

1 A I only know that they were being produced in the
2 1960s. I have no idea whether that was the initial
3 time or not.
4 Q Okay. I'm with you. Do you know the last year that
5 Dana Victor manufactured beaded steel head gaskets
6 for high heat applications?
7 A We still make beaded steel gaskets.
8 Q For high heat applications?
9 A Cylinder head gaskets, I would consider to be high
10 heat applications.
11 Q During the 1960s and the 1970s, other than the beaded
12 steel head gaskets, was there any other asbestos—
13 Was there any other non-asbestos gaskets that Dana
14 Victor was manufacturing that could be used in a high
15 heat application, or was that the only one?
16 MR. CELBA: Object to form.
17 THE WITNESS: Exhaust manifold gaskets were
18 often steel construction.
19 BY MR. VALLAS:
20 Q Any others you can think of?
21 MR. CELBA: Same objection.
22 THE WITNESS: No, nothing else I can
23 recall.
24 BY MR. VALLAS:
25 Q Okay. Do you know the first year that Dana Victor

1 compatible with high heat applications, and I wanted
2 to explore that a little bit more with you. We were
3 talking about two types, the beaded steel head gasket
4 as well as the steel construction exhaust manifold
5 gasket. And I think that you mentioned that those
6 were the only two high heat application non-asbestos
7 containing Dana Victor gaskets that were manufactured
8 at any time during the '60s and '70s; is that
9 correct?

10 MR. CELBA: Object to form.

11 THE WITNESS: I guess the question I would
12 have beyond that, those are what I consider to be the
13 two highest heat applications in an internal
14 combustion engine or diesel engine, so beyond that
15 I'm unclear as to what other areas of an engine you
16 would consider to be high heat applications.

17 BY MR. VALLAS:

18 Q Okay. Well, let me ask you that question because
19 you're probably more familiar with internal
20 combustion engines and where Dana Victor gaskets
21 might be used inside of an engine than I am. Let's,
22 if we can, run through the different types, the
23 different places within an engine that you are
24 familiar with where heat would be a concern. Just
25 generically speaking, head gaskets intake gaskets,

1 made an exhaust manifold gasket of steel construction
2 that could be used in a high heat application? Do
3 you know the first year?
4 A No, sir, I do not.
5 Q I'm sorry, with steel construction that did not
6 contain asbestos-- Let me back up and ask the
7 question again. Do you know the first year that Dana
8 Victor manufactured the exhaust manifold steel
9 construction gasket that you just mentioned without
10 asbestos, do you know the first year?
11 A No, I do not.
12 Q Do you know the last year?
13 A There are still some applications that are
14 manufactured to this date.
15 Q Okay. These-- Why don't we do this, we've been going
16 almost an hour. Why don't we take about a
17 five-minute break? Is that okay?
18 A That's fine.
19 MR. VALLAS: We'll be back with you in just
20 a second, all right? Thanks.
21 (Off the record.)
22 BY MR. VALLAS:
23 Q Mr. Austin, just prior to the break we were talking
24 about non-asbestos containing gaskets that Dana
25 Victor made that you're familiar with that were

1 exhaust gaskets, whatever the case may be, if you can
2 just kind of list them for me, that would be great.
3 I'll figure out where I'm going to go from there.

4 MR. CELBA: I'm going to object to the
5 form. Go ahead.

6 THE WITNESS: In general the head gaskets
7 and exhaust gaskets I would consider to be the
8 highest heat portions of an engine. Many of the
9 gaskets beyond that become more what I would describe
10 as secondary or ancillary gaskets. They would be
11 mounting gaskets, that type of gasket, and that would
12 be strictly dependent upon where on the engine that
13 gasket was being used.

14 BY MR. VALLAS:

15 Q Okay. Let's go through-- let's go through what kind
16 of-- I'm going to kind of make a list here. I'm
17 going to put heat gaskets and exhaust gaskets. I'm
18 sorry, not heat gaskets, head gaskets and exhaust
19 gaskets kind of in a category by themselves. We'll
20 just kind of refer to them for purposes of this
21 deposition as high heat gaskets. Let's visit a little
22 bit about this second category that you're talking
23 about, these mounting gaskets. Where might those be
24 used in an internal combustion engine where heat was
25 a concern?