Page 54

manufactured by Dana Victor other than steel gaskets that were head gaskets, could you still characterize that percentage as being large? In other words, can you give me the same answer for the head gaskets as you gave me for the exhaust gaskets, or can you not?
MR. CELBA: Same objection.
THE WITNESS: In general, the rules that applied were that in '77 we were beginning the evolution away from asbestos gaskets, or in the late '70s, and by 1988 we were 100 percent asbestos free.
MR. VALLAS: Let me object to the responsiveness.
BY MR. VALLAS:
Q I understand that. But I'm wondering, I've asked you the questions with regard to the exhaust gaskets, and I appreciate it. I'm just trying to clear it up with the head gaskets for that time period between 1977 and 1987, other than telling me that the percentage of asbestos containing gaskets manufactured by Dana Victor that were head gaskets, that were not metal gaskets, in 1977 was a large percentage, could you be any more specific than that?
MR. CELBA: Object to form.
THE WITNESS: No, I don't want to be any

Page 55

more--
MR. CELBA: That was with respect to exhaust gaskets, I thought.
MR. VALLAS: That was the first category we were talking about. I'm just trying to see if he can tell me the same thing with regard to the head gaskets.
MR. CELBA: That's been asked and answered. You phrased your last question improperly. You referred to him giving that testimony to you with respect to heads rather than exhaust. That was the basis for my objection.
MR. VALLAS: Let me strike it and just try to clean it up.
BY MR. VALLAS:
Q In 1977 can you say that the percentage of asbestos containing gaskets, head gaskets that were being manufactured by Dana Victor, other than the metal gaskets, was a large percentage?
MR. CELBA: Same objection.
THE WITNESS: Yes, I can say that.
BY MR. VALLAS:
Q Can you be any more specific than that with respect to the year 1977?
A No, I will not be.

Page 56

Q Okay. With regard to any of the years between 1977 and 1987 can you be any more specific than that? Would your answer change in any manner?
MR. CELBA: Object to form.
THE WITNESS: My answer is the same. It was evolutionary over that period of time. I'm not in a position to try to speculate as to what the numbers were at any given time during that period.
BY MR. VALLAS:
Q Okay. Let me go back to the coramic style material a little bit. I think you mentioned you don't know the first year that those were actually used-- Strike that. Were the coramic style materials used in exhaust manifold applications as well as head gasket applications at some point?
A I don't have a clear recollection, to be perfectly honest with you.
Q Okay. From what you know about these coramic style materials that we discussed earlier, if you can't answer the question, let me know. It may be a question I've got to ask one of you all's engineers. Could they have been used in an exhaust manifold application or a head gasket application, if you know?
MR. CELBA: Object to form.

Page 57

BY MR. VALLAS:
Q Is there anything about the composition of that gasket that either made it compatible with or not compatible with application to either a head gasket or an exhaust manifold gasket?
MR. CELBA: Same objection.
THE WITNESS: I think that's a question better asked of the materials engineers.
BY MR. VALLAS:
Q I appreciate that. I'll move on then. I think kind of the second-- You mentioned something else other than coramic style materials. You also mentioned a little while ago-- I think you just referred to it as engineering facing materials similar in appearance to asbestos containing gaskets. Do you remember that?
A Yes.
Q Okay. Do you know whether or not that-- those materials that we're kind of-- that I'm kind of referring to there, do you know if there was anything about those materials that would have either made them compatible with or incompatible with exhaust manifold application or head gasket application from 1977 to 1987, or would I have to ask an engineer that?
MR. CELBA: Object to form.