

ROGER HOBBIE

Page 10 1 Q How current is the information on that document? 2 A It is up-to-date. 3 Q I will have some additional questions later on but I 4 wanted to go to a couple of other items before we do that. I 5 will show you a couple other documents preliminarily. I would 6 like to have the following marked 2, 3 and 4. 7 (Exhibit 2, memo-1/14/87; Exhibit 3, monthly 8 report; Exhibit 4, monthly report, were marked for 9 identification.) 10 Q I have had those items marked and am showing them to 11 Mr. Quick and the witness. I will describe them before I ask 12 any questions. Mr. Hobbie, what I will do is, I have some 13 preliminary questions about each of these documents. I won't 14 go into anything substantive until you have had a chance to 15 look at them. I have a couple of preliminary questions. 16 According to your CV, you first began working 17 for Eaton in 1959; is that correct? 18 A That's correct. 19 Q What was the name of the company when you first 20 started working for them? 21 A Eaton Manufacturing Company. 22 Q Where were they located? 23 A East 140th street in Cleveland, Ohio. 24 Q How long did you continue to work for Eaton until 25 you left their employ?	Page 12 1 A Yes. 2 Q Can you describe generally what you did in that 3 position? 4 A Basically, I was domiciled in Portland, Oregon and I 5 called on customers in the northwestern United States and 6 western Canada plus Alaska and the Yukon, both the truck 7 manufacturers that were located in that area and truck fleets 8 and dealerships and basically represented the company and our 9 products from the axle and brake product line area. 10 Q Exactly, what were you trying to sell, generally? 11 A Generally, we were trying to promote our 12 specification of our components in vehicles where a fleet 13 would specify different components when they were ordering new 14 trucks and just basically familiarizing them with Eaton 15 components and providing a contact so that we informed them 16 about our products and their use. 17 Q Can you describe some of the component parts that 18 you were representing to the customers? 19 A Yes. Drive axles that ranged from weight ratings of 20 15,000 pounds up to 44,000 pounds and generally 16 and a half 21 by seven inch S-cam brakes. Basically, that's it. 22 Q I assume you had to have a working knowledge of how 23 the braking systems were used and what materials were used 24 within the braking systems? 25 A Yes.
Page 11 1 A Almost 38 years. 2 Q Based on the information in your CV, it looks like 3 you last worked for Eaton as an employee in 1997; is that 4 correct? 5 A That is correct. 6 Q Between 1959 and 1997, did you work for anyone other 7 than Eaton Corporation? 8 A No. 9 Q Your first job it looks like according to your CV 10 between 1959 and 1970, you worked as an engineering test 11 technician for Eaton axle and brake divisions; is that 12 correct? 13 A Yes. 14 Q Can you generally describe what you do as an 15 engineering test technician? 16 A Basically worked in a lab area where we conducted, 17 oh, both development tests and quality audit-type tests on 18 axle components using dynamometers and test trucks and also on 19 foundation brake products using primarily at that time test 20 trucks. 21 Q Obviously, your testing would include brakes? 22 A Yes. 23 Q Between 1970 and 1974, it looks like you then moved 24 on to the district sales and engineering manager for Eaton; is 25 that correct?	Page 13 1 Q From 1974 to 1977, it looks like you were the 2 manager of the engineering test facilities and application 3 engineering for the axle division; is that correct? 4 A Yes. Brake product had been moved basically out of 5 the axle division when the brake division was formed, about 6 the time I moved back to Cleveland. 7 Q Were you working in the brake division between '74 8 and '77? 9 A No. 10 Q What division were you working for? 11 A The axle division. 12 Q You were back in Cleveland at that point? 13 A Yes. 14 Q Generally, describe what your responsibilities were 15 as the manager of the engineering test facilities. 16 A Basically, I was the manager of the facility that I 17 had worked in before where I was overall supervisor of setting 18 up tests and managing the people that conducted those tests. 19 Q What kind of tests generally were you supervising? 20 A Dynamometer tests, truck tests where we used test 21 trucks to put new products through durability testing things 22 like that before they were released for sale to our OEM 23 customers. 24 Q What is a dynamometer test? 25 A Basically where you mount an axle between two load

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