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IN THE COURT OF COMMON
LAKE COUNTY, OHIO

Case No. 91CV001653

RUTH M. BURNHEIMER, etc..)
Plaintiffs,)
vs.)
UNIROYAL CHEMICAL CO., INC.,)
et al.,)
Defendants.)

ORIGINAL
FOR COURT PURPOSES ONLY

Jack Besoner & Assocs.
255 S.E. 14th Street
Suite 2-B
Fort Lauderdale, Florida
November 12, 1992
10:00 - 12:40 p.m.

URL 23197

DEPOSITION OF JACK H. WOLFSIE

Taken before Jeffrey M. Goldstein,
Certified Shorthand Reporter and Notary Public in
and for the State of Florida at Large, pursuant to
Notice of Taking Deposition filed in the above
cause.

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JACK BESONER & ASSOCIATES
FORT LAUDERDALE, FL. (305)763-1608

1 library with current and available materials?

2 A. Well, first of all, I subscribe to all
3 the worthwhile scientific journals that had all of
4 this material. Also too, don't forget -- And I
5 joined any number of organizations. For example,
6 I was an active member of the American Academy of
7 Chemical Toxicology. So if they had any, in any
8 of their programs they dealt with, let's say,
9 whether it was vinyl chloride or A,B,C substance,
10 it didn't matter, then that would become part of
11 my package of information.

12 Q. Where is the greatest exposure to vinyl
13 chloride? Is it in the creation of the monomer,
14 or is it in the creation of the polymer, or is it
15 in processing and fabricating?

16 A. You mean, where the greatest likelihood
17 of where somebody could become exposed.

18 Q. Yes, sir.

19 A. I would say maintenance people that
20 tear apart equipment. I would also say two people
21 taking samples, if they weren't careful, far more
22 than in ordinary day-to-day operating.

23 Q. Do you understand what I mean when I
24 say creation of the monomer versus polymerization,
25 versus processing and fabricating?