

**IN THE CIRCUIT COURT OF KANAWHA
COUNTY
WEST VIRGINIA**

IN RE: ASBESTOS IV CIVIL ACTION
NO: 95-8888

The deposition of TERRY K. LINDQUIST, taken upon oral examination, pursuant to notice and pursuant to the West Virginia Rules of Civil Procedure, before Monique Christiansen, Court Reporter and Notary Public in and for the State of West Virginia, Friday, June 9, 1995, at the offices of Goldberg, Persky, Jennings, White & Hostler, Suite 1400, 910 Fourth Avenue, Huntington, West Virginia.
JOHNNY JACKSON & ASSOCIATES, INC.
606 Virginia Street, East
Charleston, WV 25301
(304) 346-8340

Borg Warner

APPEARANCES:

GOLDBERG, PERSKY, JENNINGS & WHITE,
P.C. (Bruce

Carter appearing) 1030 Fifth Avenue, Pittsburgh, Pennsylvania, 15219, (412) 471-3980, Counsel for Plaintiffs.

PIETRAGALLO, BOSICK & GORDON (Eric K. Falk appearing)

One Oxford Center, Thirty-Eighth Floor, Pittsburgh, Pennsylvania, 15219, (412) 263-2000, Counsel for Allied Signal.

BAKER & Marsteller (Roy D. Baker appearing) 1108 Third Avenue, Suite 300, Huntington, West Virginia, 25701 (304) 522-6906, Counsel for Borg-Warner.

BARNARD AND GANNON (Timothy B. Barnard appearing) The

Williamson House, 218 West Front Street, P.O. Box 289, Media, Pennsylvania, 19063-0289, (610) 565-4055, Counsel for Borg-Warner.

INDEX

DEPONENT: TERRY K. LINDQUIST
JUNE 9, 1995

EXAMINATION BY: PAGE:

Mr. Carter 4

EXHIBIT IDENTIFICATION:

Exhibit No. 1 4

Exhibit No. 2 4

Exhibit No. 3 10

Exhibit No. 4 57

Exhibit No. 5 73

Exhibit No. 6 73

Exhibit No. 7 88

1 **TERRY K. LINDQUIST, DEPONENT, SWORN**

2 **EXAMINATION**

3 **BY MR. CARTER:**

4 **Q.** My name is Bruce Carter. I represent
5 some of the plaintiffs in this case.

6 If you would, please state your name for
7 the record?

8 **A.** My full name is Terry K. Lindquist,
9 L-I-N-D-Q-U-I-S-T. Terry is the proper name.

10 **Q.** Where do you presently reside?

11 **A.** Presently reside in a suburb of the City
12 of Chicago. The name of the suburb is Winfield,
13 W-I-N-F-I-E-L-D, Illinois.

14 **Q.** How old are you today?

15 **A.** I am 56 years old.

16 **Q.** I am going to hand you, after the court
17 reporter marks this, a copy of the notice of
18 deposition.

19 (Exhibit Nos. 1 and 2 were marked for
20 identification.)

21 **BY MR. CARTER:**

22 **Q.** Take a look at that.

23 Have you ever seen this notice of
24 deposition before or a copy of it?

1 **A.** Yes.

2 **Q.** The first thing I would like to do is go
3 through each of the items on there. There are some
4 eight areas to be covered.

5 I would like for you to go through each
6 one and tell me whether you feel that you are the
7 most knowledgeable person for that area, or if you
8 feel competent to testify on the subject matter on
9 each of the numbered paragraphs.

10 **MR. BAKER:** While he's doing that let me
11 just state generally for the record. Don Baker, on
12 behalf of Borg-Warner, the first part of your
13 question I am not sure that he's technically in a
14 position to answer. I can tell you that we believe
15 that Mr. Lindquist is the person who has the most
16 knowledge about most of these areas that we are aware
17 of at the present time. That's why we have produced
18 him here today.

19 As far as the second part of your
20 question, I am quite comfortable with him going
21 through each point and telling you what he knows
22 about those points.

23 **BY MR. CARTER:**

24 **Q.** Let's go through the different areas.

Page 6

Page 8

1 The first area essentially talks about an
 2 overview of the corporation with respect to asbestos
 3 and asbestos products, do you feel that that's an
 4 area that you have sufficient knowledge to answer
 5 questions?
 6 A. I do.
 7 Q. The second one has to deal with sales
 8 and marketing of asbestos products.
 9 Do you feel that you have knowledge
 10 sufficient to answer questions about the sales and
 11 marketing of the asbestos products of Borg-Warner?
 12 A. With one minor discussion point, and
 13 that is I see in the next to the last line, Produced
 14 or sold by the defendant to West Virginia.
 15 I don't have personal knowledge of sales
 16 into West Virginia.
 17 Q. But as far as an overview of the sales
 18 activities of Borg-Warner with relation to asbestos
 19 products?
 20 A. Yes.
 21 Q. No. 3, general record keeping. Do you
 22 feel comfortable in answering questions about the
 23 record keeping of Borg-Warner?
 24 A. I do.

1 A. No. I have no knowledge of insurance
 2 coverage.
 3 Q. Finally, No. 8 is any knowledge of the
 4 threshold limit value?
 5 A. Again, I have no knowledge of threshold
 6 limit value.
 7 Q. You provided for me a document that's
 8 been marked as Exhibit No. 2 which is essentially
 9 your resume or CV; is that correct?
 10 A. That's correct.
 11 Q. At the beginning before we begin the
 12 deposition, there was mentioned there may be an error
 13 in this document that you wanted to correct?
 14 A. Yes. There is just a minor
 15 typographical error under the second page, the period
 16 of 1960 to 1963 the city in Japan is Iwakuni,
 17 I-W-A-K-U-N-I, Japan.
 18 Q. Have you ever been deposed before?
 19 A. Yes, once before.
 20 Q. Where was that?
 21 A. That was in Chicago, Illinois.
 22 Q. Can you tell me the subject matter of
 23 the deposition?
 24 A. It was a deposition on asbestos in the

Page 7

Page 9

1 Q. No. 4 as an investigation into asbestos
 2 products.
 3 Do you feel comfortable in discussing or
 4 knowledgeable in discussing any investigations that
 5 may have been made into the asbestos products of
 6 Borg-Warner?
 7 A. The products of Borg-Warner that I am
 8 familiar with are clutches. I have no knowledge that
 9 there has been any concern expressed on those
 10 products; and, therefore, I don't have any knowledge
 11 of any investigations that were made.
 12 Q. No. 5, it's any steps that may have been
 13 taken to provide warnings to any person with regards
 14 to asbestos products of Borg-Warner.
 15 A. The products of Borg-Warner at one point
 16 in time did carry a label. Other than that our
 17 workplace practices were certainly according to
 18 requirements, and I can testify to that extent.
 19 Q. Any knowledge that Borg-Warner may have
 20 had regarding the January 1946 article that's listed
 21 therein?
 22 A. I have no knowledge of that article.
 23 Q. I think I skipped 6. No. 6 is insurance
 24 issues.

1 products.
 2 Q. When was that deposition taken?
 3 A. Three weeks ago, I believe.
 4 MR. CARTER: At this time I would like
 5 to request a copy of the transcript.
 6 MR. BAKER: To my knowledge it has not
 7 been transcribed.
 8 MR. CARTER: At such a time that it is
 9 transcribed I am requesting a copy.
 10 MR. BAKER: I will give you the name of
 11 the court reporter. I personally feel that it's the
 12 court reporter's right to distribute those.
 13 I will give you her name and you can
 14 contact her.
 15 I am not trying to be difficult, it's
 16 just that I represent that right of hers to
 17 transcribe and sell her own transcripts.
 18 BY MR. CARTER:
 19 Q. Have you ever signed any affidavits or
 20 statements under oath with regards to asbestos
 21 activities?
 22 A. Not to my knowledge.
 23 Q. What did you do to prepare yourself for
 24 the deposition today?

Page 10

1 A. I had a meeting earlier today to read
 2 the notice.
 3 Q. Have you read any other documents to
 4 prepare yourself for the deposition?
 5 A. No, I have not.
 6 Q. Did you participate at all in the
 7 preparation of discovery responses, interrogatories,
 8 productions of documents or requests for admissions
 9 in this case?
 10 A. I did not.
 11 Q. When were you informed that you were
 12 going to be named as a witness in this litigation?
 13 A. I don't have knowledge that I have been
 14 informed that I have been assigned as a witness in
 15 this litigation if that's different than being here
 16 today as a person to be deposed.
 17 MR. CARTER: At this time I am going to
 18 ask the court reporter to mark the final witness list
 19 of Borg-Warner as the next deposition Exhibit.
 20 (Exhibit No. 3 was marked for
 21 identification.)
 22 BY MR. CARTER:
 23 Q. I am showing you now Exhibit No. 3,
 24 which is the witness list of Borg-Warner. You notice

Page 11

1 on page one under the heading, Lay Witnesses, No.
 2 1-C, I believe that's you; is that not correct?
 3 A. I believe that is.
 4 Q. You have been named as a witness for
 5 trial in this case?
 6 MR. BAKER: We will stipulate that we,
 7 on behalf on Borg-Warner, have named Mr. Lindquist
 8 as
 9 a witness for trial. He may be called, I think it
 10 says, with information concerning the products
 11 manufactured and distributed by Borg-Warner
 12 Automotive.
 13 Q. Let's go through your background. It's
 14 easier to start from the back forward.
 15 It says here that you received a
 16 bachelors in mechanical engineering?
 17 A. Yes.
 18 Q. From the Illinois Institute of
 19 Technology in 1960, and an MBA from the University
 20 of
 21 Chicago in 1965.
 22 At some point, looking at page 2, it
 23 appears that while you were working on your masters
 24 you were working for Borg-Warner also; is that
 correct?
 A. That's correct.

Page 12

1 Q. Let's go through the Borg-Warner
 2 positions starting from '63 to get an idea of what
 3 your responsibilities were.
 4 If you can, give me an idea of what was
 5 entailed as an engineering management trainee from
 6 1963 to '64.
 7 A. Between 1963 and 1964 I was the first
 8 engineering management trainee on a management
 9 training program that Borg-Warner Corporation had at
 10 that time. It was specifically for engineers who had
 11 little experience in engineering but an engineering
 12 degree, and were then going to get a management
 13 degree through an MBA.
 14 The program had three stops. Six months
 15 at the corporate research center where, in effect, we
 16 worked side by side with the researchers at the
 17 center learning about the types of products which
 18 were being developed.
 19 Then two stops of three months each at
 20 two divisions of Borg-Warner that were arbitrarily
 21 chosen.
 22 Q. With regard to the research center, is
 23 that the Roy Ingersoll Center?
 24 A. At the time it was called the Roy C.

Page 13

1 Ingersoll Research Center.
 2 Q. Where is that located?
 3 A. It's located in Des Plaines, Illinois.
 4 Q. The two divisions that you stopped at
 5 during this position, can you tell me what divisions
 6 they were?
 7 A. Yes. The first one was the Spring
 8 division in Bellwood, Illinois, where I learned about
 9 mechanical clutches, one-way clutches in particular.
 10 The second was the Borg & Beck division
 11 in the south side of Chicago.
 12 Q. Borg & Beck made what at this time?
 13 A. At that time they had three primary
 14 products. One was manual transmission clutches, the
 15 second was automatic transmission torque converters,
 16 the third was damper assembly.
 17 Q. During your education for your bachelors
 18 degree did you take any courses that dealt with
 19 mineralogy?
 20 A. No.
 21 Q. Were there any courses that mentioned
 22 asbestos that you can recall, I know it's going back
 23 ways?
 24 A. I cannot recall any course that I had

Page 14

Page 16

1 that mentioned asbestos.
 2 Q. While you were working at the research
 3 center, can you give me an idea what you did?
 4 A. Yes. I remember in particular that
 5 during those six months we were trying to develop a
 6 new type of hydraulic control valve.
 7 I was working with a project engineer
 8 who had been at the research center for longer than
 9 me, and we were working side by side. I was doing
 10 the calibrations on pressure and flow and he was
 11 doing the design.
 12 Q. Were all the products that we mentioned
 13 so far automotive or truck products as opposed to
 14 industrial or piping products?
 15 A. All of them were automotive or truck.
 16 Q. How big was the research center?
 17 A. I don't recall the exact number at that
 18 point in time.
 19 Q. Was it one building, part of a building?
 20 A. It was one self-contained building in
 21 Des Plaines, Illinois.
 22 Q. Was it a single-floor building or
 23 multi-floor building?
 24 A. It was a single-floor building.

1 Was that the nature of that library?
 2 A. As I recall it was a room that had
 3 shelves mainly for current design literature, like
 4 magazines.
 5 Q. Would most of these be professional
 6 publications?
 7 A. Yes.
 8 Q. Were there any, as opposed to
 9 professional publications, any trade publications
 10 such as Automotive Weekly, or something like that?
 11 A. Yes.
 12 Q. Were there any publications that you
 13 recall that dealt with asbestos?
 14 A. I don't recall.
 15 Q. After you completed this program you
 16 became a project manager at the Borg & Beck division?
 17 A. Yes.
 18 Q. You spent approximately two years there?
 19 A. Yes.
 20 Q. As project manager was that for a single
 21 project?
 22 A. Yes. It was for a single project.
 23 Q. What was the project?
 24 A. The project was in an area that we

Page 15

Page 17

1 Q. Do you have an idea of how big the
 2 building was?
 3 I don't expect you to give me the exact
 4 floor space in square feet, but just an estimate
 5 would be good.
 6 A. I would estimate it at about 100,000
 7 square feet. That was laboratories and offices.
 8 Q. Were there any parts of this research
 9 center where there were materials kept that you could
 10 read about different aspects of the engineering
 11 requirements for products? I know that's a vague
 12 question. Let me just get to the point.
 13 Was there a library there?
 14 A. There was a library.
 15 Q. Can you give me an idea of how big the
 16 library was?
 17 A. If I recall correctly it was about as
 18 big as this room.
 19 Q. 10 by 14, something like that?
 20 A. Yes.
 21 Q. Did you spend much time in the library?
 22 A. No.
 23 Q. My concept of a library is a lot of
 24 shelves with books or magazines on them.

1 called advanced engineering. We were trying to use a
 2 wet clutch to affect a variable speed drive
 3 mechanism.
 4 Q. Was this for an automotive transmission
 5 or was it designed for heavier applications?
 6 A. For heavier applications. At that point
 7 in time it was for pumps, trying to drive a
 8 centrifugal pump at a varying speed.
 9 Q. For the next nine years you were sales
 10 manager and engineering manager at Borg & Beck?
 11 A. Yes.
 12 Q. You moved from Chicago to Detroit?
 13 A. Yes.
 14 Q. Was this a manufacturing facility in
 15 Detroit?
 16 A. Yes. The one in Detroit was a
 17 manufacturing facility.
 18 Q. I can imagine since it was Detroit it
 19 was almost all automotive because that's the
 20 automotive industry, but is that correct?
 21 A. All the products from that facility were
 22 automotive products.
 23 Q. Then your next position was the
 24 vice-president of engineering for Borg & Beck in

Page 18

1 Sterling Heights?
 2 A. Yes.
 3 Q. Can you give me an idea of what your job
 4 responsibilities were as vice-president of
 5 engineering?
 6 A. Yes. I have to go back to the previous
 7 one because it's indicative.
 8 In the previous nine years I was in
 9 charge of a project, both through sales and
 10 engineering, in controls of electronic systems for
 11 automobiles. That was dependant upon a government
 12 requirement which was withdrawn.
 13 Therefore, one of the tasks I had as
 14 vice-president of engineering was to close that whole
 15 area. That was one of the first tasks I had.
 16 The rest of the time, which was much
 17 shorter, was to oversee an administrative overview,
 18 the engineering department and design and
 19 development
 20 of automotive products.
 21 Q. Can you give me an idea of the scope of
 22 automotive products that were being made by Borg
 23 & Beck during this first 10 or so years that were
 24 there?
 25 A. The scope of automotive products?

Page 19

1 Q. Essentially the types of products.
 2 A. At these locations?
 3 Q. Right.
 4 A. They were the same type that I recited
 5 the earlier. That is manual transmission clutches,
 6 automatic transmission torque convertors, and damper
 7 assemblies.
 8 Q. As so often happens in asbestos
 9 litigation we tend to focus on one product and we
 10 never take a look at the entire scope of the
 11 corporation. Frequently I am just going to keep
 12 saying that this was such a small part of what we
 13 did, this is a single asbestos product and that was
 14 the idea, is to get an idea of the range of products
 15 that were being made by Borg & Beck. I am not
 16 focusing on one small product.
 17 After your position as vice-president of
 18 engineering you went into research and engineering as
 19 vice-president in Troy, Michigan?
 20 A. Yes. Troy, Michigan, was the
 21 headquarters of a group within Borg-Warner, the
 22 automotive components group. I was asked to be the
 23 vice-president of research and engineering for that
 24 group.

Page 20

1 Q. The automotive components group of
 2 Borg-Warner, were there more aspects of automotive
 3 products, or more types of automotive products that
 4 you were working with here than you were working
 5 with
 6 at Borg & Beck?
 7 A. Yes, on an oversight but not a direct-
 8 responsibility position.
 9 Q. Can you give me an idea of the products
 10 that were being made through the automotive
 11 components group?
 12 A. Yes. They were components for automatic
 13 transmissions like the one-way clutch that I learned
 14 about during my training program. They were
 15 four-wheel drive transfer cases. They were manual
 16 transmissions, and there were controls such as
 17 electrohydraulic selenoid valves.
 18 Q. At the time that you were with Borg &
 19 Beck, were you aware that any of the products that
 20 Borg & Beck was working with contained asbestos?
 21 A. Yes.
 22 Q. Can you give me an idea of the products
 23 that you were aware of at that time that contained
 24 asbestos?
 25 MR. BAKER: At what time?

Page 21

1 MR. CARTER: At the time he was with
 2 Borg & Beck.
 3 A. The only product that I was aware of
 4 that contained asbestos was the friction material
 5 that we purchased from outside and attached to our
 6 manual transmission clutches.
 7 Q. When you went to the BW auto components
 8 group, were there any asbestos-containing products
 9 that were coming out of the BrW automotive
 10 components
 11 group?
 12 A. With the exception of the one I just
 13 mentioned I have no knowledge of any other.
 14 Q. Your next stint took you to Brazil?
 15 A. Yes.
 16 Q. You were with Borg-Warner, I guess, "do"
 17 meaning "of Brazil?"
 18 A. Yes.
 19 Q. What did you do in Brazil?
 20 A. I was the president and general manager
 21 of a manufacturing facility in Brazil. More
 22 particularly, I was an interface with governmental
 23 agencies in Brazil in such things as economics and
 24 trade.
 25 Q. Were any of the products that were made

Page 22

1 in Brazil shipped to the United States?
 2 A. Yes.
 3 Q. What products were made at the Brazil
 4 facility?
 5 A. We made in Brazil manual transmission
 6 clutches.
 7 Q. Are these similar to the ones that were
 8 made by Borg & Beck?
 9 A. Yes.
 10 Q. At the facility in Brazil, was it still
 11 the same in that you would purchase the asbestos-
 12 containing part of the clutch assembly from outside
 13 source, or did you actually manufacture that segment
 14 there in Brazil?
 15 A. There were two types. Those that we
 16 shipped to the OEM, the original equipment
 17 manufacturers in the United States, we purchased
 18 from
 19 a vendor in the United States.
 20 Those that we produced and sold in
 21 Brazil we manufactured in Brazil.
 22 Q. Would that mean that for the products
 23 that you were selling in Brazil, as opposed to those
 24 that were being shipped back to the United States,
 that you were actually working with the raw asbestos

Page 23

1 to create the product?
 2 A. No, because at that point we would buy
 3 the encapsulated yarn. The only thing we were doing
 4 is pressing it into shape.
 5 Q. I guess at this point it would be a good
 6 idea to give me an idea of what the asbestos in a
 7 clutch is comprised of or is made up of.
 8 A. I am not sure that I can answer that
 9 question accurately for you.
 10 Q. Can you give me an idea of how the
 11 asbestos is put into the clutch friction material
 12 that you discussed.
 13 You just mentioned that you would buy an
 14 encapsulated yarn and then press it into something to
 15 make the plate?
 16 A. Yes. The encapsulated yarn, which would
 17 have the rubber materials around it, was purchased
 18 and shaped in the shape of the clutch disc.
 19 It was then put into a hot platen that
 20 came down and closed and cured the rubber product.
 21 That made the clutch disc.
 22 Q. You mentioned that the yarn was
 23 encapsulated. From your description it sounds like
 24 the yarn itself came with a rubber coating; is that

Page 24

1 correct?
 2 A. Yes. I don't know what the coating was.
 3 All I know is that we did cure it as if it was a
 4 rubber.
 5 Q. I may be misunderstanding how this is
 6 put together, but essentially if you had a circular
 7 disc that you were trying to make would that mean you
 8 would simply try to make a spiral from the center out
 9 and then as you applied the heat and the pressure
 10 when you were curing it it would kind of merge into a
 11 single solid disc?
 12 A. That's one description, yes.
 13 Q. Is that fairly accurate from a layman's
 14 point of view?
 15 A. Yes.
 16 Q. You were at the Brazil facility for
 17 about four years?
 18 A. That's correct.
 19 Q. How long had that plant been in
 20 operation, if it had been in operation before you got
 21 there?
 22 A. It had been in operation before I got
 23 there, and approximately 25 years.
 24 Q. When the clutch was being made in Brazil

Page 25

1 from the asbestos yarn, was there anything that was
 2 put on the yarn or above or below the yarn when you
 3 were pressing it in the platen to keep it from
 4 sticking?
 5 A. I don't know.
 6 Q. The reason I ask is it goes back to some
 7 things I have done before. I am familiar with the
 8 way tires are made.
 9 I have heard many a tire maker talk
 10 about that in order to keep the raw rubber from
 11 sticking to a press they had to coat it with
 12 essentially talc powder to keep it from sticking.
 13 Was that something that was required to
 14 be done?
 15 A. I really don't know. I can't give you
 16 an answer on that.
 17 Q. Were you aware at the time that you were
 18 in Brazil of any problems with the workforce as far
 19 respiratory injuries?
 20 A. No. I was aware of no respiratory
 21 injuries and problems in Brazil.
 22 Q. Was the workforce at that plant fairly
 23 stable at that time?
 24 A. At that time it was fairly stable.

Page 26

Page 28

1 **MR. BAKER:** Show my objection. What do
 2 you mean by stable? In length or duration.
 3 **MR. CARTER:** I will be a little bit more
 4 specific.
 5 **BY MR. CARTER:**
 6 **Q.** When I am asking about the stability of
 7 the workforce, would that plant have a large number
 8 of long-term production workers?
 9 **A.** The answer to that is yes.
 10 **Q.** In terms of giving an estimate of the
 11 percentage of products that were being made for
 12 Brazilian consumption as opposed to being shipped
 13 back to the United States for OEM use, can you give
 14 me some kind of an estimate of the production, how
 15 much was being used in Brazil and how much was
 16 being shipped back?
 17 **A.** It changed over time because of the
 18 economics of the country of Brazil. Between the
 19 period of 1983 and '87 they went through horrendous
 20 inflation. The percentage would have increased
 21 coming into the United States but the total numbers
 22 would not have.
 23 **Q.** How much of the production would have
 24 been devoted to producing things to be shipped to the

1 **Q.** You were the director for about two
 2 years, between '87 and '89?
 3 **A.** Yes.
 4 **Q.** Is that research center still in
 5 operation today?
 6 **A.** No, it's not. It was closed in 1989.
 7 **Q.** Was that during your tenure there?
 8 **A.** Yes.
 9 **Q.** In '89 you went to Michigan to work as a
 10 vice-president of technology and marketing for
 11 Borg-Warner Automotive?
 12 **A.** That's correct.
 13 **Q.** What were the products being marketed by
 14 Borg-Warner Automotive at this time?
 15 **A.** At that point in time I had two major
 16 functions. The one was an oversight of the various
 17 advanced technologies that were going on at our
 18 operating units.
 19 The second thing was to develop a new
 20 type of automatic transmission. It's called a
 21 continuously variable transmission.
 22 **Q.** Your next position from April of '92 to
 23 May of '94 was as president and general manager for
 24 Borg-Warner Automotive Transmission Engine

Page 27

Page 29

1 United States?
 2 **A.** I would think that at one time it got up
 3 to approximately 25 percent of what was being
 4 manufactured.
 5 **Q.** So the majority of the products that
 6 were made at that plant were for domestic use in
 7 Brazil?
 8 **A.** That's correct.
 9 **Q.** When you returned to the United States
 10 you went back to the research center in Des Plains?
 11 **A.** Yes.
 12 **Q.** You were the director there for about
 13 two years?
 14 **A.** Yes.
 15 **Q.** This is the same Ingersoll Research
 16 Center?
 17 **A.** It was the same building.
 18 **Q.** They may somewhere changed the
 19 designation or the name or something.
 20 By the way, who was Roy Ingersoll?
 21 **A.** Roy Ingersoll was a family. Roy and his
 22 son Bob were chairmen of Borg-Warner in the periods
 23 after the war. I am not sure exactly what years.
 24 After World War II, that is.

1 Components, and Borg & Beck torque Systems in
 2 Sterling Heights?
 3 **A.** Yes.
 4 **Q.** Was Borg & Beck at that time a division
 5 of Borg-Warner?
 6 **A.** Borg & Beck torque Systems manufactured
 7 torque converters for the automotive industry. We
 8 reported to a unit of Borg-Warner Automotive called
 9 Borg-Warner Automotive Transmission and Engine
 10 Components Corporation.
 11 **Q.** The products that were being sold
 12 through Borg-Warner Automotive were just the torque
 13 converters from Borg & Beck, or were there other
 14 products?
 15 **A.** No. There were other products that the
 16 Transmission and Engine Components Corporation
 17 manufactured and sold.
 18 **Q.** What other products were being sold?
 19 **A.** There were components for automatic
 20 transmissions, there were of three different types.
 21 **MR. BAKER:** Have we attached a specific
 22 time frame to this discussion?
 23 **MR. CARTER:** During this position.
 24 **MR. BAKER:** Only during that position

Page 30

1 time?
 2 **MR. CARTER:** Yes.
 3 **MR. BAKER:** I just wanted to make sure
 4 we weren't switching back and forth.
 5 **BY MR. CARTER:**
 6 **Q.** Are those the only two things, the
 7 torque converter and the component parts for
 8 automatic transmissions?
 9 **A.** There were torque converters, there were
 10 damper assemblies and there were components for
 11 automatic transmission.
 12 **Q.** Currently you are the vice-president for
 13 business development of Borg-Warner Automotive
 14 Automatic Transmission Systems out of Lombard?
 15 **A.** That's correct.
 16 **Q.** I take it from this that the main
 17 production is either automatic transmissions or parts
 18 for automatic transmission?
 19 **A.** Parts therefor.
 20 **Q.** Are there any parts in an automatic
 21 transmission that would contain asbestos, to your
 22 knowledge?
 23 **A.** Not to my knowledge.
 24 **Q.** So if my understanding is correct, and

Page 32

1 automotive market.
 2 When you first began with Borg-Warner
 3 and Borg & Beck I would imagine that, just with the
 4 knowledge of history and talking with my dad, that
 5 more often than not the transmissions being made at
 6 that time were the manual transmissions?
 7 **A.** That's correct.
 8 **Q.** Has that segment of the automotive
 9 market decreased over time?
 10 **A.** Without a doubt.
 11 **Q.** For the manual transmissions that are
 12 being made now for the dry clutches, is there a
 13 different product that has replaced the asbestos as a
 14 component part of the clutch assembly?
 15 **A.** Yes.
 16 **Q.** What has been used as a replacement for
 17 the asbestos?
 18 **A.** I can't give you an accurate description
 19 of what's being used now. I can only tell you that
 20 back many years ago the replacement was fiberglass.
 21 **Q.** Can you give me an idea of why asbestos
 22 was used in a clutch assembly?
 23 **A.** Again, I can't tell you the history as
 24 to why it was initially selected. I can only tell

Page 31

1 please correct me if I am wrong, the products that we
 2 have been talking about thus far are simply parts of
 3 a clutch for a manual transmission?
 4 **A.** There are two types of manual
 5 transmissions. One that uses a wet clutch and one
 6 that uses a dry clutch. With that amplification,
 7 yes, that's correct.
 8 **Q.** The asbestos products would be used in a
 9 dry clutch as opposed to a wet clutch, or vice-versa?
 10 **A.** Back at that time, yes.
 11 **Q.** Is there a time when Borg-Warner ceased
 12 to make asbestos-containing clutch products?
 13 **A.** Yes.
 14 **Q.** That was when?
 15 **A.** It started, the transition started
 16 somewhere, and I'm sorry, I don't know the exact
 17 date. Somewhere in the early 1980s. I believe the
 18 transition was completed somewhere in the mid
 19 eighties.
 20 **Q.** Do you have an idea of anything more
 21 specific than the "mid eighties?"
 22 **A.** I really can't tell you exactly when
 23 that was completed.
 24 **Q.** I mentioned earlier the changing

Page 33

1 you that when I first became involved asbestos had
 2 very good functional characteristics which made it a
 3 material of choice.
 4 **Q.** I have talked to a lot of different
 5 people about many asbestos products. Some people
 6 have told me that the asbestos was a component part
 7 simply because it kept the product from bouncing off
 8 the wall on sprayed mastics and cements.
 9 Others have said it's used for a fire
 10 retardant. Some people use it for an acid resistant.
 11 It is the durability of the fiber that
 12 would have made it an attractive component to a
 13 clutch as opposed to some other esoteric thing like
 14 it keeps things from bouncing off the wall?
 15 **A.** Again, this goes back several years, but
 16 as I recall, one of the main reasons was its
 17 capability to provide a material that had heat
 18 resistance.
 19 **Q.** I see on some literature about the heat
 20 that is generated during the operation of a dry
 21 clutch, but I have never seen anybody estimate the
 22 maximum temperature that would be generated
 23 through
 24 that friction process.
 25 Do you have any idea of what

Page 34

1 temperatures we are looking at in terms of the clutch
 2 operation?
 3 A. I don't know the maximum. I am sure it
 4 depends on the application. I do recall that there
 5 was a number of over 400 degrees fahrenheit, but I
 6 can't be more accurate than that.
 7 Q. I would like to switch gears at this
 8 point and take a look at the corporate history of
 9 Borg-Warner.
 10 Can you give me an idea, going from the
 11 beginning, how Borg-Warner was formed?
 12 A. I recall reading that Borg-Warner was
 13 formed in 1928 during the period of time in the
 14 automotive industry when there was a lot of
 15 consolidation going on. There were four independent
 16 companies that were brought together to form
 17 Borg-Warner at that time.
 18 Q. Do you know the names of the four
 19 companies?
 20 A. You are really taxing me.
 21 One of them was Borg & Beck, and that's
 22 where the Borg comes from in Borg-Warner.
 23 Another one was Warner Gear, and that's
 24 where the Warner in Borg-Warner comes from.

Page 35

1 I believe the third was Mechanics
 2 Universal Joint.
 3 The fourth was Marvel Carburetor.
 4 Q. Do you know what product lines were
 5 contributed by these four companies that went
 6 together to make Borg-Warner or what product line
 7 came out of the consolidation of these four
 8 companies?
 9 A. The companies really did not consolidate
 10 in that they didn't then all produce a single
 11 product. They continued to manufacture products that
 12 they were manufacturing when they were brought
 13 together under the Borg-Warner umbrella.
 14 Q. So if I understand correctly there may
 15 have been a division out of Borg-Warner that would at
 16 that time continued to make universal joints from the
 17 Mechanics Corporation and carburetors from Marvel
 18 Carburetor and, I guess, gears from Warner Gear?
 19 A. To my knowledge that's true.
 20 Q. Just assuming from names things from the
 21 name. At Borg & Beck we talked about it being a
 22 clutch company.
 23 A. Yes, sir.
 24 Q. From answers to interrogatories there

Page 36

1 appears to be five divisions or subparts of
 2 Borg-Warner that at one time or another dealt in
 3 asbestos products. The first being Borg & Beck.
 4 They made clutch assemblies that contained asbestos;
 5 is that correct?
 6 A. Yes.
 7 Q. The second one is Rockford division, out
 8 of Rockford, Illinois.
 9 Are you aware of any asbestos products
 10 that they made?
 11 A. Rockford division in Rockford, Illinois,
 12 was outside of any of the responsibility that I had.
 13 I do know that they made clutches as well.
 14 Q. From the answers to interrogatories the
 15 definition was off-highway and heavy duty vehicles?
 16 A. Yes.
 17 Q. Can you give me an idea of what "off-
 18 highway" and "heavy duty vehicles" means?
 19 A. Yes, I can, because that's why it was
 20 not part of my responsibility which was OEM in
 21 automotive.
 22 They were making clutches for large
 23 vehicles like tractors, Caterpillars. I don't know
 24 their customer base, but that's why they were

Page 37

1 classified as off-highway as opposed to on-highway,
 2 being automobile and truck.
 3 Q. If I understand this correctly, the
 4 off-highway and large vehicle would be essentially
 5 construction equipment?
 6 A. I believe that that could include
 7 construction equipment since I do know that it did
 8 tractors.
 9 Q. It would not include something like a
 10 tractor for a semi? Would that be a highway under
 11 the OEM or automotive section?
 12 A. I believe that they did have some
 13 clutches that went to some sectors of the on-highway
 14 large vehicle, but that was not their major market.
 15 MR. BAKER: Do you know that? Do you
 16 actually know that?
 17 THE DEPONENT: Yes, I actually know.
 18 BY MR. CARTER:
 19 Q. Would the Rockford division also be
 20 selling to manufacturers of large farm equipment?
 21 A. I don't know.
 22 Q. Another division that you had mentioned
 23 briefly was the Spring/Brummer division?
 24 A. Yes.

Page 38

Page 40

1 Q. What I was been able to glean from
 2 answers to interrogatories it appears that sometime
 3 in the early seventies from approximately '71 to '75
 4 they went into the disc brake market?
 5 A. I don't have any knowledge of that.
 6 Q. At the time that you spent, what three
 7 months at Spring/Brummer, what were they making?
 8 A. I can only tell you that the product
 9 that I was involved in was a mechanical one-way
 10 clutch for automatic transmissions. That was the
 11 project that I was working on.
 12 Q. From your history with Borg-Warner, can
 13 you give me an idea of what the product line of
 14 Spring/Brummer would have been traditionally?
 15 A. It initiated out of springs, which is
 16 why the name was developed.
 17 Early in the development of automatic
 18 transmissions and prior to the RC Ingersoll Research
 19 Center being developed the research on automatic
 20 transmissions was done at the Spring division.
 21 Coming from that, then, was the wet
 22 clutches for automatic transmissions and the one-way
 23 clutches for automatic transmissions.
 24 Q. Do you know if they ever got into the

1 were a company that supplied parts to the
 2 aftermarket.
 3 Q. Do you know what kind of parts they
 4 distributed?
 5 A. I don't know their entire range,
 6 however, I do know that they distributed parts like
 7 ignition components at the time when cars used point
 8 and distributor caps and things.
 9 That's typical of the kinds of parts
 10 that they distributed.
 11 Q. Do you know if the automotive parts
 12 division manufactured their own parts, or did they
 13 simply resell something that they purchased from
 14 other manufacturers?
 15 A. I'm afraid I can't tell you. I don't
 16 know.
 17 Q. There also were documents that were
 18 provided earlier this week from counsel regarding a
 19 company called Unit Parts out of Oklahoma City.
 20 Do you know anything at all about that?
 21 A. No knowledge of that.
 22 Q. I could not glean from the documents how
 23 large Unit Parts was when it was purchased in '72.
 24 For some reason the answers to

Page 39

Page 41

1 dry clutches for manual transmissions?
 2 A. Not to my knowledge.
 3 Q. From what you have said before, if I am
 4 correct, you didn't have anything to do with this
 5 division at the time when they would have been making
 6 disc brakes?
 7 A. If they made disc brakes I didn't know
 8 about it.
 9 Q. The next one is the automotive parts
 10 division.
 11 Are you aware of that division?
 12 A. The automotive parts division that I
 13 recall, which was many years ago, was a distributor
 14 of aftermarket components.
 15 Q. Can you tell me what "aftermarket
 16 components" are?
 17 A. I don't know what their entire line up
 18 was, but these were parts that were sold for
 19 replacement of original parts that failed.
 20 Q. So, essentially, these would be parts
 21 that someone would buy from a parts company like
 22 NAPA
 23 if they were doing some repairs on their car?
 24 A. Again, I don't know what their
 distribution methods were. I just know that they

1 interrogatories there was that some point in '76 it
 2 may have been discontinued or it got out of the
 3 asbestos product line.
 4 But you have no knowledge at all about
 5 Unit Parts Company?
 6 A. I don't know anything about Unit Parts.
 7 Q. Is there someone who might be more
 8 knowledgeable about that part of the corporate
 9 operations of Borg-Warner?
 10 A. I have no idea where it was. I don't
 11 know anything about Unit Parts.
 12 Q. Can you give me an idea of how big
 13 Borg-Warner is today as far as subsidiaries and
 14 products that get into even beyond the automotive
 15 end?
 16 A. Borg-Warner Automotive is by its name
 17 strictly automotive. It is a worldwide company that
 18 has sales of about \$1.2 billion a year.
 19 Q. Is there a parent corporation for
 20 Borg-Warner Automotive?
 21 A. No. Borg-Warner Automotive,
 22 Incorporated, is a public company.
 23 Q. There is no other Borg-Warner
 24 Corporation?

Page 42

1 A. No.
 2 Q. Would Borg-Warner have always been
 3 automotive?
 4 As far as you know, all the products
 5 that they made were designed for, for lack of a
 6 better word, transportation?
 7 A. No. At one point in time Borg-Warner
 8 was a corporation that had units in other than
 9 automotive.
 10 Q. Are you aware of any of the other units
 11 that Borg-Warner had historically?
 12 A. Yes, I am. There was a finance services
 13 company, there was an air conditioning company, there
 14 was a company that sold pumps to municipalities, and
 15 another one that sold components to control systems
 16 for hydraulics like in aircraft controls. Finally
 17 there was a Borg-Warner Chemicals company.
 18 (Break.)
 19 **BY MR. CARTER:**
 20 Q. Before the break we were talking about
 21 other units of the Borg-Warner corporation that you
 22 were aware of. You had mentioned five units that you
 23 were aware of; financial services, the air
 24 conditioning, pumps for municipalities, component

Page 43

1 hydraulics for aircraft systems, essentially, and the
 2 chemical division.
 3 Are there any other units that you are
 4 aware of?
 5 A. Not that I can call to mind right now.
 6 Q. During your history with Borg-Warner
 7 have you ever had any interaction with any of the
 8 other aspects of Borg-Warner?
 9 A. The only interaction I have goes way
 10 back to that first program that we talked about back
 11 in 1964 where I was trying to make a variable speed
 12 drive for one of the pumps. Subsequent to that, no.
 13 Q. Do you know if these units are still
 14 part of Borg-Warner?
 15 A. I know that they are not still part of
 16 Borg-Warner.
 17 Q. Do you have an idea as to the time
 18 frames when Borg-Warner either sold them or got rid
 19 of them or closed them down or whatever they did?
 20 A. Yes. In the period of the mid-eighties
 21 terminating in about 1987.
 22 Q. Did Borg-Warner generally sell off these
 23 divisions?
 24 A. Yes, generally we did.

Page 44

1 Q. It's not something where they were just
 2 closed down?
 3 A. No.
 4 Q. Is there a reason why Borg-Warner chose
 5 to sell off these five units?
 6 A. Yes, a very definitive reason.
 7 During the mid-eighties we were a target
 8 for two different company writers who were going to
 9 be using junk bonds to buy our corporation and to
 10 dissolve it.
 11 So, to my knowledge, the corporation
 12 decided to take the corporation private themselves
 13 and sold these areas of the corporation to pay for
 14 the debt that was taken on to take the company
 15 private.
 16 Q. Are you aware of any asbestos products
 17 that would have been made by any of the five units at
 18 a time when they were part of Borg-Warner?
 19 A. I have no knowledge of that.
 20 Q. Was the air conditioning unit the York?
 21 A. It was the York unit, yes.
 22 Q. If they made an asbestos product it's
 23 not something that you are aware of?
 24 A. I would not know.

Page 45

1 Q. At this time is Borg-Warner public or
 2 private?
 3 A. It's a public company now in the New
 4 York Stock Exchange.
 5 Q. Did they go private in '87?
 6 A. Yes.
 7 Q. Sometime between '87 and now they
 8 decided to go back public?
 9 A. That's correct.
 10 Q. Do you know when they went public?
 11 A. I believe it was two years ago.
 12 Q. When Borg-Warner was first created from
 13 the four companies have you ever looked or seen or
 14 been told about the articles of incorporation for
 15 Borg-Warner?
 16 A. No.
 17 Q. So you wouldn't know what the statement
 18 of the corporate purpose would be?
 19 A. No, I am afraid I don't.
 20 Q. As a public corporation you are required
 21 to generate annual reports for the stockholders and
 22 annual reports for the IRS?
 23 A. That's correct.
 24 Q. Do you have an idea of how many

Page 46

Page 48

1 employees Borg-Warner employs now?
 2 A. Approximately it's between 9 and
 3 10,000 people.
 4 Q. You mentioned that Borg-Warner is an
 5 international corporation.
 6 Can you tell me what countries
 7 Borg-Warner does business in or has facilities in
 8 besides the United States?
 9 A. What countries?
 10 Q. Yes.
 11 A. Yes, I can.
 12 Besides the United States we have
 13 companies in Canada and Mexico, Japan, South Korea,
 14 Germany, Italy, and Wales.
 15 Q. Do you know if any of the historical
 16 documents relating to Borg minutes are available for
 17 Borg-Warner?
 18 A. I have no knowledge about that.
 19 Q. Does Borg-Warner have a record keeping
 20 policy at this time?
 21 A. A record keeping --
 22 Q. A record retention policy?
 23 A. I believe we do, but I am not familiar
 24 with what it is.

1 of sales of the Borg-Warner automotive parts
 2 restricted to the United States?
 3 A. Primarily we are a designer, developer
 4 and manufacturer of components that go to the
 5 original equipment manufacturers. More particularly
 6 for Borg-Warner Automotive that would be the large
 7 automotive companies.
 8 Q. If I understand correctly, back to the
 9 very early days, Borg-Warner would have been selling
 10 to the manufacturers of automobiles and then the
 11 parts that Borg-Warner made would have gone
 12 wherever
 13 the autos went?
 14 A. That's true.
 15 Q. The automotive parts division, the
 16 distributor division, do you know if that unit
 17 distributed parts nationwide or were they limited by
 18 some geographic scope?
 19 A. I am sorry. I really don't know what
 20 their market was.
 21 Q. Is there someone still around that would
 22 have familiarity with the automotive parts division
 23 that you know of?
 24 A. That area, the aftermarket, the
 automotive parts division was completely separate

Page 47

Page 49

1 Q. Is there any place where Borg-Warner
 2 would keep historical reference documents?
 3 I know some companies keep engineering
 4 documents so they can see the cycle of a particular
 5 product. If they want to take a look at if this
 6 formulation works then why doesn't this one now
 7 work.
 8 Is there any facility where the
 9 engineering records would be kept for different
 10 product lines?
 11 A. If there is such a place it would be the
 12 responsibility of the operating unit to keep those
 13 records. There is no central.
 14 Q. So, if I understand you correctly, the
 15 record keeping function would be essentially
 16 delegated to the operating unit and they would keep
 17 them on-site at the production facility?
 18 A. To the best of my knowledge that's
 19 correct.
 20 Q. Do you know if any of the documents have
 21 been either microfilmed or converted to a computer
 22 medium for storage?
 23 A. That's beyond my knowledge.
 24 Q. What is the traditional geographic area

1 from anything that I came up through. I don't know
 2 anybody in that area.
 3 Q. Do you know if there was ever a warning
 4 put on any of the asbestos-containing products made
 5 by Borg-Warner?
 6 A. I know that we put a label on some
 7 shipping containers that were shipped to General
 8 Motors.
 9 Q. Was this done at a time when
 10 asbestos-containing products were being shipped to
 11 other OEMs besides GM?
 12 A. I really don't know whether we were or
 13 not.
 14 At the time and to this date I don't
 15 know of any problems with the kind of products that
 16 we were making. I do know that we were requested by
 17 General Motors to put that label on their shipping
 18 containers.
 19 Q. So if some other company, such as Ford
 20 or Chrysler just to make up a name, did not request a
 21 warning label then you would not have put one on?
 22 A. I don't know firsthand whether there was
 23 or was not.
 24 Q. At the production facilities that you

Page 50

1 had worked at, were there at any of these production
 2 facilities any persons who were in charge of, or as
 3 part of their duties, would have done air sampling
 4 for quality?
 5 A. Again, I was in engineering. I don't
 6 know whether that was the case or not.
 7 Q. At any of the facilities do you know if
 8 any of the plants had a doctor or a medical
 9 department?
 10 A. I don't know.
 11 Q. I think you said earlier that you don't
 12 know really anything about the Unit Parts?
 13 A. No.
 14 Q. Is there anybody who would know anything
 15 about Unit Parts?
 16 A. I really have no idea where they were or
 17 if they were in the corporation, so I don't know who
 18 would know anything about it.
 19 Q. I have been provided by counsel a number
 20 of catalogs of parts that were made by Borg-Warner
 21 divisions. The first one -- I am not going to have
 22 these marked as an exhibit so they are not
 23 redundant -- is a catalog that is entitled Disc
 24 Brakes DB-71. I will try to see if there is a

Page 52

1 I want to see if you would agree, being
 2 more an expert in the field of automotive
 3 applications, if that would be a correct description
 4 of the contents.
 5 A. There is certainly applications here for
 6 all the major manufacturers that I recall at the
 7 time, all four of them.
 8 Q. It appears, and correct me if I am
 9 wrong, this looks like these were only made for
 10 automobiles. I don't see any trucks listed.
 11 Actually counsel can correct me if I am
 12 wrong, these were just made for automobiles?
 13 A. I don't see any trucks listed on these
 14 papers.
 15 Q. Is there any person who would have been
 16 better situated to discuss the operations of the
 17 Spring/Brummer division during the early seventies
 18 that you know of from your history with Borg-Warner?
 19 A. I don't even know that these came from
 20 the Spring/Brummer division. This mentions
 21 automotive parts division Franklin Park, Illinois.
 22 That's the division that you and I have discussed
 23 already that I have really no knowledge of.
 24 Q. That's a mistake on my part.

Page 51

1 publication date on the document itself. No.
 2 MR. BAKER: What number is that?
 3 MR. CARTER: This would be, I think, No.
 4 50. I am not going to be doing a lot with this. I
 5 am going to be looking at the scope of the
 6 applications of the disc brakes that were made by
 7 Borg-Warner at this time.
 8 BY MR. CARTER:
 9 Q. I am going to ask you to kind of glance
 10 through this to take a look at the manufacturers that
 11 are listed in terms of applications for the disc
 12 brakes.
 13 A. May I state first of all that I have
 14 absolutely no knowledge of any disc brakes by
 15 Borg-Warner.
 16 Q. Okay.
 17 A. You said particularly the United States?
 18 Q. Right. Just the car makers that they
 19 show listed.
 20 It appears from my looking through this
 21 that the disc brakes that were made by Borg-Warner
 22 appear to be applicable to virtually every
 23 manufacturer in the United States of automobiles, and
 24 multiple models of those vehicles.

Page 53

1 MR. BAKER: It's on page 2.
 2 Q. I was making an assumption without
 3 looking at it carefully.
 4 So this is more of a catalog of
 5 distribution from that distributing division of
 6 Borg-Warner and not some things necessarily that
 7 were made by Borg-Warner?
 8 A. The fact that it's listed under
 9 automotive parts division I believe what you just
 10 said is correct.
 11 Q. Some of the documents that were produced
 12 this week showed or demonstrated sales, I would
 13 guess -- have you seen the stack of documents that is
 14 sitting next to counsel before today?
 15 A. I saw a listing of the documents that
 16 were listed here.
 17 Q. There are a couple of sections of
 18 documents that I just wanted to ask if I was reading
 19 them correctly.
 20 MR. BAKER: You understand that that
 21 table of contents was put together by our office
 22 just to make looking through the documents easier.
 23 It in and of itself is not a document produced by
 24 Borg-Warner.

Page 54

1 **MR. CARTER:** I will agree to that.
 2 **BY MR. CARTER:**
 3 **Q.** There were a number of documents
 4 contained in that set that appeared to be invoices.
 5 I am just trying to find out whether it was sold from
 6 someone to Borg-Warner or purchased by someone
 7 from
 8 Borg-Warner.
 9 I am going to ask you to take a look at
 10 the documents that had been tabbed as 48 by counsel.
 11 The first one appears to be to HK
 12 Porter.
 13 Do you have one like that?
 14 **A.** Yes.
 15 **Q.** I am asking, is this a sale of a product
 16 from Borg & Beck to HK Porter or is it a purchase
 17 from HK Porter by Borg & Beck?
 18 **A.** It's a purchase from HK Porter by Borg &
 19 Beck.
 20 **Q.** That makes sense.
 21 There were a number of companies who
 22 supplied the clutch materials that contained asbestos
 23 to Borg & Beck; is that correct?
 24 **A.** Yes.
 25 **Q.** Did you have any dealings with the

Page 56

1 **A.** Abex I know the name, but I don't know
 2 of them as being a supplier.
 3 **Q.** Johns-Manville?
 4 **A.** Again, I know the name. I don't know
 5 that they supplied any product to Borg-Warner.
 6 **Q.** National Friction Products?
 7 **A.** I don't know of them.
 8 **Q.** Then there's a company called Russe,
 9 R-U-S-S-E?
 10 **A.** I don't know that company.
 11 **Q.** At any time did any of the suppliers,
 12 such as HK Porter or Raymark, ever mention, to your
 13 knowledge, anything about potential hazards from
 14 asbestos?
 15 **A.** Not to my knowledge.
 16 **Q.** If I understand you correctly from your
 17 prior testimony the vast majority of sales of
 18 asbestos-containing products would have been directly
 19 from Borg-Warner to the manufacturer of automobiles
 20 or other vehicles?
 21 **A.** Absolutely true.
 22 **Q.** And not distributed to the general
 23 public through parts stores or whatever?
 24 **A.** That's true.

Page 55

1 suppliers when you were dealing with Borg & Beck or
 2 the clutch aspects of Borg-Warner?
 3 **A.** No direct dealings, no.
 4 **Q.** Would you be generally familiar with who
 5 were the suppliers?
 6 **A.** I could recall that the two main
 7 suppliers, as a matter of fact the only two that come
 8 to mind, is HK Porter and Raymark or it was Raybestos
 9 at that point in time.
 10 **Q.** There are a number of other companies
 11 that were suppliers, and I would take it, or a list
 12 of suppliers in answers to interrogatories, I would
 13 take it from your comment that they would be minor
 14 suppliers compared to these two?
 15 **A.** Only in that my knowledge and my
 16 recollection was that I knew about these two.
 17 **Q.** I am going to go through a list of
 18 suppliers and see if you are familiar with the
 19 companies. You mentioned Raymark. What about the
 20 Gatke Company, G-A-T-K-E?
 21 **A.** No, sir.
 22 **Q.** Austo, A-U-S-T-O?
 23 **A.** No, sir.
 24 **Q.** American Brake Shoe, or Abex?

Page 57

1 **Q.** Other than anything that may have been
 2 distributed through automotive parts, of which you
 3 are pretty much unaware?
 4 **A.** Yes.
 5 **Q.** Are you aware of any sales offices that
 6 Borg-Warner may have had in the West Virginia
 7 region,
 8 Ohio, Pennsylvania?
 9 **A.** I am not aware of any in the West
 10 Virginia region.
 11 **Q.** There was at one time an answer to
 12 interrogatories by Borg-Warner regarding the warning
 13 that you mentioned. I want to find that and see if
 14 that goes with your recollection.
 15 **MR. BAKER:** For the record, when you
 16 find it could you mention what set it is you are
 17 pointing at?
 18 **MR. CARTER:** Sure, I will. Actually I
 19 will probably have it marked.
 20 I am going ask the court reporter to
 21 mark this as the next exhibit in order.
 22 (Exhibit No. 4 was marked for
 23 identification.)
 24 **BY MR. CARTER:**
 25 **Q.** These are interrogatories from

Page 58

1 Borg-Warner in a case captioned Parker Thayer versus
 2 AP Green Refractories in the State of Michigan,
 3 County of Wayne. These were time stamped by the
 4 court on July 14, 1993, I believe, before Judge
 5 Robert Colombo. I will hand these to you and I am
 6 going to ask you a few questions about these.
 7 First of all, have you ever seen these
 8 before?
 9 A. No, I have never seen these before.
 10 Q. There is an exhibit to that which is
 11 noted as Exhibit B. That's probably two or three
 12 pages from the back.
 13 That Exhibit B is referenced in the
 14 interrogatories at page 43, interrogatory number 70.
 15 I will let you go ahead and read the
 16 question and answer and I will ask you some questions
 17 about that.
 18 MR. BAKER: Before you ask any questions
 19 I would like a chance to look through the rest of the
 20 set here for a second since I have never seen those
 21 questions before.
 22 (Break.)
 23 MR. BAKER: Just for the record I notice
 24 that these are not apparently signed by anybody.

Page 59

1 Do you have a signed set?
 2 MR. CARTER: I don't know if I have a
 3 signed set with me. These were time stamped and
 4 filed with the court in that case, as noted from page
 5 1 on the time stamp. I don't know if I have one
 6 signed by Mr. Wentz. Was it Wentz that was signing
 7 these then?
 8 MR. BAKER: I am just looking at the page
 9 which apparently has listed in type Horiszney, but it
 10 is neither signed with his signature nor is it dated
 11 nor is it verified. All those blanks remain empty.
 12 I offer that as an observation in the
 13 sense that I am not disputing your representation
 14 here on the record that these were filed. I am
 15 simply offering it as an observation that apparently
 16 we are looking at a document titled Exhibit No. 4 to
 17 this deposition which is not signed by anybody from
 18 Borg-Warner. I would like to place that on the
 19 record before Mr. Lindquist answers any questions.
 20 BY MR. CARTER:
 21 Q. Going to interrogatory No. 70 and
 22 Exhibit B, which is referenced in the answer to
 23 interrogatory No. 70, and excluding the part in the
 24 answer gives standard objections.

Page 60

1 It states in this one that the
 2 defendant, Borg-Warner, states that it placed warning
 3 labels on its asbestos-bearing clutch products in
 4 accordance with the requirements of the Hazard
 5 Communication Rule of 1986.
 6 In your earlier testimony you stated
 7 that, and correct me if I misstate your testimony,
 8 that the only warning that you are aware of was a
 9 warning that was produced and placed on shipments to
 10 General Motors, and it was done at the request of
 11 General Motors; is that correct?
 12 A. Yes. The use of our products, to my
 13 knowledge at that point in time all the way up
 14 through now, has never shown a problem as far as
 15 health effects.
 16 At the time my testimony has to do with
 17 the fact that I was producing products in Brazil for
 18 a shipment to General Motors. General Motors
 19 indicated that they wanted to have this label put on.
 20 Out of courtesy to our customer we did put that on.
 21 I can't tell you exactly when that date
 22 was.
 23 Q. You being the person designated as most
 24 knowledgeable in a number of areas that we have gone

Page 61

1 over and another area, one of which being warnings,
 2 which statement -- there appears to be, from my
 3 reading of this list, a conflict between what you
 4 have said and what was given as an answer by counsel
 5 for Borg-Warner.
 6 I am just trying to see which one is the
 7 more accurate. Whether it was simply warnings that
 8 were placed at the request of General Motors or
 9 whether it was warnings placed as a response to a
 10 requirement?
 11 MR. BAKER: Show my objection to the
 12 form of the question. I don't believe that there is
 13 an inconsistency here.
 14 If you are going to characterize it as
 15 an inconsistency I am going to further object on the
 16 grounds that, number one, you have pulled out here a
 17 set that purports to be answers to interrogatories
 18 numbering 64 pages and directed as simply to one
 19 question, showing us one exhibit attached. I have
 20 already mentioned that this set that you have shown
 21 to us is not signed by anybody from Borg-Warner.
 22 Secondly, I think Mr. Lindquist has
 23 already testified that he has not participated in the
 24 preparation in the answers to interrogatories on

Page 62

1 behalf of Borg-Warner, so he does not have knowledge
 2 of the exact thought processes that went into
 3 answering question No. 70, if, in fact, this is an
 4 answer on behalf of Borg-Warner.
 5 I would object to the characterization
 6 of your question in the sense that there may be
 7 inconsistencies here.
 8 But to the extent that he has knowledge
 9 of the general area of warnings he's certainly
 10 qualified to testify on those points.
 11 **BY MR. CARTER:**
 12 **Q.** All of that aside, does it appear to you
 13 from your reading of the answer, the reading of the
 14 warning and your knowledge of the operations of
 15 Borg-Warner at this particular time, that the
 16 response of Borg-Warner in putting a warning on just
 17 those products that were shipped to General Motors at
 18 their request was not a response to the Hazardous
 19 Communication Rule, but simply a response to a
 20 request by a specific purchaser?
 21 **A.** Again, I have no knowledge of the
 22 Hazardous Communication Rule of 1986. I don't know
 23 what that is.
 24 I do know that I was in Brazil at the

Page 63

1 time when we were making clutch products at the
 2 request and to sell to General Motors. I do know
 3 that on those products we were asked to put this
 4 label on it and we did.
 5 **Q.** I want to go through the interrogatories
 6 and ask a few other questions.
 7 If you go to page 8, actually the
 8 question starts, I believe, on page 7, it's question
 9 No. 12. I am looking at particularly answer No.
 10 12-C.
 11 You stated before that you are not aware
 12 of any of the disc brakes that were made or sold?
 13 **A.** No, sir I am not.
 14 **Q.** So you wouldn't know whether or not disc
 15 brake pads were sold to Kelsey Hayes or Bendix?
 16 **A.** I really don't know.
 17 **MR. BAKER:** Back up a second. Are you
 18 asking him to review interrogatory No. 12 and you
 19 were going to ask a question?
 20 **MR. CARTER:** No. I was just confirming
 21 that asking a question about the disc brakes would
 22 probably be useless because he doesn't know anything
 23 about the disc brakes.
 24 **MR. BAKER:** I just wanted to make sure

Page 64

1 we were on the same page.
 2 **BY MR. CARTER:**
 3 **Q.** Where was Spring/Brummer's manufacturing
 4 facility or facilities?
 5 **A.** In Bellwood, Illinois.
 6 **Q.** Not being from Illinois I am going to
 7 ask you where that is.
 8 **A.** Bellwood, Illinois, is a western suburb
 9 of the City of Chicago.
 10 **Q.** Did you ever have an opportunity, other
 11 than the one time that you mentioned earlier in your
 12 career, to get out to that manufacturing facility?
 13 **A.** I am sure I did get there because I
 14 continued to work on that mechanical one-way clutch.
 15 I am sure I had been there more than just that one
 16 three-month period.
 17 **Q.** Can you give me an idea, just your best
 18 recollection, not holding you to photographic memory,
 19 the last time you were there?
 20 **A.** Probably last week.
 21 **Q.** Have you visited that facility on a
 22 relatively regular basis?
 23 **A.** No, I can't say regularly relatively
 24 because I did visit it early in my career. They are

Page 65

1 now part of the group for which I am the
 2 vice-president of business development. So I have
 3 visited in both those times.
 4 **Q.** Was there a period of time that you
 5 essentially did not visit that facility?
 6 **A.** Sure. That period would be probably in
 7 the seventies through when I was down in Brazil, '87.
 8 **Q.** Is there any company that would have
 9 resold a Borg-Warner clutch under their own name or
 10 in their own box?
 11 **A.** I don't know. Again, that's aftermarket
 12 resales, and that's outside of my original equipment
 13 knowledge.
 14 **Q.** I want to go back to one of the early
 15 exhibits, which is the witness list. There are two
 16 people mentioned on the witness list that I want to
 17 ask you a couple questions about.
 18 The first one, of course, being Mr.
 19 James Grady. He's the first lay witness listed.
 20 Do you know who Mr. Grady is?
 21 **A.** Yes, I have known Mr. Grady as being
 22 part of Borg-Warner.
 23 **Q.** Can you give me an idea of how long you
 24 have known Mr. Grady?

Page 66

1 A. Mr. Grady came to Borg-Warner in the
 2 Detroit area, so my earliest recollection would have
 3 been when I moved to Detroit, which would have been
 4 in the late sixties. Somewhere in that time period.
 5 Q. Do you know what area of the operations
 6 of Borg-Warner in which he would be the most
 7 knowledgeable?
 8 A. I can only give you the kinds of
 9 positions that he's held.
 10 Q. That's probably a better question.
 11 A. Those positions were, at least that I
 12 recall, were in sales.
 13 Q. Going to the Thayer interrogatories, on
 14 page 22 it mentions in there that at the time that
 15 these were filed Mr. Grady was vice-president of
 16 marketing and involved in the sale of Borg-Warner's
 17 clutch products.
 18 Does that seem correct with your memory
 19 and knowledge of Mr. Grady?
 20 A. I can't give you an exact statement that
 21 that was the correct title. I know that he was in
 22 sales.
 23 Q. Was he involved, to the extent of your
 24 knowledge of Mr. Grady and his history with

Page 68

1 A. To the best of my knowledge that's true.
 2 Q. What is his training? Do you know if
 3 he's an engineer?
 4 A. I am afraid I don't know.
 5 Q. Do you have an idea of how old he is,
 6 best guess?
 7 A. I can only tell you that I think he's
 8 older than I am. So I don't know exactly how much.
 9 Q. Through your career with Borg-Warner
 10 have you ever worked with him at any of the positions
 11 that you have held?
 12 A. It would only have been on an oversight,
 13 but not on any direct reporting relationship. Such
 14 as when I had the research center and
 15 Spring/Brummer
 16 may have had a program that they were having done at
 17 the research center.
 18 Q. To the extent that I wanted to find
 19 something out about the operations of the
 20 Spring/Brummer division he would probably be a
 21 better source than you?
 22 A. Yes.
 23 Q. Probably better than Mr. Grady from what
 24 you have told me about Mr. Grady being pretty much
 in
 the clutch transmission line?

Page 67

1 Borg-Warner, has he been involved with the Borg &
 2 Beck clutch line, or would he have been involved in
 3 the Spring/Brummer or the automotive parts division
 4 or some other division?
 5 A. He would have been involved in Borg &
 6 Beck products.
 7 Q. Which would have been essentially the
 8 transmission line, clutches, and that sort of thing?
 9 A. Yes.
 10 Q. The second person listed on the lay
 11 witness list is Robert Hornick.
 12 Can you tell me anything about Mr.
 13 Hornick?
 14 A. Mr. Hornick I knew much less than I know
 15 about Mr. Grady. I know that he was an employee of
 16 the Spring division.
 17 Q. Do you have an idea, to the best of your
 18 knowledge, the first time you met him through
 19 Borg-Warner, or an estimation?
 20 A. I really can't recall the first time. I
 21 do know that I've known him since I came back from
 22 Brazil, which was '87.
 23 Q. To the best of your knowledge has most
 24 of his work been with the Spring/Brummer division?

Page 69

1 A. I assume that's true.
 2 Q. In your visit or work with any of the
 3 production facilities are you aware of any
 4 measurements of asbestos levels in any of the plants?
 5 A. No, I am not aware. Again, I was in
 6 engineering.
 7 Q. Are you aware of any medical exams of
 8 any workers for occupational lung diseases?
 9 A. I am not aware.
 10 Q. I am going to ask you about a few people
 11 to see if you have met or know these people.
 12 We have talked about Mr. Hornick and Mr.
 13 Grady.
 14 Have you ever met a person by the name
 15 of Edward Fuller?
 16 A. That name doesn't ring a bell with me.
 17 Q. How about Richard Rosenberg?
 18 A. No.
 19 Q. Have you ever had any dealings with
 20 someone who would have been the manager of
 21 regulatory
 22 affairs and safety?
 23 A. No.
 24 Q. How about Jack Wentz, W-E-N-T-Z?
 A. Jack Wentz was, yes, I've heard that

Page 70

1 name in downtown Chicago, corporate headquarters.
 2 Exactly what job, I don't know.
 3 **Q.** Have you ever met Mr. Wentz?
 4 **A.** I probably met him at a Borg-Warner
 5 gathering, but, again, not on a working and reporting
 6 relationship.
 7 **Q.** Have you ever met an attorney with
 8 Borg-Warner by the name of Scott Boylan,
 9 B-O-Y-L-A-N?
 10 **A.** No.
 11 **Q.** Or anybody by the name of Thomas
 12 Wolowicz, W-O-L-O-W-I-C-Z?
 13 **A.** No.
 14 **Q.** Victor McCloskey?
 15 **A.** No.
 16 **Q.** A lady by the name of Joyce D-R-A-V-K,
 17 Dravk?
 18 **A.** No.
 19 **Q.** Are you aware of any person who might
 20 have had responsibility for safety in any of the
 21 facilities where you worked?
 22 **A.** I believe the safety reported to the
 23 plant managers in any of the facilities at
 24 Borg-Warner, but I can't give you any names for
 those.

Page 71

1 **Q.** On page 58 of the Thayer
 2 interrogatories, it would be answer to question No.
 3 104.
 4 It lists a deposition by Jack Wentz, who
 5 was at that time assist general counsel of
 6 Borg-Warner on September 28, 1988, in regard to a
 7 case called Becker versus Barron Brothers.
 8 Were you ever aware of this case?
 9 **A.** No.
 10 **Q.** It also mentions that a copy of this
 11 deposition is kept by Borg-Warner Automotive's law
 12 department in Sterling Heights.
 13 **MR. CARTER:** At this time I would like
 14 to request a copy of that deposition.
 15 **MR. BAKER:** I will make an inquiry to
 16 see, first of all, if they still have it. Secondly,
 17 what my client's position is on releasing it directly
 18 as opposed to through a court reporter. I think
 19 there is some ethical considerations there, for
 20 example, the court reporter's copyright of the work.
 21 **BY MR. CARTER:**
 22 **Q.** If you will go back to page 48 in the
 23 answer to interrogatory No. 82 at the very bottom.
 24 It's essentially a question about

Page 72

1 different organizations that Borg-Warner was a
 2 member
 3 of. It lists The American Society of Metals, The
 4 American Association of Mechanical Engineers,
 5 Friction Subcommittee, Transmission and drive train
 6 technical committee and the National Safety Council.
 7 Then continuing on the next page it says
 8 that Richard Rosenberg, formerly of the Borg-Warner
 9 Research Center attended meetings of the Asbestos
 10 Information Association.
 11 Are you aware of any information or any
 12 membership in any of the organizations that have been
 13 mentioned?
 14 **A.** No.
 15 **MR. BAKER:** I would like to put, since
 16 we keep going on and on about this set of answers to
 17 interrogatories, I would like to put a continuing
 18 objection on the record that until we are shown a
 19 signed copy of these that we are objecting to this
 20 entire line of questioning.
 21 **MR. CARTER:** Okay. I am going to ask
 22 counsel to investigate the mention of Richard
 23 Rosenberg attending meetings of the Asbestos
 24 Information Association. To the extent that they may
 exist, any notes taken or memoranda relating to the

Page 73

1 **AIA.**
 2 **MR. BAKER:** May I suggest you put the
 3 request in writing and we will respond.
 4 (Exhibit Nos. 5 and 6 were marked for
 5 identification.)
 6 (Break.)
 7 **BY MR. CARTER:**
 8 **Q.** Going to the next set, which is a set of
 9 interrogatories in the case captioned Helen M. Webb
 10 versus Borg-Warner, State of Michigan, again the
 11 Circuit Court of Wayne County.
 12 **MR. CARTER:** Just for the record, there
 13 is an affidavit duly signed and notarized by Jack
 14 Wentz.
 15 **Q.** I will hand these to you.
 16 **MR. CARTER:** For the record, also, they
 17 are dated July 3, 1986.
 18 **Q.** I would first like to direct
 19 your attention to No. 71, which is on page 68.
 20 This question, to summarize it if my
 21 interpretation is incorrect, essentially asks about
 22 warnings. The answer to this one is not applicable
 23 in 1986 when they were signed by Mr. Wentz.
 24 **MR. BAKER:** Can we have a moment to read

Page 74

1 the question?
 2 **MR. CARTER:** Sure.
 3 **MR. BAKER:** Before he answers let me
 4 just state on the record that I object to the
 5 question in the sense that we, sitting here today,
 6 are unfamiliar with the set of interrogatories not
 7 knowing whether these questions were tailored toward
 8 a specific type of usage, products, or a specific
 9 genre of products. In other words, the specific
 10 context in which these questions were asked.
 11 Also, we are being asked to look at one
 12 question out of a total of 113 questions stretched
 13 over 100 pages, of which we have not had an
 14 opportunity to look at.
 15 I am going to object to the manner in
 16 which the question is being posed and also to the
 17 form of it on the basis that we are not familiar with
 18 the context in which this question, No. 71, was posed
 19 in this particular set of interrogatories.
 20 **MR. CARTER:** But you are not stating
 21 that Jack Wentz does not have authority to answer
 22 interrogatories on behalf of the corporation, are
 23 you?
 24 **MR. BAKER:** I am taking no position in

Page 76

1 answered by Borg-Warner, of which you haven't
 2 seen but Borg-Warner should be aware if they signed
 3 them.
 4 **MR. BAKER:** Understand that I am counsel
 5 for Borg-Warner in the State of West Virginia. My
 6 representation of Borg-Warner does not date back to
 7 the time frame of these discovery questions nor was I
 8 counsel in those cases.
 9 So I am taking no position at all under
 10 authenticity.
 11 **MR. CARTER:** The other counsel that came
 12 with you today is counsel for Borg-Warner nationwide
 13 or corporate counsel?
 14 **MR. BARNARD:** Not corporate counsel.
 15 **MR. CARTER:** Nationwide counsel?
 16 **MR. BARNARD:** Counsel outside.
 17 **MR. CARTER:** It definitely would cover
 18 the scope of Michigan, I would guess, if it's
 19 nationwide?
 20 **MR. BARNARD:** I don't represent them in
 21 all states.
 22 **BY MR. CARTER:**
 23 **Q.** Anyway, going back to the answer on page
 24 81. I am going to summarize the questions as simply

Page 75

1 that regard because I do not know who Jack Wentz is.
 2 **MR. CARTER:** I will go from there.
 3 **BY MR. CARTER:**
 4 **Q.** Again, going back to question 71. The
 5 answer at this point, which was signed July 3, 1986,
 6 would that have been a correct answer on July 3,
 7 1986?
 8 You appear to be one of the most
 9 knowledgeable people about when those warnings were
 10 applied to those products that were shipped to GM.
 11 **A.** Again, as I said earlier, I was in
 12 Brazil at the time. I know that we were requested to
 13 put a warning label on, but I cannot give you an
 14 exact date as to when that was.
 15 **Q.** You left Brazil in 1987?
 16 **A.** I left Brazil in the spring of '87.
 17 **Q.** I am going to ask you also to go to page
 18 80, and interrogatory No. 88. Please read through it
 19 and the answer.
 20 **MR. BAKER:** I simply renew my objections
 21 as stated earlier.
 22 **MR. CARTER:** If you want you can have a
 23 continuing objection on any questions based on
 24 interrogatories answered by or purported to be

Page 77

1 one that's asking about a library.
 2 Does Borg-Warner have a library or did
 3 they have a library?
 4 **A.** If you recall I indicated that I
 5 remember that there was a library. I remember that
 6 it was about the size of this room. I mentioned that
 7 before. It was my understanding that that was a
 8 general library that had trade journals in it.
 9 **Q.** That's correct. I am not saying that
 10 you haven't testified about a library. I just want
 11 to ask you some questions about this particular
 12 answer.
 13 It notes in this answer that Richard
 14 Rosenberg established a small library on July 21,
 15 1976, but no longer maintains it. You have stated
 16 that you don't know Mr. Rosenberg?
 17 **A.** No.
 18 **Q.** At this point in time in 1986 it states
 19 that there was a publication called Asbestos
 20 Magazine, of which, those of us who do asbestos work
 21 are well aware as being a trade journal for asbestos
 22 manufacturers or people who deal in asbestos, but it
 23 does not state when the articles existed.
 24 **MR. BAKER:** Excuse me, was there a

Page 78

1 question?
 2 **Q.** I want to ask you, at any time that you
 3 have been at the Ingersoll Research Center have you
 4 ever run across any magazines entitled Asbestos?
 5 **A.** Not to my knowledge.
 6 **Q.** If you will go to page 50 of the Thayer
 7 interrogatories, I will show you, beginning on page
 8 50, question No. 88, and the answer to question No.
 9 88, I would like for you to read that.
 10 **MR. BAKER:** Same objections as before.
 11 **Q.** Remembering that these interrogatories
 12 were answered in 1993 as opposed to 1986, which the
 13 Webb interrogatories were answered, the question that
 14 I pointed you to is, again, a question about
 15 libraries.
 16 There is a note on the answer in 1993
 17 that the research center was closed in 1988, which is
 18 somewhat consistent with what you said.
 19 Was it 1988 or '89?
 20 **A.** It was either at the end of '88
 21 or early '89.
 22 **Q.** It states there, And the then remaining
 23 contents of the library were sold or disposed of.
 24 Were you aware of the disposition of the

Page 79

1 materials of the library at the Ingersoll Research
 2 Center?
 3 **A.** Not in particular. I was involved in
 4 the closure of the research center, but I was more
 5 involved in the distribution of equipment and
 6 unfortunately the distribution of people, too.
 7 **Q.** To the extent that between the time they
 8 were sued in 1986 and the case of 1993, that any of
 9 the materials in the library may have had anything to
 10 do with asbestos or harms or anything that we wanted
 11 to find out they were disposed of during that time
 12 period; is that correct?
 13 **MR. BAKER:** Show my objection. First of
 14 all, I don't agree with your assessment of the
 15 interpretation of those two interrogatory answers by
 16 your question. I would object on those grounds.
 17 Secondly, it calls for speculation on
 18 his part. I think he's already told you that that's
 19 not something that he is very familiar with. So I
 20 think it calls for speculation on his part, and I
 21 object on that ground.
 22 You can certainly answer to the extent
 23 you know.
 24 **A.** I really have no information to give. I

Page 78 - Page 81

Page 80

1 don't know what was in the library. I don't know
 2 where it went.
 3 **Q.** I think we are done with Thayer.
 4 I want to put in front of you a set of
 5 interrogatories that are marked as Exhibit No. 6.
 6 These are in a case, again, in Wayne
 7 County, Michigan, which seems that Borg-Warner had
 8 a
 9 lot of history in Wayne County, entitled Jack
 10 Bruening, B-R-U-E-N-I-N-G, versus Borg-Warner.
 11 These are answers to interrogatories
 12 that were signed by Jack Wentz, again, in 1986,
 13 although the date is somewhat hard to read. 21st day
 14 of something.
 15 **MR. BAKER:** I note there is no
 16 certificate of service on any of these. Do you know
 17 the name of the firm that was counsel for the
 18 plaintiff in each of these cases?
 19 **MR. CARTER:** Honestly, no. I know in
 20 Thayer, it says on the front, that Michael Serling's
 21 office is counsel for the plaintiffs.
 22 The rest of them I can't tell you.
 23 **BY MR. CARTER:**
 24 **Q.** This set of interrogatories is answered
 on page 2, interrogatory No. 3, with regards to

Page 81

1 Borg-Warner Corporation. Particularly, the things
 2 that are mentioned here are applicable to the York
 3 division, which we mentioned before but you said you
 4 didn't have any dealing with York, which is with air
 5 conditioning; right?
 6 **A.** Yes.
 7 **Q.** If we turn to page 5, question No. 8, it
 8 simply asks the question about asbestos products.
 9 Basically, what did you make? The
 10 response appears to be a steam grid humidifier
 11 containing asbestos from 1959-1979.
 12 That's a product, of course, that you are
 13 not aware of; right?
 14 **A.** No. I don't even know what a steam grid
 15 humidifier is, to tell you the truth.
 16 **MR. BAKER:** Once again, I object on the
 17 grounds as I did earlier in the sense that we
 18 certainly don't know the context in which these
 19 questions were asked, whether they were case specific
 20 dealing with alleged exposure of a particular plant,
 21 and the other grounds as I stated earlier.
 22 **Q.** If you will, turn this one to page 47,
 23 question No. 79. Go ahead and read that and the
 24 answer on the next page.

ECOSCRIPT™

Page 82

Page 84

1 A. The question asks in essence, correct me
 2 if you disagree, that the defendant or defendant's
 3 subsidiary in this case, prepared material safety
 4 data sheet, or an MSDS, and asked, When?
 5 In this case the response was that the
 6 defendant prepared an MSDS in approximately 1970.
 7 Are you aware of any MSDSs that were
 8 ever prepared by the automotive end of Borg-Warner
 9 relating to asbestos?
 10 **MR. BAKER:** Show my objection. Did your
 11 question say "prepared" or "received?"
 12 **MR. CARTER:** At this point, prepared by
 13 Borg-Warner Automotive section.
 14 **MR. BAKER:** Do you want to look at the
 15 question yourself? I would rather have him read the
 16 question.
 17 A. First of all, I am not aware of what an
 18 MSDS is. I have never seen one, so therefore, I
 19 can't tell you whether, other than the York unit as
 20 stated in this question and answer, whether anything
 21 of Borg-Warner had ever been received or prepared in
 22 response to an MSDS.
 23 Q. Sort of anticipating the next question
 24 let me ask it as a compound question if you don't

1 that you've held, or would that be someone else's
 2 area of responsibility?
 3 A. Again, my field of responsibility
 4 generally has been engineering and research. I have
 5 not had that kind of data come across my desk.
 6 Q. Do you have any information about any
 7 lawsuits that Borg-Warner has been involved in
 8 regarding allegations of exposure to asbestos from
 9 their automotive parts, the ones we have been
 10 discussing today, the clutches? You are not aware of
 11 the brakes, but if you have seen any allegations?
 12 A. I have seen no allegations.
 13 Q. Are you aware of, other than the lawsuit
 14 we are involved in today and the one that you gave a
 15 deposition in approximately weeks ago, were you aware
 16 before that time of any lawsuits regarding asbestos
 17 exposure allegations?
 18 A. No, sir.
 19 Q. Do you know whether Borg-Warner has been
 20 involved in any insurance litigation regarding
 21 coverage for asbestos exposure?
 22 A. No, I have no knowledge of any insurance
 23 coverage.
 24 Q. Do you know whether Borg-Warner in any

Page 83

Page 85

1 mind, to summarize what you just said.
 2 The automotive end, to the best of
 3 your knowledge, neither prepared nor received, again,
 4 to the best of your knowledge, any material safety
 5 data sheet which is an OSHA form that discusses the
 6 hazards of particular products that are used in the
 7 workplace?
 8 A. To the best of my knowledge, I have no
 9 knowledge of an MSDS.
 10 Q. I think that's it for this set.
 11 Just for your information, a lot of the
 12 names that you didn't understand came actually out of
 13 the Bruening interrogatories. If they were in the
 14 York division you probably didn't have any dealing
 15 with them?
 16 A. I had no dealings with the York
 17 division; that's correct.
 18 Q. Are you aware of any Workers'
 19 Compensation claims that have been made by any
 20 employees of Borg-Warner relating to either an
 21 occupational lung disease or cancer?
 22 A. I am not aware of any.
 23 Q. Would that be something that you would
 24 be aware of in the normal course of the positions

1 of the facilities where you have worked ever abated
 2 any asbestos that may have been in the buildings in
 3 which you worked?
 4 A. Could you explain "abate," please?
 5 Q. Did anybody come in and sample for
 6 asbestos and remove any asbestos from ceiling tiles,
 7 wall boards, anything like that?
 8 A. If they did I don't know about it.
 9 Q. Earlier in the interrogatories that we
 10 have been talking about I asked about organizations
 11 of which Borg-Warner was a member.
 12 My question is were you ever a member of
 13 any of those organizations, the American Society of
 14 Metals, the American Association of Mechanical
 15 Engineers, the National Safety Council or the
 16 Asbestos Information Association?
 17 A. No, I was never a member of any of
 18 those. I recall that I attended one meeting of the
 19 Asbestos Institute at the point in time where we were
 20 to open a program to find a friction material without
 21 asbestos. I found that the discussion did not entail
 22 any discussions of alternate fibers and never went
 23 back to any more.
 24 Q. The Asbestos Institute, is that the

Page 86

1 Asbestos Information Association?
 2 **A.** I believe it was. That was a long time
 3 ago. I believe that it was the Asbestos Information
 4 Institute.
 5 **Q.** Approximately, when was the time that
 6 you attended that meeting?
 7 **A.** Approximately in the late seventies.
 8 **Q.** Can you give me an idea of what was
 9 being discussed at that meeting which you attended?
 10 **A.** I really can't. I don't really know
 11 what the agenda or what was being discussed. I know
 12 that I went specifically to find out about alternate
 13 materials like fiberglass.
 14 I recall that there was no discussion at
 15 all about alternate materials. I can't tell you what
 16 the agenda was or what was discussed.
 17 **Q.** Did you keep any materials, notes,
 18 memos, records from that meeting?
 19 **A.** I don't believe I did because I was
 20 disappointed that it didn't meet my goals of why I
 21 went.
 22 **Q.** Have you seen any publications from any
 23 of the other agencies or groups of which Borg-Warner
 24 was a member; the National Safety Council or the

Page 88

1 (Exhibit No. 7 was marked for
 2 identification).
 3 **BY MR. CARTER:**
 4 **Q.** The last exhibit is Exhibit No. 7. This
 5 is a witness list. Just to get it on the record,
 6 earlier I had asked you some questions about some
 7 individuals who were listed on the witness list for
 8 this case, and this one that you have in front of you
 9 is from the Thayer case in Michigan, and were signed
 10 by Richard Brennen on behalf of Borg-Warner,
 11 December
 12 23, 1994.
 13 It lists under witnesses Mr. Grady, Mr.
 14 Hornick, and instead of you it listed Mr. Fuller.
 15 **A.** I don't believe I did. I don't believe
 16 so.
 17 **Q.** I want to ask you just a couple of
 18 questions about some of the witnesses that they had
 19 listed here. If you will go to page 5. I am at a
 20 loss as to who these people are.
 21 Witnesses No. 52 through 56, I want to
 22 make sure they are not a Borg-Warner person.
 23 Dan Foster, Americus Crawford, Donald
 24 McCullum, John McCallum and Dan Mead?

Page 87

1 American Society of Metals or the American
 2 Association of Mechanical Engineers?
 3 **A.** No.
 4 **Q.** One last question.
 5 We were talking earlier about hazards of
 6 exposure, or allegations of hazards of exposure of
 7 brakes and clutches.
 8 I want to ask you a question whether you
 9 ever read any paper by DuCharme Somers on the brake
 10 and clutch emissions generated during vehicle
 11 operations?
 12 **A.** No.
 13 **Q.** Have you ever been aware of any
 14 literature where anybody has ever tried to study
 15 whether or not brakes or clutches had any
 16 asbestos residue after their lifespan?
 17 **A.** No.
 18 **Q.** I will go through my notes one time.
 19 **MR. BAKER:** In regard to the last
 20 question you posed was that another set of
 21 interrogatories?
 22 **MR. CARTER:** No. That was something I
 23 came across elsewhere.
 24 (Break.)

Page 89

1 **A.** I don't know any of those.
 2 **Q.** They listed as experts a number of
 3 people at the bottom of page 5, No. 60 through 65.
 4 I want to ask you if you ever dealt with
 5 or heard anything about the individuals that are
 6 listed.
 7 Dr. John Craighead?
 8 **A.** No.
 9 **Q.** Arnold Anderson?
 10 **A.** There was an Arnold Anderson at Ford
 11 Motor Company. I know his name, but I don't know
 12 what he does or what he would be expert in.
 13 **Q.** William Krebs?
 14 **A.** No.
 15 **Q.** Otto Wong?
 16 **A.** No.
 17 **Q.** Dr. Churg?
 18 **A.** No.
 19 **Q.** Mark Wick?
 20 **A.** No.
 21 **Q.** Going back to the witness list for this
 22 case, I am going to ask you some similar questions
 23 about the experts that have been listed.
 24 In this case Borg-Warner has listed Otto

Page 90

Page 92

1 Wong. You have already said that you don't know Mr.
2 Wong.
3 How about Sheldon Rabinovitz?
4 A. No.
5 Q. Arnold Anderson?
6 A. Maybe I was wrong, because that listed
7 him as with a different company. So that may be
8 someone else.
9 Q. That may be a different Arnold Anderson
10 than the one you know.
11 Do you know anything about the field of
12 tribology? It's listed there.
13 A. I know only that tribology is the study
14 of friction, wear and lubrication. Those are the
15 three "ologies" in tribology.
16 Q. Have you seen any of the reports from
17 any of the experts that we have gone through so far?
18 Any reports saying that they find that there is or is
19 not asbestos or any potential harm from clutch
20 or brake materials?
21 A. No, not that I am aware of.
22 Q. I will ask you, is there anything in any
23 of the questions that I have asked and the answers
24 that you have given that you want to clarify

1 1985, which certainly predates our involvement here
2 in the State of West Virginia on behalf of
3 Borg-Warner. If, in fact, Mr. Wentz filed those
4 answers, then certainly they are valid as attachments
5 to the record here today.
6 But not having personal knowledge of his
7 role in those cases those were the reasons for my
8 grounds for objecting earlier.
9 That's all that I have.
10 We would like to read and sign. If you
11 would send it to me I will see that Mr. Lindquist
12 gets a copy and reviews a copy.
13 (The deposition of TERRY K. LINDQUIST
14 was concluded.)

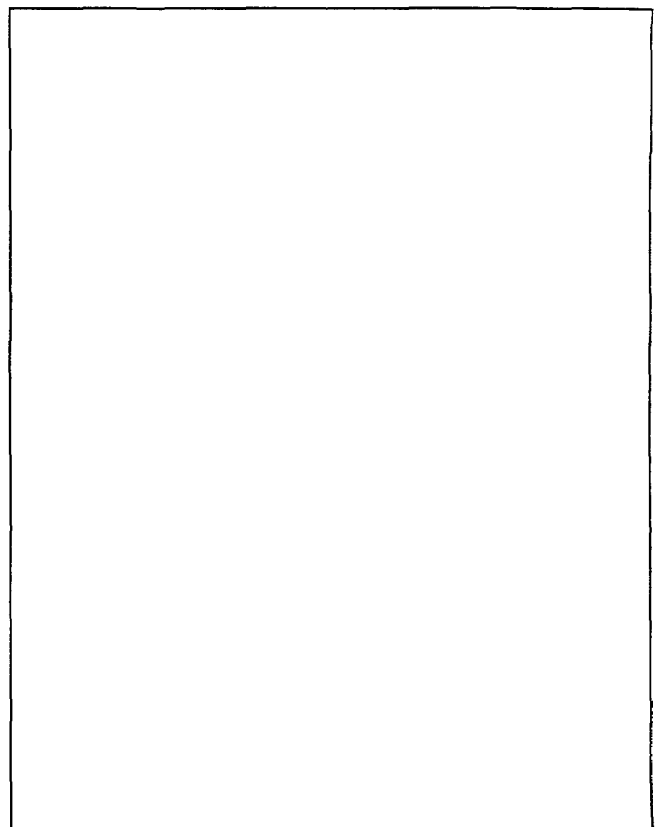
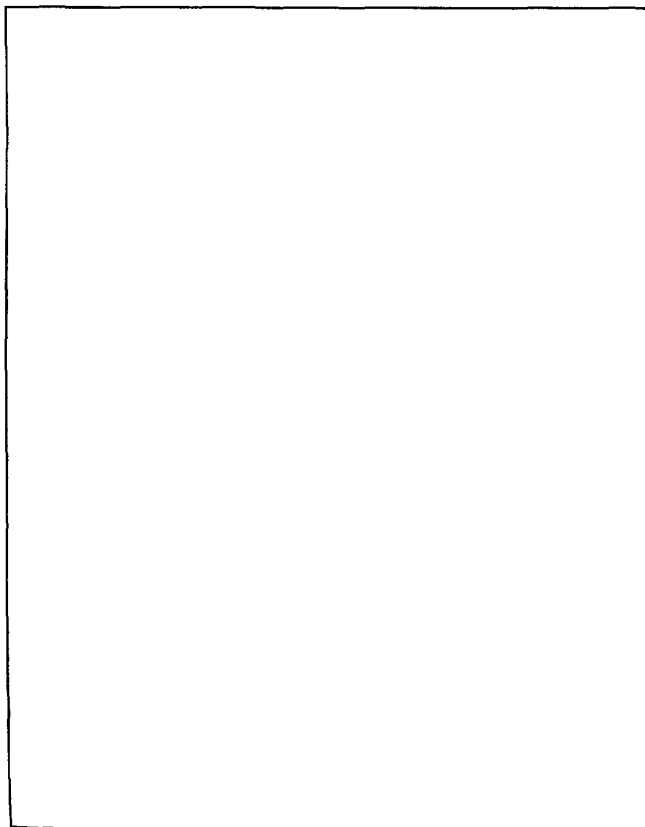
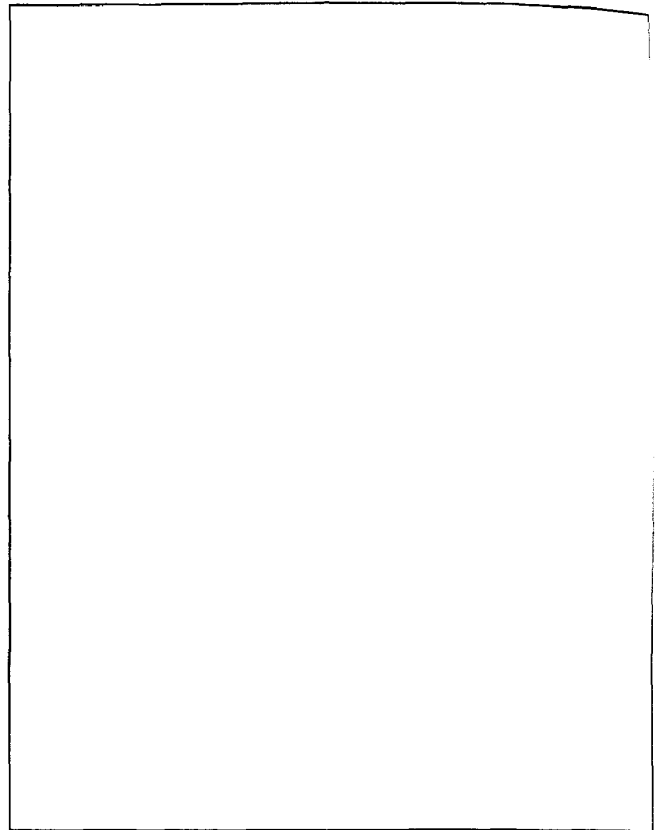
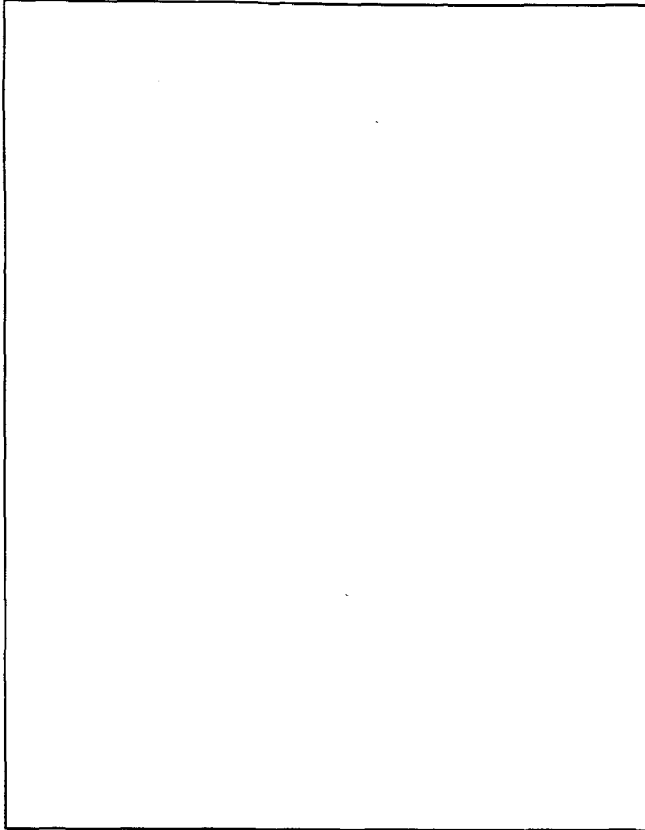
Page 91

Page 93

1 or at this point think that something may have come
2 across incorrectly?
3 A. I can't think of anything.
4 Q. I just want to give you an opportunity
5 if something came to mind to correct the record now
6 rather than try and do it later.
7 The object here is to get the best and
8 most complete record and exhaust as much knowledge
9 as
10 we can today.
11 **MR. CARTER:** At this point I have no
12 further questions. Thank you very much for
13 your time.
14 **MR. BAKER:** I just have one matter I
15 would like to clarify on the record.
16 We have looked at a number of sets of
17 answers to interrogatories today dealing with cases,
18 I believe, mainly in the State of Michigan.
19 As I understand it we are getting
20 copies of those made before we leave today.
21 In regard to Mr. Wentz, I made a
22 statement earlier on the record that I was not
23 personally familiar with his role in these answers to
24 interrogatories. I want the record to reflect that
the answers that we were looking at date back to

1 STATE OF WEST VIRGINIA, To-wit:
2 I, Monique Christiansen, a Notary Public and
3 Court Reporter within and for the State aforesaid,
4 duly commissioned and qualified, do hereby certify
5 that the deposition of TERRY K. LINDQUIST was duly
6 taken by me and before me at the time and place
7 specified in the caption hereof.
8 I do further certify that said proceedings were
9 correctly taken by me in stenotype notes, that the
10 same were accurately transcribed out in full and
11 true record of the testimony given by said witness.
12 I further certify that I am neither attorney or
13 counsel for, nor related to or employed by, any of
14 the parties to the action in which these proceedings
15 were had, and further I am not a relative or employee
16 of any attorney or counsel employed by the parties
17 hereto or financially interested in the action.
18 My commission expires the 24 day of August
19 2004.
20 Given under my hand and seal this 16th day of
21 June 1995.
22 -----
23 Monique Christiansen
24 CourtReporter
Notary Public

Page 94



===== A =====

abate (85:4)
 abated (85:1)
 abex (55:24) (56:1)
 able (38:1)
 above (25:2)
 absolutely (51:14) (56:21)
 accordance (60:4)
 according (7:17)
 accurate (24:13) (32:18) (34:6) (61:7)
 accurately (23:9) (93:10)
 acid (33:10)
 across (78:4) (84:5) (87:23) (91:2)
 action (1:5) (93:14) (93:17)
 activities (6:18) (9:21)
 actually (22:13) (22:24) (37:16) (37:17) (52:11) (57:17) (63:7) (83:12)
 administrative (18:17)
 admissions (10:8)
 advanced (17:1) (28:17)
 affairs (69:21)
 affect (17:2)
 affidavit (73:13)
 affidavits (9:19)
 aforesaid (93:3)
 afraid (40:15) (45:19) (68:4)
 after (4:16) (16:15) (19:17) (27:23) (27:24) (87:16)
 aftermarket (39:14) (39:15) (40:2) (48:23) (65:11)
 agencies (21:22) (86:23)
 agenda (86:11) (86:16)
 agree (52:1) (54:1) (79:14)
 ahead (58:15) (81:23)
 aia (73:1)
 air (42:13) (42:23) (44:20) (50:3) (81:4)
 aircraft (42:16) (43:1)
 allegations (84:8) (84:11) (84:12) (84:17) (87:6)
 alleged (81:20)
 allied (2:6)
 almost (17:19)
 already (52:23) (61:20) (61:23) (79:18) (90:1)
 alternate (85:22) (86:12) (86:15)
 although (80:12)
 always (42:2)
 american (55:24) (72:2) (72:3) (85:13) (85:14) (87:1) (87:1)
 americanus (88:23)
 amplification (31:6)
 anderson (89:9) (89:10) (90:5) (90:9)
 annual (45:21) (45:22)
 another (34:23) (36:2) (37:22) (42:15) (61:1) (87:20)
 answer (5:14) (6:4) (6:10) (23:8) (25:16) (26:9) (57:10) (58:16) (59:22) (59:24) (61:4) (62:4) (62:13) (63:9) (71:2) (71:23) (73:22) (74:21) (75:5) (75:6) (75:19) (76:23) (77:12) (77:13) (78:8) (78:16) (79:22) (81:24) (82:20)
 answered (75:24) (76:1) (78:12) (78:13) (80:23)
 answering (6:22) (62:3)

answers (35:24) (36:14) (38:2) (40:24) (55:12) (59:19) (61:17) (61:24) (72:15) (74:3) (79:15) (80:10) (90:23) (91:16) (91:22) (91:24) (92:4)
 anticipating (82:23)
 anyway (76:23)
 apparently (58:24) (59:9) (59:15)
 appear (51:22) (62:12) (75:8)
 appearances (2:1)
 appeared (54:4)
 appearing (2:2) (2:5) (2:8) (2:10)
 appears (11:21) (36:1) (38:2) (51:20) (52:8) (54:10) (61:2) (81:10)
 applicable (51:22) (73:22) (81:2)
 application (34:4)
 applications (17:5) (17:6) (51:6) (51:11) (52:3) (52:5)
 applied (24:9) (75:10)
 approximately (16:18) (24:23) (27:3) (38:3) (46:2) (82:6) (84:15) (86:5) (86:7)
 april (28:22)
 arbitrarily (12:20)
 area (5:7) (6:1) (6:4) (16:24) (18:15) (47:24) (48:23) (49:2) (61:1) (62:9) (66:2) (66:5) (84:2)
 areas (5:4) (5:16) (5:24) (44:13) (60:24)
 arnold (89:9) (89:10) (90:5) (90:9)
 around (23:17) (48:20)
 article (7:20) (7:22)
 articles (45:14) (77:23)
 asbestos (1:5) (6:2) (6:3) (6:8) (6:11) (6:18) (7:1) (7:5) (7:14) (8:24) (9:20) (13:22) (14:1) (16:13) (19:8) (19:13) (20:19) (20:23) (21:4) (22:24) (23:6) (23:11) (25:1) (30:21) (31:8) (32:13) (32:17) (32:21) (33:1) (33:5) (33:6) (36:3) (36:4) (36:9) (41:3) (44:16) (44:22) (54:21) (56:14) (69:4) (72:8) (72:22) (77:19) (77:20) (77:21) (77:22) (78:4) (79:10) (81:8) (81:11) (82:9) (84:8) (84:16) (84:21) (85:2) (85:6) (85:6) (85:16) (85:19) (85:21) (85:24) (86:1) (86:3) (87:16) (90:19)
 asbestos- (22:11)
 asbestos-bearing (60:3)
 asbestos-containing (21:8) (31:12) (49:4) (49:10) (56:18)
 aside (62:12)
 asking (26:6) (54:14) (63:18) (63:21) (77:1)
 asks (73:21) (81:8) (82:1)
 aspects (15:10) (20:2) (43:8) (55:2)
 assemblies (19:7) (30:10) (36:4)
 assembly (13:16) (22:12) (32:14) (32:22)
 assessment (79:14)
 assigned (10:14)
 assist (71:5)
 associates (1:22)
 association (72:3) (72:9) (72:23) (85:14) (85:16) (86:1) (87:2)
 assume (69:1)
 assuming (35:20)
 assumption (53:2)
 attached (21:5) (29:21) (61:19)
 attachments (92:4)

attended (72:8) (85:18) (86:6) (86:9)
attending (72:22)
attention (73:19)
attorney (70:7) (93:12) (93:16)
attractive (33:12)
august (93:18)
austo (55:22)
authenticity (76:10)
authority (74:21)
auto (21:7)
automatic (13:15) (19:6) (20:11) (28:20) (29:19) (30:8) (30:11) (30:14) (30:17) (30:18) (30:20) (38:10) (38:17) (38:19) (38:22) (38:23)
automobile (37:2)
automobiles (18:11) (48:10) (51:23) (52:10) (52:12) (56:19)
automotive (11:11) (14:13) (14:15) (16:10) (17:4) (17:19) (17:20) (17:22) (18:19) (18:21) (18:24) (19:22) (20:1) (20:2) (20:3) (20:9) (21:9) (28:11) (28:14) (28:24) (29:7) (29:8) (29:9) (29:12) (30:13) (32:1) (32:8) (34:14) (36:21) (37:11) (39:9) (39:12) (40:11) (41:14) (41:16) (41:17) (41:20) (41:21) (42:3) (42:9) (48:1) (48:6) (48:7) (48:14) (48:21) (48:24) (52:2) (52:21) (53:9) (57:2) (67:3) (82:8) (82:13) (83:2) (84:9)
automotive's (71:11)
autos (48:12)
available (46:16)
avenue (1:18) (2:2) (2:8)
aware (5:16) (20:18) (20:22) (21:3) (25:17) (25:20) (36:9) (39:11) (42:10) (42:22) (42:23) (43:4) (44:16) (44:23) (57:5) (57:8) (60:8) (63:11) (69:3) (69:5) (69:7) (69:9) (70:18) (71:8) (72:10) (76:2) (77:21) (78:24) (81:13) (82:7) (82:17) (83:18) (83:22) (83:24) (84:10) (84:13) (84:15) (87:13) (90:21)
aways (13:23)
===== B =====
bachelors (11:15) (13:17)
back (11:13) (13:22) (18:6) (22:23) (25:6) (26:13) (26:16) (27:10) (30:4) (31:10) (32:20) (33:15) (43:10) (43:10) (45:8) (48:8) (58:12) (63:17) (65:14) (67:21) (71:22) (75:4) (76:6) (76:23) (85:23) (89:21) (91:24)
background (11:12)
baker (2:8) (2:8) (5:10) (5:11) (9:6) (9:10) (11:6) (20:24) (26:1) (29:21) (29:24) (30:3) (37:15) (51:2) (53:1) (53:20) (57:14) (58:18) (58:23) (59:8) (61:11) (63:17) (63:24) (71:15) (72:14) (73:2) (73:24) (74:3) (74:24) (75:20) (76:4) (77:24) (78:10) (79:13) (80:14) (81:16) (82:10) (82:14) (87:19) (91:13)
barnard (2:10) (2:10) (76:14) (76:16) (76:20)
barron (71:7)
base (36:24)
based (75:23)
basically (81:9)
basis (64:22) (74:17)
became (16:16) (33:1)
beck (13:10) (13:12) (16:16) (17:10) (17:24) (18:22) (19:15) (20:5) (20:18) (20:19) (21:2) (22:8) (29:1)

(29:4) (29:6) (29:13) (32:3) (34:21) (35:21) (36:3) (54:15) (54:16) (54:18) (54:22) (55:1) (67:2) (67:6)
becker (71:7)
began (32:2)
begin (8:11)
beginning (8:11) (34:11) (78:7)
behalf (5:12) (11:7) (62:1) (62:4) (74:22) (88:10) (92:2)
believe (5:14) (9:3) (11:2) (11:3) (31:17) (35:1) (37:6) (37:12) (45:11) (46:23) (53:9) (58:4) (61:12) (63:8) (70:21) (86:2) (86:3) (86:19) (88:15) (88:15) (91:17)
bell (69:16)
bellwood (13:8) (64:5) (64:8)
below (25:2)
bendix (63:15)
besides (46:8) (46:12) (49:11)
best (47:18) (64:17) (67:17) (67:23) (68:1) (68:6) (83:2) (83:4) (83:8) (91:7)
better (42:6) (52:16) (66:10) (68:20) (68:22)
beyond (41:14) (47:23)
big (14:16) (15:1) (15:15) (15:18) (41:12)
billion (41:18)
bit (26:3)
blanks (59:11)
boards (85:7)
bob (27:22)
bonds (44:9)
books (15:24)
borg (13:10) (13:12) (16:16) (17:10) (17:24) (18:21) (19:15) (20:5) (20:17) (20:19) (21:2) (22:8) (29:1) (29:4) (29:6) (29:13) (32:3) (34:21) (34:22) (35:21) (36:3) (46:16) (54:15) (54:16) (54:17) (54:22) (55:1) (67:1) (67:5)
borg-warner (2:9) (2:12) (5:12) (6:11) (6:18) (6:23) (7:6) (7:7) (7:14) (7:15) (7:19) (10:19) (10:24) (11:7) (11:10) (11:22) (12:1) (12:9) (12:20) (19:21) (20:2) (21:15) (27:22) (28:11) (28:14) (28:24) (29:5) (29:8) (29:9) (29:12) (30:13) (31:11) (32:2) (34:9) (34:11) (34:12) (34:17) (34:22) (34:24) (35:6) (35:13) (35:15) (36:2) (38:12) (41:9) (41:13) (41:16) (41:20) (41:21) (41:23) (42:2) (42:7) (42:11) (42:17) (42:21) (43:6) (43:8) (43:14) (43:16) (43:18) (43:22) (44:4) (44:18) (45:1) (45:12) (45:15) (46:1) (46:4) (46:7) (46:17) (46:19) (47:1) (48:1) (48:6) (48:9) (48:11) (49:5) (50:20) (51:7) (51:15) (51:21) (52:18) (53:6) (53:7) (53:24) (54:6) (54:7) (55:2) (56:5) (56:19) (57:6) (57:11) (58:1) (59:18) (60:2) (61:5) (61:21) (62:1) (62:4) (62:15) (62:16) (65:9) (65:22) (66:1) (66:6) (67:1) (67:19) (68:9) (70:4) (70:8) (70:23) (71:6) (71:11) (72:1) (72:7) (73:10) (76:1) (76:2) (76:5) (76:6) (76:12) (77:2) (80:7) (80:9) (81:1) (82:8) (82:13) (82:21) (83:20) (84:7) (84:19) (84:24) (85:11) (86:23) (88:10) (88:22) (89:24) (92:3)
borg-warner's (66:16)
bosick (2:5)
bottom (71:23) (89:3)
bouncing (33:7) (33:14)
box (2:11) (65:10)

boylan (70:8)
brake (38:4) (55:24) (63:15) (87:9) (90:20)
brakes (39:6) (39:7) (50:24) (51:6) (51:12) (51:14)
 (51:21) (63:12) (63:21) (63:23) (84:11) (87:7) (87:15)
brazil (21:13) (21:16) (21:18) (21:20) (21:22) (22:1)
 (22:3) (22:5) (22:10) (22:14) (22:20) (22:20) (22:22)
 (24:16) (24:24) (25:18) (25:21) (26:15) (26:18) (27:7)
 (60:17) (62:24) (65:7) (67:22) (75:12) (75:15) (75:16)
brazilian (26:12)
break (42:18) (42:20) (58:22) (73:6) (87:24)
brennen (88:10)
briefly (37:23)
brothers (71:7)
brought (34:16) (35:12)
bruce (2:2) (4:4)
bruening (80:9) (83:13)
brummer (37:23) (38:7) (38:14) (52:17) (52:20) (67:3)
 (67:24) (68:14) (68:19)
brummer's (64:3)
brw (21:9)
building (14:19) (14:19) (14:20) (14:22) (14:23) (14:24)
 (15:2) (27:17)
buildings (85:2)
buy (23:2) (23:13) (39:21) (44:9)
 ===== C =====
calibrations (14:10)
call (43:5)
called (11:8) (12:24) (17:1) (28:20) (29:8) (40:19)
 (56:8) (71:7) (77:19)
calls (79:17) (79:20)
came (23:20) (23:24) (35:7) (49:1) (52:19) (66:1)
 (67:21) (76:11) (83:12) (87:23) (91:5)
canada (46:13)
cancer (83:21)
cannot (13:24) (75:13)
capability (33:17)
caps (40:8)
caption (93:7)
captioned (58:1) (73:9)
car (39:22) (51:18)
carburetor (35:3) (35:18)
carburetors (35:17)
career (64:12) (64:24) (68:9)
carefully (53:3)
carry (7:16)
cars (40:7)
carter (2:2) (3:8) (4:3) (4:4) (4:21) (5:23) (9:4) (9:8)
 (9:18) (10:17) (10:22) (21:1) (26:3) (26:5) (29:23)
 (30:2) (30:5) (37:18) (42:19) (51:3) (51:8) (54:1) (54:2)
 (57:17) (57:23) (59:2) (59:20) (62:11) (63:20) (64:2)
 (71:13) (71:21) (72:20) (73:7) (73:12) (73:16) (74:2)
 (74:20) (75:2) (75:3) (75:22) (76:11) (76:15) (76:17)
 (76:22) (80:18) (80:22) (82:12) (87:22) (88:3) (91:10)
case (4:5) (10:9) (11:5) (50:6) (58:1) (59:4) (71:7) (71:8)
 (73:9) (79:8) (80:6) (81:19) (82:3) (82:5) (88:8) (88:9)
 (89:22) (89:24)
cases (20:14) (76:8) (80:17) (91:16) (92:7)

catalog (50:23) (53:4)
catalogs (50:20)
caterpillars (36:23)
ceased (31:11)
ceiling (85:6)
cements (33:8)
center (2:5) (12:15) (12:17) (12:22) (12:23) (13:1)
 (14:3) (14:8) (14:16) (15:9) (24:8) (27:10) (27:16)
 (28:4) (38:19) (68:14) (68:16) (72:8) (78:3) (78:17)
 (79:2) (79:4)
central (47:13)
centrifugal (17:8)
certainly (7:17) (52:5) (62:9) (79:22) (81:18) (92:1)
 (92:4)
certificate (80:15)
certify (93:4) (93:8) (93:12)
chairmen (27:22)
chance (58:19)
changed (26:17) (27:18)
changing (31:24)
characteristics (33:2)
characterization (62:5)
characterize (61:14)
charge (18:9) (50:2)
charleston (1:23)
chemical (43:2)
chemicals (42:17)
chicago (4:12) (8:21) (11:19) (13:11) (17:12) (64:9)
 (70:1)
choice (33:3)
chose (44:4)
chosen (12:21)
christiansen (1:16) (93:2) (93:23)
chrysler (49:20)
churg (89:17)
circuit (1:1) (73:11)
circular (24:6)
city (4:11) (8:16) (40:19) (64:9)
civil (1:5) (1:16)
claims (83:19)
clarify (90:24) (91:14)
classified (37:1)
client's (71:17)
close (18:14)
closed (23:20) (28:6) (43:19) (44:2) (78:17)
closure (79:4)
clutch (17:2) (20:12) (22:12) (23:7) (23:11) (23:18)
 (23:21) (24:24) (31:3) (31:5) (31:6) (31:9) (31:9)
 (31:12) (32:14) (32:22) (33:13) (33:21) (34:1) (35:22)
 (36:4) (38:10) (54:21) (55:2) (60:3) (63:1) (64:14)
 (65:9) (66:17) (67:2) (68:24) (87:10) (90:19)
clutches (7:8) (13:9) (13:9) (13:14) (19:5) (21:6) (22:6)
 (32:12) (36:13) (36:22) (37:13) (38:22) (38:23) (39:1)
 (67:8) (84:10) (87:7) (87:15)
coat (25:11)
coating (23:24) (24:2)
colombo (58:5)

come (55:7) (84:5) (85:5) (91:1)
comes (34:22) (34:24)
comfortable (5:20) (6:22) (7:3)
coming (21:9) (26:21) (38:21)
comment (55:13)
commission (93:18)
commissioned (93:4)
committee (72:5)
communication (60:5) (62:19) (62:22)
companies (34:16) (34:19) (35:5) (35:8) (35:9) (45:13) (46:13) (47:3) (48:7) (54:20) (55:10) (55:19)
company (35:22) (39:21) (40:1) (40:19) (41:5) (41:17) (41:22) (42:13) (42:13) (42:14) (42:17) (44:8) (44:14) (45:3) (49:19) (55:20) (56:8) (56:10) (65:8) (89:11) (90:7)
compared (55:14)
compensation (83:19)
competent (5:8)
complete (91:8)
completed (16:15) (31:18) (31:23)
completely (48:24)
component (30:7) (32:14) (33:6) (33:12) (42:24)
components (19:22) (20:1) (20:10) (20:11) (21:7) (21:9) (29:1) (29:10) (29:16) (29:19) (30:10) (39:14) (39:16) (40:7) (42:15) (48:4)
compound (82:24)
comprised (23:7)
computer (47:21)
concept (15:23)
concern (7:9)
concerning (11:9)
concluded (92:14)
conditioning (42:13) (42:24) (44:20) (81:5)
confirming (63:20)
conflict (61:3)
considerations (71:19)
consistent (78:18)
consolidate (35:9)
consolidation (34:15) (35:7)
construction (37:5) (37:7)
consumption (26:12)
contact (9:14)
contain (30:21)
contained (20:19) (20:22) (21:4) (36:4) (54:4) (54:21)
containers (49:7) (49:18)
containing (22:12) (81:11)
contents (52:4) (53:21) (78:23)
context (74:10) (74:18) (81:18)
continued (35:11) (35:16) (64:14)
continuing (72:6) (72:16) (75:23)
continuously (28:21)
contributed (35:5)
control (14:6) (42:15)
controls (18:10) (20:15) (42:16)
converted (47:21)
converter (30:7)
converters (13:15) (29:7) (30:9)

convertors (19:6) (29:13)
copies (91:19)
copy (4:17) (4:24) (9:5) (9:9) (71:10) (71:14) (72:18) (92:12) (92:12)
copyright (71:20)
corporate (12:15) (34:8) (41:8) (45:18) (70:1) (76:13) (76:14)
corporation (6:2) (12:9) (19:11) (29:10) (29:16) (35:17) (41:19) (41:24) (42:8) (42:21) (44:9) (44:11) (44:12) (44:13) (45:20) (46:5) (50:17) (74:22) (81:1)
correct (8:9) (8:10) (8:13) (11:2) (11:23) (11:24) (17:20) (24:1) (24:18) (27:8) (28:12) (30:15) (30:24) (31:1) (31:7) (32:7) (36:5) (39:4) (45:9) (45:23) (47:19) (52:3) (52:8) (52:11) (53:10) (54:22) (60:7) (60:11) (66:18) (66:21) (75:6) (77:9) (79:12) (82:1) (83:17) (91:5)
correctly (15:17) (35:14) (37:3) (47:14) (48:8) (53:19) (56:16) (93:9)
council (72:5) (85:15) (86:24)
counsel (2:3) (2:6) (2:9) (2:12) (40:18) (50:19) (52:11) (53:14) (54:9) (61:4) (71:5) (72:21) (76:4) (76:8) (76:11) (76:12) (76:13) (76:14) (76:15) (76:16) (80:16) (80:20) (93:13) (93:16)
countries (46:6) (46:9)
country (26:18)
county (1:1) (58:3) (73:11) (80:7) (80:8)
couple (53:17) (65:17) (88:17)
course (13:24) (65:18) (81:12) (83:24)
courses (13:18) (13:21)
court (1:1) (1:16) (4:16) (9:11) (9:12) (10:18) (57:19) (58:4) (59:4) (71:18) (71:20) (73:11) (93:3)
courtesy (60:20)
courtreporter (93:23)
cover (76:17)
coverage (8:2) (84:21) (84:23)
covered (5:4)
craighead (89:7)
crawford (88:23)
create (23:1)
created (45:12)
cure (24:3)
cured (23:20)
curing (24:10)
current (16:3)
currently (30:12)
customer (36:24) (60:20)
cycle (47:4)
 ===== D =====
dad (32:4)
damper (13:16) (19:6) (30:10)
dan (88:23) (88:24)
data (82:4) (83:5) (84:5)
date (31:17) (49:14) (51:1) (60:21) (75:14) (76:6) (80:12) (91:24)
dated (59:10) (73:17)
day (80:12) (93:18) (93:20)
days (48:9)

db-71 (50:24)
deal (6:7) (77:22)
dealing (55:1) (81:4) (81:20) (83:14) (91:16)
dealings (54:24) (55:3) (69:19) (83:16)
dealt (13:18) (16:13) (36:2) (89:4)
debt (44:14)
december (88:10)
decided (44:12) (45:8)
decreased (32:9)
defendant (6:14) (60:2) (82:2) (82:6)
defendant's (82:2)
definitely (76:17)
definition (36:15)
definitive (44:6)
degree (12:12) (12:13) (13:18)
degrees (34:5)
delegated (47:16)
demonstrated (53:12)
department (18:18) (50:9) (71:12)
dependant (18:11)
depends (34:4)
deponent (3:3) (4:1) (37:17)
deposed (8:18) (10:16)
deposition (1:15) (4:18) (4:24) (8:12) (8:23) (8:24) (9:2) (9:24) (10:4) (10:19) (59:17) (71:4) (71:11) (71:14) (84:15) (92:13) (93:5)
des (13:3) (14:21) (27:10)
description (23:23) (24:12) (32:18) (52:3)
design (14:11) (16:3) (18:18)
designated (60:23)
designation (27:19)
designed (17:5) (42:5)
designer (48:3)
desk (84:5)
detroit (17:12) (17:15) (17:16) (17:18) (66:2) (66:3)
develop (14:5) (28:19)
developed (12:18) (38:16) (38:19)
developer (48:3)
development (18:18) (30:13) (38:17) (65:2)
devoted (26:24)
different (5:24) (10:15) (15:10) (29:20) (32:13) (33:4) (44:8) (47:9) (72:1) (90:7) (90:9)
difficult (9:15)
direct (55:3) (68:13) (73:18)
direct- (20:6)
directed (61:18)
directly (56:18) (71:17)
director (27:12) (28:1)
disagree (82:2)
disappointed (86:20)
disc (23:18) (23:21) (24:7) (24:11) (38:4) (39:6) (39:7) (50:23) (51:6) (51:11) (51:14) (51:21) (63:12) (63:14) (63:21) (63:23)
discontinued (41:2)
discovery (10:7) (76:7)
discuss (52:16)
discussed (23:12) (52:22) (86:9) (86:11) (86:16)

discusses (83:5)
discussing (7:3) (7:4) (84:10)
discussion (6:12) (29:22) (85:21) (86:14)
discussions (85:22)
disease (83:21)
diseases (69:8)
disposed (78:23) (79:11)
disposition (78:24)
disputing (59:13)
dissolve (44:10)
distribute (9:12)
distributed (11:10) (40:4) (40:6) (40:10) (48:16) (56:22) (57:2)
distributing (53:5)
distribution (39:24) (53:5) (79:5) (79:6)
distributor (39:13) (40:8) (48:15)
division (13:8) (13:10) (16:16) (29:4) (35:15) (36:7) (36:11) (37:19) (37:22) (37:23) (38:20) (39:5) (39:10) (39:11) (39:12) (40:12) (43:2) (48:14) (48:15) (48:21) (48:24) (52:17) (52:20) (52:21) (52:22) (53:5) (53:9) (67:3) (67:4) (67:16) (67:24) (68:19) (81:3) (83:14) (83:17)
divisions (12:20) (13:4) (13:5) (36:1) (43:23) (50:21)
doctor (50:8)
document (8:7) (8:13) (51:1) (53:23) (59:16)
documents (10:3) (10:8) (40:17) (40:22) (46:16) (47:2) (47:4) (47:20) (53:11) (53:13) (53:15) (53:18) (53:22) (54:3) (54:9)
doesn't (47:6) (63:22) (69:16)
doing (5:10) (14:9) (14:11) (23:3) (39:22) (51:4)
domestic (27:6)
don (5:11)
donald (88:23)
done (25:7) (25:14) (38:20) (49:9) (50:3) (60:10) (68:15) (80:3)
doubt (32:10)
down (23:20) (43:19) (44:2) (65:7)
downtown (70:1)
dravk (70:16)
drive (17:2) (17:7) (20:14) (43:12) (72:4)
dry (31:6) (31:9) (32:12) (33:20) (39:1)
ducharme (87:9)
duly (73:13) (93:4) (93:5)
durability (33:11)
duration (26:2)
during (13:5) (13:17) (14:5) (18:22) (20:13) (28:7) (29:23) (29:24) (33:20) (34:13) (43:6) (44:7) (52:17) (79:11) (87:10)
duties (50:3)
duty (36:15) (36:18)
===== E =====
earlier (10:1) (19:5) (31:24) (40:18) (50:11) (60:6) (64:11) (75:11) (75:21) (81:17) (81:21) (85:9) (87:5) (88:6) (91:21) (92:8)
earliest (66:2)
early (31:17) (38:3) (38:17) (48:9) (52:17) (64:24) (65:14) (78:21)

easier (11:13) (53:22)
east (1:22)
economics (21:22) (26:18)
education (13:17)
edward (69:15)
effect (12:15)
effects (60:15)
eight (5:4)
eighties (31:19) (31:21)
either (30:17) (43:18) (47:21) (78:20) (83:20)
electrohydraulic (20:16)
electronic (18:10)
else's (84:1)
elsewhere (87:23)
emissions (87:10)
employed (93:13) (93:16)
employee (67:15) (93:15)
employees (46:1) (83:20)
employs (46:1)
empty (59:11)
encapsulated (23:14) (23:16) (23:23)
end (41:15) (78:20) (82:8) (83:2)
engine (28:24) (29:9) (29:16)
engineer (14:7) (68:3)
engineering (11:15) (12:5) (12:8) (12:11) (12:11)
 (15:10) (17:1) (17:10) (17:24) (18:5) (18:10) (18:14)
 (18:18) (19:18) (19:18) (19:23) (47:3) (47:9) (50:5)
 (69:6) (84:4)
engineers (12:10) (72:3) (85:15) (87:2)
entail (85:21)
entailed (12:5)
entire (19:10) (39:17) (40:5) (72:19)
entitled (50:23) (78:4) (80:8)
equipment (22:16) (37:5) (37:7) (37:20) (48:5) (65:12)
 (79:5)
eric (2:5)
error (8:12) (8:15)
esoteric (33:13)
essence (82:1)
essentially (6:1) (8:8) (19:1) (24:6) (25:12) (37:4)
 (39:20) (43:1) (47:15) (65:5) (67:7) (71:24) (73:21)
established (77:14)
estimate (15:4) (15:6) (26:10) (26:14) (33:21)
estimation (67:19)
ethical (71:19)
exact (14:17) (15:3) (31:16) (62:2) (66:20) (75:14)
exactly (27:23) (31:22) (60:21) (68:8) (70:2)
examination (1:15) (3:7) (4:2)
example (71:20)
exams (69:7)
exception (21:11)
exchange (45:4)
excluding (59:23)
excuse (77:24)
exhaust (91:8)
exhibit (3:10) (3:11) (3:12) (3:13) (3:14) (3:15) (3:16)
 (3:17) (4:19) (8:8) (10:19) (10:20) (10:23) (50:22)

(57:20) (57:21) (58:10) (58:11) (58:13) (59:16) (59:22)
 (61:19) (73:4) (80:5) (88:1) (88:4) (88:4)
exhibits (65:15)
exist (72:24)
existed (77:23)
expect (15:3)
experience (12:11)
expert (52:2) (89:12)
experts (89:2) (89:23) (90:17)
expires (93:18)
explain (85:4)
exposure (81:20) (84:8) (84:17) (84:21) (87:6) (87:6)
expressed (7:9)
extent (7:18) (62:8) (66:23) (68:17) (72:23) (79:7)
 (79:22)
 ===== F =====
facilities (46:7) (49:24) (50:2) (50:7) (64:4) (69:3)
 (70:20) (70:22) (85:1)
facility (17:14) (17:17) (17:21) (21:20) (22:4) (22:10)
 (24:16) (47:8) (47:17) (64:4) (64:12) (64:21) (65:5)
fact (53:8) (55:7) (60:17) (62:3) (92:3)
fahrenheit (34:5)
failed (39:19)
fairly (24:13) (25:22) (25:24)
faik (2:5)
familiar (7:8) (25:7) (46:23) (55:4) (55:18) (74:17)
 (79:19) (91:22)
familiarity (48:21)
family (27:21)
far (5:19) (6:17) (14:13) (25:18) (31:2) (41:13) (42:4)
 (60:14) (90:17)
farm (37:20)
feel (5:6) (5:8) (6:3) (6:9) (6:22) (7:3) (9:11)
feet (15:4) (15:7)
few (58:6) (63:6) (69:10)
fiber (33:11)
fiberglass (32:20) (86:13)
fibers (85:22)
field (52:2) (84:3) (90:11)
fifth (2:2)
filed (59:4) (59:14) (66:15) (92:3)
final (10:18)
finally (8:3) (42:16)
finance (42:12)
financial (42:23)
financially (93:17)
find (54:5) (57:12) (57:15) (68:17) (79:11) (85:20)
 (86:12) (90:18)
fire (33:9)
firm (80:16)
first (5:2) (5:12) (6:1) (12:7) (13:7) (18:15) (18:22)
 (32:2) (33:1) (36:3) (43:10) (45:12) (50:21) (51:13)
 (54:10) (58:7) (65:18) (65:19) (67:18) (67:20) (71:16)
 (73:18) (79:13) (82:17)
firsthand (49:22)
five (36:1) (42:22) (44:5) (44:17)
floor (2:5) (15:4)

flow (14:10)
focus (19:9)
focusing (19:16)
ford (49:19) (89:10)
form (34:16) (61:12) (74:17) (83:5)
formed (34:11) (34:13)
formerly (72:7)
formulation (47:6)
forth (30:4)
forward (11:13)
foster (88:23)
found (85:21)
four (24:17) (34:15) (34:18) (35:5) (35:7) (45:13) (52:7)
four-wheel (20:14)
fourth (1:18) (35:3)
frame (29:22) (76:7)
frames (43:18)
franklin (52:21)
frequently (19:11)
friction (21:4) (23:11) (33:23) (56:6) (72:4) (85:20) (90:14)
friday (1:17)
front (2:11) (80:4) (80:19) (88:8)
full (4:8) (93:10)
fuller (69:15) (88:13) (88:14)
function (47:15)
functional (33:2)
functions (28:16)
further (61:15) (91:11) (93:8) (93:12) (93:15)
===== G =====
gannon (2:10)
gathering (70:5)
gatke (55:20)
gave (84:14)
gear (34:23) (35:18)
gears (34:7) (35:18)
general (6:21) (21:19) (28:23) (49:7) (49:17) (56:22) (60:10) (60:11) (60:18) (60:18) (61:8) (62:9) (62:17) (63:2) (71:5) (77:8)
generally (5:11) (43:22) (43:24) (55:4) (84:4)
generate (45:21)
generated (33:20) (33:22) (87:10)
genre (74:9)
geographic (47:24) (48:17)
germany (46:14)
gets (92:12)
given (61:4) (90:24) (93:11) (93:20)
gives (59:24)
giving (26:10)
glance (51:9)
glean (38:1) (40:22)
goals (86:20)
goldberg (1:18) (2:2)
gone (48:11) (60:24) (90:17)
good (15:5) (23:5) (33:2)
gordon (2:5)
government (18:11)

governmental (21:21)
grady (65:19) (65:20) (65:21) (65:24) (66:1) (66:15) (66:19) (66:24) (67:15) (68:22) (68:23) (69:13) (88:12)
green (58:2)
grid (81:10) (81:14)
ground (79:21)
grounds (61:16) (79:16) (81:17) (81:21) (92:8)
group (19:21) (19:22) (19:24) (20:1) (20:10) (21:8) (21:10) (65:1)
groups (86:23)
guess (21:15) (23:5) (35:18) (53:13) (68:6) (76:18)
===== H =====
hand (4:16) (58:5) (73:15) (93:20)
happens (19:8)
hard (80:12)
harm (90:19)
harms (79:10)
hayes (63:15)
hazard (60:4)
hazardous (62:18) (62:22)
hazards (56:13) (83:6) (87:5) (87:6)
he's (5:10) (5:13) (62:9) (65:19) (66:9) (68:3) (68:7) (79:18)
heading (11:1)
headquarters (19:21) (70:1)
health (60:15)
heard (25:9) (69:24) (89:5)
heat (24:9) (33:17) (33:19)
heavier (17:5) (17:6)
heavy (36:15) (36:18)
heights (18:1) (29:2) (71:12)
held (66:9) (68:11) (84:1)
helen (73:9)
her (9:13) (9:14) (9:17)
hereby (93:4)
hereof (93:7)
hereto (93:17)
hers (9:16)
highway (36:18) (37:10)
historical (46:15) (47:2)
historically (42:11)
history (32:4) (32:23) (34:8) (38:12) (43:6) (52:18) (66:24) (80:8)
holding (64:18)
honestly (80:18)
horiszney (59:9)
hornick (67:11) (67:13) (67:14) (69:12) (88:13)
horrendous (26:19)
hostler (1:18)
hot (23:19)
house (2:11)
however (40:6)
humidifier (81:10) (81:15)
huntington (1:18) (2:8)
hydraulic (14:6)
hydraulics (42:16) (43:1)

===== I =====

idea (12:2) (12:4) (14:3) (15:1) (15:15) (18:3) (18:20) (19:14) (19:14) (20:8) (20:21) (23:6) (23:6) (23:10) (31:20) (32:21) (33:24) (34:10) (36:17) (38:13) (41:10) (41:12) (43:17) (45:24) (50:16) (64:17) (65:23) (67:17) (68:5) (86:8)

identification (3:10) (4:20) (10:21) (57:22) (73:5) (88:2)

ignition (40:7)

illinois (4:13) (8:21) (11:17) (13:3) (13:8) (14:21) (36:8) (36:11) (52:21) (64:5) (64:6) (64:8)

imagine (17:18) (32:3)

inc (1:22)

incapsulated (23:3)

include (37:6) (37:9)

inconsistencies (62:7)

inconsistency (61:13) (61:15)

incorporated (41:22)

incorporation (45:14)

incorrect (73:21)

incorrectly (91:2)

increased (26:20)

independent (34:15)

indicated (60:19) (77:4)

indicative (18:7)

individuals (88:7) (89:5)

industrial (14:14)

industry (17:20) (29:7) (34:14)

inflation (26:20)

information (11:9) (72:9) (72:10) (72:23) (79:24) (83:11) (84:6) (85:16) (86:1) (86:3)

informed (10:11) (10:14)

ingersoll (12:23) (13:1) (27:15) (27:20) (27:21) (38:18) (78:3) (79:1)

initially (32:24)

initiated (38:15)

injuries (25:19) (25:21)

inquiry (71:15)

instead (88:13)

institute (11:17) (85:19) (85:24) (86:4)

insurance (7:23) (8:1) (84:20) (84:22)

interaction (43:7) (43:9)

interested (93:17)

interface (21:21)

international (46:5)

interpretation (73:21) (79:15)

interrogatories (10:7) (35:24) (36:14) (38:2) (41:1) (55:12) (57:11) (57:24) (58:14) (61:17) (61:24) (63:5) (66:13) (71:2) (72:16) (73:9) (74:6) (74:19) (74:22) (75:24) (78:7) (78:11) (78:13) (80:5) (80:10) (80:23) (83:13) (85:9) (87:21) (91:16) (91:23)

interrogatory (58:14) (59:21) (59:23) (63:18) (71:23) (75:18) (79:15) (80:24)

investigate (72:21)

investigation (7:1)

investigations (7:4) (7:11)

invoices (54:4)

involved (33:1) (38:9) (66:16) (66:23) (67:1) (67:2) (67:5) (79:3) (79:5) (84:7) (84:14) (84:20)

involvement (92:1)

irs (45:22)

issues (7:24)

italy (46:14)

items (5:3)

its (33:16) (41:16) (60:3)

itself (23:24) (51:1) (53:23)

iwakuni (8:16)

===== J =====

jack (69:23) (69:24) (71:4) (73:13) (74:21) (75:1) (80:8) (80:11)

jackson (1:22)

james (65:19)

january (7:20)

japan (8:16) (8:17) (46:13)

jennings (1:18) (2:2)

job (18:3) (70:2)

john (88:24) (89:7)

johnny (1:22)

johns-manville (56:3)

joint (35:2)

joints (35:16)

journal (77:21)

journals (77:8)

joyce (70:15)

judge (58:4)

july (58:4) (73:17) (75:5) (75:6) (77:14)

june (1:17) (3:5) (93:21)

junk (44:9)

===== K =====

kanawha (1:1)

keep (19:11) (25:3) (25:10) (25:12) (47:2) (47:3) (47:12) (47:16) (72:15) (86:17)

keeping (6:21) (6:23) (46:19) (46:21) (47:15)

keeps (33:14)

kelsey (63:15)

kept (15:9) (33:7) (47:9) (71:11)

kinds (40:9) (66:8)

knew (55:16) (67:14)

knowing (74:7)

knowledgable (60:24)

knowledge (5:16) (6:4) (6:9) (6:15) (7:8) (7:10) (7:19) (7:22) (8:1) (8:3) (8:5) (9:6) (9:22) (10:13) (21:12) (30:22) (30:23) (32:4) (35:19) (38:5) (39:2) (40:21) (41:4) (44:11) (44:19) (46:18) (47:18) (47:23) (51:14) (52:23) (55:15) (56:13) (56:15) (60:13) (62:1) (62:8) (62:14) (62:21) (65:13) (66:19) (66:24) (67:18) (67:23) (68:1) (78:5) (83:3) (83:4) (83:8) (83:9) (84:22) (91:8) (92:6)

knowledgeable (5:7) (7:4) (41:8) (66:7) (75:9)

known (65:21) (65:24) (67:21)

knows (5:21)

korea (46:13)

krebs (89:13)

===== L =====

label (7:16) (49:6) (49:17) (49:21) (60:19) (63:4) (75:13)
labels (60:3)
laboratories (15:7)
lack (42:5)
lady (70:15)
large (26:7) (36:22) (37:4) (37:14) (37:20) (40:23) (48:6)
last (6:13) (64:19) (64:20) (87:4) (87:19) (88:4)
late (66:4) (86:7)
later (91:6)
law (71:11)
lawsuit (84:13)
lawsuits (84:7) (84:16)
lay (11:1) (65:19) (67:10)
layman's (24:13)
learned (13:8) (20:12)
learning (12:17)
least (66:11)
leave (91:19)
left (75:15) (75:16)
length (26:2)
less (67:14)
levels (69:4)
libraries (78:15)
library (15:13) (15:14) (15:16) (15:21) (15:23) (16:1) (77:1) (77:2) (77:3) (77:5) (77:8) (77:10) (77:14) (78:23) (79:1) (79:9) (80:1)
lifespan (87:16)
limit (8:4) (8:6)
limited (48:16)
lindquist (1:15) (3:3) (4:1) (4:8) (5:15) (11:7) (59:19) (61:22) (92:11) (92:13) (93:5)
line (6:13) (35:6) (38:13) (39:17) (41:3) (67:2) (67:8) (68:24) (72:19)
lines (35:4) (47:10)
list (10:18) (10:24) (55:11) (55:17) (61:3) (65:15) (65:16) (67:11) (88:5) (88:7) (89:21)
listed (7:20) (51:11) (51:19) (52:10) (52:13) (53:8) (53:16) (59:9) (65:19) (67:10) (88:7) (88:13) (88:19) (89:2) (89:6) (89:23) (89:24) (90:6) (90:12)
listing (53:15)
lists (71:4) (72:2) (88:12)
literature (16:3) (33:19) (87:14)
litigation (10:12) (10:15) (19:9) (84:20)
little (12:11) (26:3)
located (13:2) (13:3)
locations (19:2)
lombard (30:14)
long (24:19) (65:23) (86:2)
long-term (26:8)
longer (14:8) (77:15)
look (4:22) (19:10) (34:8) (47:5) (51:10) (54:8) (58:19) (74:11) (74:14) (82:14)
looked (45:13) (91:15)
looks (52:9)

loss (88:20)

lubrication (90:14)

lung (69:8) (83:21)

===== M =====

magazine (77:20)

magazines (15:24) (16:4) (78:4)

main (30:16) (33:16) (55:6)

mainly (16:3) (91:17)

maintains (77:15)

major (28:15) (37:14) (52:6)

majority (27:5) (56:17)

make (23:15) (24:7) (24:8) (30:3) (31:12) (35:6) (35:16) (43:11) (49:20) (53:22) (63:24) (71:15) (81:9) (88:22)

maker (25:9)

makers (51:18)

makes (54:19)

management (12:5) (12:8) (12:8) (12:12)

manager (16:16) (16:20) (17:10) (17:10) (21:19) (28:23) (69:20)

managers (70:22)

manner (74:15)

manual (13:14) (19:5) (20:14) (21:6) (22:5) (31:3) (31:4) (32:6) (32:11) (39:1)

manufacture (22:13) (35:11)

manufactured (11:10) (22:20) (27:4) (29:6) (29:17) (40:12)

manufacturer (48:4) (51:23) (56:19)

manufacturers (22:17) (37:20) (40:14) (48:5) (48:10) (51:10) (52:6) (77:22)

manufacturing (17:14) (17:17) (21:20) (35:12) (64:3) (64:12)

mark (10:18) (57:20) (89:19)

marked (4:19) (8:8) (10:20) (50:22) (57:18) (57:21) (73:4) (80:5) (88:1)

market (32:1) (32:9) (37:14) (38:4) (48:19)

marketed (28:13)

marketing (6:8) (6:11) (28:10) (66:16)

marks (4:17)

marsteller (2:8)

marvel (35:3) (35:17)

masters (11:21)

mastics (33:8)

material (21:4) (23:11) (33:3) (33:17) (82:3) (83:4) (85:20)

materials (15:9) (23:17) (54:21) (79:1) (79:9) (86:13) (86:15) (86:17) (90:20)

matter (5:8) (8:22) (55:7) (91:13)

maximum (33:22) (34:3)

mba (11:18) (12:13)

mccallum (88:24)

mccloskey (70:13)

mccullum (88:24)

mead (88:24)

mean (22:21) (24:7) (26:2)

meaning (21:16)

means (36:18)

measurements (69:4)

mechanical (11:15) (13:9) (38:9) (64:14) (72:3) (85:14) (87:2)
mechanics (35:1) (35:17)
mechanism (17:3)
media (2:11)
medical (50:8) (69:7)
medium (47:22)
meet (86:20)
meeting (10:1) (85:18) (86:6) (86:9) (86:18)
meetings (72:8) (72:22)
member (72:1) (85:11) (85:12) (85:17) (86:24)
membership (72:11)
memoranda (72:24)
memory (64:18) (66:18)
memos (86:18)
mention (56:12) (57:15) (72:21)
mentioned (8:12) (13:21) (14:1) (14:12) (21:12) (23:13) (23:22) (31:24) (37:22) (42:22) (46:4) (55:19) (57:12) (61:20) (64:11) (65:16) (72:12) (77:6) (81:2) (81:3)
mentions (52:20) (66:14) (71:10)
merge (24:10)
met (67:18) (69:11) (69:14) (70:3) (70:4) (70:7)
metals (72:2) (85:14) (87:1)
methods (39:24)
mexico (46:13)
michael (80:19)
michigan (19:19) (19:20) (28:9) (58:2) (73:10) (76:18) (80:7) (88:9) (91:17)
microfilmed (47:21)
mid (31:18) (31:21)
mid-eighties (43:20) (44:7)
might (41:7) (70:18)
mind (43:5) (55:8) (83:1) (91:5)
mineralogy (13:19)
minor (6:12) (8:14) (55:13)
minutes (46:16)
misstate (60:7)
mistake (52:24)
misunderstanding (24:5)
models (51:24)
moment (73:24)
monique (1:16) (93:2) (93:23)
months (12:14) (12:19) (14:5) (38:7)
more (20:2) (20:3) (21:20) (26:3) (31:20) (32:5) (34:6) (41:7) (48:5) (52:2) (53:4) (61:7) (64:15) (79:4) (85:23)
most (5:7) (5:15) (5:16) (16:5) (60:23) (66:6) (67:23) (75:8) (91:8)
motor (89:11)
motors (49:8) (49:17) (60:10) (60:11) (60:18) (60:18) (61:8) (62:17) (63:2)
moved (17:12) (66:3)
msds (82:4) (82:6) (82:18) (82:22) (83:9)
msdss (82:7)
multi-floor (14:23)
multiple (51:24)
municipalities (42:14) (42:24)

===== N =====
name (4:4) (4:6) (4:8) (4:9) (4:12) (9:10) (9:13) (27:19) (35:21) (38:16) (41:16) (49:20) (56:1) (56:4) (65:9) (69:14) (69:16) (70:1) (70:10) (70:15) (80:16) (89:11)
named (10:12) (11:4) (11:7)
names (34:18) (35:20) (70:23) (83:12)
napa (39:21)
national (56:6) (72:5) (85:15) (86:24)
nationwide (48:16) (76:12) (76:15) (76:19)
nature (16:1)
necessarily (53:6)
neither (59:10) (83:3) (93:12)
never (19:10) (33:21) (58:9) (58:20) (60:14) (82:18) (85:17) (85:22)
new (14:6) (28:19) (45:3)
next (6:13) (10:19) (17:9) (17:23) (21:13) (28:22) (39:9) (53:14) (57:20) (72:6) (73:8) (81:24) (82:23)
nine (17:9) (18:8)
nor (59:10) (59:11) (76:7) (83:3) (93:13)
normal (83:24)
nos (4:19) (73:4)
notarized (73:13)
notary (1:17) (93:2) (93:24)
note (78:16) (80:14)
noted (58:11) (59:4)
notes (72:24) (77:13) (86:17) (87:18) (93:9)
notice (1:15) (4:17) (4:23) (10:2) (10:24) (58:23)
number (14:17) (26:7) (34:5) (50:19) (51:2) (54:3) (54:20) (55:10) (58:14) (60:24) (61:16) (89:2) (91:15)
numbered (5:9)
numbering (61:18)
numbers (26:21)
 ===== O =====
oath (9:20)
object (61:15) (62:5) (74:4) (74:15) (79:16) (79:21) (81:16) (91:7)
objecting (72:18) (92:8)
objection (26:1) (61:11) (72:17) (75:23) (79:13) (82:10)
objections (59:24) (75:20) (78:10)
observation (59:12) (59:15)
occupational (69:8) (83:21)
oem (22:16) (26:13) (36:20) (37:11)
oems (49:11)
off (33:7) (33:14) (43:22) (44:5)
off- (36:17)
off-highway (36:15) (37:1) (37:4)
offer (59:12)
offering (59:15)
office (53:21) (80:20)
offices (1:17) (15:7) (57:5)
often (19:8) (32:5)
ohio (57:7)
oklahoma (40:19)
old (4:14) (4:15) (68:5)
older (68:8)
ologies (90:15)
on-highway (37:1) (37:13)

on-sight (47:17)
one-way (13:9) (20:12) (38:9) (38:22) (64:14)
open (85:20)
operating (28:18) (47:12) (47:16)
operation (24:20) (24:20) (24:22) (28:5) (33:20) (34:2)
operations (41:9) (52:16) (62:14) (66:5) (68:18) (87:11)
opportunity (64:10) (74:14) (91:4)
opposed (14:13) (16:8) (22:22) (26:12) (31:9) (33:13) (37:1) (71:18) (78:12)
oral (1:15)
order (25:10) (57:20)
organizations (72:1) (72:11) (85:10) (85:13)
original (22:16) (39:19) (48:5) (65:12)
osha (83:5)
others (33:9)
otto (89:15) (89:24)
our (7:16) (21:5) (28:17) (44:9) (53:21) (60:12) (60:20) (92:1)
outside (21:5) (22:12) (36:12) (65:12) (76:16)
over (26:17) (32:9) (34:5) (61:1) (74:13)
oversee (18:17)
oversight (20:6) (28:16) (68:12)
overview (6:2) (6:17) (18:17)
own (9:17) (40:12) (65:9) (65:10)
oxford (2:5)
===== P =====
pads (63:15)
page (3:7) (8:15) (11:1) (11:20) (53:1) (58:14) (59:4) (59:8) (63:7) (63:8) (64:1) (66:14) (71:1) (71:22) (72:6) (73:19) (75:17) (76:23) (78:6) (78:7) (80:24) (81:7) (81:22) (81:24) (88:19) (89:3)
pages (58:12) (61:18) (74:13)
paper (87:9)
papers (52:14)
paragraphs (5:9)
parent (41:19)
park (52:21)
parker (58:1)
part (5:12) (5:19) (14:19) (19:12) (22:12) (32:14) (33:6) (36:20) (41:8) (43:14) (43:15) (44:18) (50:3) (52:24) (59:23) (65:1) (65:22) (79:18) (79:20)
participate (10:6)
participated (61:23)
particular (13:9) (14:4) (47:4) (62:15) (74:19) (77:11) (79:3) (81:20) (83:6)
particularly (21:21) (48:5) (51:17) (63:9) (81:1)
parties (93:14) (93:16)
parts (15:8) (30:7) (30:17) (30:19) (30:20) (31:2) (39:9) (39:12) (39:18) (39:19) (39:20) (39:21) (40:1) (40:3) (40:6) (40:9) (40:11) (40:12) (40:19) (40:23) (41:5) (41:6) (41:11) (48:1) (48:11) (48:14) (48:16) (48:21) (48:24) (50:12) (50:15) (50:20) (52:21) (53:9) (56:23) (57:2) (67:3) (84:9)
pay (44:13)
pennsylvania (2:3) (2:6) (2:11) (57:7)
people (33:5) (33:5) (33:10) (46:3) (65:16) (69:10)

(69:11) (75:9) (77:22) (79:6) (88:20) (89:3)
percent (27:3)
percentage (26:11) (26:20)
period (8:15) (26:19) (34:13) (43:20) (64:16) (65:4) (65:6) (66:4) (79:12)
periods (27:22)
persky (1:18) (2:2)
person (5:7) (5:15) (7:13) (10:16) (52:15) (60:23) (67:10) (69:14) (70:18) (88:22)
personal (6:15) (92:6)
personally (9:11) (91:22)
persons (50:2)
photographic (64:18)
pietragallo (2:5)
piping (14:14)
pittsburgh (2:2) (2:5)
place (47:1) (47:11) (59:18) (93:6)
placed (60:2) (60:9) (61:8) (61:9)
plaines (13:3) (14:21)
plains (27:10)
plaintiff (80:17)
plaintiffs (2:3) (4:5) (80:20)
plant (24:19) (25:22) (26:7) (27:6) (70:22) (81:20)
plants (50:8) (69:4)
plate (23:15)
platen (23:19) (25:3)
please (4:6) (31:1) (75:18) (85:4)
point (5:21) (6:12) (7:15) (11:20) (14:18) (15:12) (17:6) (23:2) (23:5) (24:14) (28:15) (34:8) (41:1) (42:7) (55:9) (60:13) (75:5) (77:18) (82:12) (85:19) (91:1) (91:10)
pointed (78:14)
pointing (57:16)
points (5:22) (40:7) (62:10)
policy (46:20) (46:22)
porter (54:11) (54:15) (54:16) (54:17) (55:8) (56:12)
posed (74:16) (74:18) (87:20)
position (5:14) (13:5) (17:23) (19:17) (20:7) (28:22) (29:23) (29:24) (71:17) (74:24) (76:9)
positions (12:2) (66:9) (66:11) (68:10) (83:24)
potential (56:13) (90:19)
powder (25:12)
practices (7:17)
predates (92:1)
preparation (10:7) (61:24)
prepare (9:23) (10:4)
prepared (82:3) (82:6) (82:8) (82:11) (82:12) (82:21) (83:3)
present (5:17)
presently (4:10) (4:11)
president (21:19) (28:23)
press (23:14) (25:11)
pressing (23:4) (25:3)
pressure (14:10) (24:9)
pretty (57:3) (68:23)
previous (18:6) (18:8)
primarily (48:3)
primary (13:13)

prior (38:18) (56:17)
private (44:12) (44:15) (45:2) (45:5)
probably (57:18) (58:11) (63:22) (64:20) (65:6) (66:10) (68:19) (68:22) (70:4) (83:14)
problem (60:14)
problems (25:18) (25:21) (49:15)
procedure (1:16)
proceedings (93:8) (93:14)
process (33:23)
processes (62:2)
produce (35:10)
produced (5:17) (6:13) (22:19) (53:11) (53:23) (60:9)
producing (26:24) (60:17)
product (19:9) (19:13) (19:16) (21:3) (23:1) (23:20) (32:13) (33:7) (35:4) (35:6) (35:11) (38:8) (38:13) (41:3) (44:22) (47:5) (47:10) (54:14) (56:5) (81:12)
production (26:8) (26:14) (26:23) (30:17) (47:17) (49:24) (50:1) (69:3)
productions (10:8)
products (6:3) (6:8) (6:11) (6:19) (7:2) (7:5) (7:7) (7:10) (7:14) (7:15) (9:1) (11:9) (12:17) (13:14) (14:12) (14:13) (14:14) (15:11) (17:21) (17:22) (18:19) (18:21) (18:24) (19:1) (19:14) (20:3) (20:3) (20:8) (20:18) (20:21) (21:8) (21:24) (22:3) (22:21) (26:11) (27:5) (28:13) (29:11) (29:14) (29:15) (29:18) (31:1) (31:8) (31:12) (33:5) (35:11) (36:3) (36:9) (41:14) (42:4) (44:16) (49:4) (49:10) (49:15) (56:6) (56:18) (60:3) (60:12) (60:17) (62:17) (63:1) (63:3) (66:17) (67:6) (74:8) (74:9) (75:10) (81:8) (83:6)
professional (16:5) (16:9)
program (12:9) (12:14) (16:15) (20:13) (43:10) (68:15) (85:20)
project (14:7) (16:16) (16:20) (16:21) (16:22) (16:23) (16:24) (18:9) (38:11)
proper (4:9)
provide (7:13) (33:17)
provided (8:7) (40:18) (50:19)
public (1:17) (41:22) (45:1) (45:3) (45:8) (45:10) (45:20) (56:23) (93:2) (93:24)
publication (51:1) (77:19)
publications (16:6) (16:9) (16:9) (16:12) (86:22)
pulled (61:16)
pump (17:8)
pumps (17:7) (42:14) (42:24) (43:12)
purchase (22:11) (54:15) (54:17)
purchased (21:5) (22:17) (23:17) (40:13) (40:23) (54:6)
purchaser (62:20)
purported (75:24)
purports (61:17)
purpose (45:18)
pursuant (1:15) (1:16)
putting (62:16)
===== **Q** =====
qualified (62:10) (93:4)
quality (50:4)
question (5:13) (5:20) (15:12) (23:9) (58:16) (61:12) (61:19) (62:3) (62:6) (63:8) (63:8) (63:19) (63:21)

(66:10) (71:2) (71:24) (73:20) (74:1) (74:5) (74:12) (74:16) (74:18) (75:4) (78:1) (78:8) (78:8) (78:13) (78:14) (79:16) (81:7) (81:8) (81:23) (82:1) (82:11) (82:15) (82:16) (82:20) (82:23) (82:24) (85:12) (87:4) (87:8) (87:20)
questioning (72:19)
questions (6:5) (6:10) (6:22) (58:6) (58:16) (58:18) (58:21) (59:19) (63:6) (65:17) (74:7) (74:10) (74:12) (75:23) (76:7) (76:24) (77:11) (81:19) (88:6) (88:18) (89:22) (90:23) (91:11)
quite (5:20)
===== **R** =====
rabinovitz (90:3)
range (19:14) (40:5)
rather (82:15) (91:6)
raw (22:24) (25:10)
raybestos (55:8)
raymark (55:8) (55:19) (56:12)
read (10:1) (10:3) (15:10) (58:15) (73:24) (75:18) (78:9) (80:12) (81:23) (82:15) (87:9) (92:10)
reading (34:12) (53:18) (61:3) (62:13) (62:13)
really (25:15) (31:22) (34:20) (35:9) (48:18) (49:12) (50:12) (50:16) (52:23) (63:16) (67:20) (79:24) (86:10) (86:10)
reason (25:6) (40:24) (44:4) (44:6)
reasons (33:16) (92:7)
recall (13:22) (13:24) (14:17) (15:17) (16:2) (16:13) (16:14) (33:16) (34:4) (34:12) (39:13) (52:6) (55:6) (66:12) (67:20) (77:4) (85:18) (86:14)
received (11:14) (82:11) (82:21) (83:3)
recited (19:4)
recollection (55:16) (57:13) (64:18) (66:2)
record (4:7) (5:11) (6:21) (6:23) (46:19) (46:21) (46:22) (47:15) (57:14) (58:23) (59:14) (59:19) (72:17) (73:12) (73:16) (74:4) (88:5) (91:5) (91:8) (91:14) (91:21) (91:23) (92:5) (93:11)
records (47:9) (47:13) (86:18)
redundant (50:23)
reference (47:2)
referenced (58:13) (59:22)
reflect (91:23)
refractories (58:2)
regard (12:22) (71:6) (75:1) (87:19) (91:20)
regarding (7:20) (40:18) (57:11) (84:8) (84:16) (84:20)
regards (7:13) (9:20) (80:24)
region (57:6) (57:9)
regular (64:22)
regularly (64:23)
regulatory (69:20)
related (93:13)
relating (46:16) (72:24) (82:9) (83:20)
relation (6:18)
relationship (68:13) (70:6)
relative (93:15)
relatively (64:22) (64:23)
releasing (71:17)
remain (59:11)

remaining (78:22)
 remember (14:4) (77:5) (77:5)
 remembering (78:11)
 remove (85:6)
 renew (75:20)
 repairs (39:22)
 replaced (32:13)
 replacement (32:16) (32:20) (39:19)
 reported (29:8) (70:21)
 reporter (1:17) (4:17) (9:11) (10:18) (57:19) (71:18) (93:3)
 reporter's (9:12) (71:20)
 reporting (68:13) (70:5)
 reports (45:21) (45:22) (90:16) (90:18)
 represent (4:4) (9:16) (76:20)
 representation (59:13) (76:6)
 request (9:5) (49:20) (60:10) (61:8) (62:18) (62:20) (63:2) (71:14) (73:3)
 requested (49:16) (75:12)
 requesting (9:9)
 requests (10:8)
 required (25:13) (45:20)
 requirement (18:12) (61:10)
 requirements (7:18) (15:11) (60:4)
 resales (65:12)
 research (12:15) (12:22) (13:1) (14:2) (14:8) (14:16) (15:8) (19:18) (19:23) (27:10) (27:15) (28:4) (38:18) (38:19) (68:14) (68:16) (72:8) (78:3) (78:17) (79:1) (79:4) (84:4)
 researchers (12:16)
 resell (40:13)
 reside (4:10) (4:11)
 residue (87:16)
 resistance (33:18)
 resistant (33:10)
 resold (65:9)
 respect (6:2)
 respiratory (25:19) (25:20)
 respond (73:3)
 response (61:9) (62:16) (62:18) (62:19) (81:10) (82:5) (82:22)
 responses (10:7)
 responsibilities (12:3) (18:4)
 responsibility (20:7) (36:12) (36:20) (47:12) (70:19) (84:2) (84:3)
 rest (18:16) (58:19) (80:21)
 restricted (48:2)
 resume (8:9)
 retardant (33:10)
 retention (46:22)
 returned (27:9)
 review (63:18)
 reviews (92:12)
 richard (69:17) (72:7) (72:21) (77:13) (88:10)
 rid (43:18)
 ring (69:16)
 robert (58:5) (67:11)

rockford (36:7) (36:8) (36:11) (36:11) (37:19)
 role (91:22) (92:7)
 room (15:18) (16:2) (77:6)
 rosenberg (69:17) (72:7) (72:22) (77:14) (77:16)
 roy (2:8) (12:23) (12:24) (27:20) (27:21) (27:21)
 rubber (23:17) (23:20) (23:24) (24:4) (25:10)
 rule (60:5) (62:19) (62:22)
 rules (1:16)
 run (78:4)
 russe (56:8)
 ===== S =====
 safety (69:21) (70:19) (70:21) (72:5) (82:3) (83:4) (85:15) (86:24)
 sale (54:14) (66:16)
 sales (6:7) (6:10) (6:15) (6:17) (17:9) (18:9) (41:18) (48:1) (53:12) (56:17) (57:5) (66:12) (66:22)
 sample (85:5)
 sampling (50:3)
 saw (53:15)
 saying (19:12) (77:9) (90:18)
 says (11:9) (11:14) (72:6) (80:19)
 scope (18:20) (18:24) (19:10) (48:17) (51:5) (76:18)
 scott (70:8)
 seal (93:20)
 second (5:19) (6:7) (8:15) (13:10) (13:15) (28:19) (36:7) (58:20) (63:17) (67:10)
 secondly (61:22) (71:16) (79:17)
 section (37:11) (82:13)
 sections (53:17)
 sectors (37:13)
 seem (66:18)
 seems (80:7)
 segment (22:13) (32:8)
 selected (32:24)
 solenoid (20:16)
 self-contained (14:20)
 sell (9:17) (43:22) (44:5) (63:2)
 selling (22:22) (37:20) (48:9)
 semi (37:10)
 send (92:11)
 sense (54:19) (59:13) (62:6) (74:5) (81:17)
 separate (48:24)
 september (71:6)
 serling's (80:19)
 service (80:15)
 services (42:12) (42:23)
 set (54:4) (57:15) (58:20) (59:1) (59:3) (61:17) (61:20) (72:15) (73:8) (73:8) (74:6) (74:19) (80:4) (80:23) (83:10) (87:20)
 sets (91:15)
 seventies (38:3) (52:17) (65:7) (86:7)
 several (33:15)
 shape (23:4) (23:18)
 shaped (23:18)
 sheet (82:4) (83:5)
 sheldon (90:3)
 shelves (15:24) (16:3)

shipment (60:18)
shipments (60:9)
shipped (22:1) (22:16) (22:23) (26:12) (26:16) (26:24) (49:7) (49:10) (62:17) (75:10)
shipping (49:7) (49:17)
shoe (55:24)
shorter (18:17)
should (76:2)
show (26:1) (51:19) (61:11) (78:7) (79:13) (82:10)
showed (53:12)
showing (10:23) (61:19)
shown (60:14) (61:20) (72:17)
side (12:16) (12:16) (13:11) (14:9) (14:9)
sign (92:10)
signal (2:6)
signature (59:10)
signed (9:19) (58:24) (59:1) (59:3) (59:6) (59:10) (59:17) (61:21) (72:18) (73:13) (73:23) (75:5) (76:2) (80:11) (88:9)
signing (59:6)
similar (22:7) (89:22)
simply (24:8) (31:2) (33:7) (40:13) (59:15) (61:7) (61:18) (62:19) (75:20) (76:24) (81:8)
single (16:20) (16:22) (19:13) (24:11) (35:10)
single-floor (14:22) (14:24)
sitting (53:14) (74:5)
situated (52:16)
six (12:14) (14:5)
sixties (66:4)
size (77:6)
skipped (7:23)
small (19:12) (19:16) (77:14)
society (72:2) (85:13) (87:1)
sold (6:14) (22:19) (29:11) (29:17) (29:18) (39:18) (42:14) (42:15) (43:18) (44:13) (54:5) (63:12) (63:15) (78:23)
solid (24:11)
somers (87:9)
sometime (38:2) (45:7)
somewhat (78:18) (80:12)
somewhere (27:18) (31:16) (31:17) (31:18) (66:4)
son (27:22)
sorry (31:16) (48:18)
sort (67:8) (82:23)
sounds (23:23)
source (22:13) (68:20)
south (13:11) (46:13)
space (15:4)
specific (26:4) (29:21) (31:21) (62:20) (74:8) (74:8) (74:9) (81:19)
specifically (12:10) (86:12)
specified (93:7)
speculation (79:17) (79:20)
speed (17:2) (17:8) (43:11)
spend (15:21)
spent (16:18) (38:6)
spiral (24:8)

sprayed (33:8)
spring (13:7) (38:20) (67:16) (75:16)
springs (38:15)
square (15:4) (15:7)
stability (26:6)
stable (25:23) (25:24) (26:2)
stack (53:13)
stamp (59:5)
stamped (58:3) (59:3)
standard (59:24)
start (11:13)
started (31:15) (31:15)
starting (12:2)
starts (63:8)
state (1:17) (4:6) (5:11) (51:13) (58:2) (73:10) (74:4) (76:5) (77:23) (91:17) (92:2) (93:1) (93:3)
stated (60:6) (63:11) (75:21) (77:15) (81:21) (82:20)
statement (45:17) (61:2) (66:20) (91:21)
statements (9:20)
states (22:1) (22:17) (22:18) (22:23) (26:13) (26:21) (27:1) (27:9) (46:8) (46:12) (48:2) (51:17) (51:23) (60:1) (60:2) (76:21) (77:18) (78:22)
stating (74:20)
steam (81:10) (81:14)
stenotype (93:9)
steps (7:12)
sterling (18:1) (29:2) (71:12)
sticking (25:4) (25:11) (25:12)
still (22:10) (28:4) (43:13) (43:15) (48:20) (71:16)
stint (21:13)
stipulate (11:6)
stock (45:4)
stockholders (45:21)
stopped (13:4)
stops (12:14) (12:19)
storage (47:22)
stores (56:23)
street (1:22) (2:11)
stretched (74:12)
strictly (41:17)
study (87:14) (90:13)
subcommittee (72:4)
subject (5:8) (8:22)
subparts (36:1)
subsequent (43:12)
subsidiaries (41:13)
subsidiary (82:3)
suburb (4:11) (4:12) (64:8)
such (9:8) (16:10) (19:12) (20:15) (21:22) (47:11) (49:19) (56:12) (68:13)
sued (79:8)
sufficient (6:4) (6:10)
suggest (73:2)
suite (1:18) (2:8)
summarize (73:20) (76:24) (83:1)
supplied (40:1) (54:21) (56:5)
supplier (56:2)

suppliers (55:1) (55:5) (55:7) (55:11) (55:12) (55:14)
 (55:18) (56:11)
sure (5:13) (23:8) (27:23) (30:3) (34:3) (57:17) (63:24)
 (64:13) (64:15) (65:6) (74:2) (88:22)
switch (34:7)
switching (30:4)
sworn (4:1)
systems (18:10) (29:1) (29:6) (30:14) (42:15) (43:1)
 ===== T =====
tabbed (54:9)
table (53:21)
tailored (74:7)
taken (1:15) (7:13) (9:2) (44:14) (72:24) (93:6) (93:9)
taking (74:24) (76:9)
talc (25:12)
talk (25:9)
talked (33:4) (35:21) (43:10) (69:12)
talking (31:2) (32:4) (42:20) (85:10) (87:5)
talks (6:1)
target (44:7)
tasks (18:13) (18:15)
taxing (34:20)
technical (72:5)
technically (5:13)
technologies (28:17)
technology (11:18) (28:10)
telling (5:21)
temperature (33:22)
temperatures (34:1)
tend (19:9)
tenure (28:7)
terminating (43:21)
terms (26:10) (34:1) (51:11)
terry (1:15) (3:3) (4:1) (4:8) (4:9) (92:13) (93:5)
testified (61:23) (77:10)
testify (5:8) (7:18) (62:10)
testimony (56:17) (60:6) (60:7) (60:16) (93:11)
thank (91:11)
thayer (58:1) (66:13) (71:1) (78:6) (80:3) (80:19) (88:9)
themselves (44:12)
therefor (30:19)
therefore (7:10) (18:13) (82:18)
therein (7:21)
third (2:8) (13:16) (35:1)
thirty-eighth (2:5)
thomas (70:10)
thought (62:2)
three (9:3) (12:14) (12:19) (13:13) (29:20) (38:6)
 (58:11) (90:15)
three-month (64:16)
threshold (8:4) (8:5)
thus (31:2)
tiles (85:6)
times (65:3)
timothy (2:10)
tire (25:9)
tires (25:8)

title (66:21)
titled (59:16)
to-wit (93:1)
today (4:14) (5:18) (9:24) (10:1) (10:16) (28:5) (41:13)
 (53:14) (74:5) (76:12) (84:10) (84:14) (91:9) (91:16)
 (91:19) (92:5)
together (24:6) (34:16) (35:6) (35:13) (53:21)
took (21:13)
torque (13:15) (19:6) (29:1) (29:6) (29:7) (29:12) (30:7)
 (30:9)
total (26:21) (74:12)
toward (74:7)
tractor (37:10)
tractors (36:23) (37:8)
trade (16:9) (21:23) (77:8) (77:21)
traditional (47:24)
traditionally (38:14)
train (72:4)
trainee (12:5) (12:8)
training (12:9) (20:13) (68:2)
transcribe (9:17)
transcribed (9:7) (9:9) (93:10)
transcript (9:5)
transcripts (9:17)
transfer (20:14)
transition (31:15) (31:18)
transmission (13:14) (13:15) (17:4) (19:5) (19:6)
 (21:6) (22:5) (28:20) (28:21) (28:24) (29:9) (29:16)
 (30:11) (30:14) (30:18) (30:21) (31:3) (67:8) (68:24)
 (72:4)
transmissions (20:12) (20:15) (29:20) (30:8) (30:17)
 (31:5) (32:5) (32:6) (32:11) (38:10) (38:18) (38:20)
 (38:22) (38:23) (39:1)
transportation (42:6)
trial (11:5) (11:8)
tribology (90:12) (90:13) (90:15)
tried (87:14)
troy (19:19) (19:20)
truck (14:13) (14:15) (37:2)
trucks (52:10) (52:13)
true (35:19) (48:13) (56:21) (56:24) (68:1) (69:1)
 (93:11)
truth (81:15)
turn (81:7) (81:22)
two (12:19) (12:20) (13:4) (16:18) (22:15) (27:13) (28:1)
 (28:15) (30:6) (31:4) (44:8) (45:11) (55:6) (55:7)
 (55:14) (55:16) (58:11) (65:15) (79:15)
types (12:17) (19:1) (20:3) (22:15) (29:20) (31:4)
typical (40:9)
typographical (8:15)
 ===== U =====
umbrella (35:13)
unaware (57:3)
under (8:15) (9:20) (11:1) (35:13) (37:10) (53:8) (65:9)
 (76:9) (88:12) (93:20)
understand (35:14) (37:3) (47:14) (48:8) (53:20)
 (56:16) (76:4) (83:12) (91:18)

understanding (30:24) (77:7)
unfamiliar (74:6)
unfortunately (79:6)
unit (29:8) (40:19) (40:23) (41:5) (41:6) (41:11) (44:20)
 (44:21) (47:12) (47:16) (48:15) (50:12) (50:15) (82:19)
united (22:1) (22:17) (22:18) (22:23) (26:13) (26:21)
 (27:1) (27:9) (46:8) (46:12) (48:2) (51:17) (51:23)
units (28:18) (42:8) (42:10) (42:21) (42:22) (43:3)
 (43:13) (44:5) (44:17)
universal (35:2) (35:16)
university (11:18)
until (72:17)
upon (1:15) (18:11)
usage (74:8)
use (17:1) (26:13) (27:6) (33:10) (60:12)
useless (63:22)
uses (31:5) (31:6)
using (44:9)

===== V =====

vague (15:11)
valid (92:4)
value (8:4) (8:6)
valve (14:6)
valves (20:16)
variable (17:2) (28:21) (43:11)
various (28:16)
varying (17:8)
vast (56:17)
vehicle (37:4) (37:14) (87:10)
vehicles (36:15) (36:18) (36:23) (51:24) (56:20)
vendor (22:18)
verified (59:11)
versus (58:1) (71:7) (73:10) (80:9)
very (33:2) (44:6) (48:9) (71:23) (79:19) (91:11)
vice-president (17:24) (18:4) (18:14) (19:17) (19:19)
 (19:23) (28:10) (30:12) (65:2) (66:15)
vice-versa (31:9)
victor (70:13)
view (24:14)
virginia (1:1) (1:16) (1:17) (1:18) (1:22) (2:8) (6:14)
 (6:16) (57:6) (57:9) (76:5) (92:2) (93:1)
virtually (51:22)
visit (64:24) (65:5) (69:2)
visited (64:21) (65:3)

===== W =====

wales (46:14)
wall (33:8) (33:14) (85:7)
wanted (8:13) (30:3) (53:18) (60:19) (63:24) (68:17)
 (79:10)
war (27:23) (27:24)
warner (34:23) (34:24) (35:18)
warning (49:3) (49:21) (57:11) (60:2) (60:8) (60:9)
 (62:14) (62:16) (75:13)
warnings (7:13) (61:1) (61:7) (61:9) (62:9) (73:22)
 (75:9)
wayne (58:3) (73:11) (80:6) (80:8)
wear (90:14)

webb (73:9) (78:13)
week (40:18) (53:12) (64:20)
weekly (16:10)
weeks (9:3) (84:15)
wentz (59:6) (59:6) (69:23) (69:24) (70:3) (71:4)
 (73:14) (73:23) (74:21) (75:1) (80:11) (91:20) (92:3)
west (1:1) (1:16) (1:17) (1:18) (2:8) (2:11) (6:14) (6:16)
 (57:6) (57:8) (76:5) (92:2) (93:1)
western (64:8)
wet (17:2) (31:5) (31:9) (38:21)
whatever (43:19) (56:23)
wherever (48:11)
whether (5:6) (49:12) (49:22) (50:6) (54:5) (61:7)
 (61:9) (63:14) (74:7) (81:19) (82:19) (82:20) (84:19)
 (84:24) (87:8) (87:15)
white (1:18) (2:2)
whole (18:14)
wick (89:19)
william (89:13)
williamson (2:11)
winfield (4:12)
withdrawn (18:12)
without (32:10) (53:2) (85:20)
witness (10:12) (10:14) (10:18) (10:24) (11:4) (11:8)
 (65:15) (65:16) (65:19) (67:11) (88:5) (88:7) (89:21)
 (93:11)
witnesses (11:1) (88:12) (88:18) (88:21)
wolowicz (70:11)
wong (89:15) (90:1) (90:2)
word (42:6)
words (74:9)
work (28:9) (47:7) (64:14) (67:24) (69:2) (71:20)
 (77:20)
worked (12:16) (50:1) (68:10) (70:20) (85:1) (85:3)
workers (26:8) (69:8)
workers' (83:18)
workforce (25:18) (25:22) (26:7)
working (11:21) (11:22) (14:2) (14:7) (14:9) (20:4)
 (20:4) (20:19) (22:24) (38:11) (70:5)
workplace (7:17) (83:7)
works (47:6)
world (27:24)
worldwide (41:17)
wouldn't (45:17) (63:14)
writers (44:8)
writing (73:3)
wrong (31:1) (52:9) (52:12) (90:6)

===== Y =====

yarn (23:3) (23:14) (23:16) (23:22) (23:24) (25:1) (25:2)
 (25:2)
year (41:18)
years (4:15) (16:18) (17:9) (18:8) (18:22) (24:17)
 (24:23) (27:13) (27:23) (28:2) (32:20) (33:15) (39:13)
 (45:11)
york (44:20) (44:21) (45:4) (81:2) (81:4) (82:19) (83:14)
 (83:16)
yourself (9:23) (10:4) (82:15)