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June 3, 2003

Jason E. Luckasevic, Esquire  
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1030 Fifth Avenue, Third Floor  
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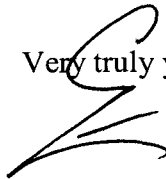
RE: Robert F. Adams and Naomi Adams, his wife vs. General Motors  
Corporation, et al. No. 7870 of 2002 (Westmoreland County)

Dear Jason:

Enclosed please find the transcripts of Maremont's representative, Carl Liggett, taken on 9/26/01, 12/12/01, 3/29/02, and 8/15/02.

After reviewing these transcripts, please advise as to whether you still believe it will be necessary to proceed with the deposition of the Maremont representative. If so, I will have to make arrangements for the deposition to take place at a time and place other than June 24 at your office.

Very truly yours,



Eric K. Falk

EKF/sla  
Enclosures

cc: Defense Counsel of Record (w/o enc.)

1 SUPERIOR COURT OF THE STATE OF WASHINGTON  
2 FOR KING COUNTY  
3

4 Helen E. Pedrick, as Personal  
5 Representative for the Estate of  
6 Raymond F. Pedrick, Sr., deceased,  
7 Plaintiff,

8 VS. Case No.: 00-2-26588-3SEA  
9 ACandS, Inc., et al.,  
Defendants.

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12  
13 DEPOSITION OF CARL LIGGETT  
14 FRIDAY, MARCH 29, 2002  
15 TAKEN ON BEHALF OF THE PLAINTIFF  
16

17 - - -  
18

19 BE IT REMEMBERED THAT, pursuant to the Oregon Rules  
20 of Civil Procedure, the deposition of Carl Liggett was  
21 taken before Mary Jacks, a Notary Public and Court  
22 Reporter for the State of Oregon, on March 29, 2002,  
23 commencing at the hour of 11:00 a.m., the proceedings  
24 being reported at 111 S.W. Fifth Avenue, Portland,  
25 Oregon.

Page 2

## APPEARANCES

DAVID A. STEWART

Brayton Purcell

621 S.W. Morrison Street, Suite 950

Portland, OR 97205

503-295-4931

Appearing on behalf of the Plaintiff

DIANNE KERO

Gordon, Thomas, Honeywell

600 University Street

Seattle, WA 98101

206-676-7500

Appearing telephonically on behalf of Maremont

JOHN CANONI

Kasowitz, Denson, Torres &amp; Friedman, LLP

1633 Broadway, Suites 50 and 51

New York, NY 10019

212-506-1700

Appearing telephonically on behalf of Maremont

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A. Yes, I have.

Q. And approximately how many times have you testified in a courtroom trial?

A. About four times.

Q. And of those, how many were related to the subject matter of asbestos?

A. None.

Q. And Mr. Liggett, I will assume since you've given some depositions in the past that you understand the basic parameters of how a deposition works. I will do my best to state questions clearly but we are on the telephone here and if you don't understand a question, I ask that you let me know and I'll restate it or rephrase the question.

If you answer the question, I'm going to assume that you understood my question, is that okay?

A. That's okay.

Q. Thank you. And you do understand that you are under oath today and that your testimony here today is just as if you were sworn in as a witness in the courtroom, correct?

A. I understand that.

Q. Okay. Thank you. Well, I'll proceed with my questioning, then. Could you please tell me your current employer and your position?

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PORTLAND, OREGON;  
FRIDAY, MARCH 29, 2002

11:00 A.M.

CARL LIGGETT

having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY-MR.STEWART:

Q. Good afternoon, Mr. Liggett. Could you please state and spell your name for the record?

A. My name is Carl Liggett, L-I-G-G-E-T-T.

Q. And Mr. Liggett, have you been deposed previously for any reasons?

A. Yes, I have.

Q. Approximately how many prior depositions have you given?

A. Are you asking in all matters in my business career?

Q. That's my first question, yes.

A. Perhaps ten or twelve.

Q. And of those, how many pertained to the subject matter of asbestos?

A. I would guess that that's five or six.

Q. Have you had occasion to testify in courtroom trials?

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A. My current employer is Accurate Partitions. I am the general manager.

Q. And how long have you held the position of general manager with Accurate Partitions?

A. Approximately seven years.

Q. In your capacity here today as -- Well, strike that.

When was the last time that you gave a deposition related to the subject of asbestos?

A. I don't recall the exact date.

Q. Can you tell me, was it in -- do you have a year in mind? Was it more than two years ago?

A. It would have been in the last year.

Q. Okay. And do you recall the first deposition pertaining to asbestos that you gave?

A. Probably about two years.

Q. And so if I understand your answers, then, the five to six depositions have all been in the last three years time, two, three years time, that those five to six depositions occurred?

A. I think that would be correct.

Q. In your capacity for providing today's deposition and in any of the -- of the past depositions, were you retained by Maremont as a

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1 consultant? In other words, did Maremont provide  
2 you with compensation for your time in association  
3 with those depositions?

4 A. Yes, they did.

5 Q. And can you tell me, if you recall, what  
6 amount of compensation they provided you with for  
7 those past depositions and for today's deposition,  
8 if you know?

9 A. \$175 per hour.

10 Q. Aside from the time that you have spent  
11 providing depositions, and occasionally if Maremont  
12 asks you for declarations, and I'll get to that  
13 subject in a moment, do you perform any other  
14 services for Maremont currently?

15 A. No, I do not.

16 Q. Do you consider yourself an employee of  
17 Maremont?

18 A. No.

19 Q. Do you serve in any capacity to Maremont on  
20 their board of directors or as a shareholder?

21 A. No.

22 Q. Are you represented by John Canoni as your  
23 attorney here today?

24 A. I'm not sure I understand the question.

25 Q. Well, my question is if you consider Mr.

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1 A. I have a B.S. degree in business  
2 administration from the University of Tennessee in  
3 Knoxville.

4 Q. And following studies at the University of  
5 Tennessee, what was your first employment upon  
6 leaving?

7 A. I was a foreman with Ford Motor Company in  
8 Lorain, Ohio.

9 Q. How long did you serve as an employee of  
10 Ford?

11 A. Less than a year.

12 Q. And what was your next position?

13 A. I was a maintenance officer in the U.S. Air  
14 Force.

15 Q. And how long did you serve in the Air  
16 Force, sir?

17 A. Four years.

18 Q. And what was -- What year was that when  
19 you left the Air Force?

20 A. 1970.

21 Q. What was your next position following the  
22 Air Force?

23 A. I was a foreman with Proctor and Gamble in  
24 their Charman paper products division.

25 Q. And how long did you stay in that position?

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1 Canoni to be representing you as your attorney for  
2 the purposes of this deposition?

3 A. I consider Mr. Canoni representing Maremont.

4 Q. Okay. Prior to the beginning of today's  
5 deposition did you meet and confer with Mr. Canoni  
6 about the deposition?

7 A. We had lunch together.

8 Q. And what did you discuss over lunch  
9 pertaining to this deposition?

10 A. He give me some basic rules in any  
11 deposition. To think before I respond and ask  
12 questions if I don't understand the question.

13 Q. Did Mr. Canoni discuss with you the time  
14 line of Maremont's production or distribution of  
15 friction materials?

16 A. No.

17 Q. Mr. Liggett, I'd like to go over with you  
18 briefly your career with Maremont and preceding your  
19 career with Maremont. Could you just very briefly  
20 provide to me your background in terms of your  
21 education before you came to join the Maremont  
22 company?

23 A. Okay. What can I tell you?

24 Q. Well, how far did you go with your formal  
25 education, sir?

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1 A. Three years.

2 Q. And what was your next position after  
3 leaving Proctor and Gamble?

4 A. I went with Maremont Corporation.

5 Q. Was that 1973?

6 A. Late '72, I believe.

7 Q. What was your beginning position and what  
8 facility were you located at when you started at  
9 Maremont?

10 A. I was the operations manager at the Allied  
11 Drive facility in Nashville, Tennessee.

12 Q. And how long did you hold the title of  
13 operations manager at that facility?

14 A. I'm not sure that I recollect the exact  
15 dates, but two or three years.

16 Q. I understand that at some point in time you  
17 came to oversee or had some responsibilities in  
18 regards to the Paulding, Ohio facility, is that  
19 correct?

20 A. That is correct.

21 Q. At what point in time did you begin to  
22 have responsibilities pertaining to the Paulding,  
23 Ohio facility?

24 A. I'm not sure of the exact date but probably  
25 sometime around 1975.

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1 Q. And if you could take me through the  
2 various titles you held at Maremont starting with  
3 operations manager, if you recall. What was your  
4 next job title?

5 A. My next job title was operations manager of  
6 both Allied Drive and Paulding, Ohio.

7 Q. Okay.

8 A. And then Maremont was sold to Turner and  
9 Newell and I was responsible for constructing and  
10 staffing a new manufacturing facility in Smithville,  
11 Tennessee and I became the vice president of  
12 manufacturing for Nuturn Corporation.

13 Q. What was the scope of operations -- Strike  
14 that.

15 What activities did Maremont engage  
16 in at the Allied Drive, Nashville, Tennessee  
17 facility from the time period when you started in  
18 '72 for the first five years that you were  
19 associated with that facility?

20 A. Maremont had two functions at the Allied  
21 Drive facility. I was the operations manager of the  
22 passenger car group. We assembled drum brakes and  
23 disc brakes and packaged them primarily for  
24 distribution to Sears.

25 Q. What were the brand name or brand names of

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1 A. The passenger car division did that,  
2 correct.

3 Q. And what other -- Were there other  
4 divisions at Allied Drive that were engaged in the  
5 distribution of friction products in the 1972 to '77  
6 time frame?

7 A. Yes.

8 Q. And what divisions were those?

9 A. The heavy duty truck division.

10 Q. The heavy duty truck division?

11 A. Correct.

12 Q. Was there a single individual who was  
13 responsible for overseeing the heavy duty truck  
14 division during the time frame of late 1972 until  
15 1977?

16 A. Yes.

17 Q. And who was that or were those individuals?

18 A. I believe that would be Bob Steinmetz.

19 Q. Do you know if Mr. Steinmetz is still  
20 living?

21 A. To the best of my knowledge, he is.

22 Q. And do you know where he resides?

23 A. Somewhere in the greater Chicago area.

24 Q. Do you know if he is presently retired or  
25 still employed?

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1 the drum brakes and disc brakes during that time  
2 period of '72 to '77 that the Allied Drive facility  
3 distributed to Sears?

4 A. The Sears All-In-One brake package and the  
5 Sears Brake-In-A-Box package. There was another  
6 brand, I think, called Over-The-Counter.

7 Q. Did Maremont have distribution of other  
8 brands of friction products through the Allied Drive  
9 facility in the 1972 to '77 time period?

10 A. They had a heavy duty division out of the  
11 Allied Drive facility that purchased bulk truck  
12 parts and resold them.

13 Q. Aside from the Allied Drive facility, are  
14 you aware of other facilities that Maremont used in  
15 the 1972 to '77 time frame to distribute other  
16 brands of friction products aside from the  
17 All-In-One, the Brake-In-A Box and the  
18 Over-The-Counter brands that you referenced as being  
19 distributed to Sears?

20 A. Yes, the Paulding, Ohio facility.

21 Q. And you mentioned that the -- as I  
22 understood it, the Allied Drive facility in  
23 Nashville, Tennessee in the time period of 1972 to  
24 1977 primarily distributed to Sears in the course of  
25 distributing friction materials, is that correct?

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1 A. I believe he is still employed.

2 Q. And do you know who he is with?

3 A. No, I don't know the name of the company.

4 Q. Do you ever see Mr. Steinmetz either  
5 socially or in business settings?

6 A. No, I don't.

7 Q. What types of friction products did the  
8 heavy duty truck division distribute in the 1972 to  
9 1977 time period?

10 A. Primarily drum brakes for large vehicles.

11 Q. Do you recall what brand name or names  
12 those drum brakes were sold under?

13 A. I recall the Grizzly brand name.

14 Q. Are there any other brands that you recall  
15 as being distributed from the heavy duty truck  
16 division during that time?

17 A. There was the Leland brand but that was not  
18 related to friction materials.

19 Q. What about the Ultra brand?

20 A. That may have been another minor brand they  
21 had.

22 Q. Same question as to Hyper.

23 A. I'm not sure I recall that.

24 Q. Same question as to Safety Grip.

25 A. I do recall that brand.

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1 Q. Was that a brand of friction product?  
 2 A. Yes, it was.  
 3 Q. Was it distributed through the Allied Drive  
 4 facility?  
 5 A. I don't recall where it was distributed.  
 6 Q. Same question as to Silver Tip.  
 7 A. I remember that brand now that you mention  
 8 it. I don't remember if that was distributed from  
 9 Paulding or the heavy duty group in Nashville.  
 10 Q. Same question as to XT Woven.  
 11 A. I don't recall that brand.  
 12 Q. Same question as to Syncro.  
 13 A. I don't recall that brand.  
 14 Q. Same question as to SS Metallic.  
 15 A. I don't recall that brand.  
 16 Q. And same question as to Tru, T-R-U, dash,  
 17 Guard.  
 18 A. I don't recall that brand either.  
 19 Q. Mr. Liggett, when you began at Maremont who  
 20 was your direct supervisor?  
 21 A. Bob Rogers.  
 22 Q. And is Mr. Rogers living or deceased, if  
 23 you know?  
 24 A. To the best of my knowledge, he's alive.  
 25 Q. And where does he reside, if you know?

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1 A. I do not know.  
 2 Q. When was the last time that you heard from  
 3 him?  
 4 A. I would guess 20 years ago.  
 5 Q. What was Mr. Rogers role when you started  
 6 with Maremont?  
 7 A. Mr. Rogers was either the president or the  
 8 general manager of the passenger car division of  
 9 Maremont's friction products.  
 10 Q. And when you started with Maremont in the  
 11 Allied Drive facility did you have responsibility  
 12 over the heavy duty truck division at the beginning  
 13 of your tenure?  
 14 A. No, I did not.  
 15 Q. Was there a point in time when you were  
 16 put in charge of the heavy duty truck division at  
 17 the Allied Drive facility?  
 18 A. No, there was not.  
 19 Q. And in terms of the time line of Mr. Bob  
 20 Rogers' work with with Maremont, was there a point  
 21 when he left and then came back?  
 22 A. Yes, he left Maremont, but when he came  
 23 back it was Nuturn.  
 24 Q. And what was his position when he came back  
 25 for Nuturn?

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1 A. He was president of Nuturn, I believe.  
 2 Q. What was your position with Maremont in  
 3 1977 prior to the friction products transferring to  
 4 Nuturn?  
 5 A. I was the operations manager at the Allied  
 6 Drive facility, the Paulding, Ohio facility and was  
 7 responsible for building and starting up the  
 8 Smithville, Tennessee plant.  
 9 Q. Can you briefly outline for me the scope of  
 10 materials that the Smithville, Tennessee plant was  
 11 engaged with and whether that was simply assembly or  
 12 whether there was manufacturing going on there?  
 13 A. Yes, I can.  
 14 Q. If you could just please do that, and, you  
 15 know, just briefly describe for me what -- what went  
 16 on at the Smithville, Tennessee facility.  
 17 A. They made brake linings, disc pads, clutch  
 18 facings, and assembled brake linings to drum shoes  
 19 and disc pads to disc plates.  
 20 Q. When did the Smithville, Tennessee facility  
 21 come online?  
 22 A. I'm sorry, I don't remember the exact date.  
 23 Q. Was it in the '70s?  
 24 A. Well, yes, it was.  
 25 Q. Was it online at the time of the transition

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1 to Nuturn?  
 2 A. Either shortly before or shortly thereafter.  
 3 Q. And that was in 1977?  
 4 A. Probably the end of 1977 or maybe '79.  
 5 I'm sorry, I don't remember very well.  
 6 Q. That's fine. I just want to the best of  
 7 your recollection and if all you can give me is an  
 8 estimate over several years, that's fine. Did you  
 9 have responsibilities of the products that were  
 10 leaving the Smithville, Tennessee facility?  
 11 A. Yes, I did.  
 12 Q. Are you aware of what brands of products --  
 13 what brand names those products went out under?  
 14 A. I'm not sure I could recollect them all  
 15 from memory right now but if you want to refresh my  
 16 memory, I'll try to remember.  
 17 Q. Well, were Grizzly friction products  
 18 distributed through the Smithville, Tennessee  
 19 facility?  
 20 A. They were manufactured there and sold, yes.  
 21 Q. And was the OTC brand manufactured and sold  
 22 through the Smithville Tennessee facility?  
 23 A. Yes, it was.  
 24 Q. Was the All-In-One brand of friction  
 25 materials manufactured and sold through the

Page 18

1 Smithville, Tennessee facility?  
 2 A. Yes, it was.  
 3 Q. Was the AIO brand of friction material  
 4 distributed, manufactured and sold through the  
 5 Smithville, Tennessee facility?  
 6 A. The All-In-One was, yes.  
 7 Q. Mr. Liggett, as operations manager with the  
 8 Allied Drove facility and with the Paulding, Ohio  
 9 facility, did you have responsibilities in terms of  
 10 the negotiations that Maremont engaged in with  
 11 Turner and Newell pertaining to the transfer of the  
 12 brake systems division?  
 13 A. No, I did not.  
 14 Q. Did you serve in a capacity on Maremont's  
 15 board of directors?  
 16 A. No, I did not.  
 17 Q. Aside from yourself, was there someone who  
 18 had responsibility for the Paulding, Ohio facility  
 19 who was primarily based in Paulding from the time  
 20 you gained responsibility for that facility through  
 21 1977?  
 22 A. At one time there was a man named Bill  
 23 Shunk.  
 24 Q. And do you know if Mr. Shunk is still  
 25 living?

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1 A. I believe he still is.  
 2 Q. Do you know where he resides?  
 3 A. I believe it's in Pennsylvania.  
 4 Q. Mr. Liggett, when did you first become  
 5 aware of any health hazards concerning asbestos?  
 6 MR. CANONI: Objection as to form.  
 7 THE WITNESS: Help me understand  
 8 your question.  
 9 BY MR. STEWART:  
 10 Q. Sure. Let me see if I can rephrase it.  
 11 At the time when you began working for Maremont in  
 12 late '72, were you aware of any health hazards  
 13 associated with exposure to asbestos?  
 14 MR. CANONI: Objection as to form.  
 15 BY MR. STEWART:  
 16 Q. You can go ahead and answer my question if  
 17 you understand it, Mr. Liggett.  
 18 A. I was aware of the OSHA regulations that  
 19 pertained to asbestos exposure.  
 20 Q. And did you have an understanding as to why  
 21 OSHA had regulations in place pertaining to asbestos  
 22 exposure?  
 23 MR. CANONI: Objection as to form.  
 24 THE WITNESS: I understood that  
 25 prolonged exposure to high dosages could cause

Page 20

1 asbestosis.  
 2 BY MR. STEWART:  
 3 Q. How did you come to learn that?  
 4 A. From the OSHA regulations and information  
 5 put forth by the Asbestos Information Association.  
 6 Q. And was the information that was put forth  
 7 by the Asbestos Information Association, was that  
 8 something that you were privy to before you started  
 9 with Maremont? In other words, did you come to the  
 10 company with that knowledge?  
 11 A. No.  
 12 Q. And same question as to the OSHA  
 13 regulations.  
 14 A. I don't recall if I was aware of the  
 15 general news media accounts of asbestos exposure  
 16 before I went there or after I got there.  
 17 Q. Did you attend meetings of the Asbestos  
 18 Information Association yourself?  
 19 A. Yes, I did.  
 20 Q. From what time period did you start  
 21 attending meetings of the AIA?  
 22 A. Again, you are asking me to recall things  
 23 from many years back. I would say in the '75 to  
 24 '77 time period.  
 25 Q. Did you continue to attend those meetings

Page 21

1 when, as you understood it, the company, the  
 2 employer you worked for, was Nuturn?  
 3 MR. CANONI: Objection as to form.  
 4 THE WITNESS: I don't recall if I  
 5 or one of my subordinates attended at that point.  
 6 BY MR. STEWART:  
 7 Q. If you were to have sent subordinates to an  
 8 AIA meeting could you tell me who would be the most  
 9 likely individuals that would have attended those  
 10 meetings? In other words, looking back, what  
 11 subordinates had responsibilities that would have  
 12 made them people that you would have likely chosen  
 13 to attend those meetings?  
 14 MR. CANONI: Objection as to form.  
 15 THE WITNESS: If I understand the  
 16 question, it probably would have been Cindy Hayes,  
 17 who was the personnel manager with the  
 18 responsibilities for health and safety.  
 19 BY MR. STEWART:  
 20 Q. Do you know if Cindy Hayes is still living?  
 21 A. Yes, I do.  
 22 Q. And do you know where she resides?  
 23 A. In Oregon.  
 24 Q. Do you know who her current employer is, if  
 25 she is employed?

Page 22

1 A. I believe that it's a company called  
2 Superior Medical Products.  
3 Q. Mr. Liggett, was there a period of time  
4 when you had responsibility for safety and health  
5 training in regards to the Allied Drive facility?  
6 And my question encompasses both the '72 to '77 time  
7 period and continuing on under the Nuturn banner.  
8 A. Yes.  
9 Q. What time period did you have  
10 responsibility for safety and health training at the  
11 Allied Drive facility?  
12 A. Either I or through subordinates, from the  
13 time that I arrived until the time that I left.  
14 Q. And does that apply to the Paulding, Ohio  
15 facility in respect to -- starting from the time  
16 when you were given responsibility as operations  
17 manager for that location?  
18 A. Yes.  
19 Q. From the time that you were given  
20 responsibility for Paulding, Ohio, how often would  
21 you need to travel to that facility in the average  
22 month or year, however best you can estimate for me?  
23 MR. CANONI: Are you restricting  
24 the question to the time when Maremont owned it?  
25 MR. STEWART: No.

Page 23

1 MR. CANONI: Object as to form.  
2 THE WITNESS: When I got initial  
3 responsibility, I would travel two to four times per  
4 month, and as I became more involved in building the  
5 Smithville plant, it would drop down to perhaps once  
6 a month.  
7 BY MR. STEWART:  
8 Q. When you first started having supervisory  
9 responsibilities of operations at Paulding, Ohio what  
10 was the range of friction products that were  
11 manufactured and/or assembled at that facility?  
12 A. At Paulding, Ohio?  
13 Q. Yes.  
14 A. They manufactured drum brake lining, disc  
15 pads, clutch facings, and truck block.  
16 Q. Did the truck block that was manufactured  
17 at Paulding, Ohio contain asbestos friction material  
18 when you began supervising operations in '75?  
19 A. Yes, it did.  
20 Q. Did it contain non-asbestos components as  
21 well?  
22 A. Yes, it did.  
23 Q. Do you recall the brand names of the  
24 friction products distributed out of Paulding, Ohio  
25 when you took over as operations manager at that

Page 24

1 facility?  
2 A. No, I don't recall all of them.  
3 Q. Which ones do you recall?  
4 A. I recall the Grizzly, the Silver Tip. The  
5 brands that got assembled into Sears products, I  
6 don't think had a brand name of their own until  
7 they were part of the Sears product. If you were  
8 to refresh my memory, I might recollect some others.  
9 Q. I'll just quickly go through the list with  
10 you, Ultra?  
11 A. Yes, that was a brand.  
12 Q. Distributed through Paulding, Ohio?  
13 A. Manufactured by Paulding.  
14 Q. Okay. Hyper?  
15 A. That's another one.  
16 Q. Safety Grip?  
17 A. That's another one.  
18 Q. Silver Tip?  
19 A. Yes.  
20 Q. XT Woven?  
21 A. I don't recall that.  
22 Q. Syncro?  
23 A. I don't recall that one.  
24 Q. SS Metallic?  
25 A. I vaguely recall that one.

Page 25

1 Q. And Tru-Guard?  
2 A. That's correct.  
3 Q. Mr. Liggett, did you ever come to know an  
4 individual by the name of Kenneth Cornelius in your  
5 work for Maremont Corporation?  
6 A. Yes, I did.  
7 Q. What was Mr. Cornelius's position with the  
8 company when you first started?  
9 A. He was performing a financial function. He  
10 was probably the controller of the friction products  
11 group.  
12 Q. Was Mr. Cornelius someone that you had  
13 responsibility to interact with directly?  
14 A. Yes, I did.  
15 Q. And while Bob Rogers was with Maremont,  
16 were you aware of whether Mr. Rogers would interact  
17 with Mr. Cornelius?  
18 A. Yes, I am.  
19 Q. And did he do so?  
20 A. Yes, he did.  
21 Q. On what type of matters did you, yourself,  
22 have to discuss or report to Mr. Cornelius?  
23 A. Yearly budgets, monthly financial  
24 statements.  
25 Q. Mr. Liggett, have you ever had occasion to

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1 review the deposition that Mr. Cornelius gave back  
2 in November of 1983?

3 A. Not to my knowledge.

4 Q. Were you aware that in 1982 the Maremont  
5 company sold its remaining 20 percent share of  
6 Nuturn and that prior to 1982 Maremont continued to  
7 own a 20 percent share of the Nuturn company?

8 MR. CANONI: Objection as to form.

9 THE WITNESS: I left Nuturn  
10 sometime in 1979, so I'm not sure of, you know,  
11 everything that transpired after that date.

12 BY MR. STEWART:

13 Q. I'm sorry, what date did you leave Nuturn?

14 A. I believe it was 1979.

15 Q. Do you know approximately what month that  
16 was that you left Nuturn?

17 A. No, I'd have to go back and see if I could  
18 refresh my memory.

19 Q. Up until the time that you left Nuturn,  
20 were you aware that Maremont was a 20 percent owner  
21 of Nuturn during that time period?

22 MR. CANONI: Objection as to form.

23 BY MR. STEWART:

24 Q. You can answer the question, sir.

25 A. Yes, I was.

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1 Nuturn was formed that you, yourself, did not have  
2 responsibility over the heavy duty truck division at  
3 the Allied Drive location?

4 A. I never had responsibility for the truck  
5 division.

6 Q. Are you aware as to whether the heavy duty  
7 truck division continued its operations after Nuturn  
8 was formed?

9 A. Yes, I am.

10 Q. And did they do so?

11 A. Yes, they did.

12 Q. And was Bob Steinmetz still with the heavy  
13 duty truck division when Nuturn was formed?

14 A. To the best of my recollection, yes, he  
15 was.

16 Q. And please don't take disrespect from this  
17 question, but would Bob Steinmetz have a better  
18 understanding of what products were distributed  
19 through the heavy duty truck division than yourself?

20 A. I take no offense. And yes, he would.

21 Q. And would Bob Steinmetz have a better  
22 understanding as to whether there were capacities  
23 that Maremont Corporation was engaged in with  
24 regards to the heavy duty truck division after  
25 Nuturn was formed?

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1 Q. And during the time period of 1977 and when  
2 Nuturn was created until the time you left in 1979,  
3 did you continue to have business dealings with  
4 anyone under the employ of Maremont?

5 A. Yes, I did.

6 Q. Who did you have business dealings with at  
7 Maremont during that time period?

8 A. Dick Sealey, Ken Cornelius, I think that  
9 would be the two main people.

10 Q. What was Mr. Sealey's role with Maremont at  
11 that time?

12 A. He was in charge of all sales to Sears.

13 Q. And did Mr. Cornelius still have the role  
14 as the financial controller as you described, or  
15 maybe you could just tell me what his -- either his  
16 title or his position with Maremont as you  
17 understood it to be was for that time period?

18 A. With Maremont he was still in a financial  
19 capacity. I think he was a member of Nuturn's  
20 board.

21 Q. Were there other individuals who served on  
22 Nuturn's board who were also Maremont employees, if  
23 you know?

24 A. I would not know for sure.

25 Q. Did I understand correctly that even after

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1 MR. CANONI: Objection as to form,  
2 lack of foundation. You may answer.

3 THE WITNESS: He'd be a much  
4 better source.

5 BY MR. STEWART:

6 Q. Mr. Liggett, during your time period as  
7 operations manager with Maremont, prior to the  
8 formation of Nuturn, are you aware of any OSHA  
9 violations with regards to asbestos at any Maremont  
10 facility?

11 A. Please repeat that question.

12 Q. I'd be happy to. During your tenure with  
13 Maremont, prior to the formation of Nuturn, are you  
14 aware of any OSHA violations at any Maremont  
15 facilities?

16 A. I do recall there were OSHA violations.  
17 I'd like to say that I never seen an OSHA  
18 inspection where there were not some violations.

19 Q. And my question is specific with asbestos,  
20 do you recall asbestos-related OSHA violations?

21 A. I don't recall them.

22 Q. Can you explain for me the role that Wayne  
23 Knight had at Maremont during the mid '70s?

24 A. Wayne Knight was the general manager of the  
25 brake products division prior to there being an

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1 Allied Drive facility. He was responsible for both  
2 production and marketing functions, I believe one  
3 hundred percent related to Paulding, Ohio.

4 Q. Did Mr. Knight ever discuss with you any  
5 OSHA citations or penalties pertaining to asbestos?

6 A. No, he did not.

7 Q. Mr. Liggett, why did you leave Nuturn in  
8 1979?

9 A. Bob Rogers, the president, and I were not  
10 getting along well.

11 Q. I have a few questions for you about the  
12 durability of the friction products that were  
13 manufactured by Maremont, and again, after Nuturn  
14 took over but in particular to -- I'll start with  
15 the period prior to the formation of Nuturn.

16 Do you have an understanding as to  
17 the shelf life of the drum lining material?

18 MR. CANONI: Objection as to form.

19 THE WITNESS: I'm not sure I  
20 understand the question.

21 BY MR. STEWART:

22 Q. I think I can ask it a better way. I  
23 apologize.

24 Was the drum lining material that  
25 was manufactured by Maremont a perishable material

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1 overstock or materials on hand at the time that  
2 Nuturn was formed with respect to the  
3 Maremont/Turner and Newell agreement? Was that an  
4 aspect that you had any responsibilities for?

5 A. I'm not sure I understand the question.

6 Q. Well, in your role with operations, did you  
7 have oversight over how -- Strike that.

8 Were materials warehoused at the  
9 Paulding, Ohio facility?

10 A. Yes, they were.

11 Q. And were they warehoused at the Allied  
12 Drive facility?

13 A. Yes, they were.

14 Q. Did you have responsibility over keeping  
15 track of how much materials were on hand in the  
16 warehouses?

17 A. Yes, I would.

18 Q. And at the time that Nuturn was formed did  
19 you have subordinates or were there other people at  
20 a lateral level to you that also had  
21 responsibilities over the materials in the warehouse  
22 and how they were distributed to customers?

23 A. I'm not sure I understand the question, but  
24 if you're asking was it my goal to keep enough in  
25 stock that we didn't run out but so little in stock

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1 such that Maremont advised that stock only be kept  
2 on shelves for a certain amount of time?

3 In other words, was drum lining a  
4 product that if it was in the box and on the shelf  
5 in a warehouse or at an auto parts dealer, is that  
6 a product that would, for example, have a date to  
7 use by or sell by associated with it?

8 A. If you're referring to the linings that had  
9 adhesive on them so they could be bonded by the  
10 automotive rebuilder, then, yes, there would be a  
11 time after which the adhesive would probably not be  
12 good.

13 Q. And same question as to disc pads.

14 A. Disc pads would probably be riveted so  
15 there would be less concern about shelf life.

16 Q. Same question as to clutch facings.

17 A. I don't believe there would be a shelf life  
18 issue on clutch facings.

19 Q. And same question as to truck block.

20 A. Probably not a shelf life. Speaking  
21 strictly on a performance standard, obviously you  
22 wouldn't want to invest a lot of money and just  
23 have it sit around forever.

24 Q. I understand. Mr. Liggett, do you recall  
25 any instructions or provisions that had to do with

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1 that we turned our inventory as many times as  
2 possible each year, then yes, that was my  
3 responsibility.

4 Q. And I think what I'm getting at is a  
5 little different from that, but who had  
6 responsibility for speaking with the customers who  
7 were receiving the product from the warehouses? Was  
8 that part of operations or was that a sales function  
9 that was distinct from your responsibilities?

10 A. That was a joint function. With Sears as  
11 our major customer we met with them monthly to plan  
12 inventory levels of each stock keeping unit.

13 Q. And if you could help me understand it in  
14 terms of Sears who was a major customer of your  
15 divisions. With respect to the heavy duty truck  
16 division, are you aware of who their major customers  
17 were at the time Nuturn was formed?

18 A. No, I would not be aware of that.

19 Q. And would you be aware of whether the  
20 manner of distribution of products from the heavy  
21 duty truck division was something that in any way  
22 involved Maremont serving in a distributor role of  
23 those products after Nuturn was formed?

24 A. I don't believe Maremont had any function  
25 in the heavy duty products division after Nuturn was

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1 created.

2 Q. What is your basis of that knowledge?

3 A. Maremont's only responsibility with Nuturn  
4 after Nuturn was created was for Nuturn to continue  
5 to utilize their computer and distribution, primarily  
6 their trucks, to get friction products to Sears  
7 along with the shocks and exhaust that they also  
8 made for Sears.

9 Q. Mr. Liggett, was it your responsibility to  
10 review the purchase and sale agreement between  
11 Maremont and Turner and Newell?

12 A. No, it was not.

13 Q. And would it be fair to say that there are  
14 aspects of that purchase and sale agreement which  
15 did not affect your work as operations manager over  
16 the divisions which you've described?

17 A. I really don't have enough knowledge of the  
18 purchase and sale agreement to comment on that  
19 question.

20 Q. Did you have any knowledge of any  
21 provisions of that agreement with regards to  
22 Maremont undertaking to include Nuturn as a  
23 beneficiary of Maremont's insurance coverage for  
24 three years following the closing date of the  
25 purchase and sale agreement?

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1 A. That agreement was done certainly at a  
2 level above my responsibility.

3 Q. Can you explain to me what the brake, dash,  
4 bulk operations of Maremont were with respect to the  
5 transportation network?

6 A. I don't believe I understand the question.

7 Q. Sure. Let me read a provision to you of  
8 the purchase and sale agreement. It's section 2.8,  
9 transportation network.

10 Maremont agrees to make available  
11 to N, to the extent permitted by applicable laws and  
12 regulations, for a period of three years following  
13 the closing date Maremont's existing transportation  
14 network including its brake, dash, bulk operations.  
15 Maremont's charges for such services will be tariffs  
16 used in its internal charge system. Such tariffs  
17 after reimbursement to N of any excess charges on a  
18 semi-annual basis will be at rate equivalent to the  
19 actual cost of the network as a whole.

20 In that context do you have an  
21 understanding of what brake-bulk operations were?

22 A. I think so.

23 Q. Could you explain that to me, please?

24 A. Maremont had developed a system to deliver  
25 their shocks and exhaust products to the network of

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1 Sears stores nationwide, and the friction products  
2 division wanted to utilize that system to get  
3 friction materials to Sears.

4 Q. Did Maremont have an entirely different  
5 distribution system to its non-Sears customers, if  
6 you know?

7 A. I don't know.

8 MS. KERO: David, do you mean  
9 different or separate?

10 MR. STEWART: Well, I'm not sure  
11 how the -- what would be different than different or  
12 separate, but since you've asked, if you could  
13 elaborate on Ms. Kero's question, Mr. Liggett, I  
14 would appreciate it. If the use of the terms  
15 different or separate have any significance as to  
16 your understanding of the transportation network of  
17 Maremont.

18 MR. CANONI: David, I think as to  
19 the last question, he said he didn't know.

20 MR. STEWART: Okay.

21 THE WITNESS: I don't know.

22 BY MR. STEWART:

23 Q. Fair enough. Mr. Liggett, are you aware of  
24 whether prior to the formation of Nuturn whether  
25 Maremont itself engaged in distribution of Grizzly

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1 friction products?

2 MR. CANONI: Ask that question  
3 again, please.

4 BY MR. STEWART:

5 Q. Well, I'm trying to understand. I will ask  
6 it again and I'll put a little explanation on there.  
7 My question is whether you were aware of whether  
8 Maremont prior to the formation of Nuturn had its  
9 own distribution system for Grizzly friction  
10 products?

11 MR. CANONI: David, do you mean to  
12 differentiate between Sears and non-Sears?

13 MR. STEWART: Well, if the way I  
14 asked the question doesn't convey that, then, yes, I  
15 meant to. Let me ask a prefacing question, then.

16 BY MR. STEWART:

17 Q. Mr. Liggett, do you know whether Maremont  
18 distributed any Grizzly brand products to Sears?

19 A. No, I don't believe they did.

20 Q. Were there Grizzly brand products for which  
21 you did not have responsibility other their  
22 manufacture and distribution?

23 A. The word I guess I'm confused with is  
24 distribution. If a customer ordered it, we would  
25 put it on a truck and ship it, so that is a form

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1 of distribution.

2 Q. And that's a system that's overseen by  
3 people specializing in transportation and logistics,  
4 is that correct?

5 A. No, that's a program that's put together by  
6 hook and by crook by the warehouse and shipping  
7 manager.

8 Q. Fair enough. What's the basis of your  
9 belief that when Maremont agreed to make its  
10 existing transportation network available to Nuturn  
11 that in some way that reference of the existing  
12 transportation network is limited only to Sears?

13 A. Sears did a significant amount of business  
14 with Maremont. I believe Maremont was their sole  
15 supplier of shock absorbers and exhaust products and  
16 because of that Maremont had developed a fairly  
17 sophisticated computer forecasting system and a  
18 fairly sophisticated system to get things to the  
19 Sears stores, quote, just in time. So if they were  
20 going there on a very regular basis, then it made  
21 sense for Nuturn to try to piggyback on that system.

22 Q. And is it fair to say that to the extent  
23 that there were other regular customers of Maremont  
24 friction products that those customers may, in fact,  
25 have been included in that just-in-time distribution

1 THE WITNESS: Yes, I think so.

2 BY MR. STEWART:

3 Q. Can you describe it for me, please?

4 A. They had some of their very own trucks.  
5 They used LTL common carriers, and some of their  
6 customers would come by with their own trucks to  
7 pick up their products.

8 Q. For the trucks that the heavy duty truck  
9 division had of their own, did those trucks bear the  
10 name Maremont on them at the time Nuturn was formed?

11 A. I don't recall. I just remember they had  
12 heavy duty. You've got to remember, heavy duty is  
13 primarily providing lining to rebuilders; not  
14 finished product. And they were hauling a lot of  
15 nonfriction related materials such as springs and  
16 axle parts.

17 Q. Did the heavy duty truck division provide  
18 linings to Sears?

19 A. No.

20 Q. Was it your understanding that Maremont  
21 continued to provide accounting services to Nuturn  
22 after Nuturn was formed until the time that you left  
23 Nuturn?

24 A. I don't believe that they did. Nuturn had  
25 its own controller, computer system, etc.

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1 system as well as Sears?

2 MR. CANONI: Objection as to form.

3 THE WITNESS: Sears was the vast  
4 majority of the passenger car friction products  
5 business, way beyond 50 percent, so they were  
6 virtually the only customer.

7 BY MR. STEWART:

8 Q. But, you know, my questions today, Mr.  
9 Liggett, are not limited to the passenger car  
10 friction products. My questions encompass and  
11 include the heavy duty truck division. And to the  
12 extent that there were substantial customers for the  
13 heavy duty truck division other than Sears, is it  
14 possible that the distribution to those customers  
15 was included and a component of Maremont's existing  
16 transportation network, if you know?

17 A. I do know. And no, they were not because  
18 those customers were so different in their nature  
19 and what they bought and the volume that they had  
20 no relationship to these trucks that were hauling  
21 exclusively for Sears.

22 Q. Are you aware of what type of distribution  
23 system the heavy duty truck division used at the  
24 time Nuturn was formed?

25 MR. CANONI: Objection as to form.

1 Q. If I represented to you that section 2.9 of  
2 the purchase and sale agreement provided that  
3 Maremont agreed to supply for a period of three  
4 years following the closing date with accounting and  
5 electronic data processing services, would that in  
6 any way influence your recollection?

7 A. I believe that would be referring to  
8 servicing the Sears businesses, that Maremont would  
9 probably invoice and collect from Sears as a part of  
10 their automated system.

11 Q. Was it part of your responsibilities to  
12 oversee any extended contracts with customers other  
13 than Sears?

14 A. I'm not sure I understand that question.

15 Q. I think I can do better. I apologize.

16 Are you aware of whether it was a  
17 practice of Maremont to negotiate sales contracts  
18 with customers who would agree to purchase products  
19 over a period of -- I'll just give a hypothetical,  
20 you know, customer X agrees to buy disc pads for  
21 the next four years from Maremont.

22 A. I know that Maremont -- or, excuse me. I  
23 know that Nuturn after leaving Maremont made a major  
24 effort to develop a broader customers base other  
25 than just Sears and was not very successful at that

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1 in the short time that I was with them.

2 MR. CANONI: I guess the question  
3 related to Maremont; not Nuturn, right, David?

4 BY MR. STEWART:

5 Q. My question was directed as to Maremont,  
6 but it also goes more to the type of sales  
7 contracts for products that would be made in the  
8 friction products industry and whether Maremont  
9 negotiated to, for example, sell to a customer, say,  
10 Nappa. I'm not suggesting that Maremont had a sales  
11 contract with Nappa, but if Nappa said we'd like to  
12 buy friction products from you, would Maremont  
13 endeavor to have a contract with that customer that  
14 would go over a period of years of time so that  
15 they would have better control over how much  
16 production they were going to need to do?

17 A. I do know that Maremont sold friction  
18 lining to rebuilders. I had no responsibility.  
19 That was marketing. So that's not an area that I'm  
20 intimately familiar with.

21 Q. Are you aware as to whether Nuturn  
22 endeavored to continue the relationships with  
23 rebuilders that Maremont had established in terms of  
24 the sale of friction linings?

25 A. Yes, I do.

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1 recall it but out of my memory, I don't think I can  
2 answer you.

3 Q. I don't have anything to show you about  
4 that. I just was inquiring of your memory so --

5 Mr. Liggett, do you have an  
6 understanding as to why Maremont retained a 20  
7 percent interest in Nuturn from the time it was  
8 formed until the time you left the company?

9 MR. CANONI: Objection as to form.

10 THE WITNESS: As I mentioned  
11 earlier, I was not a party to those negotiations.

12 BY MR. STEWART:

13 Q. But it is something that you're aware of  
14 that Maremont did, in fact, own 20 percent of  
15 Nuturn?

16 A. That's correct.

17 Q. How often would Maremont -- You mentioned  
18 two Maremont employees that you continued to have  
19 interactions with, Dick Sealey and Kenneth Cornelius,  
20 after Nuturn was formed.

21 Can you tell me how often those  
22 individuals would come to the, if at all, facilities  
23 at Allied Drive after Nuturn was formed or were your  
24 dealings with them at some other location or over  
25 the telephone?

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1 Q. And was that something that Nuturn  
2 endeavored to continue?

3 A. Yes, it was.

4 Q. And what individuals at the time Nuturn was  
5 formed were responsible for the continuation of  
6 those relationships with rebuilders?

7 A. I believe that would be Bob Rogers and Jim  
8 Mellow.

9 Q. Could you spell Jim's last name, please?

10 A. M-E-L-L-O-W.

11 Q. What was his position at the time Nuturn  
12 was formed?

13 A. VP of sales and marketing.

14 Q. Do you know whether Mr. Mellow is still  
15 living?

16 A. I don't know.

17 Q. Was he still with Nuturn when you left the  
18 company?

19 A. Yes, he was.

20 Q. Are you aware of whether Maremont made any  
21 announcements to its non-Sears customers to the  
22 effect that they were -- that they were selling the  
23 friction products division to Nuturn?

24 A. Mr. Stewart, I'm sorry, that's been a few  
25 years. If you have something to show me, I may

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1 A. Primarily at other locations.

2 Q. And you mentioned that Ken Cornelius was a  
3 member of Nuturn's board of directors, as you  
4 understand it, is that correct?

5 A. I think for some period of time he was.

6 Q. Are you aware of any officers with Nuturn  
7 serving in a role on Maremont's board of directors?

8 A. No, I'm not.

9 Q. And I'd just like to ask you a few  
10 questions about the affidavits which I was provided  
11 with signed by you, Mr. Liggett. The first one I  
12 was provided with -- Well, they're very similar. It  
13 looks like the only difference is a reference to an  
14 Exhibit A in the first one from a Harris County  
15 Texas case. Do you have a copy of either of your  
16 affidavits there with you today?

17 A. No, I don't.

18 MR. STEWART: Counsel, do you have  
19 a copy of Mr. Liggett's affidavit there with you in  
20 Chicago?

21 MR. CANONI: No, I don't.

22 MR. STEWART: It's only two pages.  
23 Let's recess for a moment and I will fax that to  
24 you. We can go off the record.

25 (Whereupon, a brief recess was

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1 taken.)  
 2 BY MR. STEWART:  
 3 Q. Mr. Liggett, who sent you the affidavit  
 4 that -- I'll go ahead and mark this as Exhibit One  
 5 to the deposition.  
 6 (Whereupon, Exhibit-1 was marked  
 7 for purposes of identification.)  
 8 BY MR. STEWART:  
 9 Q. Can you tell me who sent Exhibit One to  
 10 you?  
 11 A. The law firm of Kasowitz Denson.  
 12 Q. Can you tell me approximately how many  
 13 declarations or affidavits that that law firm has  
 14 sent to you over the last three years?  
 15 A. Four to five.  
 16 Q. How did they contact with you regards to  
 17 requesting an affidavit?  
 18 A. Usually by telephone.  
 19 Q. I'd like to ask you about some of the  
 20 matters contained in this particular affidavit. My  
 21 copy doesn't have a date on it but this may have  
 22 been one that didn't come through. Do you recall  
 23 when you signed the affidavit that we've marked as  
 24 Exhibit One?  
 25 A. No, I don't.

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1 Q. In paragraph two of the affidavit it  
 2 describes Maremont Corporation purchasing assets of a  
 3 company called Grizzly Manufacturing. Are the terms  
 4 of that purchase agreement something that you came  
 5 to be aware of at some time after you began working  
 6 for Maremont?  
 7 A. I have a vague knowledge of that, yes.  
 8 Q. And would it be fair to say that in terms  
 9 of how that transaction was carried out and what  
 10 form of business transaction was used that that is  
 11 something that's outside the scope of your  
 12 knowledge?  
 13 A. Yes, I have, you know, reviewed the  
 14 documents. I've not read them word for word.  
 15 Q. Is that something that you reviewed as a  
 16 Maremont employee or is that something you've  
 17 reviewed in preparation for the depositions in the  
 18 last few years pertaining to asbestos?  
 19 A. The latter part of your question would be  
 20 the correct one.  
 21 Q. Has Maremont -- Strike that.  
 22 How do you go about reviewing the  
 23 Maremont records? Is that something that you do in  
 24 the Chicago area? Do you have copies of records sent  
 25 to you or do you go somewhere else to look at

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1 Maremont's records?  
 2 A. I've primarily reviewed those with Mr.  
 3 Canoni when he would be in Chicago.  
 4 Q. Approximately how much time, if you could  
 5 estimate for me, have you spent reviewing Maremont  
 6 records in the last three years?  
 7 A. To give you a guesstimation, I would say  
 8 two to three hours.  
 9 Q. Can you estimate for me how many hours  
 10 total you have consulted for Maremont in regards to  
 11 asbestos?  
 12 A. I would say approximately 20.  
 13 MR. CANONI: Do you mean outside  
 14 depositions or total?  
 15 MR. STEWART: Everything.  
 16 MR. CANONI: If you know.  
 17 THE WITNESS: I think it's been  
 18 between ten and 30 hours.  
 19 BY MR. STEWART:  
 20 Q. In paragraph three of the affidavit, it  
 21 describes that Maremont continued to manufacture  
 22 asbestos containing friction products including brake  
 23 linings at the Paulding, Ohio facility until June  
 24 30th, 1977 when Maremont sold its Grizzly friction  
 25 products division to Nuturn Corporation.

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1 Could you describe for me, to the  
 2 extent we haven't already covered this today -- I've  
 3 asked you about a number of the brand names of  
 4 friction products that Maremont manufactured. Were  
 5 those brand names divided up into different  
 6 divisions of the company?  
 7 A. I'm not sure I understand the question.  
 8 Q. Well, I'm just trying to understand the  
 9 description given here in paragraph three. It says  
 10 that Maremont sold its Grizzly friction products  
 11 division. Was there a distinct division of Grizzly  
 12 friction products at Maremont?  
 13 A. Yes, there was. At some point, the  
 14 passenger car division, which was almost exclusively  
 15 Sears, was split off from the Grizzly group, which  
 16 was almost exclusively rebuilders. And the Grizzly  
 17 friction is the one that had all of those trademarks  
 18 that you and I were trying to recall. The  
 19 passenger car division assembled those linings at  
 20 the Allied Drive facility for sale primarily to  
 21 Sears. So that's where I ran -- Bob Rogers was the  
 22 head of the passenger car group and I was the  
 23 operations manager reporting to him and Bob  
 24 Steinmetz ran the heavy duty division which was the  
 25 Grizzly product group.

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1 Q. And if I understand this correctly, just  
2 prior to the time Nuturn was formed, were there  
3 products that came to market under the Grizzly brand  
4 that were manufactured in both Paulding, Ohio and at  
5 the Allied Drive facilities?

6 A. The Grizzly products were manufactured in  
7 Paulding.

8 Q. And were they both distributed from  
9 Paulding and from Allied Drive?

10 A. Yes, that's correct.

11 Q. And in terms of Maremont's Corporate  
12 structure, was the Grizzly product group a distinct  
13 subsidiary of the Maremont Corporation prior to the  
14 formation of Nuturn, if you know?

15 A. I don't know if it was a distinct  
16 subsidiary. I know it functioned as a separate  
17 operational group.

18 Q. And as I understand your testimony, it's  
19 your understanding that the Grizzly product group  
20 was transferred to Nuturn on June 30th, 1977?

21 A. That's correct.

22 Q. And in the next paragraph, paragraph four,  
23 in the last sentence you state that Maremont no  
24 longer manufactured any asbestos containing friction  
25 products. But in terms of distribution of friction

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1 I'm aware that they sold it to Nuturn Corporation  
2 around 1977, and I've just stated that they  
3 continued to help deliver them to the Sears  
4 Corporation for some time period after that and I  
5 presume that ended in 1980.

6 Q. In terms of Maremont, while Maremont was  
7 distributing linings through its heavy duty truck  
8 division, that was never a department that you had a  
9 responsibility for, is that correct?

10 A. I had some responsibility for the  
11 manufacture of those products, which I in turn sold  
12 to the heavy duty division and then they had  
13 responsibility for the sales and distribution and I  
14 did not, so that is correct. Other than getting  
15 them to the heavy duty group, that's all I had to  
16 do.

17 Q. And in terms of what happened on July 1,  
18 1977, did your responsibilities to the heavy duty  
19 products group change when you became an employee of  
20 Nuturn?

21 A. Not really.

22 Q. So after 1977 you were not given  
23 responsibility for the distribution of products  
24 distributed by the heavy duty products division?

25 A. The only responsibility I would have is if

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1 products, is it fair to say that Maremont was still  
2 engaged in the distribution of friction products  
3 after July 1 of 1977?

4 A. Maremont assisted Nuturn in the delivery of  
5 products to Sears.

6 Q. So that would be a yes?

7 A. I guess that answer stands as I gave it.

8 Q. Have you reviewed defendant Maremont's  
9 second supplemental responses to standard  
10 interrogatories to friction defendants pursuant to  
11 general order number 129 out of San Francisco?

12 A. I don't have any idea what you're talking  
13 about.

14 Q. Has Mr. Canoni discussed with you or anyone  
15 from his office a statement made by attorneys for  
16 defendant Maremont Corporation that Grizzly was  
17 engaged in the manufacture of, and they say such  
18 products and I'll represent to you that that's  
19 friction products, from 1953 until 1977 and in the  
20 distribution of such products from 1953 until 1980?

21 A. I'm not sure I understand your question.  
22 Have they discussed that with me?

23 Q. Yes.

24 A. I'm aware that Grizzly made friction  
25 products; that Maremont bought them around 1953.

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1 they sold something manufactured at the Paulding  
2 plant and they told me where to ship it. I would  
3 see that it got on the truck and went to their  
4 rebuilder.

5 Q. Are you aware of whether Bob Steinmetz had  
6 interaction with anyone at Maremont from the time  
7 period of July 1, 1977 until you left Nuturn?

8 A. I was not that familiar with what Bob  
9 Steinmetz did.

10 Q. Is it possible that Bob Steinmetz relied on  
11 Maremont for any -- and I'm not talking substantial.  
12 I'm using the word any -- assistance in distribution  
13 of friction products from July 1, 1977 until the  
14 time you left the company?

15 A. Again, I think it would be presumptuous of  
16 me to say what Bob Steinmetz did or didn't do  
17 because he and I did not work that closely and I  
18 don't know who he would have relied upon. By this  
19 time, I'm busy building and starting up a plant in  
20 Smithville, Tennessee and Bob Steinmetz has started  
21 a facility in Nashville separate from Allied Drive,  
22 so he and I were not seeing each other.

23 Q. And you've previously stated that the  
24 purchase and sale agreement of Maremont was not a  
25 project that you had direct responsibility for

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1 negotiating, and to the extent that there were  
2 aspects of that outside of your responsibilities,  
3 there's things about that that you just may not have  
4 needed to know about, is that correct?

5 MR. CANONI: That's already  
6 testified to.

7 THE WITNESS: That's correct. I  
8 had very little to do with the purchase and sale  
9 agreement negotiation.

10 BY MR. STEWART:

11 Q. The next statement you make in paragraph  
12 four is that Maremont no longer manufactured any  
13 asbestos containing products. But in 1977 as of  
14 July 1st, Maremont did still own 20 percent of  
15 Nuturn, is that correct?

16 A. That's my understanding, yes.

17 Q. Does that modify how you would state that  
18 Maremont no longer manufactured asbestos containing  
19 friction products given that they owned 20 percent  
20 of Nuturn?

21 MR. CANONI: Objection as to form.

22 THE WITNESS: I don't think being  
23 an investor means that they were doing it.

24 BY MR. STEWART:

25 Q. At what point in time did you feel that

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1 BY MR. STEWART:

2 Q. Did you and Bob Steinmetz have to review or  
3 oversee each other's operations after the sale to  
4 Nuturn?

5 A. No, we did not review or oversee each  
6 other.

7 Q. Is it fair to say that it's possible that  
8 Bob Steinmetz and his division continued to have  
9 interactions with the Maremont Corporation after the  
10 formation of Nuturn which you would not have been  
11 aware of?

12 MR. CANONI: Objection as to form.

13 THE WITNESS: You know, you're  
14 talking about people that have known each other  
15 socially for many years, so I'm sure --

16 BY MR. STEWART:

17 Q. I'll limit it to a business relationship.

18 A. No, I don't think there was much that  
19 occurred.

20 Q. Mr. Liggett, did you have occasion to work  
21 with an individual named Rita Grisham?

22 A. Yes, I did.

23 Q. It's my understanding that she was a  
24 director of personnel of Nuturn?

25 A. Initially, she was Bob Rogers secretary and

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1 you and Bob Rogers were not seeing eye to eye on  
2 things? Was that -- Were you having problems with  
3 Bob Rogers at the time that Nuturn was formed?

4 MR. CANONI: When Nuturn was  
5 formed, Bob Rogers wasn't with Maremont.

6 THE WITNESS: That's correct.

7 MR. STEWART: That's correct.

8 BY MR. STEWART:

9 Q. I'm asking about the relationship with  
10 yourself and Bob Rogers. At the time Nuturn was  
11 formed, I understand that he was given the title and  
12 position with Nuturn. What my question goes to is  
13 were you getting along with him at that time?

14 A. When Bob Rogers came back he was involved  
15 in negotiating the purchase and sale agreement. I  
16 was involved in running a plant. So we had very  
17 little interaction. I would say that Bob Rogers was  
18 always a challenging boss to work for.

19 Q. Did Bob Steinmetz have a responsibility to  
20 report to Bob Rogers?

21 A. Yes, he did.

22 MR. CANONI: Are you talking about  
23 after the sale?

24 MR. STEWART: After the sale.

25 THE WITNESS: Yes.

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1 administrative assistant.

2 MR. CANONI: He's asking with  
3 Nuturn.

4 THE WITNESS: Excuse me, yes, I  
5 think that would be correct.

6 BY MR. STEWART:

7 Q. It's my understanding that in a prior  
8 deposition Ms. Grisham stated that in 1977 all  
9 products manufactured by Nuturn in terms of the  
10 friction products contained asbestos, would you agree  
11 with that?

12 A. Repeat that question again, please.

13 Q. That all friction products manufactured by  
14 Nuturn contained asbestos in 1977?

15 A. I would certainly say the vast majority.  
16 There might have been a few experimental products  
17 that were not asbestos.

18 Q. In her prior deposition she stated that  
19 Nuturn first marketed non-asbestos brake blocks in  
20 the first quarter of 1982 and non-asbestos clutch  
21 facings in mid 1981, would you agree with that  
22 statement?

23 A. Yes, I would.

24 Q. Mr. Liggett, that's all the questions I  
25 have today. I appreciate you making yourself

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1 available to us today and I'll turn it over to Mr.  
2 Canoni or Ms. Kero.

3 MR. CANONI: I have no questions  
4 for the witness at this time.

5 MS. KERO: I have no questions  
6 either.

7 THE COURT REPORTER: Mr. Stewart,  
8 would you like to order the original of that  
9 transcript?

10 MR. STEWART: Yes.

11 THE COURT REPORTER: Ms. Kero,  
12 would you like to order a copy of the transcript?

13 MS. KERO: Yes.

14 THE COURT REPORTER: Mr. Canoni,  
15 would you like to order a copy of the transcript?

16 MR. CANONI: No, I'll share with  
17 Ms. Kero.

18 (Whereupon, the deposition was  
19 concluded at 1:10 p.m.)

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