

1 Mr. Smith, please.

2 READING OF DEPOSITION OF RONALD W. HILL

3 TAKEN ON AUGUST 25, 1987

4 (Whereupon, the questions were read by Mr.
5 Smith and Mr. McGowan and the answers were read by Mr.
6 Shellenberger.)

7 MR. SMITH: Thank you.

8 Ronald Hill after having been first duly
9 sworn was examined and testified as follows:

10 BY MR. SMITH:

11 Q Mr. Hill, what is your birth date?

12 A December 13th, '38.

13 Q And so you are 48 years old?

14 A Yes.

15 Q Where were you born?

16 A West Jersey Hospital in Camden.

17 Q What is the first residence that you
18 remember?

19 A 112 Rich Avenue.

20 Q Where is that?

21 A Berlin.

1 Q Mr. Hill, how far did you go in school?

2 A I went to the 8th grade, and then I went a
3 year and a half to vocational.

4 MR. SMITH: Skipping to page 28.

5 BY MR. SMITH:

6 Q After working at American Pulley, you went
7 back to Kelly Carpet?

8 A Yes.

9 Q Do you know the year you left Kelly Carpet?

10 A 1960.

11 Q Where did you go to work then?

12 A Owens-Corning Fiberglas in Berlin.

13 Q Mr. Hill, you mentioned that you went to
14 work at Owens-Corning Fiberglas in 1960.

15 What was the reason that you sought
16 employment there?

17 A Higher pay.

18 Q Than at Kelly Carpet Company?

19 A Yes.

20 Q What was your first job duty at the Owens-
21 Corning Fiberglas plant?

1 A I was a stripper.

2 Q I assume that means you stripped pipe
3 molds?

4 A Yes. Took the wear out of the molds.

5 Q Did you start working there in, what was it,
6 July 1960?

7 A July the 18th, 1960.

8 Q Was there any ware left over like caked on
9 the inside of the mold after you took the pipecovering
10 out?

11 A Yes.

12 Q Was anybody responsible for getting that
13 leftover ware out of the mold?

14 A No. Just fell on the floor, blew around
15 with the fans.

16 Q Was working as a pipe mold stripper a dusty
17 job?

18 A Yes.

19 Q How long did you work as a pipe mold
20 stripper?

21 A About two years, I believe.

1 Q And the entire time it was on number 2
2 production line?

3 A Yes.

4 Q During those two years, did you ever speak
5 to anyone at the Owens-Corning plant about the dangers
6 of asbestos dust?

7 A No. Nobody knew anything about asbestos
8 dust.

9 Q Did a supervisor ever ask you to wear a
10 respirator during those two years?

11 A No.

12 Q They never instructed you to wear one?

13 A No.

14 Q During those two years, did you ever see any
15 signs in any areas of the plant instructing that
16 respirators should be used?

17 A No.

18 Q During those two years, did you ever have
19 conversations with any of your co-workers about the
20 dustiness or the conditions?

21 A We didn't like the dust, but there was

1 nothing we could do about it. It was just there.

2 Q Do you know if you or any of your co-workers
3 complained to the supervisor at OCF about the dust?

4 A I don't know.

5 Q Did you?

6 A I didn't complain because it was there. I
7 just thought it was the way it was.

8 Q While you were working as a stripper on
9 number 2 production line, were there exhaust vents on
10 that line designed to suck up airborne dust?

11 A No. When I was on there, I believe it was a
12 blower-type thing that blew the dust off.

13 I don't believe it sucked it up because all
14 around it was all piles of the dust that it blew off.

15 Q After you worked as a pipe mold stripper,
16 what were your next duties at the Owens-Corning
17 Fiberglas plant?

18 A I went into finishing.

19 Q What is entailed in finishing?

20 A I worked on a saw line. They run the ware
21 through a saw and then up a conveyor belt and then

1 packers pack it and it goes on out to the warehouse.

2 Q So you actually worked on the saw itself?

3 A I worked packing for 10 years.

4 Q So you actually put the ware in the boxes?

5 A Right.

6 Q Did you work on any other part of the
7 finishing line other than the packing?

8 A I was a saw setup man after that.

9 Q What did you do as a packer?

10 A The ware would come up line, sometimes you
11 will put tape around it, other times put a piece of
12 cloth around it and put it in the box.

13 Q What was the tape or cloth designed to do?

14 A The tape was designed to just hold the ware
15 together, keep it from falling apart, and the cloth
16 was a way of putting it on the pipe. They would
17 somehow glue it, the overlap, and that would hold it
18 on the pipe.

19 Q So the cloth was glued onto the pipe?

20 A Yes.

21 Q Then you put the ware with the cloth or tape

1 into a box?

2 A Right.

3 Q And you shut the box?

4 A It went through a conveyor line, through a
5 carton sealer and then onto a pallet.

6 Q Now, how big were these individual boxes
7 that you would put the ware in?

8 A Well, they were all three feet long, not
9 counting the flaps.

10 Q Do you remember the years that you worked as
11 a packer?

12 A Must be from '62 to '72, I guess. I can't
13 be sure.

14 Q Mr. Hill, do you know what Kaylo is?

15 A That is the product we are talking about.

16 Q Kaylo is what you put into the boxes?

17 A Yes.

18 Q What did the boxes of Kaylo look like?

19 A Just the box itself?

20 Q Yes. I mean, was there printing on it?

21 What color were they? Was there writing?

1 A The boxes were printed with Owens-Corning
2 Fiberglas.

3 Q So it said Owens-Corning Fiberglas.
4 Was the printing a certain color?

5 A Yes, red.

6 Q Were the boxes themselves a cardboard-kind
7 of color?

8 A Yes, corrugated cardboard.

9 Q Then they had red printing that said Owens-
10 Corning Fiberglas?

11 A Yes, Kaylo.

12 Q Kaylo was also on it?

13 A Yes.

14 Q What color printing was that in?

15 A That was in red, also.

16 Q Do you remember other than the OCF label and
17 the Kaylo label whether there was any other printing
18 on the boxes?

19 A Just on the bottom, the manufacturer's
20 number and carton size.

21 Q Those are like lot numbers and that kind of

1 thing?

2 A Yes. The size of the carton and a carton --
3 excuse me, an A carton, and a D carton.

4 Q Anything else?

5 A No.

6 Q When you were in the finishing department
7 packing boxes, did you see any warnings on the
8 boxes --

9 A No.

10 Q -- about the dangers of Kaylo?

11 A No.

12 Q No?

13 A No.

14 MR. SMITH: Move to page 57, please.

15 BY MR. SMITH:

16 Q While you were working in the finishing
17 department as a packer, did a supervisor ever tell you
18 that you should wear a respirator?

19 A No.

20 Q While you were in the finishing department
21 as a packer, did you ever complain to a supervisor

1 about dusty conditions?

2 A No. Dust was everywhere, just a way of
3 life.

4 Q Do you know of any co-workers who complained
5 about dusty conditions?

6 A No.

7 Q Can you compare the dustiness of your job as
8 a pipe mold stripper with the dustiness of your job as
9 a packer?

10 Which one was more dusty? Were they the
11 same?

12 A I would say the dust was finer packing
13 because it come through the saw, but as far as one
14 being dustier than the other, it is --

15 Q It is pretty much the same?

16 A Yes.

17 Q While you were working as a packer, were
18 there any exhaust hoods, exhaust fans in your working
19 area?

20 A No.

21 Q There was nothing to suck the dust up out of

1 the area?

2 A Nothing whatsoever.

3 Q Was there a time at which OCF installed
4 ventilation fans that would suck dust out of the plant
5 area?

6 A Yes.

7 Q Do you remember when that was?

8 A Not exactly, no.

9 MR. MCGOWAN: Page 59, line 2.

10 BY MR. MCGOWAN:

11 Q After you worked as a packer, you worked as
12 a saw setup man?

13 A Yes.

14 Q How long did you do that?

15 A Up until about six months ago.

16 Q What are the duties of a saw setup man?

17 A A few years ago they took the saw setup away
18 from me and I still drove the truck and did everything
19 I did before, but the crew sets the saw now, but
20 before that, I drove the truck, I brought the ware, I
21 set the new saw, moved the blades in and out to suit

1 the different sizes of the ware, and so it come out to
2 the right size so it fit on a pipe.

3 Q You mentioned several things and I would
4 like to try and go through them one at a time.

5 You drove a truck?

6 A Yes.

7 Q What type of truck was that?

8 A A forklift truck.

9 Q From where to where did you drive it?

10 A Around the stripping lines. The saw was
11 near the stripping lines at the time.

12 Q Okay.

13 A I would have to run around and get cages and
14 bring them back, set them up to the saw, take the
15 empty cages away, put them over where the strippers
16 were who were taking the ware out of the molds. That
17 is how to rotate them.

18 Q So the forklift picked up a cage full of
19 ware?

20 A Right.

21 Q Took it over to the saw?

1 A Right.

2 Q You would set up the saw for the proper
3 cut?

4 A Right.

5 Q You would take an empty cage back to the end
6 of the production line so they could fill it with more
7 ware?

8 A Right.

9 Q So the job entailed driving the forklift and
10 setting the saw?

11 A Right.

12 Q In the areas of the production line is where
13 the saws were?

14 A Right.

15 Q You have done that right up to the present
16 except they took the saw adjustment away?

17 A Setup.

18 Q That was a few years ago that they took the
19 saw away?

20 A A couple of years ago, I guess.

21 Q You testified before that during the entire

1 time that you worked as a fork truck driver and a saw
2 setup man, that you wore a respirator every day.

3 A Yes, from '66 or '65 on every day.

4 MR. SMITH: I think I will read the next
5 couple of questions.

6 BY MR. SMITH:

7 Q Was your job as a forklift driver and saw
8 setup man a dusty job?

9 A Yes.

10 Q Do you know the source of the dust in that
11 area of the plant?

12 A Driving the truck, the dust off the cages
13 blew while you were bringing them around to put them
14 up to the saw.

15 Q The cages were in front of you when you were
16 driving?

17 A Yes. You had to take them forward and then
18 there was dust off the saw.

19 MR. SMITH: Now to page 75. Are you with
20 me?

21 MR. SHELLENBERGER: Yes.

1 BY MR. SMITH:

2 Q Mr. Hill, do you remember the first time you
3 became aware of asbestos could be dangerous to your
4 health?

5 A In the late '70s.

6 Q Do you remember how that was brought to your
7 attention?

8 A I believe it was an article in the paper.

9 Q In a regular newspaper?

10 A Yes.

11 Q Prior to that time no one at the Owens-
12 Corning Fiberglas plant had told you that asbestos was
13 a dangerous substance?

14 A No.

15 MR. McGOWAN: 77, line 3.

16 BY MR. McGOWAN:

17 Q While you were at OCF, did the company have
18 programs under which it would give physical
19 examinations to the employees?

20 A Yes.

21 Q When did that program start, do you know?

1 A I can't remember specifically when it
2 started. I think they just gave us X-rays. I am not
3 sure how it started.

4 Q When you started working there in 1960, did
5 you receive an X-ray?

6 A I don't recall. I don't know.

7 Q At some point during your time at OCF, did
8 they start having annual X-rays?

9 A Yes.

10 Q Do you recall when that was?

11 A No, not really.

12 Q Was there anything else involved in the
13 physical other than X-rays?

14 A The doctor would give you a checkup at the
15 plant. I believe that started like once a year like
16 the X-ray.

17 Q Was that an OCF doctor or someone that they
18 called in from the outside?

19 A No, it was an OCF doctor, the plant doctor.

20 Q Do you recall the names of the plant
21 doctors at the Berlin plant?

1 A There is a doctor from ACCO, I can't
2 remember his name. No, I can't remember the name.

3 MR. SMITH: Page 79.

4 BY MR. SMITH:

5 Q When you were given these physicals, did
6 they appear actually at the plant or did you go to a
7 doctor's office for them?

8 A We get them at the plant now. We used to go
9 out for X-rays, and I think the plant doctor gave us
10 the physicals.

11 Q Did the doctors ever discuss the results of
12 the X-rays or physicals with you?

13 A No.

14 MR. MCGOWAN: 132.

15 BY MR. MCGOWAN:

16 Q Now, when you had these physicals by Owens-
17 Corning doctors, were these doctors that were employed
18 by Owens-Corning?

19 A Yes.

20 Q Were there any outside doctors that Owens-
21 Corning used or sent to you?

1 A Not for physicals that I recall, no.

2 Q The doctors that were employed by Owens-
3 Corning, did you ever have occasion to ask them any
4 questions about your health after your testimony was
5 done?

6 A Only in the latter years, last four or five
7 years.

8 Q On the occasions that you asked them
9 questions, did they answer the questions that you
10 asked them?

11 A Yes.

12 MR. MCGOWAN: I believe that is all, Your
13 Honor.

14 THE COURT: Thank you.

15 Next, please.

16 MR. SMITH: At this time, Your Honor, I
17 would like to publish to the jury discovery responses
18 by Owens-Illinois and Owens-Corning Fiberglas
19 regarding some foundational matters, corporate
20 history, products.

21 THE COURT: Please.

1 MR. SMITH: Thank you.

2 As part of the pretrial discovery in this
3 case we have asked the defendants to admit to certain
4 matters or give us some information, and I am going to
5 read some admission requests and some interrogatory
6 answers by the two companies I have just identified.

7 First will be Owens-Illinois, and this will
8 be our admission request number 1.

9 Ms. Tostanoski, if you have any problems,
10 just let me know for following along.

11 MS. TOSTANOSKI: Certainly.

12 PRESENTATION OF DOCUMENTS

13 MR. SMITH: The Owens-Illinois Glass
14 Company -- I will start over. I am sorry.

15 Owens-Illinois has admitted that the Owens-
16 Illinois Glass Company was incorporated in 1929 under
17 the laws of Ohio.

18 Owens-Illinois has also admitted that on
19 April 28, 1965, Owens-Illinois Glass Company changed
20 its name to Owens-Illinois, Inc.

21 That was request number 2.

1 Number 4. We asked them in 1962 --
2 Owens-Illinois Glass Company obtained authorization to
3 do business in the State of Maryland.

4 Their response, on May 31, 1962, Owens-
5 Illinois Glass Company obtained authorization to do
6 business in the State of Maryland.

7 Number 9. In admission response number 9,
8 Owens-Illinois stated, in 1953, this defendant entered
9 into a sales agreement with Owens-Corning Fiberglas
10 Corporation in which it agreed to the sale of
11 asbestos-containing products to that corporation.

12 This defendant believes that it ceased the
13 general marketing and sales of its asbestos-containing
14 thermal insulation products at that time, disbanded
15 its sales force and that thereafter Owens-Corning
16 Fiberglas Corporation was the primary marketer of its
17 product until the sale of the division to
18 Owens-Corning Fiberglas Corporation in 1958.

19 In response to admission request number 10,
20 Owens-Illinois stated that this defendant has found
21 information in its records which indicate that at

1 least in 1956 it placed Owens-Corning Fiberglas
2 Corporation's logo on some of its boxes.

3 Owens-Illinois has admitted that on April
4 30, 1958, Owens-Corning Fiberglas purchased all
5 properties, products, patents, trademarks, materials
6 and assets of the Kaylo division of the Owens-Illinois
7 Inc. Owens-Illinois stated admitted as set forth in
8 Exhibit I.

9 Exhibit I is the sales agreement between
10 Owens-Illinois and Owens-Corning Fiberglas dated April
11 30th, 1958, which we have marked as our Exhibit 1054.

12 I would just like to read a couple of
13 sentences from the sales agreement between Owens-
14 Corning and Owens-Illinois.

15 O-I hereby sells certain of the properties
16 hereinafter more particularly described as the Kaylo
17 division of O-I under the following terms and
18 conditions.

19 Paragraph 7 it states, O-I will permit OCF
20 to have such access as OCF may desire, the books,
21 records, contracts, orders, files, and properties of

1 the Kaylo division and as promptly as practicable, O-I
2 will deliver to OCF all books, records, contracts,
3 orders, and files of the Kaylo division except such as
4 O-I desires to retain and as to these O-I will make
5 and deliver to OCF copies of any OCF desires.

6 Now I would like to read a few discovery
7 responses by Owens-Corning Fiberglas.

8 Number 11. OCF has stated, OCF admits that
9 it was formed as a result of an agreement dated
10 October 28, 1938, between Owens-Illinois and Corning
11 Glass Works.

12 Number 17 it is stated, OCF admits that from
13 1938 until June 29, 1949, some members of the Board of
14 Directors of Owens-Illinois and Corning Glass Works
15 served on the Board of Directors of OCF.

16 In response number 15 it is stated, OCF
17 admits that Harold Boeschenstein was a director of
18 both OCF and Owens-Illinois from 1938 to June 29,
19 1949. B-o-e-s-c-h-e-n-s-t-e-i-n. I think I am
20 pronouncing that correctly.

21 In interrogatory -- supplemental

1 interrogatory answer number 100, OCF has stated the
2 following:

3 OCF states that Owens-Illinois and Corning
4 Glass Company were parent companies for OCF. From
5 1938 until 1947, various Owens-Illinois and Corning
6 Glass officials served as officers and/or on the Board
7 of Directors of OCF.

8 The initial officers of OCF were Harold
9 Boeschenstein, president and general manager, formerly
10 vice-president and general manager of Owens-Illinois;
11 James Slater, he was the OCF vice-president, formerly
12 director of research glass fiber laboratories of
13 Owens-Illinois; W.P. Zimmerman was the OCF
14 vice-president and formerly general manager of the
15 glass fiber and block division of Owens-Illinois;
16 Harold Boeschenstein, again, he was also the
17 treasurer; and H.R. Winkle was the OCF comptroller and
18 formerly general auditor at Owens-Illinois.

19 The initial Board of Directors of OCF was as
20 follows:

21 Harold Boeschenstein, he was the president

1 of Owens-Corning; William Levis, vice-president of
2 Owens-Illinois; C.B. Belknap, executive vice-
3 president of Owens-Illinois; and Urban E. Bowes,
4 B-o-w-e-s, was director of research of Owens-
5 Illinois.

6 After June 29, 1949, no one with any
7 financial interest in or connection to Owens-Illinois
8 or Corning Glass was permitted to serve on the OCF
9 Board of Directors.

10 In OCF's admission response number 16 it is
11 stated, OCF admits that on December 10, 1947, the U.S.
12 Justice Department filed an antitrust suit against
13 OCF, Owens-Illinois, and Corning Glass Works.

14 On June 29, 1949, the parties to the
15 antitrust suit entered into a consent decree whereby
16 the members of OCF's Board of Directors would have no
17 current financial interest in or connection to Owens-
18 Illinois.

19 Accordingly, Harold Boeschenstein resigned
20 from Owens-Illinois Board of Directors.

21 OCF response to our interrogatory number 1,

1 they stated, OCF states that it was incorporated under
2 the laws of the State of Delaware on October 31,
3 1938.

4 Its principal place of business is in the
5 State of Ohio, and its current address is Fiberglas
6 Tower, Toledo, Ohio.

7 OCF has been authorized to transact business
8 in the State of Maryland since August 20, 1964.

9 OCF further states that it purchased the
10 assets of the Kaylo division of Owens-Illinois in May
11 1958, specifically the Berlin, New Jersey
12 manufacturing place.

13 OCF believes that Owens-Illinois ceased
14 distributing and selling Kaylo at that time that it
15 acquired the Berlin plant in 1958.

16 OCF first distributed Kaylo in 1953 and
17 began to manufacture Kaylo in 1958.

18 OCF also purchased the assets of the
19 Chembest division of Unarco in 1970, specifically the
20 Bloomington, Illinois facility.

21 OCF believes that Unarco ceased distributing

1 and selling Unarcoboard at the time it acquired the
2 Bloomington facility. OCF began to manufacture and
3 distribute Unarco Fyrcor at the time it acquired
4 Chembest in 1970.

5 In a supplement to the same interrogatory
6 answer number 1, OCF stated on June 27, 1952, OCF
7 purchased certain assets of the marine engineering and
8 supply company.

9 OCF operated these assets under the name
10 Fiberglass Engineering and Supply Company which came
11 to be known as the contracting and supply division and
12 eventually the contracting division of Owens-Corning
13 Fiberglas.

14 In response to admission request number 110,
15 OCF admits that it had contracting units which
16 operated as the contracting division of OCF from
17 January 1950 until February 1987 when this division
18 was sold.

19 Now I am jumping back to Owens-Illinois.
20 This is their response to interrogatory number 5.

21 In response to our question about what

1 products, asbestos products they sold or used, they
2 stated as follows:

3 Owens-Illinois Glass Company began a limited
4 pilot plant operations involved in the production of
5 asbestos-containing products in 1943.

6 It began the manufacture of commercial
7 quantities of asbestos-containing products in about
8 1948. It continued such manufacture until about April
9 30, 1958.

10 American Structural Products Company, a
11 wholly-owned subsidiary of Owens-Illinois Glass
12 Company, engaged in the manufacture, sale,
13 distribution of asbestos-containing products from
14 about January 1948 until June 1949 when it became the
15 Kaylo division of Owens-Illinois Glass Company.

16 The Kaylo division of this defendant
17 continued to manufacture such products until about
18 April 30, 1958, when it was purchased by Owens-Corning
19 Fiberglas Corporation from this defendant effective on
20 that date.

21 In interrogatory response number 12, we

1 asked them to identify their manufacturing facilities
2 and Owens-Illinois stated:

3 This defendant's manufacturing plants were
4 located in Berlin, New Jersey, in Sayreville, New
5 Jersey. The Berlin plant was in operation from
6 approximately 1943 until on or about April 30, 1958.

7 The Sayreville plant was in operation from
8 February 1948 until about April 30, 1953.

9 In response to our interrogatory number 8
10 when we asked about asbestos-containing products,
11 Owens-Illinois stated in response to the question
12 about the brand name, it is called Kaylo.

13 And in response to the composition of the
14 product, Owens-Illinois stated:

15 Its investigation as to the composition of
16 each such product is continuing, although defendant
17 now believes that its asbestos-containing products
18 were hydrous calcium silicates containing between 13
19 percent and 25 percent asbestos.

20 Chrysotile asbestos was the primary type
21 apparently used. Amosite was used to a lesser

1 extent.

2 In response to our admission request number
3 15, Owens-Illinois has admitted the following:

4 Owens-Illinois knew that asbestos-containing
5 products it manufactured, sold and/or distributed
6 would be used to insulate equipment, structures, and
7 pipes which generated heat. It has admitted it would
8 be used by asbestos insulators and by pipecoverers.

9 In response to number 16, the question was,
10 you knew that in the normal and expected use of your
11 asbestos-containing products that those products would
12 be, and Owens-Illinois' response was, this defendant's
13 asbestos-containing industrial insulation was
14 manufactured in two forms, block and pipecovering.

15 It was a premolded rigid product which was
16 not intended or required to be molded or mixed in
17 application.

18 It was manufactured in standard premolded
19 shapes and sizes and intended to minimize cutting the
20 pieces in application.

21 It appears the product was applied by

1 methods including gluing, tying, strapping or wiring
2 it to pipe.

3 It appears that a limited amount of its
4 product was cut during application.

5 We also asked some of the similar questions
6 to Owens-Corning. And this is Owens-Corning's
7 response to our interrogatory number 8 where we asked
8 them about its asbestos-containing products. Their
9 supplemental answer is as follows:

10 OCF further states that Kaylo manufactured
11 by OCF from 1958 through 1972 contained amosite and
12 chrysotile asbestos.

13 The approximate percentage of amosite fibers
14 as compared to chrysotile fibers contained in Kaylo
15 varied between one-half and two-thirds of the total
16 percentage of the asbestos content of Kaylo.

17 Kaylo 10 pipecovering and block contained
18 approximately 15 percent asbestos, and Kaylo 20
19 pipecovering and block contained approximately 20
20 percent asbestos.

21 The amount of amosite in Kaylo 10 and Kaylo

1 20 varied between one-half and two-thirds of the total
2 asbestos content of those products.

3 The amount of chrysotile in Kaylo 10 and
4 Kaylo 20 varied between one-third and one-half the
5 total asbestos content of those products.

6 In its response, supplemental response to
7 our interrogatory number 22 where we asked them about
8 the description on the boxes, OCF responded:

9 Both -- excuse me, to the best of OCF's
10 knowledge, both OCF's and Owens-Illinois' names
11 appeared on packages of Kaylo distributed by OCF from
12 1953 to 1958.

13 In a document we have marked as Plaintiff's
14 Exhibit OCF-353, this is an internal OCF memo dated
15 November 8, 1966, and I apologize I didn't put it on
16 the overhead, it is just one sentence.

17 This is a memo from an official in New York,
18 Mr. Johnson to OCF officials in Toledo and New York.

19 The memo states, "Asbestos content of Kaylo
20 is about 15 percent, composed of 12 to 13 percent
21 amosite mined in Africa and 3 percent chrysotile mined

1 in Canada."

2 I will move these and other documents into
3 evidence at a later date.

4 Just a couple of more discovery responses
5 here. Thank you for bearing with me.

6 In response to our admission request number
7 16, OCF has stated, it admits that it knew its Kaylo
8 asbestos-containing pipe and block insulation would be
9 handled, moved, removed from its container, cut,
10 sawed, installed, and moved.

11 In its supplemental response to admission
12 request number 23, OCF admits that its asbestos-
13 containing insulation products may have emitted some
14 dust, a small percentage of which contained asbestos
15 when the product was cut or sawed during application.

16 OCF also admits that asbestos-containing
17 cements previously manufactured and/or sold by OCF may
18 have emitted some dust, a small percentage of which
19 was asbestos when the product was mixed during
20 application.

21 In response to our admission request number

1 30 -- this is the last one -- OCF admits that from
2 1953 to 1973, asbestos-containing Kaylo pipe
3 insulation products were generally distributed
4 throughout the United States, including Baltimore City
5 and/or Baltimore County areas of Maryland.

6 Thank you.

7 THE COURT: Thank you, Mr. Smith.

8 MR. SMITH: At this time we would like to
9 read another deposition, Your Honor.

10 This one will be of Edward Ames an employee
11 of both Owens-Corning and Owens-Illinois at various
12 times.

13 THE COURT: When and where was the
14 deposition taken, please.

15 MR. SMITH: As soon as Mr. Shellenberger
16 hands it to me, I will tell you.

17 THE COURT: Mr. Smith will do the questions,
18 and Mr. Shellenberger will do the answers; and Mr.
19 McGowan will do the defense designations?

20 MR. MCGOWAN: Yes, Your Honor.

21 THE COURT: When and where was it taken,