

FILE NAME: Pratt & Whitney (PW)

DATE: 1992

DOC#: PW004

DOCUMENT DESCRIPTION: Legal - Deposition of Newton Ketcham

WILLIAM
CAPRISIDE

RUSSELL ALLEN, ET AL.	B-126,986	:	IN THE DISTRICT COURT
VS.	:	:	OF JEFFERSON COUNTY, TEXAS
AMERICAN PETROFINA, ET AL.	:	:	60TH JUDICIAL DISTRICT
FRENCH HICKS, ET AL.	A-134,614	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
BETHLEHEM STEEL CORP., ET AL.	:	:	58TH JUDICIAL DISTRICT
ROOSEVELT SCOTT	B-141,242	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
AMERICAN OPTICAL CORP., ET AL.	:	:	60TH JUDICIAL DISTRICT
MARGARET FAULKNER, ET AL.	A-138,633	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
AKRON CHEMICAL CO., ET AL.	:	:	58TH JUDICIAL DISTRICT
KEITH GIBLIN, ET AL.	A-136,143	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
MOBIL OIL CORPORATION, ET AL.,	:	:	58TH JUDICIAL DISTRICT
JOSEPH E. BARNARD, ET UX	E-141,216	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
ALLIED-SIGNAL, INC., ET AL.,	:	:	172ND JUDICIAL DISTRICT
JOYCE A. BORNE, ET AL.	A-140,498	:	IN THE DISTRICT COURT
VS.	:	:	JEFFERSON COUNTY, TEXAS
ALLIED-SIGNAL, ET AL.	:	:	58TH JUDICIAL DISTRICT

Action Court Reporting

ALL-STATE LEGAL
PLAINTIFF'S
EXHIBIT

WK VC 6159

M. K. Comer
Post Office Box 4449
Charleston, WV 25364
340-1020 / 1-800-752-7064

COPY

The deposition of NEWTON KETCHAM in the above-styled suits was taken pursuant to notice before M. K. Comer, a Notary Public within and for the State of West Virginia at Larger, pursuant to the West Virginia Rules of Civil Procedure, commencing at 9:00 a.m. on December 8 and 9, 1992, in the Heart of Town Holiday Inn, 100 Washington Street, East, Charleston, Kanawha County, West Virginia.

APPEARANCES: Appearing on behalf of the Plaintiffs Allen, Hicks and Scott

JOSEPH C. BLANKS, ESQUIRE
Reaud, Morgan & Quinn
801 Laurel Street
Beaumont, Texas 77701

Appearing on behalf of the Plaintiffs Allen, Faulkner & Giblin

HERSCHEL L. HOBSON, ESQUIRE
Hobson & Ferguson
2190 Harrison
Beaumont, Texas 77701

Appearing on behalf of the Defendant 3M

MICHAEL J. TRUNCALE, ESQUIRE
Orgain, Bell & Tucker, L.L.P.
470 Orleans Street
Beaumont, Texas 77701

Appearing on behalf of the Defendant Harwick Chemical Company

D. CRAIG SHEW, ESQUIRE
Smith, Shew & Scrivner, P.C.
120 East 14th Street
P. O. Box 1373
Ada, Oklahoma 74821-1373

JCR

PARTIES NOTICED TO DEPOSITION (CONTINUED)

WOODARD, HALL & PRIMM
 Monsanto Company
 Edward Carstarphen
 Douglas Dougherty

I N D E XPlaintiffs' Witness Direct Cross Redirect Recross

December 8, 1992

Newton Ketcham	13 (H)			
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December 9, 1992

Newton Ketcham	168 (H)	348 (M)	356 (H)	359 (M)
	289 (B)		359 (B)	
	347 (H)		361 (H)	

Plaintiffs' Exhibits Identified

921208KetNewH001 (List of Texts and References)	37
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921208KetNewH002 (Subpoena Duces Tecum)	316
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491001KetNewH (Harvard Notes)	347
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161004KetNewH (Curriculum Vitae)	347
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Defendants' Exhibit

No. 1 (Subpoena Duces Tecum)	261
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Reporter's Certificate Pages 364-366

A.C.R.

1 We represent -- myself and Mr. Blanks represent
2 a number of parties that brought some lawsuits, so we are on
3 the opposite side of your employers in the past. Do you
4 understand that, sir?

5 A I do.

6 Q Thank you.

7 Would you give us a brief sketch of your
8 educational background, sir?

9 A Okay, I attended the University of Michigan,
10 graduated from there in 1939 with a degree of B.S. in
11 Chemistry. Then I worked for a while and took a leave of
12 absence, went back and spent a year at Harvard University's
13 Graduate School of Public Health and got a Master's Degree
14 in Industrial Hygiene there.

15 And after that, I have been involved in
16 continuing education activities which are characteristic of
17 the industrial hygiene profession, but no more formal
18 schooling.

19 Q You finished at Harvard in '49, I believe?

20 A '49.

21 Q Where do you currently reside, please, sir?

22 A I reside in South Charleston, West Virginia.

23 Q And may I ask your date of birth, please?

24 A October 4, 1916.

25 Q You were kind enough to provide us a Curriculum

1 contract read.

2 Q All right, sir.

3 A Would Carbide be responsible for that or would
4 the contractor be responsible.

5 MR. BLANKS: All right, I'm going to have to
6 quit, I am hoarse. I'm going to pass the witness.

7 MR. STANTON: Let's take a ten-minute break.
8 (WHEREUPON, a brief recess was taken,
9 after which the following proceedings
10 were had.)

11 MR. BLANKS: Back on the record.

12 DIRECT EXAMINATION

13 BY MR. HOBSON:

14 Q Mr. Ketcham, you were good enough to bring with
15 you your notes from Harvard that I requested in yesterday's
16 deposition and we have a copy that has been made and that
17 has been checked as a true and authentic copy and it has
18 been marked as 491001-KET-NEW-H.

19 This is a copy of your notes from Harvard that
20 you took that you still have in your possession, is that
21 right, sir?

22 A Yes, just thumbing through it, I would say this
23 is a copy of my notes.

24 (WHEREUPON, the document referred to
25 was marked as Plaintiffs' Exhibit

A.C.R.

Number 491001-KET-NEW-H and
161004KetNewH for purposes of
identification.)

BY MR. HOBSON:

Q And that includes at least some of the notes
that you actually took while you were a student of Professor
Phillip Drinker?

A Yes.

MR. HOBSON: We will attach these to the
deposition transcript so everyone will have copies of it.

MR. MARTIN: I would like to ask also that the
copy attached to the transcript be Bates numbered so that
each of the pages will have a unique number other than just
the exhibit number that is on top.

MR. BLANKS: We will ask the reporter, then, to
-- well, that's fine, just start from one and go.

MR. MARTIN: All right.

CROSS-EXAMINATION

BY MR. MARTIN:

Q Mr. Ketcham, my name is Kirk Martin, I have
just a few questions for you today to clear up some of the
things that I think you tried to talk about during the
course of your deposition, but may not have gotten a chance
to.

The first is, is that a lot of questions have

ACR.