hunt.
4 Q Now, how about Burn Severson?
5 A Burn Severson.
6 Q Severson.
7 A Burn Severson, he's dead.
8 Q And how did he die?
9 A I don't know. I'm not sure.
10 MR. MOORE: Don't speculate.
11 THE WITNESS: I'm not sure.
12 BY MS. RUTH:
13 Q Do you know if it was a sickness or a
14 sudden death?
15 A It was a sickness. I know he had a knee
16 replaced, a knee replacement, because he come --
17 come to see my dad and daddy took to telling him
18 about his knees and Burn says -- daddy said, I
19 think I need to have it operated on. And Burn
20 said, don't do it, don't do it, don't do it. And
21 Burn was the supervisor in the department where my
22 dad worked. But he was a good man, good man.
23 Q How about Mark Williams?

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1 A Mark was a foreman with my dad. He's
2 dead, too. He's been dead about a year.
3 Q Do you know how he died?
4 A He was of my dad's generation. He
5 died -- time and exposure got him like it did my
6 dad. Mark was active pretty much up till --
7 Q And then Joe Adcock?
8 A Joe Adcock, Joe was an operator, the
9 chief operator in the plant. He's dead. And he
10 bidded into the -- to the Guard Force and he was --
11 he was killed. Somebody shot him or he shot
12 himself, one.
13 We all -- when I say "we," we that
14 worked at the plant when all this happened -- don't
15 believe that Joe killed himself with his own gun.
16 Somebody -- somebody was -- there was too much --
17 Q How long ago was this?
18 A Twenty-five years ago.
19 Q Okay. How old would Joe have been at
20 the time?
21 A Well, Joe was probably in his sixties
22 when he was killed.
23 Q Anybody else that you can recall who's

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1 meet you.
2 (WHEREUPON, the deposition was concluded.)
3
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1 worked at the plant with you that has passed?
2 A Not right off the top of my head. There
3 has been a lot of folks --
4 Q Sure --
5 A -- that I worked with that -- over that
6 period of time, and if I get an old seniority list
7 or something out and looked at it and checked them
8 out, it would surprise me how many are gone.
9 MS. RUTH: Let me just collect my
10 thoughts for two seconds and I'll come right back.
11 (WHEREUPON, there was discussion off the record.)
12 BY MS. RUTH:
13 Q The only thing I wanted to confirm with
14 you, and I may have already asked it of you is:
15 You currently collect a pension from Monsanto; is
16 that right? Or do you currently collect a pension
17 from Monsanto?
18 A (Witness nods head.)
19 MS. RUTH: Sir, I feel like at this
20 point I've asked what I need to ask for this
21 deposition and I'm ready to say goodbye.
22 THE WITNESS: Good.
23 MS. RUTH: It was a pleasure to

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1 C E R T I F I C A T E
2 STATE OF ALABAMA)
3 CALHOUN COUNTY)
4
5 I, SAMANTHA E. NOBLE, a Court Reporter
6 and Notary Public in and for The State of Alabama
7 at Large, duly commissioned and qualified, HEREBY
8 CERTIFY that the within named witness, DONALD
9 CURRY, who was made known to me, was first duly
10 sworn to testify the truth, the whole truth, and
11 nothing but the truth in the cause aforesaid; that
12 the testimony then given by him was by me reduced
13 to shorthand in the presence of said witness,
14 afterwards transcribed upon a computer, and that
15 the foregoing is a true and correct transcript of
16 the testimony given by him as aforesaid.
17 I FURTHER CERTIFY this deposition
18 was taken at the time and place in the foregoing
19 caption specified, and was completed without
20 adjournment.
21 I FURTHER CERTIFY that I am not a
22 relative, counsel, or attorney for either party, or
23 otherwise interested in the outcome of this action.

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 -----
 2 WITNESS SIGNATURE: DONALD CURRY
 3 I, _____, have
 4 read the foregoing testimony given by me and it is
 5 true and complete with any corrections noted by
 6 page and line number on the following Errata Page.
 7 This the _____ day of _____, 2001.
 8
 9
 10 _____
 11 DONALD CURRY
 12
 13 IN WITNESS WHEREOF, I have hereunto
 14 set my hand and affixed my seal at Anniston,
 15 Alabama, on this the 22nd day of March, 2001.
 16
 17 _____
 18 SAMANTHA E. NOBLE
 19 Notary Public in and for
 20 Alabama at Large
 21
 22 MY COMMISSION EXPIRES: 11-17-2001.
 23

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 PAGE _____ LINE _____
 2
 3 NOW READS _____
 4
 5 SHOULD READ _____
 6
 7 PAGE _____ LINE _____
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 9 NOW READS _____
 10
 11 SHOULD READ _____
 12
 13 PAGE _____ LINE _____
 14
 15 NOW READS _____
 16
 17 SHOULD READ _____
 18
 19 DATE _____, 2001.
 20
 21 _____
 22 DONALD CURRY
 23

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SAMANTHA E. NOBLE NOBLE & ASSOCIATES

1 Please, make any necessary spelling
 2 corrections in your testimony on the errata sheets.
 3 Sign the signature page and mail along with the
 4 errata sheets to the following address within 30
 5 days or signature will be waived:
 6
 7 SAMANTHA E. NOBLE, Court Reporter
 8 P.O. Box 544
 9 Chatchee, Alabama 36271
 10
 11 ERRATA PAGE
 12 PAGE _____ LINE _____
 13
 14 NOW READS _____
 15
 16 SHOULD READ _____
 17
 18 PAGE _____ LINE _____
 19
 20 NOW READS _____
 21
 22 SHOULD READ _____
 23

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