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IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF EDGEFIELD

Barry Lanham and Obvia
Gamble-Lanham,

Plaintiffs,

v.

Case No: 2021-CP-19-00005

Wumag Texroll GmbH & Co. KG
f/k/a Kelzenberg + Co:
GmbH & Co. KG and Wumag
Texroll GmbH & Co. KG,

Defendants.



DEPONENT: JOHN REECE WALMSLEY
DATE: MAY 9, 2025
TIME: 10:12 AM TO 12:10 PM
LOCATION: Veritext - Augusta, GA
4 George C. Wilson Court Suite A
Augusta, GA 30909
and remotely via Zoom
REPORTED BY: Michael King
Notary Commission Georgia/W-00526283
Commission Expires: October 6th, 2025

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<p>1 MR. OSBORNE III: I'm Robert Osborne. I 2 represent Wumag as well. Sometimes we identify it 3 as Wumag 2. It's a successor entity. 4 MS. WRENN: Jay? 5 MR. PARKER JR: This is Jay Parker. I 6 represent the Plaintiffs, Barry Lanham and Obvia 7 Lanham. 8 THE REPORTER: Sir, could you please raise 9 your right hand? Do you solemnly swear or affirm 10 under penalty of perjury that the testimony you give 11 shall be the truth, whole truth, and nothing but the 12 truth? 13 THE WITNESS: I do. 14 JOHN REECE WALMSLEY, called as a witness, was examined 15 and testified as follows: 16 THE REPORTER: Thank you. Counsel, you 17 may proceed. 18 MS. WRENN: Okay. 19 DIRECT EXAMINATION 20 BY MS. WRENN: 21 Q Good morning again. My name is Catherine 22 Wrenn, and I'm an attorney with Baker, Donelson. We 23 represent Wumag in a lawsuit that Mr. Lanham and his wife 24 had filed. And I'm going to be asking you some questions 25 today about their lawsuit and specifically about the</p>	<p>1 Q Okay. Have you ever testified in court or at a 2 trial or any kind of hearing before? 3 A Never. 4 Q All right. So do you understand that you 5 currently are under oath, and that means you're sworn to 6 tell the truth and that your testimony could be used in 7 the trial in this case? 8 A Absolutely. 9 Q Are you currently taking any medications that 10 would interfere with your memory or your ability to 11 testify today? 12 A No. 13 Q Prior to this deposition, did you speak with an 14 attorney to prepare for today? 15 A No. 16 Q Did you review any kind of documents to prepare 17 for the deposition today? 18 A No. 19 Q All right. Where were you born, Mr. Walmsley? 20 A Blackburn in England. 21 Q Do you have any relatives over the age of 18 22 who live in Edgefield County, South Carolina? 23 A No. 24 Q And what is your present address? 25 A 711 Talon Court in Evans, Georgia.</p>
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<p>1 accident that Mr. Lanham was involved in at Bondex in 2 2018. 3 If any of my questions are unclear, please let me 4 know, and I'll be happy to rephrase or repeat or ask the 5 question in a different way for you. And if you need a 6 break for any reason, just let us know that. And if you 7 can remember to give verbal answers as opposed to only 8 nodding your head -- 9 A Yes. 10 Q -- up and down. 11 A I do want to interfere. 12 Q That'll help the court reporter get an accurate 13 reflection of what your answers are. 14 A Yes. 15 Q And then as the court reporter told you before 16 the deposition started, we just need to be careful not to 17 talk over each other. So if you'll let me answer -- ask 18 my question first before you answer, and I'll try to let 19 you fully respond before I ask you another question. And 20 if you have any questions during the deposition, please 21 direct the question to whoever is asking it to you. 22 A Okay. 23 Q All right. Have you ever been through a 24 deposition like this before? 25 A Never.</p>	<p>1 Q How long have you lived at that address? 2 A Ten years. 3 Q Have you ever lived in Edgewood County, South 4 Carolina? 5 A No. 6 Q All right. Did you graduate from high school 7 in England? 8 A Yes. 9 Q And what is your post-high school education? 10 College, grad school? 11 A I have an MBA. 12 Q And where is that from? 13 A Huddersfield University, England. 14 Q And as we talked about, I have lived there. 15 Other than an MBA, do you hold any other degrees? 16 A I have a postgraduate diploma in management 17 studies and a certificate in management studies. 18 Q And are those from colleges or grad schools in 19 England? 20 A Yes, Lancaster University was the -- the DMS, 21 the diploma in management studies, and similar with the 22 certificate in management studies. 23 Q Okay. And when you're talking about management 24 studies, are those essentially business degrees? 25 A Yes, business.</p>

Page 10	Page 12
<p>1 Q Okay. Do you hold any kind of certifications? 2 A No. 3 Q All right. I understand at some point you 4 worked for Bondex -- 5 A Yes. 6 Q -- correct? When did you work for Bondex? 7 A I worked for Bondex from 2015, and I want to 8 say till February 2020. 9 Q Where did you work before Bondex? 10 A I worked for Andrew Industries in England. 11 Q And are they associated with Bondex -- 12 A They are the -- 13 Q -- the parent company? 14 A -- owner -- 15 Q Okay. 16 A They are the owner of Bondex, yes. 17 Q How long did you work for Andrews Industries in 18 England? 19 A Let me see. So 2009 until 2015. 20 Q Okay. And then did Andrews Industries ask you 21 to move to the US to work with Bondex? 22 A Yes. 23 Q Okay. What was your role at Andrews 24 Industries? 25 A I had two roles. I had manufacturing manager</p>	<p>1 A It did, yes. 2 Q Okay. Were you involved in the process of 3 buying the machinery? 4 A I was. 5 Q When you worked at Andrew -- and is it Andrews 6 or Andrew? 7 A Andrew. 8 Q Andrew? 9 A Yes. 10 Q Sorry. So when you were working at Andrew 11 Industries and you were a manufacturing manager or the 12 technical manager there, were you involved at all with 13 machinery? 14 A Yes. 15 Q Okay. And what kind of involvement did you 16 have? 17 A I was involved in the design and purchase of 18 several different types of machinery -- 19 Q And -- 20 A -- including Wumag. 21 Q Okay. And what kind of Wumag machines did you 22 help design and purchase for Andrew Industries? 23 A There were -- for Andrew Industries, there were 24 three heat-set laminators. 25 Q And were those heat-set laminators similar to</p>
Page 11	Page 13
<p>1 and technical manager. 2 Q And what was your job title at Bondex? 3 A It was spunlace -- started as spunlace project 4 manager. And then I got promoted to vice president, 5 technical services. 6 Q All right. So as the spunlace project manager, 7 what were your job duties? 8 A It was to facilitate the installation of a \$9 9 million spunlace machine and also the associated 10 equipment, heat setter, (inaudible 00:07:08). 11 Q So when you moved over to work for Bondex, was 12 Bondex starting a new part of its plant? 13 A It was, yes. 14 Q And that was the spunlace -- 15 A Yes. 16 Q -- operations? 17 A Correct. 18 Q Okay. So when did the spunlace operations kind 19 of kick-start at Bondex? 20 A Round about 2016. 21 Q So we talked about how you were in charge of 22 kind of the installation of all the spunlace machinery. 23 Did that include the Wumag heat-setting -- 24 A It did. 25 Q -- laminating calender machine?</p>	<p>1 the one we're talking about today? 2 A No. 3 Q How -- 4 A But it -- it depends how you define "similar." 5 Q Okay. 6 A It -- it was still a laminating machine, but 7 the -- the three which -- which we designed with Andrew 8 Industries had a different high-temperature roller in 9 them. But the one at Bondex does not have that. 10 Q Okay. Other than not having the high- 11 temperature roller, were they -- 12 A Very, very -- 13 Q -- similar? 14 A -- similar. Yeah, very -- 15 Q Okay. 16 A -- very similar. 17 Q And in terms of the safety of machines, were 18 they similar? 19 A They -- the three in -- the three that are 20 designed with Andrew Industries, they were the same, 21 exactly identical machines. 22 Q To each other? 23 A To each other. 24 Q Okay. With regard to the one at Bondex, did it 25 have similar safety features to the ones that you had at</p>

Page 14	Page 16
1 Andrew Industries? 2 A No, there were additional safety features on 3 the one in America. 4 Q Okay. Do you recall what the additional safety 5 features were for the one Bondex had? 6 A It was the light curtain on entry to the -- 7 what we call the nip, where the two rollers meet. 8 Q Okay. So the heat-setting laminators at Andrew 9 Industries did not have the light curtain at the nip; is 10 that correct? 11 A Correct. 12 Q Okay. So I understand that you helped with the 13 design and purchase of the heat-setting laminators for 14 Andrew Industries. When you got to Bondex, did you work 15 with Wumag to design and purchase the heat-setting 16 laminator? 17 A Yes. 18 Q How long have you worked in the manufacturing 19 setting? 20 A 39 years. 21 Q So pretty much your entire career? 22 A All -- all in the same industry. 23 Q Okay. 24 A Technical textiles. 25 Q So I want to talk a little bit more about the -	1 of happened, but I don't know whether that was '19 or 2 '20, I'm sorry. 3 Q It was definitely 2020. 4 A Right. Well, it was 2020 then, yeah. 5 Q All right. So when you left Bondex, where did 6 you go? 7 A I then went to Sandler Nonwovens in Warner 8 Robins, Georgia. 9 Q Is that where you're still working? 10 A No, no. 11 Q Okay. Where do you work now? 12 A I now work for Southern Felt Company in 13 Edgefield County. 14 Q And does Southern Felt -- are they also in the 15 nonwovens -- 16 A Yes. 17 Q -- industry? 18 Does Southern Felt have any heat-setting laminating 19 machines? 20 A They do. 21 Q Did Sandler Nonwovens have any heat-setting 22 laminating machines? 23 A They had some heat-setting, but not laminating. 24 Q With regard to the heat-setting laminating 25 machine at Southern Felt Company, is it similar in design
Page 15	Page 17
1 - your design input into the laminating machines. How 2 were you involved with the design of these Wumag 3 machines? 4 A So typically, we would get the sales director 5 over to England. And then we would sit in the boardroom, 6 and we would discuss our needs in terms of temperatures, 7 speeds, accessibility, wind up, off wind. And it was -- 8 it was all a combination of talking to the sales director 9 and talking with us, what we need, and then he delivered 10 what we needed. 11 Q So are these machines kind of customer- 12 specific? 13 A They are, yes. 14 Q Okay. 15 A Yes. 16 Q So in other words, you're not purchasing a 17 stock laminating machine? 18 A Absolutely not. 19 Q Okay. So you're talking about what needs your 20 company has, and then you work with Wumag to design a 21 machine that meets those needs? 22 A Yes, correct. 23 Q Okay. All right. So it sounds like you left 24 Bondex in around February 2020? 25 A Yeah. And I -- yeah. It was when COVID sort	1 to the one that Bondex had? 2 A Very, very similar. 3 Q What kind of safety mechanisms does the machine 4 for Southern Felt have? 5 A It will have a pull wire. Emergency stop. 6 Q Does it have a light curtain? 7 A No. 8 Q Does it have any kind of safety features with 9 regard to the nip point? 10 A I would have to say I don't know on the nip 11 point. 12 Q Is it fair to say that you have, in your 13 career, worked with a number of heat-setting laminating 14 machines? 15 A Absolutely. 16 Q Okay. Do most of the machines have any kind of 17 safety feature at the nip point? 18 A Not all because they rely on either. They do 19 have a light barrier, so -- but not a light barrier. 20 It's just a red dot going against the reflector. Some 21 have, some don't, and some rely on a pull wire. So it's 22 -- it's an either-or situation. 23 Q Okay. And based on your experience, is either 24 one sufficient for a safety purpose? 25 A Yes.

<p style="text-align: right;">Page 18</p> <p>1 Q Okay. And the Wumag machine at Bondex, did it 2 have the safety pull wire? 3 A It did. 4 Q And then when it came to Bondex, did it have a 5 working light curtain at the nip point? 6 A Not -- not at the nip point, but it did have a 7 light curtain. But it was not -- it was working, but it 8 was not as per design. 9 Q Okay. Tell me about that. 10 A So when I sat with the engineer in Dusseldorf, 11 I said, "We cannot have a light curtain because we have a 12 media that goes in through that point." So you cannot 13 have a full light curtain with -- with -- with respect 14 that -- to have a pull wire is fine because it can go 15 over or under a pull wire. But when you have a full 16 light curtain, that's blocking out all access to the 17 media, which -- which defeats the point of a laminator. 18 You have to have the media feeding in. 19 Q Okay. And so when the machine arrived at 20 Bondex, was there an issue with the light curtain? 21 A There was, yes. 22 Q Okay. And is that because it was -- 23 A It was blocking -- 24 Q -- triggering -- 25 A Yeah.</p>	<p style="text-align: right;">Page 20</p> <p>1 power to the machine. It automatically opens the nip, 2 and it automatically shuts off the heat. And also the 3 pull wire automatically -- at the end where it's winding 4 up because you have a nip point, it automatically lifts 5 the arm. So whenever an emergency stop happens, that's 6 what happens. The -- the arm lifts at the back end where 7 it's winding up, the temperature goes -- the heat stops, 8 and the nip automatically opens. 9 Q Okay. And so in your opinion, having the 10 emergency pull wire is sufficient from a safety 11 standpoint; is -- 12 A Yes. 13 Q -- that fair to say? 14 Okay. All right. In January of 2018, what was your 15 job title at Bondex? Were you the spunlace -- 16 A I was -- 17 Q -- project manager? 18 A I was vice president there. 19 Q Vice president of technical services? 20 A Yes. 21 Q Okay. And as vice president of technical 22 services, did your job responsibilities change or shift 23 at all? 24 A Not really, no. 25 Q Okay.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q -- anytime you would feed in the fabric? 2 A It was triggering the light curtains, so the 3 machine was unusable. 4 Q Okay. So when the light curtain was triggered, 5 does that mean the machine was shut down? 6 A Yes. 7 Q Okay. So at that point, did Bondex disable the 8 light curtain? 9 A The light curtain was disabled, and we put a 10 pull wire in -- in -- in place of that because that's 11 what we have on all our other calenders. 12 Q Okay. And how many other calenders did Bondex 13 have in 2018? 14 A At the time, they had two. They now have four. 15 Q Okay. And at least the last time that you were 16 there, all of those calender machines had the emergency 17 pull wire? 18 A Yes. 19 Q Okay. Did any of them have the light curtain? 20 A One of them did have -- not a curtain but 21 again, you know, the light -- photocell light, one of 22 them did have. 23 Q Okay. So walk me through how the emergency 24 pull wire works. 25 A Well, the emergency pull wire shuts off all</p>	<p style="text-align: right;">Page 21</p> <p>1 A I was still in -- in charge of the machinery 2 and -- and design and engineering of products. 3 Q And as the vice president of technical services 4 in charge of spunlace, would you have ever allowed your 5 employees to work on a machine that you felt like was 6 unsafe? 7 A Never. 8 Q In January of 2018, do you recall about how 9 many employees worked at Bondex? 10 A Maybe around 40, something like that. 11 Q And how many of those -- 12 A That would be a guess. 13 Q Okay. And how many of those employees were in 14 the spunlace department? 15 A Around about five. 16 Q And Mr. Lanham worked in the spunlace 17 department -- 18 A He did. 19 Q -- is that correct? 20 A Yes. 21 Q Okay. 22 A And I'm sorry if I'm vague, but it's seven 23 years ago. It's -- 24 Q Totally understand. 25 A Yeah.</p>

Page 22	1 Q And I meant to tell you, I understand that it 2 was seven years ago. So if I'm asking you something and 3 you don't recall the answer, it's fine just to tell me 4 you don't recall. 5 A Okay. Yeah. 6 Q So in some discovery responses in this case, 7 Mr. Lanham enlisted a few different individuals who 8 worked at Bondex. And one of those was Kevin Fields 9 (phonetic). 10 A Yes. 11 Q Do you remember Kevin? 12 A Yes. 13 Q What was his role there? 14 A Kevin was spunlace operations manager. 15 Q So what did that mean that he did? 16 A He was in charge of production. 17 Q Okay. 18 A So when the orders came in, he made sure that 19 they went through in a timely fashion -- 20 Q Okay. 21 A -- from start to finish. 22 Q Was he Mr. Lanham's supervisor? 23 A He was. 24 Q Do you know where Kevin is now or he works -- 25 A Still --	Page 24	1 A Yes. 2 Q -- calender machine? 3 Did anyone else work in the spunlace department that 4 you can remember? 5 A At that time, we may have had one or two, but I 6 don't recall. I'm sorry. 7 Q That's okay. So in terms of -- 8 A It was a very small department back then. 9 Q Okay. And so in terms of people who were 10 actually operating the machinery, would that have been 11 Donald, Harry, and Mr. Lanham? 12 A Correct. 13 Q Okay. Did you ever operate the machinery? 14 A Yes. 15 Q Did you ever operate the Wumag machine? 16 A Yes. 17 Q Did you ever clean the rollers -- 18 A Yes. 19 Q -- of the Wumag machine? Other than you and 20 Mr. Lanham, who else would have cleaned the Wumag 21 rollers? 22 A Harry, Kevin. 23 Q Did you know Mr. Lanham prior to him working at 24 Bondex? 25 A No.
Page 23	1 Q -- now? 2 A -- at Bondex. 3 Q Okay. All right. And who is Donald Shealy? 4 A So Donald Shealy was, like, what we would call 5 a floater. So he would help out wherever needed, whether 6 that be the card, the laminator, packaging, QC. 7 THE REPORTER: That's "floater"? 8 THE WITNESS: We call it floater, yeah, a 9 floating position. 10 BY MS. WRENN: 11 Q Okay. Do you know where Donald works now? 12 A Unfortunately, he passed. 13 Q He passed away? 14 A (No verbal response.) 15 Q And then is Harry Walmsley your son? 16 A He is, yes. 17 Q Okay. And was he working in the spunlace 18 department in January of 2018? 19 A He was. 20 Q Okay. And what was his role? 21 A He was a production operator. 22 Q And as the production operator, would he 23 operate the machinery? 24 A Yes. 25 Q Did he ever operate the Wumag --	Page 25	1 Q What was Mr. Lanham's role at Bondex? Was he 2 also a production operator? 3 A Yes, but more on the QC and heat setter side, 4 not on the spunlace side. 5 Q What did he do on the spunlace side? 6 A He didn't do -- he didn't do much on the 7 spunlace -- the spunlace was a department, but then that 8 -- that consists of a card, a spunlace line, and then you 9 have heat-setting, you have QC. That's a full 10 department. But really, Barry only concentrated on the 11 QC and the heat-setting -- 12 Q Okay. 13 A -- laminating. 14 Q Would he have been pretty familiar with the 15 Wumag machine -- 16 A Oh, yes. 17 Q -- in January 2018? 18 A Yes. 19 Q Okay. And that's because he operated it and he 20 had cleaned it before? 21 A Yes. 22 Q Okay. How often was the Wumag machine cleaned? 23 A Almost daily, sometimes twice daily if we were 24 running an extended shift. 25 Q Okay. And would all cleaning involve cleaning

<p style="text-align: right;">Page 26</p> <p>1 the rollers, or was that a --</p> <p>2 A Yes. Always the rollers, yes.</p> <p>3 Q Okay. So is it fair to say that the rollers</p> <p>4 were cleaned almost daily?</p> <p>5 A Yes.</p> <p>6 Q And they would have been cleaned almost daily</p> <p>7 by either Harry, Kevin, or Mr. Lanham?</p> <p>8 A Yes.</p> <p>9 Q Okay.</p> <p>10 A I would -- I would like to add that when it's</p> <p>11 in laminating mode, they're cleaned daily. If it was</p> <p>12 just in heat-setting, then they didn't need cleaning</p> <p>13 daily.</p> <p>14 Q Okay. How often was the machine in laminating</p> <p>15 mode?</p> <p>16 A Maybe -- it came in sort of bouts, but maybe we</p> <p>17 could be laminating for two full straight weeks. And</p> <p>18 then maybe -- the next week, maybe two days.</p> <p>19 Q Okay.</p> <p>20 A Yeah.</p> <p>21 Q Okay. So it could be two days; it could be two</p> <p>22 weeks? Very --</p> <p>23 A It was sporadic, yes.</p> <p>24 Q -- sporadic?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 such, and bowls were coming towards you. So even if you</p> <p>2 went near the nip, it would push you away.</p> <p>3 Q Okay. And when you talk about the bowls, is</p> <p>4 that (inaudible 00:26:15) --</p> <p>5 A Sorry, roller.</p> <p>6 Q -- the rollers?</p> <p>7 A Rollers. Sorry.</p> <p>8 Q Okay. And then when you talk about the nip, is</p> <p>9 that the space between the top and the bottom --</p> <p>10 A Correct.</p> <p>11 Q -- roller?</p> <p>12 A Yes.</p> <p>13 Q Okay. So if I'm hearing you correctly, when</p> <p>14 you would clean the rollers for the machine, you would</p> <p>15 make sure that it was in a lower temperature of 50</p> <p>16 degrees Celsius?</p> <p>17 A Absolutely, yes.</p> <p>18 Q And then you would put the machine into the</p> <p>19 mode where there was some separation between the top and</p> <p>20 the bottom --</p> <p>21 A Yes.</p> <p>22 Q -- roller, and the rollers were also going to</p> <p>23 rotate toward you --</p> <p>24 A Yes.</p> <p>25 Q -- as opposed to toward the inside of the</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Okay. But it sounds like over, let's say, a</p> <p>2 year period before Mr. Lanham's accident, the machine</p> <p>3 would have been cleaned quite frequently?</p> <p>4 A Yes.</p> <p>5 Q Okay. And when it was in laminating mode, that</p> <p>6 would include cleaning the rollers?</p> <p>7 A Yes, it would.</p> <p>8 Q Okay. Prior to Mr. Lanham's accident, had</p> <p>9 anyone ever been injured while cleaning the Wumag rollers</p> <p>10 before?</p> <p>11 A No.</p> <p>12 Q And I know you said that you had personally</p> <p>13 cleaned the rollers --</p> <p>14 A Yes.</p> <p>15 Q -- before. And while you had personally</p> <p>16 cleaned the rollers, did you have any kind of safety</p> <p>17 concerns?</p> <p>18 A No.</p> <p>19 Q Can you walk me through the procedure that you</p> <p>20 used to clean the rollers of the Wumag machine?</p> <p>21 A Yes. So typically when -- when it was due for</p> <p>22 cleaning, we would lower the temperature to 50 degrees</p> <p>23 centigrade. And then we would put the rollers in a mode</p> <p>24 where they were coming towards you. So there was a mode</p> <p>25 where the bowls were open so that there was no nip as</p>	<p style="text-align: right;">Page 29</p> <p>1 machine?</p> <p>2 A Yes.</p> <p>3 Q And do you recall what mode number that was?</p> <p>4 A I don't recall. I'm sorry.</p> <p>5 Q Okay.</p> <p>6 THE REPORTER: Just try to let her finish.</p> <p>7 BY MS. WRENN:</p> <p>8 Q All right. So once you had put the machine</p> <p>9 into that mode where the rollers are rolling toward you,</p> <p>10 what would you then do?</p> <p>11 A Once the temperature reached 50 degrees</p> <p>12 centigrade, then we would spray oven cleaner, just</p> <p>13 straight-from-the-supermarket oven cleaner because the</p> <p>14 sodium hydroxide in the oven cleaner breaks down the</p> <p>15 polymer to clean the roller. So we would spray it with</p> <p>16 the roller, and then we would wipe with abrasive scouring</p> <p>17 pads, the green scour pad. And then that would get into</p> <p>18 -- all the polymer would come off. And then once all the</p> <p>19 polymer were off, then we would put floor wax. And that</p> <p>20 would bring the roller back to a shine, a polish.</p> <p>21 Q Okay. And when you are wiping rollers with the</p> <p>22 pads, are the rollers rotating at that point?</p> <p>23 A They are.</p> <p>24 Q And in what direction are they rotating?</p> <p>25 A Towards you.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q Okay. And you said earlier that prior to Mr. 2 Lanham's accident, any time these machine -- this 3 machine's rollers had been cleaned, no one had ever been 4 injured? 5 A Correct. 6 Q And at no point prior to Mr. Lanham's accident, 7 did you have a personal concern about safety of cleaning 8 the rollers in the process that you mentioned? 9 A Never. 10 Q And when you had worked at other companies with 11 laminating calender machines like this, did those 12 companies use a similar process to clean the rollers? 13 A Yes. 14 Q Okay. And that similar process included having 15 the rollers rotate toward you during cleaning? 16 A That's correct. 17 Q And at any of your prior jobs where calender 18 machine rollers had been cleaned using this process, had 19 anyone been injured during that process? 20 A Never. 21 Q And in your 39 years of working in this 22 industry, has anyone ever been injured cleaning rollers 23 like Mr. Lanham has? 24 A No, to my knowledge. 25 Q What is your understanding of how Mr. Lanham's</p>	<p style="text-align: right;">Page 32</p> <p>1 Q -- nip point? 2 And is it your understanding that's what happened 3 with Mr. Lanham? 4 THE WITNESS: I'm sorry. (inaudible 5 00:30:28) just stopped here. 6 THE REPORTER: Can we -- 7 MS. WRENN: Yes. 8 THE REPORTER: We got to go off the 9 record. 10 (OFF THE RECORD) 11 THE REPORTER: We're back on the record at 12 10:51 a.m. 13 BY MS. WRENN: 14 Q All right. So before we went off the record, 15 we were talking about your understanding of how Mr. 16 Lanham's accident happened. And you said that -- and you 17 can correct me if I'm wrong, but your understanding is 18 that he had the rollers rotating in the wrong mode? 19 A Correct. 20 Q Okay. And by that, you meant the rollers were 21 rotating inward toward the inside of the machine as 22 opposed to outward toward the operator? 23 A Yes. 24 Q Okay. What kind of training did the employees 25 at Bondex have about how to clean the rollers?</p>
<p style="text-align: right;">Page 31</p> <p>1 accident happened? 2 A My understanding is that he had the machine in 3 the wrong mode. He had the bowls -- the rollers turning 4 towards the nip. 5 Q And when you say "the rollers turning towards 6 the nip," is that kind of layman's terms? That's the 7 rollers turning toward the inside of the machine? 8 A Correct, yes. 9 Q Okay. 10 A Into the center. 11 Q Okay. And is there a safety concern with 12 cleaning the rollers in that type of a mode? 13 A There is. 14 Q Can you tell me about that? 15 A Because the -- the roller, if -- if the rag 16 gets caught or anything, then you're going towards the 17 nip. And you should never -- never have any access with 18 your hands when it's going towards the nip. It should 19 always come away from nip. 20 Q And why do you not want your hands to be going 21 towards the nip? 22 A Because your -- your arm would go through that 23 nip. 24 Q And it could get caught in the -- 25 A Yes.</p>	<p style="text-align: right;">Page 33</p> <p>1 A They was all shown how to clean the rollers. 2 They all witnessed how to clean the rollers. Typically, 3 you would never usually have one person cleaning the 4 roller because we want to get the rollers clean and get 5 the machine running as quick as possible. So typically, 6 you would have two people cleaning rollers. On that 7 particular time, it was just Barry. 8 Q Okay. So typically, you would have two people 9 cleaning the rollers at one time? 10 A Correct. 11 Q Okay. And then on the day that Mr. Lanham was 12 injured, it was just him cleaning the rollers? 13 A Yes. 14 Q Was there any reason for just having him that 15 day? Was it short staffing, or? 16 A I don't -- I don't recall. 17 Q Okay. Had there been other instances where 18 just one person had cleaned the rollers? 19 A Maybe. 20 Q Okay. So with regard to training, it sounds 21 like the training was in-person watching someone clean 22 the rollers, and that's how someone like Mr. Lanham would 23 have learned what to do? 24 A Yes. 25 Q Okay. Do you know who would have done that</p>

<p style="text-align: right;">Page 34</p> <p>1 training? 2 A I don't. 3 Q Okay. 4 A Maybe me, maybe Kevin, maybe a combination 5 because it was -- it was during and people with you are 6 learning how to clean it, so. 7 Q So it's a hands-on training? 8 A It was a hands-on, yeah. 9 Q Okay. 10 A I'm sorry. That's the best answer I can give 11 to that one. 12 Q That's okay. I know it's been a long time 13 anyway. 14 All right. I want to hand you what has been marked 15 as Exhibit Number 1. 16 (EXHIBIT 1 MARKED FOR IDENTIFICATION) 17 A Yes. 18 MS. WRENN: And just for the record, this 19 is Bondex subpoena response 3078 through 3080. 20 BY MS. WRENN: 21 Q All right. Exhibit -- 22 MR. PARKER JR: Can you tell me in more 23 detail what that is? 24 MS. WRENN: Yeah. It is a March 8th, 25 2018, letter from Willson Jones Carter & Baxley.</p>	<p style="text-align: right;">Page 36</p> <p>1 mode to mode 1, which is the operational mode." Is that 2 consistent with your understanding of what happened that 3 day? 4 A It is, yes. 5 Q Okay. And earlier when you talked about the 6 different modes, was mode 3 the mode where the roller is 7 rotating toward the operator? 8 A It is now because this refreshed my memory. 9 Q Okay. And for mode 1, is that a mode where the 10 rollers are rotating toward the inside of the machine? 11 A Yes. 12 Q Okay. All right. The letter then states that 13 "We have learned the machine has three modes. Modes 1 14 and 2 are the operational modes which heat up the 15 cylinder rolls. In order to clean the cylinders, or 16 bowls, the machine is switched to mode 3 to cool down, 17 which also reverses the bowls in the opposite direction 18 to prevent anything from being jerked into the bowls 19 while they are being cleaned"; do you agree with that 20 statement? 21 A I agree, yes. 22 Q Okay. And it says, "Apparently, Reece Walmsley 23 switched the machine to mode 3 at 10:00 a.m. to cool 24 down. After lunch, Reece walked by the machine, observed 25 it had cooled, and told Donald Shealy to tell Claimant</p>
<p style="text-align: right;">Page 35</p> <p>1 BY MS. WRENN: 2 Q All right. So Mr. Walmsley, this is a letter 3 from Bondex's attorney about Mr. Lanham's accident. Have 4 you ever seen this before? 5 A No. 6 Q Okay. So I want to look specifically at the 7 2nd page of the letter. And there's a long paragraph in 8 the middle right here -- 9 A Yes. 10 Q -- where it talks about the Bondex 11 investigation into Mr. Lanham's accident. Were you 12 involved at all in the investigation? 13 A I don't think I was. 14 Q Okay. Did anyone ask you any questions about - 15 - 16 A Yes. 17 Q -- the accident? 18 A Yes. 19 Q Okay. So according to this letter, it says, 20 "The initial investigation of the accident revealed 21 Claimant told his immediate supervisor, Kevin Fields, 22 that he was operating the machine in the wrong mode when 23 Mr. Fields visited Claimant in the hospital a few days 24 after the accident. Specifically, Claimant stated he 25 switched the machine from mode 3, the cool-down cleaning</p>	<p style="text-align: right;">Page 37</p> <p>1 the machine was ready to be cleaned"; do you remember 2 that? 3 A Yes. 4 Q And is that a correct statement? 5 A That is a correct statement. 6 Q Okay. So when you switch the machine to mode 7 3, is that when the rollers would be rotating toward the 8 inside of the machine? 9 A No, toward -- mode 3 is cleaning mode, so it 10 will be -- 11 Q Sorry. Correct. So the rollers are rotating 12 toward the operator -- 13 A Correct. 14 Q -- away from the inside of the machine? 15 Okay. So it sounds like -- did you personally turn 16 the machine to mode 3 then -- 17 A Yes. 18 Q -- that morning? Okay. 19 A Yes. 20 Q And was that in preparation for cleaning? 21 A Yes. 22 Q Okay. And after lunch, when you walked by the 23 machine, was the machine still running in mode 3? 24 A It was. 25 Q Okay. All right. I'm going to hand you what's</p>

<p style="text-align: right;">Page 38</p> <p>1 marked as Exhibit Number 2. 2 (EXHIBIT 2 MARKED FOR IDENTIFICATION) 3 A We finished with this one? 4 Q For right now. 5 A Oh, okay. 6 Q I'll get back to it in just a second. 7 MS. WRENN: So for the record, Exhibit 8 Number 2 is Bondex Subpoena Response 2114 through 9 2116. 10 BY MS. WRENN: 11 Q This is a document that was provided by Bondex, 12 which appears to show the direction of the rollers in 13 each of the modes, 1 through 3. For mode 1, it appears 14 to show that the top roller and the bottom roller are 15 rotating toward the inside of the machine; is that 16 correct? 17 A That's correct. 18 Q Okay. Should this mode be used for cleaning 19 the rollers? 20 A Never. 21 Q And why is that? 22 A Because you're -- the rollers are taking you 23 towards the nip point. 24 Q So if something got caught, it would go inside 25 toward the nip point?</p>	<p style="text-align: right;">Page 40</p> <p>1 Q Okay. Do you know how Bondex made the decision 2 to use mode 3 for cleaning? 3 A If I recall this correctly, mode 3 would not 4 enable the nip to close. That's why I was hesitant to 5 say mode 2 because even though the rollers are coming 6 towards you, the nip could close. 7 Q Okay. So it would be safer in cleaning the 8 rollers to have it in a mode where the nip could not 9 close on something caught in between -- 10 A Yes. 11 Q -- the two rollers? In mode 1, can the nip 12 close? 13 A Yes. 14 Q Okay. Was it possible to clean the rollers 15 while they were not moving when the machine was turned 16 off? 17 A No, not effectively enough. 18 Q And why is that? 19 A Because you only have access to a certain 20 amount of the roller. 21 Q Okay. So could you, I guess, clean the part of 22 the roller that you had access to, then turn the machine 23 on to get to a different part of the roller? 24 A Yes. 25 Q So it would just take longer?</p>
<p style="text-align: right;">Page 39</p> <p>1 A Yes, correct. 2 Q Okay. And for mode 2, it appears to show the 3 rollers rotating outside -- 4 A Yes. 5 Q -- is that correct? 6 A Yes, that's correct. 7 Q Okay. And should this mode be used for 8 cleaning the rollers? 9 A Not -- it could be -- 10 Q Okay. 11 A -- but not necessarily because -- it could be. 12 Q Okay. And is that because the rollers are 13 rotating toward the operator and away from the nip point? 14 A Correct, yes. 15 Q Okay. And then for mode 3, it shows the 16 rollers rotating in the same direction as 2 -- 17 A Yes. 18 Q -- away from the nip point? 19 A Yes. 20 Q And in your opinion, mode 3 is the correct one 21 to use when cleaning the rollers? 22 A Absolutely. 23 Q Okay. Is there a difference between mode 2 and 24 3 in terms of heat or anything else? 25 A I don't recall.</p>	<p style="text-align: right;">Page 41</p> <p>1 A It would take far longer, yes. 2 Q Okay. So having the machine turned on and the 3 rollers rotating was just a more efficient way to clean? 4 A Correct. 5 Q A faster way to do it? 6 A Yes. 7 Q Okay. Does the machine automatically turn off 8 after a certain amount of time in operation, or does 9 someone have to physically turn it off? 10 A Someone has to physically turn it off. 11 Q All right. I want to look back at the letter 12 you were looking at before, which is Exhibit Number 1. 13 And back to that same -- 14 A Yeah. 15 Q -- paragraph that you were looking at. And it 16 says that "The Claimant," who's Mr. Lanham, "had been 17 working with Harry Walmsley on needle boards when Donnie 18 told Claimant to clean the machine. Donnie walked away 19 to use the restroom. Reece, Kevin, and Harry Walmsley 20 were working on other machines on the needle board." 21 A That -- 22 Q How far -- 23 A That's incorrect. 24 Q Incorrect. Okay. How is that incorrect? 25 A Because I was actually in a meeting in an</p>

<p style="text-align: right;">Page 42</p> <p>1 office. 2 Q Okay. So were you on the floor at the time 3 when Mr. Lanham was cleaning the machine? 4 A I was not. 5 Q Okay. How far away was the Wumag calender 6 machine from the needle board and other machines? 7 A Maybe 20 yards. 8 Q Okay. The letter goes on to say that "Kevin 9 heard Claimant screaming and ran towards Claimant, but 10 they could not get the bowls to lift enough to extract 11 Claimant's left arm. Apparently, no one looked to check 12 the mode when they responded to the scene." Did you ever 13 personally go over to the machine after the accident? 14 A Yes. 15 Q Can you describe what you remember seeing? 16 A When I -- so Kevin came running to me in my 17 office and said, "Barry's stuck in the machine. You need 18 to come. You need to come quickly." So I ran out to the 19 machine, and then I saw Barry with his left arm -- with 20 his left arm stuck in the machine. 21 Q Okay. Was the machine still running at that 22 point? 23 A The machine was stopped. 24 Q Do you know who had stopped the machine? 25 A From what I was told by Kevin Fields, Barry had</p>	<p style="text-align: right;">Page 44</p> <p>1 that he didn't -- Kevin did not stop the machine. 2 Q Okay. 3 A And when -- and when he got to it, the machine 4 was stopped. 5 Q Okay. Did someone later check the mode to see 6 what mode it had been operating in at the time of the 7 accident? 8 A I personally didn't. 9 Q Do you know if anyone else did? 10 A I don't know. 11 Q Okay. All right. So the letter goes on to say 12 that "Claimant had cleaned the machine several times 13 before." And that's consistent with what you testified 14 earlier, right? 15 A Yes. Yes. 16 Q Okay. And that "he was an excellent employee. 17 And the interviews of fellow coworkers revealed a general 18 consensus that this was a freak accident and the machine 19 did not malfunction." Do you agree that this was an 20 accident and the machine did not malfunction? 21 A I agree. 22 Q Do you believe anybody was at fault for causing 23 the accident? 24 A In my opinion? 25 Q Yes, sir.</p>
<p style="text-align: right;">Page 43</p> <p>1 stopped the machine by pulling the cord. 2 Q And is that the emergency pull cord -- 3 A It is. 4 Q -- that we talked -- 5 A Yes. 6 Q -- about earlier? 7 A Yes. 8 Q Where is the emergency pull cord located on 9 that machine? 10 A It's -- it's probably at about, I would say, 11 neck height. Well, no. Probably neck height, maybe -- 12 or chest height. 13 Q Is it at the rollers? 14 A It's before the rollers. 15 Q Okay. 16 A Yeah, it's probably about maybe 18 -- 18 inch, 17 24 inch before the rollers. 18 Q So someone who is cleaning the rollers is able 19 to pull the emergency cord machine -- 20 A Yes. 21 Q -- the cord if they need to? 22 A Yes. 23 Q Okay. So it's your understanding that Barry 24 was able to -- did pull the emergency cord himself? 25 A It's my understanding because Kevin told me</p>	<p style="text-align: right;">Page 45</p> <p>1 A Because of what Barry told me, he had the 2 machine in the wrong direction. He spent probably the 3 first ten minutes apologizing to me, saying, "Reece, I 4 effed up. Reece, I effed up." And I said, "Barry, let's 5 just get you out of this machine. Let's -- let's not 6 worry about that yet." Because I mean, I could see that 7 his arm was fully degloved. I didn't want to enter into 8 that conversation. And then he put pressure on me 9 because he said, "Reece, you're the smart guy. Get me 10 out of this machine," which was a lot of pressure on me. 11 Q Right. 12 A And then my son was comforting Barry because my 13 son was very close to Barry because he was a really good 14 employee and a good friend, trying to comfort Barry while 15 we were trying to figure out how to extract him from the 16 machine. 17 Q So it sounds like after you arrived on the 18 scene when Mr. Lanham's arm was still in it, Mr. Lanham 19 told you that he had messed up -- 20 A Yeah. 21 Q -- and the machine was in the wrong mode? 22 A Yes. 23 Q Okay. Do you believe that the accident could 24 have been prevented if it was in mode 3? 25 A Absolutely.</p>

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<p>1 Q All right. The letter goes on to say that 2 "There have been no issues with this machine in the 3 past." Is that a correct statement with regard to the 4 safety of this machine? 5 A In regards to the safety, yes. 6 Q Okay. And I saw in the OSHA report that prior 7 to Mr. Lanham's accident, there have been no other 8 accidents or injuries on this particular machine; is that 9 -- 10 A That's correct. 11 Q Okay. All right. If you look on page 1 of 12 this letter, there's a bolded paragraph at the bottom 13 that talks about having an inspection done of the 14 machine. And then the top of the next page says, 15 "Unfortunately, I do not believe the inspection will be 16 fruitful for any of us as the Claimant indicates it was 17 operator error, and he did not have the machine in 18 cleaning mode but set in operating mode." And it sounds 19 like that's consistent with what Mr. Lanham told you? 20 A That's correct. 21 Q Okay. All right. And then looking back down 22 at the 2nd paragraph, it says, "It's my understanding the 23 insured, Bondex, plans to offer the Claimant a position 24 to return to work once he fully recovers and is fitted 25 with a prosthetic device." Do you know if Bondex ever</p>	<p>1 A Right. So 2343 -- 2 Q To 2344. 3 A 44. Yes. Okay. 4 Q Yes. Okay. This is a January 29th, 2018, 5 accident investigation report by Bondex. And it looks 6 like it's signed by the president, Steve Fransoso, and 7 the controller, Mark Wetherell? 8 A Yes. 9 Q Were you involved at all in looking at a draft 10 or helping to work on this letter? 11 A No. 12 Q Okay. All right. If you look at the 2nd page 13 of the letter, there's a paragraph that talks about what 14 you had explained. And it says that you explained that 15 you placed the Wumag heat setter in the heating and 16 cooling mode, anticipating a cleaning of the Wumag bowls. 17 This took place approximately mid-morning around 10:00 18 a.m. or so. 19 "Reece notified Kevin Fields that the bowls would 20 need to be cleaned. Kevin then notified both Donnie and 21 Barry. After lunch, Reece noticed the blue line could 22 cool down to the appropriate temperature and instructed 23 Donnie to proceed. In turn, Donnie instructed Barry to 24 proceed with the cleaning. The accident occurred 25 approximately 1:50 p.m. It was determined that the heat</p>
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<p>1 offered Mr. Lanham a job after the accident? 2 A I don't recall. I know that there was never an 3 indication that we would ever terminate him. It was 4 always, "Let's just get him, you know, to a position." 5 And if he would want to come back, then surely, you know, 6 he could come back. 7 Q Okay. So I know that you spoke with Mr. Lanham 8 right after the accident when his arm was still in the 9 machine. Did you ever speak with him again after that? 10 A Yes. 11 Q Okay. Did he tell you anything differently 12 about how the accident had happened? 13 A I -- I visited him in the hospital, and he 14 stated again and apologized to me because he had -- he 15 did have a lot of respect for me. And he said, "Reece, 16 I'm -- I'm sorry. I'm sorry." 17 Q All right. I'm going to hand you what's marked 18 as Exhibit Number 3. 19 (EXHIBIT 3 MARKED FOR IDENTIFICATION) 20 MS. WRENN: And this is, for the record, 21 Bondex email response 2344 -- or I'm sorry, 2343 to 22 2344. 23 BY MS. WRENN: 24 Q So I may have put the sticker on the wrong 25 side, sorry. I know I had it right for you.</p>	<p>1 setter was in mode 1 and that Barry must have made a 2 change from mode 1 to mode 3." Is that consistent with 3 your understanding? 4 A Yes. 5 Q Okay. Did Mr. Lanham ever tell you why he 6 changed the mode? 7 A He didn't. 8 Q Okay. All right. And then the last paragraph 9 says, "The staff further discussed corrective action 10 plans, and it was suggested and agreed that a checklist 11 should be implemented whereby the operations supervisor 12 would review and check if the equipment is in the 13 appropriate mode and review speed and temperature." 14 "Also, Reece suggested a password system be 15 developed to place the Wumag in mode 1, eliminating 16 operator error." At the time of Mr. Lanham's accident, 17 was there any kind of a written checklist or procedure 18 for employees with regard to cleaning? 19 A I don't recall. 20 Q Okay. After Mr. Lanham's accident, do you know 21 if any changes were made to the machine itself with 22 regard to safety? 23 A No. 24 Q So no changes were made -- 25 A No.</p>

Page 50	1 Q -- after this accident? 2 Okay. And I believe earlier you said, you believe 3 it was safe to clean the rollers when the machine was in 4 mode 3 -- 5 A Yes. 6 Q -- correct? 7 A Absolutely. 8 Q Did you speak with anyone at OSHA during its 9 investigation of Mr. Lanham's accident? 10 A Yes. 11 Q I am going to hand you Exhibit Number 4. 12 (EXHIBIT 4 MARKED FOR IDENTIFICATION) 13 MS. WRENN: And this, for the record, is 14 OSHA Bates numbers 11 through 13. 15 BY MS. WRENN: 16 Q And this is part of the official report about 17 Mr. Lanham's accident. And there's a summary at the 18 bottom down there. 19 A Okay. 20 Q And the summary has a description of the 21 calender machine itself, including that the machine had a 22 yellow shin roll -- I don't know if I'm saying that right 23 -- light curtain? 24 A Where are you looking on that one? 25 Q Toward the middle. This down here.	Page 52	1 THE REPORTER: Don't expand it further. 2 Trip wire. Yeah. And sorry, if I ask you to repeat 3 something, like don't expand your answer. Just try 4 to repeat exactly. Yeah. 5 THE WITNESS: Yeah, trip -- trip wire. 6 THE REPORTER: Oh, thank you. 7 MS. WRENN: Okay. 8 THE WITNESS: Sorry. 9 THE REPORTER: No worries. I should have 10 told you before. 11 BY MS. WRENN: 12 Q Okay. So it sounds like at the time of the 13 accident, there were two emergency pull cords? 14 A Yes. 15 Q So one was at the top roller and one was at the 16 bottom roller? 17 A No. 18 Q Tell me where they were. 19 A They -- so the top one was into the entrance of 20 the nip and then the bottom one was basically round about 21 knee -- knee level, and it was just to stop anybody 22 actually climbing into the machine. 23 Q Okay. And what was the purpose of the light 24 curtain when it was active? 25 A The purpose of the light curtain was to stop
Page 51	1 A All right. Yeah. I've got -- I've got it now. 2 Yeah. 3 Q And I may be saying the name wrong, but -- 4 A Yeah. 5 Q -- yellow light curtain -- 6 A Okay. 7 Q -- with a transmitter and receiver bars mounted 8 at the same height of the point operation. It was 9 mounted between the operator and the point of operation. 10 The light curtain was approximately 11 inches away from 11 the point of operation. There was another light curtain 12 mounted at the bottom section of the bottom roller. It 13 was mounted between the operator and the bottom roller. 14 So were those light curtains still on the machine at the 15 time of the accident? 16 A They were. 17 Q Okay. But they had been disabled, correct? 18 A Yes. 19 Q Okay. 20 A And also the -- on the bottom one, because the 21 bottom one was disabled, a -- a further trip -- pull wire 22 was put at the bottom one. 23 THE REPORTER: A what trip wire? 24 MS. WRENN: (inaudible 0:53:21) -- 25 THE WITNESS: An emergency pull cord.	Page 53	1 the machine if anybody accessed that particular area 2 through that barrier. 3 Q All right. And then the 3rd page of Exhibit 4 Number 4 has a section that addresses light curtains. 5 A Yes. 6 Q And it says that the employer deactivated the 7 light curtains because of the slack from the fabric kept 8 setting off the light curtain. The employer provided 9 machine guard training through the third-party vendor. 10 Employee number 1, Mr. Lanham, received that training, 11 the training covered conveyors. And is that -- it's 12 essentially what you told me earlier that Bondex 13 deactivated the light curtains because when the material 14 was fed through -- 15 A Yes. 16 Q -- it would be set off. 17 A Correct. 18 Q Okay. And it sounds like when the light 19 curtains were deactivated, did Bondex add the -- an 20 emergency pull cord? 21 A Yes. 22 Q Okay. And earlier, you said that based on your 23 experience, 39 years in the industry, an emergency pull 24 cord is sufficient for safety purposes. 25 A Yes.

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<p>1 Q In other words, having an active light curtain 2 is not a necessary safety component of this type of 3 machine. 4 A Correct. 5 Q Okay. When Wumag delivered the machine, I take 6 it the light curtains worked. 7 A Yes. 8 Q Okay. Okay, I'm going to hand you Exhibit 9 Number 5. 10 (EXHIBIT 5 MARKED FOR IDENTIFICATION) 11 Q This is also part of the OSHA report, and it's 12 Bates numbers OSHA 161 through 163. And it notes, at the 13 very top, that Steve Fransoso, President, and Reese 14 Walmsley, VP Technical Service, both stated that the 15 Wumag calender machine had a light curtain at the point 16 of operation between the upper and lower roller. They 17 stated they deactivated the light roller because it was 18 interfering with production. And that's correct, right? 19 A That's correct. 20 Q Okay. And then paragraph number 3, it says, 21 "Mr. Walmsley stated that the European Union, they 22 changed the design of the calender predecessor. This 23 calender was equipped light sensor mounted at the point 24 of operation. The position was that the sensor was too 25 close to the point of operation where it would catch a</p>	<p>1 A I don't recall. 2 Q Okay. If you look at the 3rd page, this might 3 help with your recollection. I thought somewhere in here 4 it said when the light curtain was deactivated. Let me 5 find it. Okay. So if you look at paragraph number 1 -- 6 A Yes. 7 Q -- it says the light curtain again was 8 deactivated for interfering with production. And 9 paragraph number 2 talks about how Mr. Lanham was 10 cleaning the rollers. Number 3 says the employees were 11 instructed to clean the unguarded rollers for 12 approximately 10 months. Does it sound about right? 13 A Yes. 14 Q For about 10 months, you guys did not have the 15 light curtain activated. 16 A Correct. 17 Q Okay. Do you know who at Bondex made the 18 decision to deactivate the light curtain? 19 A It was a combination of -- of discussions 20 between the president, myself, and the plant manager. 21 Q Who was the plant manager at that time? 22 A Charlie -- Charlie Waters. 23 Q Okay. And I take it you guys believed that the 24 emergency pull cords were sufficient and the light 25 curtains were not needed for safety purposes; is that</p>
<p>1 worker's fingers. As a result, the manufacturer decided 2 to use light curtains. The calender --" okay. So is 3 that an accurate statement that this -- and that is what 4 you said earlier, this particular machine had different 5 light curtains -- 6 A Yes. 7 Q -- to the ones that you've used at Andrew. 8 A Yes. 9 Q Okay. All right. It then says the calender -- 10 in paragraph number 4, "The calender was placed in 11 production," and someone has written down, "March 2017." 12 Is that approximately when the calender went into 13 operation? 14 A Probably. Yeah. I'd say late 2016, '17. 15 Q Okay. And then paragraph number 5 says, "The 16 employers stated that the employees were not exposed to 17 the hazard during normal operations. However, they knew 18 that the employees would be exposed to the hazard. The 19 employer evaluated the modes of operation for cleaning. 20 There were three modes and decided that mode 3 was the 21 safest mode to clean the rollers." And is that an 22 accurate statement? 23 A It is, yes. 24 Q Okay. Do you recall when about Bondex 25 deactivated the light curtain?</p>	<p>1 fair? 2 A Based on experience and the amount of machinery 3 that we have within the group, yes, that's -- that's a 4 fair statement. 5 Q Okay. And earlier you said the vast majority 6 of the machinery at Bondex did not have a light curtain 7 for safety purposes. 8 A Correct. 9 Q Okay. How was the light curtain deactivated? 10 Is there an on-off switch, or? 11 A It's within the electrical control panel. 12 That's about as far as I -- my remit on that. I don't 13 know. 14 Q Okay. 15 A I'm not an electrician. 16 Q So I take it you personally did not do the 17 deactivation? 18 A No. 19 Q Okay. Did Bondex discuss deactivating the 20 light curtain with Wumag? 21 A Absolutely. 22 Q Tell me about that. 23 A Again, it's very sketchy memory, but we had a 24 lot of email traffic between the engineer at Wumag and 25 myself at the time. Of course, this is seven years gone</p>

<p style="text-align: right;">Page 58</p> <p>1 by. I -- I haven't got access to those emails. But I'm 2 sure Wumag have them. 3 Q Do you recall the substance of any kind of 4 communications about deactivating the light curtain? 5 A Yes, because I -- I said that you -- you have 6 delivered a machine that is not to the specification that 7 was given to you. Unfortunately, the engineer was 8 probably a very short tenure at Wumag, so we didn't have 9 the historic data from the other engineers. But I wanted 10 the machine delivering exactly like the other three 11 machines that I had purchased. 12 Q So when you say the machine was not delivered 13 per specifications, are you talking about with regard to 14 the light curtain? 15 A Yes. I told him that the light curtain would 16 not work because we have to have media transported in 17 that area. 18 Q So for the design, did you want or not want the 19 light curtain? 20 A I did not want light curtains. 21 Q Okay. 22 A That was specified from the get-go. 23 Q Okay. So when you say the machine's not 24 delivering per specifications, that's because it had a 25 light curtain and you did not want the light curtain.</p>	<p style="text-align: right;">Page 60</p> <p>1 really long time. 2 A (inaudible 1:03:41), but it's a while ago, yes. 3 Q So there's a box, and the bottom box talks 4 about the light curtain. And it says, "Sensitive Light 5 Barriers 26.01.2017. The systems are protected by a 6 light barrier so that no employee will be harmed. The 7 last three plants also have a light barrier, but it is 8 not as safe as the new state of the (inaudible 1:04:08). 9 The customer now has problems because the light barrier 10 reacts more sensitively." And that's what you were 11 talking about earlier, right? 12 A But that's an incorrect statement -- 13 Q Okay. 14 A -- because the other three do not have light 15 barriers. 16 Q Okay. 17 A They have photocells. 18 Q Okay. And then it says, "At start, the machine 19 two flaps are put together, and these are suspended. 20 This causes a light barrier to trip. The customer had to 21 change the process and cut the flaps before starting." 22 Do you know what that's referring to? 23 A Yes. 24 Q What is that? 25 A Because it's such a lightweight media, any air</p>
<p style="text-align: right;">Page 59</p> <p>1 A It was not a usable machine with that light 2 curtain. 3 Q Okay. For the design of the machine, did you 4 only want the emergency pull cords? 5 A I didn't specify how Wumag would -- and I'm 6 sorry I said Wumag. It's because it's German, and they 7 don't pronounce the Ws. So that's why I said Wumag. But 8 -- but Wumag would not -- they said that there was an EU 9 regulation now, and it has to have a light curtain. 10 Q Okay. 11 A And the previous machines didn't come under 12 that regulation at the time, even though they were still 13 in existence and in operation. 14 Q Okay. So the machines delivered with light 15 curtains that worked, but they interfered with 16 production. So Bondex deactivated the light curtains and 17 installed an emergency pull switch? 18 A Yes. 19 Q Okay. Okay. So I'm going to hand you Exhibit 20 Number 6. 21 (EXHIBIT 6 MARKED FOR IDENTIFICATION) 22 Q And this is a document that has been produced 23 by Wumag. And there's no Bates number, I apologize, but 24 it's entitled Bondex Troubleshooting Schedule. Are you 25 familiar with this document? I know, again, it's been a</p>	<p style="text-align: right;">Page 61</p> <p>1 current within the facility could, like, blow them in. 2 It was very, very thin material. So that's what that is 3 referring to. 4 Q And what are the flaps, the cutting the flaps 5 before starting? Is that the material? 6 A That's the material. 7 Q Okay. It says, "If the customer wishes the old 8 variant of the light barrier, Wumag does not assume any 9 responsibility for the security." And is that talking 10 about the light beams that you're -- 11 A Yes -- no, that's -- that's talking about that 12 Wumag said that they would not take the light barriers 13 off. 14 Q Okay. Okay. So they -- did they essentially 15 tell you that if you wanted to deactivate the light 16 barriers, you'd have to do that yourself? They were not 17 going to assume -- 18 A They were not going to do that. 19 Q Okay. And was Bondex okay with that? 20 A Yes. 21 Q Okay. 22 A As I recall. 23 Q Okay. And did you guys understand they were 24 not assuming responsibility for the disabling of the 25 light barrier?</p>

<p style="text-align: right;">Page 62</p> <p>1 A Yes. 2 Q Okay. Did anybody at Bondex complain about the 3 disabling of the light barrier or raise any safety 4 concerns about it? 5 A No. 6 Q So I know you said that the rollers for the 7 machine were cleaned fairly often. 8 A Yes. 9 Q And is that -- when the rollers were cleaned, 10 were both the top and the bottom rollers always cleaned? 11 A Yes. 12 Q Okay. 13 A Let me retract that. Sometimes both. 14 Q Okay. Have the bottom roller ever been cleaned 15 before Mr. Lanham's accident? 16 A Yes. 17 Q Okay. And is the procedure for cleaning the 18 rollers the same regardless of whether one or both of the 19 rollers are going to be cleaned? 20 A Yes. 21 Q All right. I'm going to show you Exhibit 22 Number 7. 23 (EXHIBIT 7 MARKED FOR IDENTIFICATION) 24 Q And this is a March 6th, 2017, email from 25 Henning Gugel -- I don't know how you pronounce that --</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Okay. 2 A Because I stated earlier that the 60 -- it's 50 3 degrees. It's always 50 degrees. It's never 60. 4 Q Okay. Other than the 50 degrees as opposed to 5 60 degrees as stated on here -- 6 A Yeah. 7 Q -- is this the cleaning procedure that should 8 have been used for the Wumag machine? 9 A Yes, that's correct. 10 Q Okay. And is this the procedure that Mr. 11 Lanham would have been given training to follow? 12 A Yes. 13 Q Okay. And in bullet point number 2, it says 14 gap should be open. And is that the nip point opening 15 that you talked about -- 16 A Yes. 17 Q -- in mode 3 that would exist? 18 A Yes. 19 Q And is the gap open or can it be opened in mode 20 1? 21 A Yes. 22 Q Okay. Is there a difference between being able 23 to open the gap in mode 1 vs. mode 3? Or is the gap 24 larger in one mode vs. the other one? 25 A No, it's -- it's always a set distance. But</p>
<p style="text-align: right;">Page 63</p> <p>1 to you. And Henning Gugel, or whatever his name is, he 2 was a Wumag employee. 3 A Yes. 4 Q Are you familiar with Henning? 5 A Yes. 6 Q Okay. And this email at the very bottom, the 7 second to last paragraph talks about any changes to the 8 safety equipment or software. And he says, "I kindly 9 have to inform you that any change of the safety 10 equipment or software, the responsibility for the safe 11 operation will go over to Bondex, Inc. Wumag will not be 12 responsible for accidents caused by changed equipment. 13 This also applies to the changed position in the light 14 barrier." And is that a responsibility that Bondex 15 accepted? 16 A Yes. 17 Q Okay. I'm going to hand you Exhibit Number 8. 18 (EXHIBIT 8 MARKED FOR IDENTIFICATION) 19 Q And this is Bondex Subpoena Response 2414 and 20 2104. And these are the cleaning procedure for the 21 machine and also a checklist for cleaning. It's my 22 understanding that these documents were created after Mr. 23 Lanham's accident. Do you know if that's true? 24 A I would say yes because they have not -- I have 25 not been involved in this.</p>	<p style="text-align: right;">Page 65</p> <p>1 again, I don't recall whether in mode 3 -- I think in 2 mode 3 that it was not able to close. But in mode 1 and 3 2, it was able to close. 4 Q Okay. So the gap can always be open. It's 5 just whether or not it can be closed -- 6 A Yes. 7 Q -- in a mode vs. another mode? 8 And so in mode 3, that gap is not going to close. 9 In other words, the nip point is not going to close? 10 A Yes. 11 Q Okay. Other than Mr. Lanham, are you aware of 12 any other employee at Bondex ever being injured on the 13 job? 14 A My son was injured. 15 Q Okay. Was he injured with a machine? 16 A Yes. 17 Q Can you tell me about that? 18 A He was very, very near to a QC inspection 19 machine, and he had some -- a trailing cloth in his 20 pocket. The cloth got caught, and then he went to grab 21 the cloth, and he broke his arm. 22 Q Okay. Sorry to hear that. I hope he's okay. 23 A Yeah, he's okay now. 24 Q Okay. Mr. Lanham in his deposition testified 25 about an employee who worked on the other side of the</p>

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<p>1 plant who was injured in an accident similar to his. Do 2 you have any knowledge of that? 3 A No. 4 Q Okay. I'm going to hand you Exhibit Number 9. 5 (EXHIBIT 9 MARKED FOR IDENTIFICATION) 6 A Thank you. 7 Q This is Bondex OSHA logs of work-related 8 injuries and illnesses. And the first one is referring 9 to Mr. Lanham's injury. 10 A Yes. 11 Q Can you see that? 12 A Yes. 13 Q And then if you flip to the page that has 2331 14 on the bottom? 15 A Yes. 16 Q It talks about your son Harry's accident -- 17 A Yes. 18 Q -- and also someone named Charles Hamilton's 19 accident. And then if you flip, let's see, to the page 20 that has 2334 on the bottom. 21 A Yes. 22 Q This talks a little bit more about Charles 23 Hamilton's accident. And on the side, it says that -- 24 under number 15, it says, "What happened?" It says, 25 "Employee was attempting to remove fiber from rollers on</p>	<p>1 commissioned the machine in China, and then I 2 decommissioned the machine to bring back to the US. 3 Q Okay. So one of the machines -- so there were 4 how many machines? Two of our machines at Bondex? 5 A At Bondex, yes. 6 Q Okay. And one of them was one that you'd 7 brought with you from China? 8 A Yes. 9 Q Okay. And then one was the one that was 10 shipped directly to Bondex from Wumag? 11 A Yes. Yes. 12 Q Okay. And so the one that came with you from 13 China, it was also a laminating calender machine? 14 A Yes. 15 Q Were there any differences other than the light 16 curtain? 17 A The high -- that had a high-temperature roll 18 and -- and the light curtain difference, yes. 19 Q Okay. And it had two rollers and a nip point? 20 A Yes. 21 Q And did Bondex utilize the same cleaning 22 procedure for the one that had come from China? 23 A We didn't specifically have a mode, but we 24 always made sure that the operation, that it's coming 25 towards you.</p>
Page 67	Page 69
<p>1 incline apron when his arm was pulled between the rollers 2 and broken." Do you know anything about that? 3 A I don't know. 4 Q Okay. And I assume this was not in the 5 spunlace department. 6 A No. So Bondex is on a split level. So that -- 7 that would have been in the thermal bond operation, and I 8 was in the spunlace operation. 9 Q Okay. Did Bondex have any other Wumag machines 10 in this plant? 11 A Yes. 12 Q Okay. 13 A I don't know whether at the time of the injury. 14 Q Okay. Were any of the other machines 15 laminating -- 16 A Yes. 17 Q -- on your machines? 18 A Yes. 19 Q Were they just on the other part of the plant, 20 or were they also in spunlace? 21 A No. So for information, the three original 22 laminating machines that we have, one was in England, I 23 installed one in India, and I installed one in China. 24 Q Okay. 25 A So then I went over to China to -- I</p>	<p>1 Q Okay. So for the -- I'm just going to refer to 2 it as the China one. 3 A Yeah. 4 Q So the China one, in cleaning those rollers, 5 Bondex would always ensure that the rollers themselves 6 were rotating toward the operator and away from the nip 7 point. 8 A Correct. 9 Q And that same procedure was used for the 10 machine in question here. 11 A Yes. 12 Q And in particular, for this machine, in order 13 to have the rollers rotating toward the operator, mode 3 14 was used. 15 A Yes. 16 Q Okay. And had there been any injuries or 17 accidents in cleaning the Chinese machine before? 18 A No. 19 Q Okay. And it sounds like from your testimony 20 earlier that Bondex, in particular, you worked with Wumag 21 on the specifics of the design of this machine. 22 A Yes. 23 Q Okay. And with regard to safety, Wumag 24 insisted on the light curtains, and Bondex did not want 25 the light curtains.</p>


<p style="text-align: right;">Page 70</p> <p>1 A No. 2 Q Bondex instead wanted to have the emergency 3 pull cords. 4 A Yes. 5 Q Any other safety aspects of the machine that 6 were discussed or were implemented? 7 A Just during the design phase, Henning came 8 back, and he -- he put a complete cage around the 9 machine. And I -- and I said, "That is lazy engineering. 10 You need to go back to the drawing board because we have 11 to have access to the machine." And that's when he came 12 back with the light curtains. 13 Q Okay. So it sounds like, ultimately, Wumag and 14 Bondex never really agreed on the safety aspects of the 15 machine. 16 A With that particular machine, no. 17 Q Okay. So it was a light curtain vs. pull cord? 18 A Yes. 19 Q And ultimately, Bondex decided to adopt the 20 pull cord. 21 A Yes. 22 Q And did Bondex actually install those pull 23 cords? 24 A Yes. 25 Q Okay. All right. Based on email</p>	<p style="text-align: right;">Page 72</p> <p>1 Q -- from February of 2020. 2 A Yes. 3 Q I know you don't know since then. So in 4 between Mr. Lanham's accident and your leaving, had there 5 been any other accidents on this machine? 6 A No. 7 Q Did Bondex change the cleaning procedure for 8 the rollers after Mr. Lanham's accident? 9 A No, because the procedure was the procedure. 10 So they didn't change anything. 11 Q In your mind, the procedure worked, and it was 12 safe -- 13 A Yes. 14 Q -- if followed. 15 A Yes. 16 Q And the reason that Mr. Lanham's accident 17 happened is because he did not follow the procedure. 18 A Correct. 19 Q Okay. And prior to Mr. Lanham's accident, did 20 you believe the Wumag machine was safe to clean using 21 this procedure? 22 A Yes. 23 Q Okay. And you would not have let your son 24 clean this machine with that procedure if you believed it 25 was unsafe in some way.</p>
<p style="text-align: right;">Page 71</p> <p>1 communications, it looks like some Wumag technicians came 2 over to Bondex at some point in time. 3 A Yes. 4 Q And it looks like that was around September 5 2016. Do you -- sitting here today, do you have a memory 6 of when they came over? 7 A I don't. 8 Q Okay. Did they come over on multiple 9 occasions? 10 A I think maybe twice. 11 Q Okay. When -- 12 A Maybe three times. 13 Q Okay. When the Wumag technicians came over two 14 or three times, did they ever make any changes to the 15 safety aspects of this machine? 16 A No. 17 Q Okay. So when you left Bondex in early 2020, 18 was the Wumag machine still in operation? 19 A It was. 20 Q Had there been any other accidents on that 21 machine since Mr. Lanham's that you're aware of? 22 A No. That I'm aware of, no. 23 Q Right. And I'm just talking about when you 24 were there -- 25 A Oh, yes. Okay.</p>	<p style="text-align: right;">Page 73</p> <p>1 A I would not let anybody clean the machine, 2 whether it be my son or anybody. 3 Q Do you believe that the design of the machine 4 as it was in operation at the time of his accident was 5 unsafe or unreasonably dangerous? 6 A No. 7 Q Do you believe that Mr. Lanham needed any kind 8 of warning about the danger of the machine? 9 A I think everybody was aware of the machine, its 10 potential for injury. Well, it's not a thing I know 11 because I've been around equipment for 39 years, and I 12 always stress to people, always respect the machine 13 because every machine will try to kill you. That's the 14 way I always presented it. So it just got in their head 15 that the danger is there, and it's always there in any 16 machine. 17 Q Do you believe that any other safety mechanism 18 was needed to make this machine safe to clean? 19 A No. 20 MS. WRENN: All right. I don't have any 21 further questions. Thank you. 22 Robert, do you have any? 23 MR. OSBORNE III: Mr. Walmsley, we've been 24 going a while. If you want to take maybe a five- 25 minute break and that may give me --</p>

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<p>1 THE WITNESS: I'm good. 2 MR. OSBORNE III: Okay. All right. 3 THE WITNESS: Yeah. 4 THE REPORTER: Can you put your mic on, 5 please? 6 THE WITNESS: If we've got some water, 7 that would be good. 8 MS. WRENN: Yeah, let's take a break. I 9 think there is water back here in the rear. 10 THE REPORTER: We're off the record at 11 11:43 a.m. 12 (OFF THE RECORD) 13 THE REPORTER: We're back on the record at 14 11:46 a.m. 15 EXAMINATION 16 BY MR. OSBORNE III: 17 Q All right, Mr. Walmsley. My name is Robert 18 Osborne. We met prior to the deposition. I represent an 19 entity that's also known as Wumag. But are you aware 20 that the entity that you had dealings with Wumag went 21 through bankruptcy? 22 A Administration, yeah, yeah. 23 Q Okay. 24 A Yes, I was. 25 Q And have you had any dealings with Wumag since</p>	<p>1 that's all the questions I have for you. Thank you. 2 THE WITNESS: Wow. That was quick. 3 MR. OSBORNE III: Mr. Parker may have some 4 for you. 5 MS. WRENN: Jay, do you have any 6 questions? 7 MR. PARKER JR: Yeah. 8 CROSS-EXAMINATION 9 BY MR. PARKER JR.: 10 Q Mr. Walmsley, thank you for giving us the time 11 today. I appreciate that. 12 And just to be clear, you are not an engineer, 13 correct? 14 A I am not an engineer. 15 Q You have no sort of engineering education? 16 A No. 17 Q You do not have any sort of degree in 18 industrial engineering or mechanical engineering, 19 anything alike? 20 A That's correct. 21 Q And to the extent that you spoke about 22 assisting Wumag with design, am I correct in believing 23 what -- that what that means is you made suggestions 24 about the needs for Bondex? Is that correct? 25 A Yes. And then, typically, they would come back</p>
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<p>1 that bankruptcy? 2 A No, I haven't had any dealings since I left 3 Bondex, with Wumag. 4 Q And you're not familiar about their continued 5 operations or anything like that? 6 A I just know that they went into administration 7 or bankruptcy, but I -- I didn't know then from what 8 point happened whether somebody came to take them over. 9 I don't know. 10 Q Ms. Wrenn covered most of everything with you, 11 so I'm going to jump around a little bit and just have a 12 handful of follow-up questions. Do you know -- would the 13 rollers move freely if the machine was turned off? 14 A No. 15 Q And I believe you testified earlier that when 16 the light curtains were active, if the light curtain was 17 triggered, that would open up the rollers, correct? 18 A It -- it automatically opens up the roller, 19 knocks off the heat, and also the wind up with the 20 material going through the machine. At the far end, the 21 winding arm would lift. 22 Q Are you aware of any other machines at Bondex 23 where the operating mode was password protected? 24 A No. 25 MR. OSBORNE III: Mr. Walmsley, I think</p>	<p>1 with a counter, and then we would see if that worked for 2 us. And then -- there would be a to and fro. 3 Q And so you've never actually designed the 4 machine from an engineering standpoint, correct? 5 A Not from an engineering standpoint. 6 Q Okay. And you're not going -- you know, today, 7 as I ask you, you're not going to tell the jurors that 8 you are qualified in any way to give engineering design 9 opinions; are you? 10 A No. 11 Q And you're not qualified from an engineering 12 standpoint to say whether or not a machine is effectively 13 designed; are you? 14 A From an engineering standpoint, no. From an 15 operational standpoint, yes. 16 Q And you're not qualified from an engineering 17 standpoint to give any sort of opinion on what sort of 18 guardings or warnings a machine needs; are you? 19 A From an engineering standpoint, no. From an 20 operational standpoint, yes. 21 Q You said that you had spoken to agents or 22 employees at Wumag regarding the design of the machine. 23 But these conversations with Wumag, they continued after 24 the machine was in America? 25 A Yes.</p>

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<p>1 Q And as far as maintenance and using the machine 2 as y'all were going through the setup process at the 3 Bondex facility, y'all continued to have discussions 4 concerning that machine after it was in Edgefield -- or 5 in Trenton, correct? 6 A That's correct. 7 Q And so Wumag was fully aware that this machine 8 was in South Carolina? 9 A Yes. 10 Q And they actually did send, occasionally, 11 employees to the facility in South Carolina? 12 A Yes. 13 Q Okay. How long does it take to clean those 14 rollers? 15 A Once it's in the correct state, you know, down 16 to 50 degrees, then maybe an hour. 17 Q Okay. And do you know if Wumag includes any 18 sort of cleaning instructions in the manual that comes 19 with the machine? 20 A No. 21 Q You don't know or it does not? 22 A It -- it -- as I recall, it does not. 23 Q So you don't believe that it has any 24 instructions in the manual concerning whether or not to 25 shut the machine down or lock out or tag out the machine</p>	<p>1 MR. PARKER JR: You guys, I need to take a 2 quick just five -- not even five minute, like a 3 couple of minute break. I'll be right back. 4 MS. WRENN: Okay. Okay. 5 MR. PARKER JR: Sorry about that. 6 THE WITNESS: All right. 7 THE REPORTER: We're off the record at 8 11:53 a.m. 9 (OFF THE RECORD) 10 THE REPORTER: We're back on the record at 11 11:56 a.m. 12 BY MR. PARKER JR.: 13 Q Okay. Thanks. I want to circle back and ask a 14 question that I forgot. I want to be more specific. 15 When you were asked at the beginning of your deposition, 16 had you spoken to any attorneys prior today concerning 17 this matter, you said no; is that correct? 18 A I said no, but I remember at the time that 19 Barry got some -- and again, I'm sorry if I misspoke, but 20 I know that Barry got some attorneys originally that came 21 into Bondex. And then sort of after I left, I don't know 22 what happened. 23 Q Have you spoken to anyone about this lawsuit 24 prior to the beginning of your deposition today? 25 A No. Oh, prior?</p>
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<p>1 when you're cleaning it? 2 A That's my understanding. 3 Q Okay. So Bondex came up with -- basically had 4 to come up with some cleaning protocol for the machine. 5 MS. WRENN: Object to the form. 6 You can answer if you -- 7 THE WITNESS: Okay. 8 MS. WRENN: But you don't need to. 9 THE WITNESS: Bondex came up with that 10 procedure because that was the best working 11 procedure. Typically with textile machinery, the -- 12 the manufacturer of the OEM of the machine does not 13 tell you how to operate the machine or how to clean 14 the machine. They just deliver the machine. 15 BY MR. PARKER JR.: 16 Q Why is that? 17 A Pardon? 18 Q Why don't they provide instructions for how to 19 maintain or clean the machine? 20 A They will provide a maintenance schedule, but 21 they will not tell you how to clean the machine. 22 Q I'm sorry. Could you repeat that again? 23 A I said they will provide a maintenance 24 schedule, but they -- they typically do not provide a 25 cleaning method for the machine.</p>	<p>1 Q Yes. 2 A I'm sorry. Can you just rephrase the question, 3 or? 4 Q Have you ever -- have you spoken to anyone 5 concerning this lawsuit prior to the commencement of your 6 deposition today? 7 A No. 8 Q Whether that be an attorney or anyone at all? 9 A To my understanding, no. I mean, this 10 deposition came right out of the blue for me. 11 Q Did you know why your deposition was being 12 taken? 13 A Just probably because I've had dealings with 14 Wumag. 15 Q Okay. So just to be totally clear, you've 16 spoken to no one about this before this deposition 17 started at 10 o'clock. You did not have a single 18 conversation concerning your upcoming deposition, the 19 content of your testimony today. You've not spoken to 20 anyone about any of that in the proceeding months? 21 A No. 22 Q Or weeks. 23 A No. 24 Q Okay. I just wanted to make sure I wasn't 25 missing anything, okay?</p>

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<p>1 A I've obviously -- I've obviously mentioned it 2 at work because I have to have the time off to come to 3 the deposition. 4 Q Right. I'm just making sure I was getting the 5 understanding correctly. 6 A Okay. 7 Q And there's not something -- I know -- I'm not 8 trying -- I know people hear questions from lawyers 9 sometimes, and you think I know something or I'm trying 10 to trick you. I'm not doing that now. I'm just 11 (inaudible 1:31:32). 12 A No. And again, I'm not -- I'm just here to 13 tell the truth as it is, as I -- as -- as I recall it. 14 Q Right. Okay. Tell me about this cage that was 15 around the machine at some point. You mentioned that 16 their -- that one of the -- the engineer had designed a 17 cage around the machine, and then you thought it was lazy 18 engineering? 19 A Yes, and that was -- that was the first 20 iteration that they sent through as a drawing, which I 21 rejected. 22 Q And that's something that the engineer for 23 Wumag came up with? 24 A Yes. 25 Q And can you give me a more precise description</p>	<p>1 machinery, I know where lazy engineering is, and where it 2 isn't. I've actually done -- 3 Q I'm saying you don't have any education or 4 training in engineering that qualifies you to have that 5 opinion; is that right? 6 A And that's why I said from an operational 7 standpoint. 8 Q Okay. But not from an engineering standpoint, 9 correct? 10 A Correct. 11 Q Okay. 12 A And you would agree with me that a pull cord is 13 not guarding a nip point, correct? 14 Q I disagree with that. 15 A How does a pull cord prevent you from coming 16 into contact with the nip point? 17 Q The pull cord will stop the machine and open 18 the nip. 19 A Correct, but it doesn't prevent you from coming 20 into contact with the nip; does it? 21 Q Well, then I -- then I agree with you. 22 A Correct. And it didn't prevent the accident in 23 this instance; did it? 24 Q No. 25 A Okay. And do you believe that the accident</p>
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<p>1 of what this cage was like? 2 A It was basically encasing the whole of the 3 machine. 4 Q And is that -- would that have been similar to 5 the kind of interlocking gate that's on the back of that 6 machine right now? 7 A Yes, but it would have been all the way around 8 the machine. 9 Q Got it. 10 A Everything would be enclosed. 11 Q Okay. Why did you think that was lazy 12 engineering? 13 A Because you need access to the machine to see 14 what's happening with the rollers and see what's 15 happening with the media. 16 Q Did the machine have a gate in it? I mean, the 17 cage, did it have a gate in it? 18 A It did have a gate, but the gate would then 19 knock the machine off. 20 Q Okay. I mean, again, you're not qualified from 21 an engineering standpoint to actually say whether or not 22 something is lazy engineering; are you? 23 A Well, I feel I am in the operational 24 standpoint, yes. When I purchased millions of dollars 25 worth of machinery and millions of pounds worth of</p>	<p>1 could have been prevented if the touchscreen interface 2 would have had a password-protected access to it so that 3 Mr. Lanham couldn't have changed the operating mode? 4 MS. WRENN: Object to the form. 5 BY MR. PARKER JR.: 6 Q I mean, that was your suggestion, right? That 7 it should have had something like that? 8 MS. WRENN: Object to the form. 9 MR. PARKER JR: You can answer. 10 THE WITNESS: Oh. So as I said, that was 11 a -- that was -- you know, hindsight is a wonderful 12 thing, and after an accident, then maybe that could 13 have happened. If -- if it was password-protected, 14 then he wouldn't have been able to change the mode 15 of operation. 16 MR. PARKER JR: Okay. Let me just look at 17 this real quick, and I think I'm probably done. 18 Okay. I don't have any more questions. Thank you. 19 MS. WRENN: Okay. I just have a few 20 follow-up questions. 21 REDIRECT EXAMINATION 22 BY MS. WRENN: 23 Q Jay asked you about the password protection to 24 prevent someone from changing the operating mode. Is it 25 standard on any machines to have password protection to</p>

Page 86	1 lock operation modes? 2 A No. 3 Q Ultimately, after the accident, did Bondex make 4 the operating mode password-protected? 5 A I don't know. 6 Q Okay. With regard to the nip point, do you -- 7 from an operational standpoint, and based on your 39 8 years of experience in the industry, do you believe there 9 needs to be a safety mechanism guarding the nip point? 10 A There has to be a safety mechanism, yes. 11 Q And was there one on the Wumag? 12 A Yes. 13 Q Okay. And what was that? 14 A The pull wire. 15 Q But at some point, the fabric has to be able to 16 go through the nip without triggering some kind of safety 17 mechanism that would turn the machine off, correct? 18 A Yes. 19 Q Okay. And again, do you believe that having 20 the machine in mode 3 without a light curtain was a safe 21 way to operate -- or a safe way to clean the rollers? 22 A Yes, I do. 23 Q Okay. And again, that is essentially how all 24 of the calender machines that you've worked with in your 25 39 years of experience have been cleaned, correct?	Page 88	1 Afterwards, briefly heat up the rollers." Would you 2 agree those are instructions from Wumag about how to 3 clean the roller? 4 A It looks that way. 5 Q Okay. So regardless of whether or not these 6 were the instructions that Bondex gave to employees, 7 Wumag did provide instructions in the manual about 8 cleaning, correct? 9 A It looks that way. 10 Q Okay. And then Bondex adopted its own cleaning 11 procedure for the rollers -- 12 A Yes. 13 Q -- correct? 14 A Correct. 15 MS. WRENN: Okay. All right. Those are 16 all the questions I have. 17 MR. OSBORNE III: Just a few other 18 additional questions. 19 RE-EXAMINATION 20 BY MR. OSBORNE III: 21 Q Mr. Walmsley, cleaning is a form of 22 maintenance, correct? 23 A Yes. 24 Q And you were asked by Mr. Parker about your 25 dealings with Wumag. And you testified earlier that you
Page 87	1 A Correct. 2 Q Not with password protection, not with a light 3 curtain, correct? 4 A That's correct. 5 Q All right. Jay also asked you about the 6 operating manual that Wumag provided. So what I want to 7 show you is what I'll mark as Exhibit Number 11. 8 (EXHIBIT 11 MARKED FOR IDENTIFICATION) 9 A Thank you. 10 Q And I understand it's been a long time since 11 you looked at any of this information. 12 A A long time, yes. 13 Q This is a translation of operating manual for 14 the calender machine that Wumag gave to Bondex. 15 A Okay. 16 Q And so if you look through these pages, they 17 deal with maintenance of the machine. And then 18 specifically, on the very last page of the exhibit, it 19 has more information about maintenance, in particular 20 with regard to the rollers. And it says, "Use nothing 21 but a soft sponge and plain water to clean the rollers. 22 Use sand and quartz-free cleaning agents only. Chemical 23 substances may have to be removed with commercial 24 solvents. After cleaning, carefully rub the rollers dry 25 to prevent the moisture penetrating material underneath.	Page 89	1 don't believe -- when would -- when do you think your 2 last dealing with Wumag was? 3 A Oh, I -- I couldn't give you a date. I just 4 know that it was -- the -- the dealing with Wumag ongoing 5 since the machine was delivered because I was never fully 6 happy with the machine. Not safety-related, part was 7 safety-related, but you've got the email traffic for 8 that. But also there was a -- there was a problem with 9 the heating and cooling. So my dealing was ongoing with 10 Wumag ever since that machine landed at Bondex. 11 Q Let me ask another way. You testified earlier 12 you were aware of the insolvency proceedings that Wumag 13 went through, correct? 14 A Yes, yes. 15 Q And am I correct that you didn't have any 16 dealings with Wumag after those -- after it went into 17 insolvency? 18 A Oh, no, no. 19 Q Is GWK an entity that you're familiar with? 20 A Yes. 21 Q Okay. What does GWK do? 22 A So GWK is the heating and cooling element of 23 all the Wumag machines. 24 Q The Wumag machine is operated by a touchscreen; 25 is that correct?

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1 A Correct. 2 Q Okay. If you had any issues with the 3 touchscreen, who were you dealing with to try to work 4 through those issues? 5 A Typically, it would be Wumag because Wumag 6 created the interface. Even if the problem was the 7 interface between the GWK and the Wumag machine, it was 8 usually due to a software problem within the Wumag 9 operating software. 10 Q And tell me, C. Waters, is that Charlie Waters? 11 A Yes, it is. 12 Q And he was the plant manager; is that correct? 13 A Yes. 14 MR. OSBORNE III: All right. That's 15 everything I have. 16 THE REPORTER: Mr. Parker, do you have any 17 other questions? 18 MR. PARKER JR: No, I (inaudible 1:42:03). 19 THE REPORTER: Okay. What was Exhibit 10, 20 Counsel? 21 THE WITNESS: I never got 10. 22 MR. OSBORNE III: We may have skipped it. 23 MS. WRENN: Oh, I -- yeah, missed number 24 10. I marked it as 11. I'm sorry. 25 THE REPORTER: Okay, so if you skipped it,	1 as the witness to get a copy of the transcript and 2 read it and make sure there are no spelling errors 3 or mistakes that he misunderstood what you said. So 4 you would get a copy of it, and you would have -- I 5 don't know; what is it? -- 10 days to go through and 6 make any changes? 7 THE REPORTER: 10 to 14. 8 MS. WRENN: 10 or 14 days. Do you want to 9 do that, or do you want to waive that? 10 THE WITNESS: I'll -- I'll go through 11 that, yes. Yes. 12 MS. WRENN: Okay. He would like to do 13 that. 14 THE REPORTER: All right. That concludes 15 today's deposition. We are off the record at 12:10 16 p.m. 17 (DEPOSITION CONCLUDED AT 12:10 P.M.) 18 (Witness reserves right to read) 19 20 21 22 23 24 25
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1 what we could do -- 2 MS. WRENN: Yeah. 3 THE REPORTER: -- we can leave that as 11, 4 and I can just put on there blank 10. 5 MS. WRENN: Perfect. 6 THE REPORTER: Okay. 7 MS. WRENN: Sorry about that. 8 THE REPORTER: That's why I brought it up 9 on the record. 10 MS. WRENN: Yeah. I just missed it. 11 THE REPORTER: And one moment. Ms. Wrenn, 12 do you need a rough or do you need to order the copy 13 of the transcript? 14 MS. WRENN: Just an E-Trans. I don't need 15 a rough. 16 THE REPORTER: Standard delivery? 17 MS. WRENN: Yes. 18 THE REPORTER: Mr. Osborne? 19 MR. OSBORNE III: Same thing for me. 20 THE REPORTER: And Mr. Parker? 21 MR. PARKER JR: Same here. 22 THE REPORTER: All right. And does 23 someone want to inform the witness on reading and 24 waiving? 25 MS. WRENN: Sure. So you have the right	1 CERTIFICATE OF DIGITAL REPORTER 2 3 I, Michael Austin King, a Digital Reporter and 4 Notary public within the State of Georgia, do hereby 5 certify: 6 7 That on May 9th, 2024, I digitally reported the 8 proceedings had and the evidence given, together with the 9 objections of counsel thereto, and that said testimony 10 was accurately captured with annotations by me during the 11 proceeding, taken at said time and place. 12 13 I further certify that I am not related to any of 14 the parties to this action by blood or marriage and that 15 I am in no way interested in the outcome of this matter. 16 17 IN WITNESS THEREOF, I have hereunto set my hand the 18 10th day of May, 2025. 19 20 21  22 michael king 23 Notary Commission Georgia/W-00526283 24 Commission Expires: October 6th, 2025 25

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1 CERTIFICATE OF TRANSCRIPTIONIST
2
3 I, Brandon Diaz, CER, a Legal Transcriptionist do
4 hereby certify:
5 That the foregoing is a complete and true
6 transcription of the original digital audio recording
7 of the testimony and proceedings captured in the
8 above-entitled matter. As the transcriptionist, I
9 have reviewed and transcribed the entirety of the
10 original digital audio recording of the proceeding to
11 ensure a verbatim record to the best of my ability.
12 I further certify that I am neither attorney
13 for nor a relative or employee of any of the parties
14 to the action; further, that I am not a relative or
15 employee of any attorney employed by the parties
16 hereto, nor financially or otherwise interested in the
17 outcome of this matter.
18
19 IN WITNESS THEREOF, I have hereunto set my hand
20 this 23rd day of May, 2025.
21
22 *Brandon M Diaz*
23
24 Brandon Diaz, CER
25

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1 John Reece Walmsley
2 reece.walmsley@gmail.com
3 May 27, 2025
4 RE: Lanham, Barry v. Wumag Texroll Gmbh & Co.
5 5/9/2025, John Reece Walmsley (#7310089)
6 The above-referenced transcript is available for
7 review.
8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.
12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-carolinas@veritext.com.
16 Return completed errata within 30 days from
17 receipt of testimony.
18 If the witness fails to do so within the time
19 allotted, the transcript may be used as if signed.
20
21
22 Yours,
23 Veritext Legal Solutions
24
25

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2 John Reece Walmsley (#7310089)
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23 _____
24 John Reece Walmsley Date
25

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1 Lanham, Barry v. Wumag Texroll Gmbh & Co.
2 John Reece Walmsley (#7310089)
3 ACKNOWLEDGEMENT OF DEPONENT
4 I, John Reece Walmsley, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.
10
11 _____
12 John Reece Walmsley Date
13 *If notary is required
14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 _____ DAY OF _____, 20____.
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18 _____
19 NOTARY PUBLIC
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South Carolina Rules of Civil Procedure

Part V. Depositions and Discovery

Court Rule 30

(e) Submission to Witness; Changes; Signing.

When the testimony is fully transcribed the deposition shall be submitted to the witness for examination and shall be read to or by him unless such examination and reading are waived by the witness and by the parties. Any changes in form or substance which the witness desires to make shall be entered upon the deposition by the officer with a statement of the reasons given by the witness for making them. The deposition shall then be signed by the witness, unless the parties by stipulation waive the signing or the witness is ill or cannot be found or refuses to sign. If the deposition is not signed by the witness within 30 days of its submission to him, the officer shall sign it and state on the record the fact of the waiver or of the illness or absence of the witness or the fact of the refusal to sign together with the reason, if any, given therefor; and the deposition may then be used as fully as though signed unless on a motion to suppress under Rule 32(d)(4) the court holds

that the reasons given for the refusal to sign
require rejection of the deposition in whole or in
part.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,
2019. PLEASE REFER TO THE APPLICABLE STATE RULES
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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