

20 CORPORATION AS PART OF YOUR NORMAL SALARY TO BE HERE;
21 CORRECT?

22 A. YES.

23 Q. ARE YOU GETTING ANY ADDITIONAL PAY FOR YOUR
24 PARTICIPATION IN THIS DEPOSITION?

25 A. NO.

0060

1 Q. HAVE YOU RECEIVED A -- STRIKE THAT.
2 WHEN YOU FIRST -- SINCE YOU'VE BEEN TESTIFYING
3 IN DEPOSITIONS, HAVE YOU BEEN PROVIDED BONUSES OR SOME
4 ADDITIONAL INCENTIVES FOR YOUR WORK TESTIFYING IN
5 DEPOSITION AND AT TRIAL IN ADDITION TO YOUR OTHER
6 RESPONSIBILITIES?

7 A. NO.

8 Q. DID THEY TELL YOU YOU WERE GOING TO HAVE TO
9 TESTIFY AT DEPOSITION AND AT TRIAL AND OTHER THINGS WHEN
10 YOU ACCEPTED YOUR CURRENT POSITION WITH DANA?

11 A. NO.

12 Q. WERE YOU SURPRISED TO LEARN THAT YOU WERE GOING
13 TO HAVE TO GIVE DEPOSITION AND TRIAL TESTIMONY?

14 MR. PARKER: OBJECTION; ARGUMENTATIVE,
15 RELEVANCE.

16 CONTINUE TO ANSWER, GO AHEAD.

17 THE WITNESS: THIS WAS NOT PLANNED OR GIVEN TO
18 ME AS PART OF A JOB RESPONSIBILITY AT ANY TIME.
19 BY MR. FISHBACK:

20 Q. OKAY. I THINK YOU ANSWERED THIS QUESTION. IF
21 YOU HAVE, I APOLOGIZE.

22 THERE WERE ASBESTOS-CONTAINING HARD GASKETS
23 MANUFACTURED BY VICTOR THAT WERE MANUFACTURED DURING THE
24 1968 TO 1970 TIME PERIOD THAT YOU KNOW OF?

25 A. YES.

0061

1 Q. ARE THERE OTHER TYPES OF GASKETS BESIDES HARD
2 GASKETS AND SOFT GASKETS THAT YOU GENERALLY CATEGORIZE
3 THEM AS?

4 A. NO.

5 Q. AND, AGAIN, YOU'RE NOT THE BEST PERSON TO TALK
6 ABOUT THE PARTICULAR SPECIFICATIONS FOR
7 ASBESTOS-CONTAINING HARD GASKETS?

8 A. NO, I'M NOT.

9 Q. AND MR. KOZINSKI IS THE MAN YOU WOULD ASK IF
10 YOU HAD HAD QUESTIONS ABOUT HARD GASKETS AND THEIR
11 COMPONENT MATERIAL PARTS?

12 A. YES.

13 Q. WITH RESPECT TO THE FILE CARDS, AND
14 PARTICULARLY THOSE STORED AT THE ENGINEERING VAULT IN
15 LISLE, IS IT TRUE THAT ALL OF THE ENGINEERING CARDS FOR
16 HARD GASKETS ARE STORED IN THE ENGINEERING VAULT AT
17 LISLE?

18 MR. PARKER: CALLS FOR SPECULATION.

19 YOU CAN ANSWER, TO THE EXTENT YOU KNOW.

20 THE WITNESS: PROBABLY, YES.

21 BY MR. FISHBACK:

22 Q. WHY "PROBABLY" AND NOT "CERTAINLY"?

23 A. BECAUSE I'M NOT CUSTODIAN OF THOSE FILES.

24 Q. WHO IS?

25 A. YOU'LL HAVE TO ASK RICH KOZINSKI THAT QUESTION.

0062

1 I COULDN'T TELL YOU THAT. I MEAN I DON'T KNOW.

2 Q. SURE. BY THE WAY, HAVE YOU EVER ATTENDED ANY
3 CLASSES OR RECEIVED ANY EDUCATIONAL INSTRUCTION ON HOW TO
4 BE A WITNESS AT TRIAL OR IN DEPOSITION?