

**IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS**

LAURA PAZ, INDIVIDUALLY	)	
and SPECIAL ADMINISTRATOR OF	)	
the Estate of FARHAD DEHGHAN,	)	
Deceased, CHARLES T. MITCHELL,	)	
HANS J. RADDATZ and MELITTA	)	
RADDATZ,	)	
	)	
Plaintiffs,	)	
	)	No.
v.	)	
	)	
A.W. CHESTERTON, et. al.;	)	
	)	
Defendants	)	
	)	

**MR. LARRY ROSLINSKI
VIDEOTAPED DISCOVERY DEPOSITION
2/24/2004**

Summarized by: Jill Angle - 2/3/2005

Appearances for Plaintiff:

J. David Butler of Richardson, Patrick, Westbrook & Brickman, LLC

Appearances for Defendants, The Scotts Co:

Robert Raleigh f Armstrong Teasdale, LLP

For D, Freightline, Sprinkmann Sons of IL:

Robert Raleigh of Armstrong Teasdale, LLP

For D, Bondex International Inc, The Flintkote Co, Georgia-Pacific Corp:

George Kiser of Burroughs, Hepler, Brrom

For D, Carborundum Co, Georgia-Pacific Corp:

George Kiser of Burroughs

For D, Bondex Inter'l, Carborundum Co, Flintkote, GP Corp, Repubic Powdered Metals:

Geroge Kiser of Burroughs

For D, Riley Stoker, AW Chesterton, Advance Auto Parts, Discount AutoParts, Parts America, Western Auto, Daimler Chrysler:
Angie Donovan of Cates, Kurowski, Bailey and Shultz

For D, Ford Motor Co:
Robert Krause of Dickinson Wright

For D, Kaiser Gypsum Co:
John Bitzer and Tamara Chandler of Dunham, Boman, & Leskera

For D, BMI Refractories, Kentile Floors, Sidener Supply:
Paul Lore, Gunty & McCarthy

For D, Certainteed Corp, Union Carbide Cor; TH Agriculture and Nutrition, LLC, Maremont Corp. Dana Corp, Harcros, St. Gobain, Amchem:
Ed Johnston of Heyl, Royster

For D, Fiat Allis:
Jeff Chrones

For D, John Crane, Sepco:
Sean Fergus of O'Connell and Assoc.

For D Honeywell and Allied Chemical:
Dennis Dobbels of Polsinelli, Shalton & Welte

For D, Quigley:
Nicole Wright of Secrest, Wardle, Lynch, Hampton, Truex and Morley

For D, General Motors:
Gary Wiseman, of Law Offices of Thomas Noonan

For D, Goodyear:
Mary Rychnovsky of Williams, Venker and Sanders

Court Reporter: Dawn Brown

Examination Index:

Page 13	He retired from Ford in 2002. Has own consulting firm, Chess consulting, consults for Ford.
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Page 16 Policy at Ford, that if they had docs regarding asbestos you had to give them to the office of general counsel, policy in effect in early 1990s.

Page 19 ford bought raw asbestos fibers starting in late 1960.

Page 20 Ford bought asbestos fibers for heating and air conditioning housing for ford vehicles. Phase out process started in late 1970's. Last year used asbestos fibers would have been shortly after phasing out began.

Page 23 Industrial Hygiene dept is where he worked. Has seen tests done from this dept.

Page 24 started with ford in 1973. Head of the dept was Paul Toth who retired in late 1980s. Successor was roger wabeke who is no longer with ford.

Page 27 Ford had inside OSHA dept to make sure they were in compliance with osha. Ford had Med director under him industrial hygiene, safety dept, and medical dept.

Page 28 Added epidemiologist and ergonomists. Toth was head of industrial hygiene. Bud Deary was head of safety. He retired in late 1970s replaced by Dale Gray.

page 29 Gray was head of safety until late 1990s. Med dept headed by drs and nurses and corp individuals to give guidance.

Page 30 safety dept function to keep workers safe. Industrial hygiene was corporate function and would evaluate potential physical or chemical hazards.

Page 31 safety engineers, education came from formal education and training courses.

Page 32 Head of med was Duane block. He left in 1987. Replaced by John Tribwasser.

page 33 Witness believes there has been worker comp claims filed from asbestos exposure.

Page 36 Ford belonged to Society of toxicology, american board of toxicology, board of industrial hygiene, american hygiene assoc., society of safety engineers.

Page 37 Industrial health foundation, society of automotive engineers.

Page 38 American medical ass., society of epidemiologists. Ford hired own epidemiologist. First one was Dave Sugano hired in mid 1970s. Worked under occupational health and safety dept in Ford.

Page 39 one epidemiologists was Gordon Reeve.

Page 40 ford had medical program where yearly evaluations were made. Routine testing done.

Page 43 Besides heating and air conditioning in the vehicles, there was no asbestos manufacturing within ford during the time the witness worked there.

Page 45 a non dimensional chemical takes the form of its container.

Page 46 Witness graduated from U of Michigan in 1964, degree in experimental biology.

Page 47 Worked for Bureau of industrial hygiene in detroit, Graduate school at Wayne State for occupational environmental health graduated in 1966. Doctorate degree in pharmacology and physiology in 1968 from Wayne. Worked in DC, then worked for EPA, then in 1973 to Ford.. Learned of asbestos hazards in grad school in 1974.

Page 48 retired from ford in 2002. Consults for them now. \$350 an hour.

Page 49 earned 50,000 in consulting for ford.

Page 51 Has reviewed Selikoff reports on asbestos and friction products.

Page 54 This case is related to repair on vehicles.

Page 56 Has reviewed deps in prep for trial from Arnie Anderson in scientific research dept.

Page 57 Anderson did study, resulting in that chrysotile in brake pads, majority of it is destroyed in braking process. In 1973, asbestos potential for meso.

Page 58 He believes there are insignificant asbestos amounts off of brakes.

Page 59 Reviewed Jocko report from Bendix Corp. Another study by Williamson from GM.

Page 60 Brake wear dust does contain unaltered chrysotile fiber above 5 microns in length of regulatory size.

Page 64 He thinks there are no hazards regarding asbestos, regardless of type. Claims Selikoff studies confirm this.

Page 66 Believes there are safe levels of exposure.

Page 67 His opinion supported by Pedo and Doyle studies. Henry Lick was a manager of industrial hygiene did test in Arizona Proving grounds.

Page 70 He believes dust in certain amounts can constitute health hazard. Does not believe asbestos shorter than 5 microns can be health hazard.

Page 71 He agrees brake wear dust does contain some amount of chrysotile asbestos greater than 5 microns.

Page 72 He is familiar with studies by Hickish and Knight done in 1968. Industrial hygiene dept conducted air samplings some times.

Page 74 since he's left Ford he has kept current on health literature regarding asbestos.

Page 75 In late 1980's Ford produced vehicle with asbestos free brakes.

Page 76 Arthur Rohl and Mt. Sinai did study, exhibit 1.

Page 77 He is familiar with Sinai study.

Page 81 Does not agree with Rohl's study that states free asbestos fibers were in brake wear dust. Methodology was not accepted then. They used xray defraction .

Page 85 X-ray defractions are questionable. OSHA only counts those greater than 5 microns in length.

Page 91 He does not believe brake and clutch servicing was hazardous.

Page 92 Precautionary to use the vacuuming method. Technical services bulletins was available to the public.

Page 94 Ford did label brake materials in mid 1980's.

Page 95 He recalls no warnings given with regard to asbestos.

Page 114 In 1973, Ford knew that breathing asbestos dust could cause asbestosis and cancer.