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Q I don't understand that question, I mean that answer, too much capacity in the division. What does that mean?
A Too much floor space, too many machines, insufficient business to support all of the facilities.
Q Okay. I gotcha. Do you know the first year that asbestos containing gaskets manufactured in the Havana, Illinois facility contained any type of asbestos warning label either at the request of the customer or as a matter of course?
A No, I do not.
Q Okay. We've talked about the fact that all four of these plants, St. Thomas, Robinson, Chicago and Havana were all manufacturing asbestos containing gaskets at some point in the 1970s, correct?
A Yes, sir, that's correct.
Q Do you know if they were all manufacturing asbestos containing gaskets for all ten years of the 1970s, or do you know?
A No, I don't know.
Q Do you know that all-- Do you know whether or not all-- Well, okay, bad question. During the 1960s did Dana Victor manufacture asbestos containing gaskets out of any other plants other than– Well, strike that question. Were all four of the plants that

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we've talked about manufacturing asbestos containing gaskets sometime in the 1960s?
MR. CELBA: Object to form.
THE WITNESS: I can only testify to the period of time from when I started with the company; but in those years, yes, they were.
BY MR. VALLAS:
Q And you started with the company in I think February of 1968; is that right?
A Yes, sir, that's correct.
Q So as of February 1968 we know that all four of those facilities, St. Thomas, Robinson, Chicago and Havana, were all manufacturing asbestos containing gaskets, true?
A That's correct. I suppose for point of clarification I should say that they were all producing asbestos containing gaskets, but we were producing lots of gaskets that did not contain asbestos as well.
Q But I think you have mentioned to me-- I think we've talked about that previously in your prior deposition and whether or not-- I think it was your testimony, correct me if I'm wrong, previously, that for you to know whether or not a particular type of gasket, Dana Victor gasket, had asbestos in it, you would probably have to know the application for which it was being

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used; is that correct?
A Or the part number that was assigned to it.
Q Or the part number. In those instances, and correct me if I'm wrong, that-- in those instances in which a Dana Victor gasket was being used for some type of high heat application, would you agree that more likely than not that the gasket would have been an asbestos containing gasket?
MR. CELBA: Object to form.
THE WITNESS: No, not necessarily.
BY MR. VALLAS:
Q Okay. What's the basis for that belief?
A We made a large number of beaded steel head gaskets during the 1960s and 1970s. Those obviously contained no asbestos.
Q They were beaded head steel gaskets?
A We referred to them as beaded steel head gaskets.
Q Beaded steel, okay, head gaskets. What was the first year-- I guess tell me what kinds of temperatures those gaskets were-- Actually, strike the question. Other than those, the beaded steel head gaskets you just mentioned, manufactured in the 1960s and 1970s-- Let me ask you this, do you know whether or not they were manufactured for high heat applications in the 1950s or in the 1980s?

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MR. CELBA: Object to form.
BY MR. VALLAS:
Q Do you know?
A I'm sorry, I don't understand the question.
Q Sure. It's probably a bad question. You mentioned that these beaded steel head gaskets were manufactured for high heat applications in the 1960s and 1970s, correct?
A Yes.
Q Do you know whether or not they were manufactured for high heat applications in the '50s and/or the '80s? I guess all I'm trying to do is figure out was it just sometime in the '60s and '70s, or was it also sometime outside of that time period, or do you know?
A I can't testify to the 1950s. I don't know when that design came into being. There were still applications as early as-- or as late as the 1980s.
Q Okay. Do you know the first year that Dana Victor started manufacturing these beaded steel head gaskets for high heat applications?
MR. CELBA: Object to form.
THE WITNESS: No, I do not.
BY MR. VALLAS:
Q Do you know-- Other than the fact that it was in the 1960s sometime, correct?