

1 VERONICA B. O'MALLEY : COURT OF COMMON PLEAS
and : PHILADELPHIA COUNTY
2 FRANCIS J. O'MALLEY, :
her husband :
3 Plaintiff (s) :
4 -vs- : NOVEMBER TERM, 2001
5 AC&S, INC., et al. :
Defendant (s) : NO. 1491
6
7

8 Videotape deposition of FRANCIS
9 J. O'MALLEY, taken pursuant to notice, held
10 at the home of Francis J. O'Malley, 4118 L
11 Street, Philadelphia, Pennsylvania 19124, on
12 Friday, January 28, 2003, beginning at or
13 about 11:55 a.m., before Wanda M. Barnum,
14 Court Reporter and Notary Public, and Richard
15 Kanzinger, Jr., Videotape Operator, there
16 being present.
17

18 APPEARANCES:

19 SHEIN LAW CENTER, LTD.
20 BY: BETHANN SCHAFFZIN, ESQUIRE
121 South Broad Street
21 21st Floor
Philadelphia, Pennsylvania 19107
22 Phone: (215) 735-6677
23 Representing the Plaintiffs
24
25

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1	APPEARANCES: (continued)	1	APPEARANCES: (continued)
2	KELLEY, JASONS, McGuIRE &	2	WILBRAHAM, LAWLER & BUBA
3	SPINELLI, L.P.	3	BY: MICHAEL BLOCK, ESQUIRE
4	BY: RICHARD L. WALKER, II,	4	Suite 3100
5	ESQUIRE	5	1818 Market Street
6	Suite 1500	6	Philadelphia, Pennsylvania 19106
7	Centre Square West	7	Phone: (215) 972-2848
8	1500 Market Street	8	Representing Defendant,
9	Philadelphia, Pennsylvania 19102	9	NOSROC, AMCHEM, CERTAIN-TEED
10	Phone: (215) 854-0658	10	
11	Representing Defendant, PARS	11	
12		12	
13	HANGLEY, ARONCHICK, SEGAL &	13	
14	PUDLIN	14	
15	BY: ALAN KLEIN, ESQUIRE	15	
16	One Logan Square	16	
17	27th Floor	17	
18	Philadelphia, Pennsylvania 19103	18	
19	Phone: (215) 568-6200	19	
20	Representing Defendant,	20	
21	UNIROVAL, INC.	21	
22		22	
23	SWARTZ, CAMPBELL & DETWEILER	23	
24	BY: WILLIAM JONES, ESQUIRE	24	
25	1601 Market Street	25	
	34th Floor		
	Philadelphia, Pennsylvania 19103		
	Phone: (215) 564-5196		
	Representing Defendant,		
	BRAND, FLINTKOTE and BEVCO		
	McSHEA/TECCE		
	BY: JOHN McSHEA, ESQUIRE		
	Mellon Bank Center		
	1735 Market Street		
	16th Floor		
	Philadelphia, Pennsylvania 19103		
	Phone: (215) 599-0800		
	Representing Defendant, VIACOM		
	GOLDFEIN & HOSMER		
	BY: ROBERT COLEMAN, ESQUIRE		
	1600 Market Street, 33rd Floor		
	Philadelphia, Pennsylvania 19103		
	Phone: (215) 979-8200		
	Representing Defendant,		
	GARLOCK		
Page 3		Page 5	
1	APPEARANCES: (continued)	1	INDEX
2	TIERNEY LAW OFFICES	2	---
3	BY: MARK TURNER, ESQUIRE	3	WITNESS EXAMINATION
4	100 South Broad Street	4	FRANCIS J. O'MALLEY
5	Suite 1125	5	By Ms. Schaffzin 7
6	Philadelphia, Pennsylvania 19110	6	
7	Phone: (215) 790-2400	7	
8	Representing Defendant,	8	
9	MELRATH	9	
10		10	EXHIBITS
11	MARKS, O'NEILL, O'BRIEN &	11	---
12	COURTNEY, P.C.	12	NUMBER DESCRIPTION PAGE MARKED
13	BY: TIMOTHY RAU, ESQUIRE	13	O'Malley-1 Product list 6
14	1880 John F. Kennedy Boulevard	14	O'Malley-2 Product list 6
15	Suite 1200	15	
16	Philadelphia, Pennsylvania 19103	16	
17	Phone: (215) 564-6688	17	
18	Representing Defendant,	18	
19	PECORA	19	
20		20	
21	WILSON, ELSE, MOSKOWITZ,	21	
22	EDELMAN & DICKER, LLP	22	
23	BY: DANIEL MIRARCHI, ESQUIRE	23	
24	The Curtis Center	24	
25	Independence Square West	25	
	Suite 1130 East		
	Philadelphia, Pennsylvania 19106		
	Phone: (215) 627-6900		
	Representing Defendant,		
	A.W. CHESTERTON		
	JENKINS, ROBINSON, WOLF,		
	RUBINATE & STYLIADES		
	BY: DANIEL MAHER, ESQUIRE		
	Suite 500, Public Ledger Building		
	Sixth and Chestnut Streets		
	Philadelphia, Pennsylvania 19106		
	Phone: (215) 627-3087		
	Representing Defendant,		
	GREENE TWEED		
	McCARTER & ENGLISH, LLP		
	BY: ROBERT B. ANDERSON, ESQUIRE		
	Mellon Bank Center		
	1735 Market Street, Suite 600		
	Philadelphia, Pennsylvania 19103		
	Phone: (215) 979-3800		
	Representing Defendant,		
	Owens-Illinois		

2 (Pages 2 to 5).

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Page 6 1 - - - 2 (Whereupon, the court reporter 3 marked Exhibits O'Malley-1 and 2 for purposes 4 of identification.) 5 - - - 6 MR. ANDERSON: It's agreed that 7 an objection by any defendant is available to 8 all. 9 MS. SCHAFFZIN: I only agree to 10 that so there's not a hundred objections. 11 THE VIDEOTAPE OPERATOR: We're on 12 the record. 13 This is a videotape deposition 14 for the Court of Common Pleas, Philadelphia 15 County. 16 My name is Richard Kanzinger, 17 Jr., and I'm the videotape operator. I'm 18 employed by Knipes-Cohen Associates, 19 Registered Professional Reporters, 400 Market 20 Street, Philadelphia, Pennsylvania 19106. 21 The court reporter is Wanda 22 Barnum. 23 The caption for today's case is 24 as follows: Veronica B. O'Malley and Francis 25 J. O'Malley, her husband, versus AC&S, Inc.,	Page 8 1 A. Yeah. 2 Q. Okay. 3 A. Little bit confused, but go ahead. 4 Q. Okay. Can you give us your name, your 5 age and your date of birth? 6 A. My name is Francis O'Malley. I'm 79 7 years old. And my date of birth is December 8 the 2nd of '23. 9 Q. Okay. And what is your address? 10 A. 4118, the letter L, Street. 11 Q. Are you married? 12 A. Yes. 13 Q. And who are you married to? 14 A. Veronica O'Malley. 15 Q. Okay. Do you and Mrs. O'Malley have 16 children? 17 A. Yes. 18 Q. How many children do you have? 19 A. We had four. 20 Q. What are their names? 21 A. Francis, Kenny, Danny and Veronica. 22 Q. Okay. And do you have grandchildren? 23 A. Yes. 24 Q. How many do you have? 25 A. Six.
Page 7 1 et al., November Term 2001, Case Number 1491. 2 This deposition is being taken on 3 behalf of the plaintiff at 4118 L Street in 4 Philadelphia, Pennsylvania. 5 Appearances today by counsel will 6 be noted on the stenographic record. 7 The deponent is Francis J. 8 O'Malley. 9 Today's date is January 28, 10 2003. The time is 11:55. 11 Would the court reporter please 12 swear in the witness? 13 - - - 14 FRANCIS J. O'MALLEY, after having 15 been duly sworn, was examined and testified as 16 follows: 17 - - - 18 THE VIDEOTAPE OPERATOR: You may 19 now begin the questioning. 20 - - - 21 EXAMINATION 22 - - - 23 BY MS. SCHAFFZIN: 24 Q. Still morning. Good morning, Mr. 25 O'Malley. You okay to proceed?	Page 9 1 Q. Okay. Mr. O'Malley, how far did you go 2 in school? 3 A. To tenth grade. 4 Q. Okay. Have you ever smoked cigarettes? 5 A. No. 6 Q. And do you know why we are sitting here 7 today? 8 A. Yes. 9 Q. Why is that? 10 A. Because mommy's sick. 11 Q. Do you know what your -- mommy would be 12 your wife? 13 A. My wife, yes. 14 Q. Okay. And do you know what mommy is 15 sick with? 16 A. Mommy is sick with cancer of the lung. 17 Q. Okay. I'm going to ask you a little bit 18 about your employment history. Where have you 19 worked? 20 A. Westinghouse Electric. 21 Q. What year did you start there? 22 A. '41. 23 Q. Okay. And when you started, what was 24 your job title? 25 A. My job was a learner.

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1 Q. And in what trade were you a learner?
2 A. Fitter tester. Assembler fitter tester.
3 Q. An assembler fitter tester?
4 A. Tester, yeah.
5 Q. During your career at Westinghouse, did
6 your trade ever change?
7 A. No.
8 Q. Okay. As an assembler fitter tester,
9 can you tell us what were your job duties and
10 responsibilities?
11 A. Well, starting out you were just helping
12 the helper. Next you moved to the other -- he
13 became assembler. And then you became a
14 fitter. In that area you became -- you'd have
15 to machine or buff down or whatever or order
16 material -- machining of parts and assemble
17 them. You were continuously assembling parts,
18 making a turbine. Whatever it took to make a
19 turbine.
20 Q. Okay. Did you make any other types of
21 machinery besides turbines?
22 A. Yes, they did a little bit. They made
23 windmill. They made two locomotives,
24 experimental.
25 Q. Okay.

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1 A. But most of it was all turbine work.
2 Q. Okay. Now, within the Westinghouse
3 plant, where did you work?
4 A. The erecting floor.
5 Q. Is that the erecting floor you said?
6 A. Erecting floor.
7 Q. Okay. What building was the erecting
8 floor in?
9 A. The main building. The main building.
10 It's built like an E. Has lines coming down
11 from it, but it's all one building.
12 Q. Okay. And besides the erecting floor,
13 did you work at any other location?
14 A. As the war ended, they got a little bit
15 busy and they did put some turbines down in 3
16 shop. And then they fenced the -- had B
17 plant, which built ship turbines and all
18 for -- that was vacant, and then they built
19 some turbines over there, and I moved over
20 there, but we were still one group of
21 workers. We were the same department, same
22 everything, just that the piece we were
23 building was in one plant -- moved over to
24 there.
25 Q. Okay.

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1 A. We worked back and forth.
2 Q. Where did you spend the majority of your
3 time in the plant?
4 A. I'd say on the erecting floor.
5 Q. Is that the erecting floor?
6 A. Yes.
7 Q. Thank you.
8 You said you worked in the B
9 plant. Where was -- when did you work in the
10 B plant?
11 A. In the late '70s I would say. I'm
12 guessing at it.
13 Q. Okay. But you estimate about the
14 late '70s?
15 A. Late '70s I'd say.
16 Q. Okay. Now, you said you worked in the 3
17 shop?
18 A. The 3 shop.
19 Q. Is that -- where is the 3 shop?
20 A. Three shop comes off the main erecting
21 floor. And at the very beginning, that's
22 where they put a few turbines and that's where
23 we worked then, 3 shop. In other words, it's
24 just like going out the door here. This would
25 be 3 shop and that would -- the street would

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1 be the erecting floor. They were connected.
2 Q. Okay. So would you -- I don't know.
3 You would estimate maybe 20 feet?
4 A. Right next door.
5 Q. Right next door?
6 A. Yeah.
7 Q. Okay.
8 A. Got started. Of course it went down a
9 long way.
10 Q. Can you tell me what the jacket shop
11 is? Do you know what that is?
12 A. Jacket shop is right next to 3 shop.
13 Q. Okay. And what do they do --
14 A. And there's no partition between them.
15 Q. Okay. What did the people who worked in
16 the jacket shop do?
17 A. They made the jacket for the turbines
18 and a few other things.
19 Q. Like what?
20 A. Well, they made a -- where a turbine is
21 spinning, they have a -- where the bolts
22 are -- bolt these revolving parts together.
23 They made a sheet metal thing. They called it
24 a coupling guard because they were trying to
25 keep the oil away from it because it would

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Page 14 1 whip up. 2 Q. Was everything that was made in the 3 jacket shop steel? 4 A. No. The ladders worked there. 5 Q. What do ladders do? 6 A. The ladders made the blanket for the 7 turbine. And they also put them on -- tried 8 them on the turbine. 9 Q. Do you know what the blankets were made 10 out of? 11 A. Asbestos product. 12 Q. Okay. How close was the jacket shop to 13 the erecting floor? 14 A. Right next to it. Right next to 3 15 shop. 16 Q. Okay. Sir, do you know whether you were 17 ever exposed to asbestos in your capacity as 18 an assembler fitter tester at Westinghouse? 19 MR. COLEMAN: Objection. Lay a 20 foundation. 21 THE WITNESS: Yes. 22 BY MS. SCHAFFZIN: 23 Q. The answer is yes? 24 A. (No audible response.) 25 Q. The answer is yes?	Page 16 1 question? 2 MS. SCHAFFZIN: I'll ask it to 3 you again. 4 THE WITNESS: Yeah. 5 BY MS. SCHAFFZIN: 6 Q. Do you know whether you were exposed to 7 asbestos in your capacity as an assembler 8 fitter tester at Westinghouse? 9 A. Yes. 10 MR. COLEMAN: Objection. 11 MR. JONES: Same objection. 12 BY MS. SCHAFFZIN: 13 Q. Now, generally speaking, how do you know 14 products contained asbestos? 15 MR. JONES: Objection. 16 THE WITNESS: Because they went 17 on a hot turbine. Anything near the turbine 18 which is very hot was asbestos, had it. Then 19 it was right on the product itself. And also 20 on the drawing you draw -- three things. 21 BY MS. SCHAFFZIN: 22 Q. On the drawings? 23 A. There was something on the drawing. 24 You'd know the product was asbestos. 25 Q. Okay. And what were these drawings?
Page 15 1 MS. SCHAFFZIN: I respond -- we 2 can go off the video record for a second. 3 THE VIDEOTAPE OPERATOR: Off the 4 video. 12:02. 5 MS. SCHAFFZIN: I'm responding to 6 your objection, Mr. Coleman, by he just -- I 7 did lay a foundation. He said he worked right 8 next door to the jacket shop. The jacket shop 9 was made of -- they were making asbestos 10 blankets. 11 MR. JONES: But your question is 12 did he ever work with it, wasn't it? 13 MS. SCHAFFZIN: Do you know 14 whether you were ever exposed to asbestos? 15 MR. JONES: Okay. 16 THE VIDEOTAPE OPERATOR: Back on 17 the video. 12:03. 18 BY MS. SCHAFFZIN: 19 Q. Mr. O'Malley -- 20 A. I didn't hear him. You're talking to 21 me? 22 Q. No, I wasn't. 23 MR. JONES: We're not on the 24 video yet. 25 THE WITNESS: What's the	Page 17 1 A. Westinghouse drawings. 2 Q. Okay. Now, while working at 3 Westinghouse, did you work with or around 4 others that you believe worked with 5 asbestos-containing products? 6 A. Yes. 7 MR. COLEMAN: Objection. 8 BY MS. SCHAFFZIN: 9 Q. When both you and your co-workers worked 10 with asbestos-containing products, did that 11 work ever create dust? 12 MR. COLEMAN: Objection. 13 THE WITNESS: Yes. 14 BY MS. SCHAFFZIN: 15 Q. When the dust from asbestos-containing 16 products was created, did this dust get on 17 your work clothes? 18 A. Yes. 19 MR. BLOCK: Objection. 20 MR. JONES: Objection. 21 BY MS. SCHAFFZIN: 22 Q. How often did this occur? 23 A. Often. 24 MR. BLOCK: Same objection. 25 BY MS. SCHAFFZIN:

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Page 18 1 Q. Can you tell us about the working 2 conditions inside Westinghouse around the 3 erecting floor? 4 A DEFENSE COUNSEL: Objection, 5 vague. 6 BY MS. SCHAFFZIN: 7 Q. What was your workplace like? 8 A. It was a manufacturing outfit. It was 9 dusty and all that, yes. 10 Q. Okay. 11 A. A little bit disrupted, that's all. 12 Q. Okay. 13 A. That's all. 14 Q. Were these conditions in your workplace 15 the area you worked fairly consistent? 16 A. It was the same thing over and over, 17 yes. 18 Q. Okay. Can you tell us the names of some 19 of the people that worked around you, some of 20 your co-workers? 21 A. Doll and Big Flynn. Most of the others 22 passed away or disappeared, anyway. 23 Q. Okay. Now, at the end of a typical day 24 at working at Westinghouse, can you describe 25 what your work clothes looked like?	Page 20 1 BY MS. SCHAFFZIN: 2 Q. Now, how many times a week -- 3 MR. JONES: Objection to 4 counsel's statement. 5 BY MS. SCHAFFZIN: 6 Q. How many times a week would you bring 7 home your work clothes for washing? 8 A. I try to bring them home every time I 9 used -- every day or every other day because 10 it would take up too much room. I only had a 11 small locker. 12 Q. Okay. Did you retire from Westinghouse? 13 A. Yes. 14 Q. What year did you retire? 15 A. I guess it was '86. 16 Q. Okay. Now, I'm going to give you what 17 we have premarked as O'Malley Exhibit 1. I'm 18 going to hand that to you. 19 Do you recognize this document? 20 A. Yes. 21 Q. Can you tell me what it is? 22 A. Products. 23 Q. What's that? Can you tell me what this 24 exhibit is? I didn't hear you. I'm sorry. 25 A. These are the type of products I worked
Page 19 1 A. Dirty, dusty. 2 Q. Did you wear your work clothes home? 3 A. No. 4 Q. What did you do with your work clothes 5 at the end of a typical day? 6 A. Wrapped them up and took them home. 7 Q. What did you wrap them up in? 8 A. Just rolled them up. Put them in a 9 paper bag and take them home. 10 Q. Okay. Now, at home who washed your 11 clothes? 12 A. Mom. 13 Q. Mom is your wife, right? 14 A. Yeah. 15 Q. Did your wife wash your clothes from the 16 time that you started at Westing -- or the 17 time that you got married until the time you 18 retired? 19 A. Yes. 20 MR. JONES: Objection. Leading. 21 THE WITNESS: And she still 22 does. 23 MS. SCHAFFZIN: For the record, 24 Mr. O'Malley stated that his wife washed his 25 clothes.	Page 21 1 with or around that contained asbestos. 2 Q. Okay. And did you -- who created this 3 document? 4 A. I did. 5 Q. Did you create it from your own 6 recollection? 7 A. Yes. 8 Q. Who wrote the document? 9 A. Mommy. 10 Q. Why is that? 11 A. She prints better than I do. 12 Q. Okay. Is your -- can you tell me what's 13 at the bottom of the document? 14 A. The date, January the 26th. 15 Q. And whose signature is that? 16 A. '03. My signature. 17 Q. Okay. 18 A. And there's exhibit down there also. 19 Q. Okay. Now, Mr. O'Malley, can you tell 20 me what types of asbestos-containing products 21 you believe either you or the people around 22 you at Westinghouse worked on or with? 23 MR. COLEMAN: Objection. Lack of 24 foundation. 25 THE WITNESS: You had the sheet.

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Page 22 1 The round, regular round one. You had 2 packing. You had the blocks. You had -- 3 what's the -- blocks. You had -- what do you 4 call them damn things? The sheets. Can I 5 start again? 6 MS. SCHAFFZIN: Sure. 7 THE WITNESS: Okay. You had the 8 sheet, the packing, the blocks, the cement and 9 the thick ones, 4 inches thick around like 10 that on the mattress, I guess. 11 BY MS. SCHAFFZIN: 12 Q. The mattresses? 13 A. Yeah. 14 Q. Okay. Now, I'm going to hand you what's 15 been marked as O'Malley Exhibit Number 2. Can 16 you tell me do you recognize this document? 17 A. Yes. 18 Q. And what is that document? 19 A. Asbestos products I used or worked 20 around at Westinghouse. 21 MR. JONES: Objection. Move to 22 strike. 23 BY MS. SCHAFFZIN: 24 Q. And did you -- did you create this 25 document from your own recollection?	Page 24 1 Q. Okay. And did you personally use 2 Garlock? 3 A. Yes, I used Garlock. 4 Q. How did you use Garlock? 5 A. Well, mostly making a gasket to suit a 6 certain size and shape. 7 Q. Can you tell us how you would make a 8 gasket? 9 A. Lay the sheet on it and tap it around 10 usually with a hammer. Most of the time they 11 would cut it and that would be it. We would 12 make the gasket. Did a lot of hitting and 13 tapping. 14 Q. Okay. Did you say you did a lot of 15 that? 16 A. Well -- 17 Q. What did you just say? I'm sorry. 18 A. Well, I'm referring to -- we just kept 19 going around tapping the thing. That's what 20 I'm referring to. 21 Q. Oh, okay. I'm sorry. 22 A. Yes, we used a lot of Garlock. 23 MR. COLEMAN: Objection. 24 Nonresponsive. 25 BY MS. SCHAFFZIN:
Page 23 1 A. Yes. 2 Q. Who wrote the document? 3 A. Mommy. 4 Q. For the same reasons she wrote Exhibit 5 Number 1? 6 A. Same reason as the other one. 7 Q. Okay. And did you sign this document? 8 A. Yes. 9 Q. And is it dated? 10 A. Yes. 11 Q. Okay. 12 A. Same as the other. 13 Q. Can you tell me what the first product 14 on that list is? 15 MR. JONES: Objection. 16 Foundation. 17 MR. BLOCK: Objection. 18 MR. COLEMAN: Objection. 19 BY MS. SCHAFFZIN: 20 Q. You can answer. 21 A. I can answer. Garlock. 22 Q. And what type of product is Garlock? 23 A. Garlock made regular standard gaskets 24 out of Garlock. Also came in a roll. And 25 also came in sheets, different length sheets.	Page 25 1 Q. Did the use of Garlock gaskets, cutting 2 Garlock gaskets create any dust? 3 MR. COLEMAN: Objection. 4 Leading. 5 THE WITNESS: Yes, it did. 6 BY MS. SCHAFFZIN: 7 Q. And did this dust get on your clothes? 8 A. Yes, it did. 9 MR. COLEMAN: Objection. 10 BY MS. SCHAFFZIN: 11 Q. When you would cut Garlock gaskets, 12 would dust be created? 13 A. Yes. 14 Q. And would that dust get on your clothes? 15 A. Yes. 16 Q. Okay. Can you tell me the name of the 17 second item on your list? 18 A. Second was Melrath. 19 Q. And what is Melrath? 20 A. Melrath, most of mine was already made 21 gasket. 22 Q. Can you tell me about them? 23 A. They had made -- a lot of them were 24 steel. What the steel product was, I don't 25 know, but it had steel. And then it had

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1 Garlock -- asbestos inside. Then it was one
2 particular one I was using near the end. I
3 think they called it spherical pipe. That was
4 a piece of metal about a quarter inch thick
5 and it was round and round like a record, an
6 old-type record. And then between each roll
7 there was a tape of asbestos in there. That's
8 where the asbestos were. So when you saw it,
9 it looked like a record.
10 Q. Okay. Did you personally use these --
11 A. Yes.
12 Q. -- Melrath gaskets?
13 A. Yes, I personally used them.
14 Q. Did you use them often?
15 A. Yes, I used them often.
16 Q. And did the use of Melrath gaskets, any
17 of the gaskets create any dust?
18 A. Yes.
19 Q. And did this dust get on your clothing?
20 A. Yes.
21 Q. Okay. Can you tell me, Mr. O'Malley,
22 what is the next product on your list?
23 A. Chesterton.
24 Q. What type of product was Chesterton?
25 A. That was a packing.

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1 Q. And what type of packing, or tell me --
2 excuse me. Strike that.
3 How did you -- did you use
4 Chesterton packing?
5 A. Yes, I used Chesterton packing.
6 Q. How did you use Chesterton packing?
7 A. I used it on the reservoir a little bit
8 and also on steam valves.
9 Q. Okay. And how would you use the actual
10 packing?
11 A. You want me to tell you? On a reservoir
12 there is a square hole about 2 -- 2 feet
13 square sticking above the reservoir about a
14 foot or so. It had a heavy steel cover. You
15 just pick it up and put it on. Well, they
16 were trying to keep air out of the reservoir,
17 and they -- we put this here packing around
18 this here and this -- around the edge, and it
19 grew. Was in there already, fabricated in
20 place. And then this here cover would just
21 sit on there. And then it was like a piece of
22 steel come down hit it, forming a seal. Not a
23 perfect seal, but trying to keep some of the
24 air out of the reservoir.
25 Q. Okay. And did this packing come in any

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1 particular lengths?
2 A. Well, it came enough for me to use, you
3 know.
4 Q. To make this packing fit --
5 A. I had to cut it to the job.
6 Q. Okay. Thank you.
7 Did the cutting of Chesterton
8 packing create any dust?
9 MR. MIRARCHI: Objection.
10 THE WITNESS: Yes, every time you
11 cut something it makes dust.
12 BY MS. SCHAFFZIN:
13 Q. Okay. And did that dust get on your
14 clothing?
15 A. Yes.
16 MR. MIRARCHI: Objection.
17 BY MS. SCHAFFZIN:
18 Q. How frequently would you use --
19 A. Often.
20 Q. -- Chesterton packing?
21 A. Often.
22 Q. Okay. You have to let me finish the
23 question before you give me an answer, okay?
24 Thanks.
25 The next product on your list,

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1 can you tell me what that is?
2 A. That's another one.
3 Q. Do you need a break?
4 A. No. Go ahead.
5 Q. The next product on your list, can you
6 tell me what that is?
7 A. Permatin (sic).
8 Q. Can you --
9 A. Palmetto.
10 Q. What is Palmetto?
11 A. Palmetto is another packing.
12 Q. Okay. And can you tell me how you used
13 Palmetto? Excuse me. Strike that.
14 Did you use Palmetto?
15 A. Yes.
16 Q. Can you tell me how you used Palmetto?
17 A. The same as the other one. Came through
18 the same way, on the reservoir, and also on
19 the steam valve.
20 Q. Okay. And did you need to cut the
21 Palmetto packing like the Chesterton packing?
22 A. Yes.
23 Q. Did the cutting of Palmetto packing
24 create any dust?
25 MR. MAHER: Objection.

Page 30 1 THE WITNESS: The same. If you 2 cut it it made dust, yes. 3 BY MS. SCHAFFZIN: 4 Q. And did that dust get on your clothing? 5 A. Yes, I was working with it. 6 Q. Okay. Can you tell me what the next 7 product on your list is? 8 MR. WALKER: Objection. Lack of 9 foundation. Leading. 10 BY MS. SCHAFFZIN: 11 Q. You can answer the question. 12 A. PARS. 13 Q. And what is PARS? 14 A. The same thing. 15 MR. WALKER: Objection. 16 THE WITNESS: Only it was a 17 tube. PARS had a tube we used. 18 BY MS. SCHAFFZIN: 19 Q. Can you tell me how PARS was used? 20 A. PARS -- PARS was slid over a copper 21 tubing. And when this copper tubing, they 22 would wrap it around a -- well, like I saw it 23 wrapped around a pipe or a pipe inlet. And -- 24 you know, then they'd switch on a machine. I 25 don't know what it was. But, anyway, it would	Page 32 1 Q. Okay. Did the cutting of PARS packing 2 create dust? 3 MR. WALKER: Objection. 4 Leading. 5 THE WITNESS: Yes. 6 BY MS. SCHAFFZIN: 7 Q. And did that dust get on your clothing? 8 MR. WALKER: Objection. 9 Leading. 10 THE WITNESS: Yes. 11 BY MS. SCHAFFZIN: 12 Q. Okay. Can you tell me what the next 13 product on your list is? 14 A. Owens-Illinois blocking. Kaylo 15 blocking. 16 Q. What was Owens-Illinois Kaylo block? 17 A. It came in cartons. It was about 2 by 6 18 or something like that. 19 Q. And how was it used? 20 A. They put it on the high parts of the 21 turbine and the crossover pipe. 22 Q. Okay. Did you personally use 23 Owens-Illinois Kaylo? 24 A. I personally didn't use it. I was just 25 around it.
Page 31 1 heat up the product. It's for a welder. 2 THE COURT REPORTER: Can you 3 repeat that? 4 THE WITNESS: For a welder. 5 BY MS. SCHAFFZIN: 6 Q. Okay. Did you personally use PARS? 7 A. No, I never personally used it, but I 8 was around it. 9 Q. Did other trades use PARS? 10 A. Beg your pardon? 11 Q. Did other trades use PARS? 12 A. Yes, the elect -- 13 Q. How frequently would PARS be used around 14 you? 15 A. Often. Real often. 16 Q. Okay. Like the other packing, would 17 PARS need to be cut? 18 MR. WALKER: Objection. 19 Leading. 20 THE WITNESS: Whoever was 21 working -- yes. I didn't cut it. 22 BY MS. SCHAFFZIN: 23 Q. Did that -- 24 A. They had a -- the electrician I think 25 did that.	Page 33 1 Q. How frequently were you around the use 2 of -- 3 A. Often. 4 Q. -- of Owens-Illinois Kaylo? 5 A. Often. 6 Q. Okay. And can you tell me how you -- as 7 you observed it Owens-Illinois Kaylo block was 8 used? 9 A. It was put on the turbine and on the 10 crossover pipe. 11 Q. Okay. 12 A. Two places mostly. 13 Q. Did they come in a perfect size to go on 14 the turbine? 15 A. No, it came in a box. 16 Q. And what would have to be done to the -- 17 A. Then I have to cut it to suit. 18 Q. Okay. Did the cutting of Owens-Illinois 19 Kaylo create dust? 20 A. Yes, it did. 21 MR. ANDERSON: Objection. 22 Leading. 23 THE WITNESS: Yes, it did. 24 BY MS. SCHAFFZIN: 25 Q. Yes, it did?

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Page 34 1 A. Yes, it did. 2 Q. Okay. Do you know when during your 3 career you saw Owens-Illinois Kaylo or Kaylo? 4 A. The whole time. 5 Q. Would that include the 1950's? 6 A. Yeah. 7 Q. Okay. Can you tell me what the next 8 product on your list is? 9 MR. RAU: Objection. Leading. 10 Lack of foundation. 11 THE WITNESS: Red Devil. 12 BY MS. SCHAFFZIN: 13 Q. And what is Red Devil? 14 A. Red Devil is a cement. 15 Q. Okay. And can you tell me how Red Devil 16 was used? 17 A. Well, I think the ladders used it most. 18 Q. They used it the most? 19 A. It was more or less a ladder product, I 20 think. 21 Q. Okay. And how was Red Devil used? 22 A. I saw them -- were two joints -- the 23 joint of a low pressure come together. And on 24 the outside the low pressure gets hot, but not 25 real hot. And if the joint didn't reach --	Page 36 1 Q. Okay. 2 A. It had also asbestos on it. Written on 3 asbestos. 4 Q. It said asbestos? 5 A. Yeah, it said asbestos. 6 Q. Now, can you tell me what the next 7 product on your list is? 8 MR. JONES: Objection. Leading. 9 Lack of foundation. 10 THE WITNESS: Flintkote. 11 BY MS. SCHAFFZIN: 12 Q. And what type of product was Flintkote? 13 A. That was a cement also. 14 Q. Okay. And how was that used? 15 A. Almost the same way. 16 Q. As what? 17 A. As Red Devil. 18 Q. Okay. And how frequently was this 19 used? 20 MR. JONES: Objection to the 21 form. 22 THE WITNESS: Often. 23 BY MS. SCHAFFZIN: 24 Q. Were you around the use of Flintkote? 25 A. Most likely, yes.
Page 35 1 meet, then smoothed it out, put a -- then 2 leave it sit there until it dried. Then 3 they'd grind it off. 4 Q. Okay. What would happen when it was 5 ground off? 6 A. Make a lot of dust. 7 Q. Were you around the product when it was 8 ground off? 9 A. Yes. Most likely, yes. 10 Q. Okay. Do you recall specifically being 11 around the Red Devil product when -- 12 A. Yeah. 13 Q. -- it was ground? 14 A. Oh, yeah. 15 Q. And how frequently would that occur? 16 A. Often. 17 Q. Okay. Do you remember anything 18 distinctive about the Red Devil product 19 package? How did it come packaged? 20 A. It came in a can. 21 Q. Did it have a label on it? 22 A. Yeah, had a label on it. 23 Q. Do you recall what the label said? 24 A. Well, it had a -- had a Red Devil on 25 it.	Page 37 1 Q. Do you specifically -- 2 A. Yes. 3 Q. Let me ask the question before you 4 answer. 5 Do you specifically recall being 6 around the Flintkote? 7 A. Yes. 8 Q. Okay. You said it was used like the Red 9 Devil. Does that mean that it was used around 10 you, not by you, by yourself? 11 A. Yeah, I never used it myself. 12 Q. Okay. You worked around -- did you work 13 around others who used it? 14 A. Yes. 15 Q. Now, you told us that Red Devil would be 16 applied and dried and then was ground. 17 MR. JONES: Objection. 18 BY MS. SCHAFFZIN: 19 Q. Is there any difference about the 20 Flintkote cement? 21 A. Not as far as I know. 22 Q. Okay. And I don't know if I asked you 23 this. But how frequently was Flintkote used 24 around you? 25 MR. JONES: Objection. Asked and

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1 answered.
2 THE WITNESS: I got to say
3 often.
4 BY MS. SCHAFFZIN:
5 Q. Okay. Did the dust that would be
6 created from a cement like Flintkote when it
7 was ground get on your clothing?
8 MR. JONES: Objection to form.
9 THE WITNESS: Yes.
10 BY MS. SCHAFFZIN:
11 Q. Okay. Can you tell me what the last
12 product on your list is?
13 MR. BLOCK: Objection. Lack of
14 foundation. Leading.
15 THE WITNESS: Sealfas.
16 BY MS. SCHAFFZIN:
17 Q. And what type of product was Sealfas?
18 A. That was mostly the same thing.
19 Q. The same thing as what?
20 A. Red Devil. That was a cement.
21 Q. Okay. And can you just briefly tell me
22 again how that was used?
23 A. The ladders used it mostly and rip them
24 plaque off that there, step in the joints
25 or -- and they -- a step in the joint, and

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1 Q. Okay. Do you remember the first visit,
2 though? Do you remember your family --
3 A. Yeah, it was the Family Day.
4 Q. Okay.
5 A. Open house Family Day both times.
6 Q. Okay. Now, when your family came on to
7 visit you, where did you take them on the
8 site?
9 A. Of course you took them on the erecting
10 floor.
11 Q. And that's where --
12 A. And we walked through the shops a little
13 bit.
14 Q. Okay. Why did you take them to the
15 erecting floor?
16 A. That's where I worked.
17 Q. Just want to show them what you did?
18 A. Yeah.
19 Q. Okay. Now, when your family was there,
20 do you recall if any machinery was running?
21 A. I would say they were running more as a
22 demonstration, such as like -- such as one
23 time I can answer that they had a turbine
24 spinning and they put a scope on the end of
25 it. And this here turbine is running at 3600

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1 they'd let it dry and they'd grind it off.
2 Q. Okay. And did the grinding of Sealfas
3 cement create dust?
4 MR. BLOCK: Objection to form.
5 THE WITNESS: Yes.
6 BY MS. SCHAFFZIN:
7 Q. And did that dust get on your clothing?
8 A. Yes.
9 MR. BLOCK: Objection.
10 BY MS. SCHAFFZIN:
11 Q. How often was Sealfas used around you?
12 MR. BLOCK: Objection to form.
13 THE WITNESS: Often.
14 MS. SCHAFFZIN: Okay.
15 BY MS. SCHAFFZIN:
16 Q. Now, I'm going to switch gears a little
17 bit, okay.
18 Did there ever come a time when
19 your family came to visit you at Westinghouse?
20 A. Yes. Do you want these back?
21 Q. And how often did your family visit you
22 at Westinghouse?
23 A. That was twice.
24 Q. Okay. Do you remember when they were?
25 A. Don't remember dates, no.

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1 rpm. And with the light you could adjust it
2 to see what was printed on the end of that
3 there rotor. And also at the same time, you
4 could tell the speed of that rotor. That's
5 how you know how fast it was going.
6 Q. Okay. And was this while your family
7 was there?
8 A. Yes, they was there.
9 Q. Was this on one or both occasions when
10 they came on?
11 A. I believe they had that going twice, but
12 I know it was there once.
13 Q. Okay. When your family -- if you
14 recall, when your family came to visit you on
15 both occasions or just one, do you recall men
16 in uniform working?
17 A. Well, there had to be men up there
18 running that turbine.
19 Q. Do you specifically recall if there were
20 men working around you?
21 A. On that turbine, yes.
22 Q. On that turbine?
23 A. On the tur -- to have it running. Take
24 several men to run a turbine.
25 Q. Okay. What were the conditions of the

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Page 42 1 plant when you brought your family in when 2 they visited? 3 A. It was straightened up. 4 Q. Okay. Would you -- I'm sorry. 5 A. The straightest I ever seen it. Go 6 ahead. 7 Q. Would you say it was clean? 8 A. It would never be clean. 9 Q. Okay. Now, while working at 10 Westinghouse, did you ever personally -- let 11 me ask you this. Strike that. 12 Do you know if Westinghouse built 13 turbines for the U.S. Navy? 14 MR. McSHEA: Objection. 15 THE WITNESS: Yes, they built 16 turbines for the navy. 17 BY MS. SCHAFFZIN: 18 Q. Did you personally ever follow 19 instructions from the U.S. Navy on how to 20 build a turbine? 21 MR. McSHEA: Objection. 22 THE WITNESS: No. 23 BY MS. SCHAFFZIN: 24 Q. Did any naval employees or officers ever 25 instruct you on how to do your job?	Page 44 1 breathing -- 2 A. No. 3 Q. -- asbestos dust? 4 MR. McSHEA: Objection. 5 THE WITNESS: No. 6 BY MS. SCHAFFZIN: 7 Q. Did you ever see a warning or a caution 8 label on a bag, box or asbestos product? 9 A. No. 10 MR. COLEMAN: Objection. 11 MR. McSHEA: Objection. 12 THE WITNESS: No. 13 BY MS. SCHAFFZIN: 14 Q. Did you ever wear a mask or a respirator 15 to avoid breathing asbestos dust? 16 A. No. 17 Q. Did the asbestos companies as far as you 18 know ever advise you to wear a mask or a 19 respirator? 20 MR. COLEMAN: Objection to form. 21 THE WITNESS: No. 22 BY MS. SCHAFFZIN: 23 Q. If you had been warned hypothetically 24 that breathing dust could be hazardous, what 25 would you have done?
Page 43 1 A. No. Who's saying yes? 2 Q. No. Somebody is saying objection. 3 A. Yeah, and it's coming over here and I 4 hear it. 5 Q. Just listen to me, okay? 6 A. Uh-huh. 7 Q. Did you follow Westinghouse instructions 8 on how to do your job? 9 A. Yes. 10 MR. McSHEA: Objection. 11 BY MS. SCHAFFZIN: 12 Q. Was this at all times? 13 A. Yes. 14 MR. McSHEA: Objection. 15 BY MS. SCHAFFZIN: 16 Q. Did there come a time when you became 17 aware that breathing asbestos could be 18 hazardous to your health? 19 A. It was pretty late. 20 Q. Okay. What do you mean by pretty late? 21 A. When I damn near retired. 22 Q. And that would be near 1986? 23 A. Yeah. 24 Q. Were you instructed to take any 25 precautions to protect yourself from	Page 45 1 ALL COUNSEL: Objection. 2 THE WITNESS: Followed them. 3 BY MS. SCHAFFZIN: 4 Q. Followed the warnings? 5 A. The warning. 6 Q. Were you ever a member of a union? 7 A. Yes. 8 Q. What union was that? 9 A. The UE, United Electric Workers. 10 Q. Was this the entire time you were at 11 Westinghouse? 12 A. The whole time I was at Westinghouse. 13 Q. Did you ever hold a position with the 14 union? 15 A. No. 16 Q. Do you know if the union ever warned 17 about the hazards of -- 18 A. No. 19 Q. -- breathing asbestos dust? 20 A. Nobody warned me about asbestos. 21 Q. Okay. Now, I'm going to ask you a 22 little bit about your family. 23 Did there come a time when your 24 wife Veronica O'Malley was diagnosed with an 25 illness or disease?

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Page 46 1 A. Yes. 2 Q. What was your understanding of her 3 diagnosis? 4 A. It was bad. 5 Q. Do you know what it was? 6 A. Cancerous. 7 Q. Do you have any understanding what the 8 cause of her cancer was? 9 ALL COUNSEL: Objection. 10 THE WITNESS: From asbestos. 11 BY MS. SCHAFFZIN: 12 Q. Now, how did this affect you 13 emotionally? Do you need to take a break? 14 A. I feel that I brought it home. 15 Q. Let me ask you before -- are you able to 16 go on? 17 A. Go ahead. 18 Q. Okay. 19 A. I'll try. 20 Q. Tell me if you need a break, okay? 21 Before your wife was diagnosed, 22 okay, with her disease, what were some of the 23 things you two liked to do together? 24 A. We liked to go and see a couple of 25 shows. We liked to go and see like the	Page 48 1 STATE OF PENNSYLVANIA 2 SS: 3 COUNTY OF PHILADELPHIA 4 5 I, Wanda Barnum, Court 6 Reporter-Notary Public within and for 7 Philadelphia County, Commonwealth of 8 Pennsylvania, do hereby certify that the 9 foregoing testimony of FRANCIS J. O'MALLEY was 10 taken before me at 4118 L Street, 11 Philadelphia, Pennsylvania, on Tuesday, 12 January 28, 2003; that the foregoing testimony 13 was taken in shorthand by myself and reduced 14 to typing under my direction and control, and 15 the foregoing pages 1 to 47 contain a true and 16 correct transcript of all of the testimony of 17 said witness. 18 19 20 21 WANDA M. BARNUM Notary Public 22 23 My commission expires December 4, 2006 24 25
Page 47 1 Mummer's Parade, especially at the Convention 2 Hall. We used to like to go down the shore. 3 Mommy liked to walk the boardwalk. She'd walk 4 that whole boardwalk from end to end. She's 5 also shop on it. Mommy liked to go shopping 6 almost every weekend at the mall with her two 7 sisters. 8 Q. Are these things that you and Mommy can 9 still do? 10 A. Mommy can't even walk up to church. 11 That's up the corner. 12 MS. SCHAFFZIN: I have no more 13 questions at this time. I think maybe we'd 14 like to take a break. 15 MR. JONES: Take a short break. 16 THE VIDEOTAPE OPERATOR: Off the 17 video. 12:31. 18 - - - 19 (Whereupon, the deposition 20 concluded at 12:31 p.m.) 21 - - - 22 23 24 25	Page 49 1 I have read the foregoing 2 deposition and the answers given by me are 3 true and correct, to the best of my 4 knowledge and belief. 5 6 7 8 9 FRANCIS J. O'MALLEY 10 11 12 13 Witness to signature 14 15 16 Address 17 18 19 20 My Commission expires 21 22 23 24 25

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INSTRUCTIONS TO WITNESSES

Read your deposition over carefully. It is your right to read your deposition and make changes in form or substance. You should assign a reason in the appropriate column on the errata sheet for any change made. After making any change in form or substance which has been noted on the following errata sheet along with the reason for any change, sign your name on the errata sheet and date it. Then sign your deposition at the end of your testimony in the space provided. You are signing it subject to the changes you have made in the errata sheet, which will be attached to the deposition before filing. You must sign it in front of a witness. Have the witness sign in the space provided. The witness need not be a notary public. Any competent adult may witness your signature. Return the original errata sheet & transcript to depositing attorney, (attorney asking questions) promptly! Court rules require filing within 30 days after you receive the deposition. Thank you.

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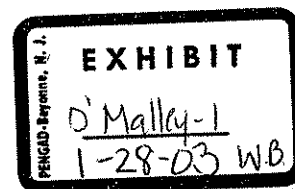
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THESE ARE THE TYPES OF PRODUCTS
I WORKED WITH OR AROUND THAT
CONTAINED ASBESTOS

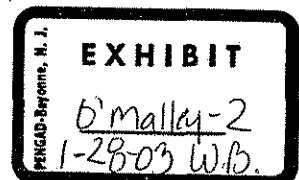
1. ASBESTOS SHEET GASKETS
2. ASBESTOS BRAIDED PACKING
3. ASBESTOS BLOCK
4. ASBESTOS CEMENTS
5. ASBESTOS BLANKETS

Jan. 24, 2003
Francis O'Malley



ASBESTOS PRODUCTS I USED OR WORKED
AROUND AT WESTINGHOUSE

1. GARLOCK
2. MELRATH
3. CHESTERTON PACKING
4. PALMETTO PACKING
5. PARS TUBE PACKING
6. OWENS ILLINOIS KAYLO BLOCK
7. RED DEVIL ASBESTOS CEMENT



8. FLINKOTE FIBREK CEMENT

9. SEAL FAS BENJAMIN FOSTER CEMENT

Jan. 26, 2003

Erana O'Malley