

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

RECEIVED
JUN 10 2019
SC Court of Appeals

Appellate Case No. 2018-001965

Jerry Howard Crawford, individually and as Personal Representative of the Estate of Evelyn Kay Crawford, Respondent,

v.

Celanese Corporation; Aurora Pump Company; Carrier Corporation; CNA Holdings, LLC, f/k/a Celanese Corporation f/k/a Hoechst Celanese Corporation; Covil Corporation; Crane Co.; Daniel International Corporation f/k/a Daniel Construction Company, Inc.; Flowserve Corporation, individually and as successor-in-interest to Anchor/Darling Valve Company and individually as successor-in-interest to Durco Pumps; Flowserve US Inc.; Fluor Constructors International, f/k/a Fluor Corporation; Fluor Constructors International, Inc.; Fluor Daniel Services Corporation; Fluor Enterprises, Inc.; Ford Motor Company; Genuine Parts Company, d/b/a Rayloc (a/k/a NAPA); The Goodyear Tire & Rubber Company; Goulds Pumps, Inc.; Grinnell, LLC f/k/a Grinnell Corp., f/k/a ITT Grinnell Corp.; Honeywell International, Inc., f/k/a Allied-Products Liability Signal, Inc., sued as successor-in-interest to Bendix Corporation; Ingersoll-Rand Company; John Crane, Inc.; Metropolitan Life Insurance Company, a wholly owned subsidiary of Metlife Inc.; National Automotive Parts Association (NAPA); Parker-Hannifin Corporation; Pneumo Abex, LLC, successor-in-interest to Abex Corporation; Spirax Sarco, Inc.; SPX Cooling Technologies, Inc., individually and as successor-in-interest to Marley Cooling Towers Co.; Standard Motor Products, Inc., sued as successor-in-interest to EIS Automotive; United States Fidelity & Guaranty Company; The William Powell Company, Defendants,

Of Which Covil Corporation is the Appellant.

RECORD ON APPEAL - VOLUME 5 OF 8

Ashley K. Brathwaite
ELLIS & WINTERS LLP
4131 Parklake Avenue, Suite 400
Raleigh, NC 27612
Telephone: (919) 573-1297
ashley.brathwaite@elliswinters.com

Graham P. Powell
WALL TEMPLETON & HALDRUP, P.A.
145 King Street, Suite 300
Charleston, South Carolina 29401
Telephone: (843) 329-9500
Graham.Powell@WallTempleton.com
Attorneys for the Appellant

Theile B. McVey
John D. Kassel
KASSEL McVEY ATTORNEYS AT LAW
1330 Laurel Street
Columbia, South Carolina 29202
Telephone: (803) 256-4242
tmcvey@kassellaw.com

Jonathan M. Holder
Ka'Leya Q. Hardin (admitted *pro hac vice*)
DEAN OMAR BRANHAM, LLP
302 N. Market Street, Ste. 300
Dallas, Texas 75202
Telephone: (214) 722-5990
jholder@dobllp.com
**Attorneys for Respondent Jerry Howard
Crawford and Evelyn Kay Crawford**

RECORD ON APPEAL INDEX

Orders

Order/Judgment/Verdict Form issued July 19, 2018.....	1
Order/Judgment granting new trial entered October 22, 2018.....	3

Pleadings

Summons and Complaint filed December 4, 2017.....	16
Defendant Covil Corporation's Answer to the Complaint filed January 5, 2018.....	65
Plaintiffs' Motion for Sanctions against Defendant Covil Corp. filed July 10, 2018.....	84
Covil Corp.'s Reply to Plaintiff's Motion for Sanctions filed July 10, 2018.....	519
Plaintiffs' Motion for JNOV filed July 30, 2018.....	522
Covil Corp.'s Memorandum in Opposition to Motion for JNOV filed August 3, 2018...	530
Plaintiffs' Memorandum in Support of JNOV with Exhibits A-J filed September 25, 2018.....	535
Covil Corp.'s Supplemental Memorandum Opposing Plaintiff's Motion for JNOV filed October 5, 2018.....	1034
Plaintiffs' Supplemental Memorandum in Support of JNOV and Exhibits filed October 9, 2018.....	1041
Covil Corp.'s Notice of Appeal filed October 31, 2018.....	1046

Transcripts

Transcript of Trial, July 16, 2018 through July 19, 2018.....	1063
Transcript of JNOV Hearing on October 10, 2018.....	1703

Deposition of Palmer Covil taken July 14, 1977.....	1758
Deposition of Jerry Crawford taken February 6, 2018.....	1963
Deposition of Dwayne Waters taken October 16, 2017.....	2350
Deposition of Machen Lee Carpenter taken May 27, 2004.....	2513
Deposition of Don Buck taken June 19, 2018.....	2642
Deposition of Harley Neelands taken December 8, 2016.....	2696
Deposition of Bruce Bowyer taken June 27, 2018.....	3027
 <u>Exhibits</u>	
Plaintiff's Exhibit 822.1.....	3242
Plaintiff's Exhibit 822.2.....	3243
Plaintiff's Exhibit 822.3.....	3244
Plaintiff's Exhibit 822.4.....	3245
Plaintiff's Exhibit 822.5.....	3247
Plaintiff's Exhibit 822.6.....	3272
Plaintiff's Exhibit 822.7.....	3294
Plaintiff's Exhibit 822.8.....	3315
Plaintiff's Exhibit 822.9.....	3337
Plaintiff's Exhibit 822.10.....	3353

Plaintiff's Exhibit 822.11.....	3359
Plaintiff's Exhibit 822.12.....	3365
Plaintiff's Exhibit 822.13.....	3383
Plaintiff's Exhibit 822.14.....	3433
Plaintiff's Exhibit 822.15.....	3446
Plaintiff's Exhibit 822.16.....	3467
Plaintiff's Exhibit 825.1.....	3754
Court Exhibit 2.....	3755
Court Exhibit 3.....	3778
Court Exhibit 4.....	3792
Court Exhibit 5.....	3799
Court Exhibit 6.....	3808
Court Exhibit 7.....	3835
Court Exhibit 8.....	3845
Court Exhibit 9.....	3850
Court Exhibit 10.....	3867
Court Exhibit 11.....	3903

1 three feet apart; is that a fair estimate?

2 A. Yeah. Yeah.

3 MR. PHILLIPS: Objection to the form
4 and representation.

5 BY MR. HENDERSON:

6 Q. How far apart would you say we are
7 sitting right now from each other?

8 A. Three and four feet.

9 Q. Three and four feet. All right. So a
10 couple of feet more than I guessed.

11 A. Okay. All right.

12 Q. I'm giving you a tough time.

13 A. Okay.

14 Q. The -- you okay?

15 A. I'm okay.

16 Q. The dust that you are describing that
17 would get created when Eddie Gene was blowing out
18 the drum -- did you breathe any of that dust in?

19 MR. MCLEOD: Object to the form.

20 THE WITNESS: Yes, I did, but I didn't
21 think anything about it at the time.

22 BY MR. HENDERSON:

23 Q. What time period are we talking about
24 when Eddie Gene had this garage?

25 A. Let me see. I'd say from 1960 to 1970.

1 When --

2 Q. Do you remember -- go ahead.

3 A. The garage was still there, but I moved
4 away. In 1970, I moved away --

5 Q. Where did you --

6 A. -- I moved --

7 Q. -- go ahead.

8 A. It was -- I was -- it wasn't really
9 Blacksburg, but it was what they call -- it was a
10 mill village called Cherokee Falls. At that time
11 -- 1970, I moved to -- I move to Gaffney. Yeah.

12 Q. Can you remember what types of cars
13 Eddy Gene was doing work on while you were there
14 working at his garage?

15 A. Oh, yep. Personal cars and also
16 trucks.

17 Q. Can you remember who made the personal
18 cars he did work on?

19 A. He had all kinds, really. He had
20 Fords, Chevrolets, Dodge -- all of them.

21 Q. How about the trucks -- can you
22 remember who made the trucks he did work on?

23 A. Yeah, it was all of them, too. Fords
24 and Chevrolet.

25 Q. About how many times do you think you

1 were helping Eddie Gene perform brake jobs?

2 MS. RIES: Objection.

3 THE WITNESS: The whole time I was
4 there -- let me see. I want to say about -- I
5 don't know exactly. I want to say roughly about
6 75, maybe.

7 BY MR. HENDERSON:

8 Q. Where did Eddie Gene buy the brakes
9 that he replaced?

10 MR. COATES: Object to the form.

11 BY MR. HENDERSON:

12 Q. Let's take it a step back. When
13 Eddie Gene was performing his brake jobs, would it
14 be fair to say he's taking off old brakes and
15 putting on new brakes?

16 A. Oh yes, that's right. New brake shoes.

17 Q. New brake shoes?

18 A. Yeah. Yeah. Yeah, that's right.

19 Q. Do you know where he bought his new
20 brake shoes?

21 A. He bought a lot of them at Advance.

22 Q. Was there any place else he bought new
23 brake shoes?

24 A. Well, he did go to Auto Zone.

25 Q. Any place else you remember?

1 A. Well, there was -- first, there was a
2 new parts place right there on 29 -- right outside
3 of Blacksburg.

4 Q. Do you remember the name of it?

5 A. It was -- I believe it was Harris's.

6 Q. Are those all of the places that you
7 remember Eddie Gene buying brakes -- Advance, Auto
8 Zone, a place you think was called Harris's?

9 A. Yeah. Yeah. It's a -- well, Harris's
10 is still up there but he build a church right over
11 there in front of it. It's right there -- it's a
12 few miles outside -- it's like a few miles north of
13 the -- wait a minute -- south of the city of
14 Blacksburg.

15 Q. Did he ever buy new brakes at auto
16 dealerships?

17 A. Oh, I never did -- I never did saw him
18 do that but --

19 Q. Can you remember -- I'm sorry. I
20 didn't mean to interrupt you.

21 A. It's okay.

22 Q. No. No. I thought you were done
23 talking.

24 A. Okay. Okay.

25 Q. Now, remember you can't fold your arms

1 over your microphone.

2 A. Yeah. Yeah.

3 Q. Do you need to take a break?

4 A. I'm okay.

5 Q. Okay. Now, a couple of times we've
6 been talking you've folded your arms over your
7 chest. Is there a reason why you do that?

8 A. Yes, my chest hurts.

9 MS. SHOFNER: Object to the form.

10 MR. HENDERSON: What's your form of
11 objection?

12 MS. SHOFNER: It's just speculation and
13 relevancy.

14 MR. HENDERSON: Speculation about why
15 he's crossing his arms?

16 MS. SHOFNER: Yes.

17 MR. HENDERSON: Okay.

18 BY MR. HENDERSON:

19 Q. Mr. Crawford, I've noticed you crossing
20 your arms and I'm not sure if the question was
21 clear when I asked you --

22 A. Okay.

23 Q. -- why do you cross your arms over your
24 chest?

25 A. Because my chest feels tight and I got

1 pain.

2 Q. Would you like to take a short break?

3 A. Oh, I'm okay.

4 Q. Tell you what -- we've been talking for
5 almost an hour.

6 A. Oh really?

7 Q. We're going to take --

8 MR. HENDERSON: Is a ten-minute break
9 okay with everybody? We are going to take a
10 ten-minute break and then we'll come back and see
11 if we can't wrap it up, okay?

12 A. Okay.

13 THE VIDEOGRAPHER: The time is
14 10:55 a.m. We are going off of the video record.

15 (A recess transpired.)

16 THE VIDEOGRAPHER: We are back on the
17 record. The time is 11:14 a.m.

18 BY MR. HENDERSON:

19 Q. Mr. Crawford, I think when we stopped I
20 was asking you questions about the brake work you
21 were around Eddie Gene when he did his garage. Do
22 you remember leaving off there?

23 MR. PHILLIPS: Object to the form.

24 THE WITNESS: Yes. Yes, sir.

25 BY MR. HENDERSON:

1 Q. Now, I asked you if you remember where
2 Eddie Gene bought the new brakes that he used. I
3 want to ask you another question.

4 Do you remember who made the new brakes
5 that Eddie Gene used?

6 A. I think it was Dow something.

7 Q. Dow?

8 A. I think.

9 Q. Was it just one company or more than
10 one company?

11 A. Yeah, I think it was -- I'm sure it was
12 more than one company. At the time he was -- time
13 I was there.

14 Q. Can you remember any other companies
15 that made the new brakes that Eddie Gene used?

16 A. I can't -- I can't think of the names
17 right now.

18 Q. Does the name Bendix mean anything to
19 you?

20 A. Oh, yeah. Yeah.

21 MR. PHILLIPS: Object to the form.

22 BY MR. HENDERSON:

23 Q. Why does Bendix mean something to you?

24 MR. PHILLIPS: Same objection.

25 THE WITNESS: Yeah, Bendix. Yeah.

1 BY MR. HENDERSON:

2 Q. And why does that mean something to
3 you?

4 A. Yes, I remember I --

5 Q. You got to let me finish my whole
6 question, okay?

7 A. Okay.

8 Q. Why does Bendix mean something to you?

9 MR. PHILLIPS: Object to the form on
10 foundation.

11 MR. HENDERSON: You can answer.

12 THE WITNESS: Oh, okay. Yeah, I
13 remember that written over there on one of the box.

14 BY MR. HENDERSON:

15 Q. When you say written on one of the
16 boxes --

17 A. Yeah, the brakes he bought.

18 Q. How often do you remember seeing a
19 Bendix brake shoe box?

20 MR. COATES: Object to the form.

21 THE WITNESS: I don't know exactly how
22 many. It was a good bit.

23 BY MR. HENDERSON:

24 Q. And the problem is, I don't know what
25 you mean when you say a good bit.

1 A. Oh, okay.

2 Q. Can you give me a number?

3 A. I say at least 60 -- when I count it
4 all up in my head.

5 Q. And did you see these boxes when you
6 were at Eddie Gene's auto shop, or did you see them
7 at some other time?

8 A. I seen them then, and the other times
9 too.

10 Q. What other times did you see them?

11 A. It was on the -- on the brake shoes
12 that was -- that went on my car. And my -- my
13 son-in-law has been putting the brakes on my car.
14 He's the only one who does it.

15 Q. Now, where did your son-in-law do this
16 brake work?

17 A. He just does it right in the yard.

18 Q. In your yard?

19 A. He does it -- he did it in his yard and
20 my yard too, but mostly in my yard.

21 Q. What time period are we talking about
22 when your son-in-law replaced your brakes?

23 A. Oh, wow. All through 1990, and all
24 through 2000 -- through 2000. And the last time
25 was -- let's see -- 2015. Yep. He put new brake

1 shoes on my -- on my Kia -- on my Kia.

2 Q. So you said you saw Eddie Gene use new
3 Bendix brakes --

4 A. Yeah.

5 Q. What I'm not clear on is --

6 MR. COATES: Object to the form.

7 BY MR. HENDERSON:

8 Q. -- you said you've seen new Bendix
9 brakes 60 times, if I understood you correctly --

10 A. Yeah, I --

11 MR. COATES: Object to the form.

12 MR. PHILLIPS: Object to the form.

13 THE WITNESS: Well, it's hard to say
14 exactly --

15 BY MR. HENDERSON:

16 Q. Okay.

17 A. -- but I would say at least that much.

18 Q. Okay. Here's what I'm asking you,
19 though --

20 A. Okay.

21 Q. -- how many times did you see
22 Eddie Gene use new Bendix brakes?

23 MR. PHILLIPS: Same objection.

24 THE WITNESS: It was a lot. I would
25 say -- I would say about -- if I had to put a

1 number on it, I would say about 60.

2 BY MR. HENDERSON:

3 Q. Do you remember if Eddie Gene worked on
4 anyone's brakes several times?

5 A. Oh, he worked on a lot of people's
6 brakes because people came from all around.

7 Q. Did he have repeat customers?

8 A. Oh yes.

9 MR. PHILLIPS: Object to the form.

10 BY MR. HENDERSON:

11 Q. Can you remember any of his repeat
12 customers?

13 A. Yeah, but most of them I didn't know.
14 But I just -- I know they just keep showing up.

15 Q. Did you recognize them by face but
16 didn't know their names?

17 MR. PHILLIPS: Object to the form.

18 BY MR. HENDERSON:

19 Q. Let me ask you a question -- I think it
20 may be confusing the way I'm asking you.

21 A. Okay.

22 Q. If I understand you correctly, you are
23 saying that you saw some people who were repeat
24 customers at Eddie Gene's garage?

25 MR. PHILLIPS: Object to the form.

1 THE WITNESS: Oh, yes.

2 BY MR. HENDERSON:

3 Q. How many repeat customers do you
4 remember at Eddie Gene's garage?

5 MR. PHILLIPS: Object to foundation.

6 THE WITNESS: There was a lot -- I
7 don't know. Okay.

8 BY MR. HENDERSON:

9 Q. I'm just trying to get a sense of what
10 you mean when you say a lot, that's all.

11 A. Okay. There was people coming in to
12 get their car worked on -- even more than just
13 brakes -- a lot, you know, an old car, spark plugs,
14 the brakes, and they was around Blacksburg and
15 Cherokee Falls.

16 Q. Do you remember anybody coming to
17 Eddie Gene repeatedly -- specifically to have brake
18 work done on their car?

19 MR. PHILLIPS: Object to the form.

20 THE WITNESS: Oh, yes, but it was like
21 about -- like over a year apart, you know?

22 BY MR. HENDERSON:

23 Q. Mr. Crawford, when we talked this
24 morning, I asked you about three different places
25 that you worked. I asked you about Hoechst,

1 Timken, and I asked you about CNA. Those are not
2 the only jobs you've had in your lifetime, are
3 they?

4 A. Oh, no.

5 Q. It was just a few of the places that
6 you worked?

7 A. Oh right. Oh yeah, that's just a few.

8 Q. When you were working at those three
9 jobs, did anybody ever warn you about the dangers
10 of working with or around asbestos?

11 A. Absolutely not.

12 MS. SHOFNER: Objection.

13 MR. HENDERSON: I'm sorry. What was
14 the objection?

15 MS. SHOFNER: To form.

16 BY MR. HENDERSON:

17 Q. Did anybody warn you about the danger
18 of working with asbestos at any of those three jobs
19 we talked about?

20 A. No.

21 MS. SHOFNER: Object to the form.

22 BY MR. HENDERSON:

23 Q. Did anybody ever warn you about the
24 dangers of working around people who were working
25 with asbestos --

1 MR. COX: Object to the form.

2 BY MR. HENDERSON:

3 Q. -- on any of the jobs we've talked
4 about?

5 A. No.

6 Q. Did anybody ever tell you during that
7 time period when you worked at these different jobs
8 that we've discussed that working with or around
9 people who were working with asbestos could cause
10 cancer?

11 MS. SHOFNER: Object to the form.

12 THE WITNESS: No.

13 BY MR. HENDERSON:

14 Q. If you had known that asbestos was
15 dangerous, what would you have done?

16 A. I would have found another job away
17 from asbestos.

18 MR. MAJOR: Object to the form of that
19 question.

20 BY MR. HENDERSON:

21 Q. When did you first find out that
22 something was wrong with your health?

23 A. It was this past year in 2017, about --
24 I think it was about August.

25 Q. What happened?

1 A. Oh, I had -- I was giving out of
2 breath, and I run out of breath quick, you know?
3 So I went to the emergency room and they did a
4 X-ray on my chest and it said it had fluid in my
5 chest -- in my lung. My right lung had fluid in
6 it.

7 Q. Did they do something about it?

8 A. Well -- oh yeah, they drained it out.
9 They put me in the -- in the -- in intensive care
10 up at Mary Black, up here in Gaffney.

11 Q. And you said they drained the fluid
12 after that?

13 A. Oh, yes. Yes, they did.

14 Q. Did they have to drain the fluid one
15 time or more than one time?

16 A. Oh, well, at one time there, and then I
17 went to the chest place the next month. Let me
18 see, that was -- oh yeah, they drewed that out on
19 -- I remember seven -- exactly 17 -- wait a minute.

20 September the 13th -- the first time in
21 Mary Black. And then after that, I went to -- I
22 started going to chest -- the chest place over on
23 221 in Spartanburg. And then that doctor -- it was
24 about a month later. It wasn't over a month. He
25 sent me up here to Spartanburg Regional, and they

1 drawed it out again.

2 Q. So is that three times that you had to
3 have fluid drained?

4 A. Let me see. It was one time there and
5 it was -- wait a minute. I know it was one time
6 over there at Mary -- over here -- over here at
7 Mary Black in Gaffney. And over at Spartanburg
8 Regional -- I know at least twice because, first,
9 the workers up there at Mary Black -- I mean,
10 Spartanburg Regional. I'm sorry.

11 Spartanburg Regional drawed it out, and
12 about a few weeks later it was Dr. O. over there at
13 the chest place. He drawed it out himself. And
14 then after that he told me that -- he would -- he
15 suggested to have the tube put in -- in my lung.

16 Q. Do you have a tube in your lung right
17 now?

18 A. Yes, sir.

19 Q. What's it called?

20 A. They called it a catheter. Catheter.

21 Q. Have you been having trouble with your
22 catheter?

23 A. Well, yes, it -- it -- well, it's --
24 it's -- my wife -- my daughter checked it and said
25 it was -- it's -- she didn't like the looks of it,

1 and also the fluid won't come out. No fluid comes
2 out.

3 Q. Are you having trouble with your
4 catheter today?

5 A. Well, it's -- yeah, I'm having a little
6 bit of trouble with it because it's loose.

7 Q. If you need to stop and take a break,
8 will you tell us?

9 A. I will.

10 Q. Is the catheter painful?

11 A. Well, my chest is painful -- my chest
12 is.

13 Q. What side of your body -- I think
14 you're indicating the right side of your body, but
15 I want to make sure that I understand you.

16 Can you show the jury where the
17 catheter is located on your body.

18 A. It's right -- it's -- it's -- let me
19 see. It's between my side and my back. As a
20 matter of fact, I can feel it right now. Right
21 there. Right here (Indicating).

22 Q. Does that affect the way you sleep?

23 A. Oh, it does. It does.

24 Q. How so?

25 A. Well, I can't -- I lay a certain way

1 and I just lay on -- I can't turn over. I have to
2 lay on my back, and I can't move, you know?

3 Q. When the fluid builds up in your lung,
4 is it painful?

5 A. Oh well, what happens is when fluids
6 builds up, I can't -- it cuts the air off because
7 it's full of fluid instead of air, and I get out of
8 breath a lot.

9 Q. Did they put the catheter in your side
10 so you can drain your fluid at home without having
11 to keep going to the hospital?

12 A. Oh, that's right. That's exactly why.
13 That's exactly.

14 Q. What other treatment are you receiving
15 right now for your Mesothelioma aside from the
16 catheter?

17 A. Chemo. And they got a port right there
18 on my left -- of my chest (Indicating).

19 Q. What do you mean when you say a port?

20 A. It's a -- well, it's what they put ,
21 in -- they put -- it's -- the chemo nurse puts
22 the -- the little -- a valve -- like the valve goes
23 in right there (Indicating). That's where the
24 chemo goes in -- on a little pipe.

25 Q. So am I understanding you correctly,

1 you had a surgery to put a valve in your chest?

2 A. Uh-huh, that's right. That's right.

3 Q. And when you say chemo, you mean
4 chemotherapy, right?

5 A. That's right. I do. I do.

6 Q. For people who are not familiar with
7 the chemotherapy, can you describe what it's like
8 when you undergo it.

9 A. Well, it's afterwards, it gives you
10 nauseate -- nauseated, you know?

11 Q. You mentioned a nurse earlier -- a
12 chemo nurse?

13 A. Yeah, that's right.

14 Q. Does the chemo nurse come to your house
15 or do you have to go see her at a clinic?

16 A. I go right -- I see her right down here
17 at Gibbs Cancer Clinic.

18 Q. So walk us through what happens when
19 you go to that facility for chemo treatment.

20 A. Oh, okay. I sat down and then she
21 puts -- she's got this -- I don't know what you
22 call it. It's a -- a little thing that moves
23 around with all of those -- what they are going to
24 put in me hooked up to?

25 Q. Yes, sir.

1 A. All these here fluids -- well, the
2 fluids -- and it's got pipes -- little pipes run
3 through it and then she's got a sharp -- like, a
4 needle -- on the end of one of them. And then she
5 just pushes it through -- through my skin.

6 The catheter -- you can't even see it.
7 All you can see is just the skin -- the puffed-up
8 skin -- all you can see. But she knows exactly
9 where it is, and she just sticks it right through
10 my skin.

11 Q. And how long do you sit there for chemo
12 treatment?

13 A. Oh man, about -- let me see. Over an
14 hour -- let me see. Let me see. It's like about
15 an -- at least an hour and a half or two hours.

16 Q. How do you feel after chemo? Do you
17 feel better?

18 A. No, I start -- I start feeling weaker.

19 Q. How long do you feel weaker for after
20 you have chemo performed?

21 A. Well, it keeps -- it keeps getting --
22 it's like -- about two weeks. Because what happens
23 is is your immune system starts going down for
24 about -- the chemo nurse says it's like about ten
25 or 11 days it starts -- your immune system keeps

1 going down and then after about 11 days, it
2 gradually starts building back up until three
3 weeks. I take chemo every three weeks and then
4 after three weeks, it starts all over again.

5 Q. So how many times have you gone through
6 that cycle already?

7 A. Three times.

8 Q. When is your next cycle; do you know?

9 A. It's a -- wait a minute. Like about a
10 week away.

11 Q. Are there things that you used to be
12 able to do that you can't do anymore because you
13 have Mesothelioma?

14 MR. PHILLIPS: Object to the form.

15 THE WITNESS: Yeah.

16 BY MR. HENDERSON:

17 Q. Let me ask that a different way to make
18 sure we're clear on this.

19 I want you to tell the jury how having
20 Mesothelioma has affected your life.

21 A. Okay. Well, I can't -- I can't do any
22 yard work like I used to.

23 Q. Did you enjoy doing yard work?

24 A. Yes -- well, like I'm seeing the yard
25 full now. It's full -- my whole yard is slammed

1 full of leaves because I can't get to it.

2 Q. Now, I asked you do you like doing yard
3 work -- you know you're under oath, right?

4 A. That's right. Well, I don't like doing
5 the yard work, but I like the results after.

6 People -- there's a lot of people --
7 well, when my -- my brother goes to church right
8 down -- right down below it, and we have -- I've
9 been going up on Wednesdays on -- to the restaurant
10 up here -- the men meet together and have breakfast
11 together.

12 Q. Yes, sir.

13 A. And I've been going with him, but I
14 can't -- I can't do it now because it's -- when
15 it's a lot of people around -- I got -- I'm
16 supposed to wear a mask when there's a lot of
17 people around, but I can't talk with it on.

18 Q. Why are you supposed to wear a mask?

19 MR. PHILLIPS: Object to the form.

20 THE WITNESS: Because my immune system
21 has gone down. It's down because of the chemo.
22 And then to keep from catching the flu.

23 And anyway, they was a -- a lot of them was
24 making -- was telling me about they ain't never
25 seen so many leaves in the yard when there's

1 nothing I can do about it, you see? And that
2 really gets on my nerves.

3 BY MR. HENDERSON:

4 Q. What is Silver Sneakers?

5 A. Silver Sneakers? That's Humana's
6 program where they let you go into a gym and they
7 pay for it. And -- okay. And I once was on the
8 Silver Sneakers -- before even I found out I had
9 lung cancer, I had to quit because I --

10 Q. Why did you have to -- go ahead. I'm
11 sorry.

12 A. Sorry.

13 Q. It's okay.

14 A. I couldn't -- I couldn't stand up to
15 it -- doing the exercise because I get out of
16 breath.

17 Q. Did you have --

18 A. Yeah, because my lungs was hurting.

19 Q. Did you like to exercise?

20 A. Oh, yes, I did.

21 Q. What kind of exercise did you like to
22 do?

23 A. The kind that was on the stair steps
24 and the bicycle. It was in the gym room. Yeah.

25 Q. Were there things that you like to do

1 with your family that you can't do the same way
2 since your diagnosis?

3 A. Oh, yeah. My daughter got a swimming
4 pool and that's where they have all the parties --
5 at her swimming pool, and I can't -- no, I -- well,
6 it's in the warmer weather, I can't -- but at the
7 end of the year, I didn't have the breath then to
8 -- to get in the pool and do the exercises, you
9 know, and play with them. And --

10 Q. Do your grandkids like ice cream?

11 A. Huh?

12 Q. Do your grandkids like ice cream?

13 A. Oh, they love ice cream. They love it.

14 Q. Do you take them for ice cream?

15 A. Oh, yes, I do. Yeah.

16 Q. Has that been affected by your
17 mesothelioma?

18 A. Oh, yeah; yeah, it really has. It
19 really has.

20 Q. What do you mean?

21 A. Well, I just ain't got the energy to
22 get out -- I don't know.

23 Q. Have your doctors talked to you about
24 what to expect moving forward?

25 A. Okay. They said the chances of getting

1 a cure is about -- in the past -- it's past -- past
2 patients, it cured about 20 percent.

3 MR. PHILLIPS: Object on hearsay.

4 BY MR. HENDERSON:

5 Q. How did it feel to hear that news?

6 A. It was devastating, but I'm just glad I
7 got -- I'm glad I got 20 percent of a chance.
8 That's better than zero. Sorry.

9 Q. It's okay. Take your time. I don't
10 want to rush you. I thought you were about to say
11 something else; I couldn't tell.

12 A. Well, it's devastating to think about
13 I'm going to have to leave my -- I might have to
14 leave my grandchildren and my grand --
15 grandchildren. Oh, I'd like to see them grow up --
16 to be a teenager.

17 I keep thinking back all the time, but
18 that -- I'll see what happens. I don't know what's
19 my next -- what's going to come next. This is -- I
20 only found out about this cancer -- it's been less
21 than a year. But I still got it, and so...

22 Oh, the doctor said that it's in -- I
23 got these -- what do you call them -- what do they
24 call them? Them ol' cells -- cancer cells -- in
25 that there -- it's in that --

1 Q. The pleura?

2 MR. PHILLIPS: Object to the form.

3 THE WITNESS: Yeah. Yeah. It's like a
4 thin -- sheet in there or best I can describe it.
5 And it's all -- where I got the cancer cells is on
6 that, and he can -- he can take them off if it's
7 too -- he has to wait to get in there to see if
8 it's too thick, 'cause see, it's so thin --

9 BY MR. HENDERSON:

10 Q. Are you talking about what to expect at
11 your next doctor visit?

12 A. I'm talking about when the operation
13 comes.

14 Q. Okay.

15 A. When he takes them out -- first, the
16 doctor decided to take chemo before the operation
17 because they said it's a -- they said they have a
18 better chance on the operation if you take the
19 chemo first before the operation.

20 And then he said if it's not all the
21 way through, he can take them off. But if it's all
22 the way through, he can't, you know?

23 Q. So am I understanding you correctly --
24 are you waiting to find out just how bad your
25 condition is?

1 A. That's absolutely right.

2 MR. PHILLIPS: Object to the form.

3 THE WITNESS: That's absolutely right.

4 MR. HENDERSON: Mr. Crawford, I think
5 that's going to do it for me in terms of questions
6 I've got for you this morning.

7 THE WITNESS: Okay.

8 MR. HENDERSON: So I think some of
9 these other lawyers may have some questions for
10 you.

11 THE WITNESS: Okay. Okay.

12 MR. HENDERSON: Are you okay to keep
13 going, or do you need a break?

14 THE WITNESS: I'm okay. I'm okay.

15 MR. HENDERSON: I'm going to scoot over
16 here to the side and let somebody else take this
17 microphone if they need it.

18 THE WITNESS: Okay. Okay.

19 MR. PHILLIPS: If you want to swap
20 seats, you're welcome to.

21 MR. HENDERSON: No, no, I'm okay over
22 here.

23 MS. SHOFNER: Are we doing the same
24 transcript? Just curious.

25 Mr. Phillips: Honestly, I had not

1 considered that. Are we on camera still?

2 THE VIDEOGRAPHER: We're still on; you
3 want to go off?

4 MR. PHILLIPS: For one second, please.

5 THE VIDEOGRAPHER: Sure. The time is
6 11:45. We are going off the video record.

7 (A recess transpired.)

8 THE VIDEOGRAPHER: The time is
9 11:46 a.m. We are back on the video record.

10 EXAMINATION

11 BY MR. PHILLIPS:

12 Q. Mr. Crawford, my name is Mark Phillips.
13 I've got some of the defendants in the case on the
14 other side -- the ones that you've sued. And I've
15 also got a -- so among those is a company called
16 Honeywell International that I'm interested in
17 discussing with you. Let me ask a few background
18 questions that weren't clear to me.

19 Y'all moved to your home on 400 Pacolet
20 Highway in Gaffney -- when was that?

21 A. On April 2007.

22 Q. When was it that -- where was it that
23 you lived right before 400 Pacolet Highway,
24 Gaffney?

25 A. On Goucher Road in Gaffney.

1 Q. I'm sorry. I'm from the country
2 myself.

3 A. Okay.

4 Q. And by the way, I was born on
5 July 20th; weren't you? Weren't you born on
6 July 20th?

7 A. Yes.

8 Q. So was I.

9 A. Oh, okay.

10 Q. Now -- and I'm from the country, but
11 I'm still having trouble understanding you.

12 A. Okay.

13 Q. So tell me what's that address.

14 A. Okay. Wait a minute. Wait a minute.
15 I'm thinking back. It's Goucher Green Bethel Road,
16 and I believe it's number 152.

17 Q. That's where you lived before you moved
18 to Pacolet Highway in April of '07?

19 A. Yes, sir.

20 Q. And 152 -- you said go -- it sounded to
21 me like Goselet, but I couldn't understand --

22 A. Yeah. Goucher.

23 Q. Could you spell that for me.

24 A. Yeah, yes, I can. G-O-U-C-H-E-R.

25 Q. Doecher [sic]?

1 A. Yeah, and then --

2 Q. And Doecher -- tell me -- I'm sorry.

3 Let's stay on Doecher for a second.

4 Is that Doucher Road? Doucher Highway?
5 Doecher Street?

6 A. Goucher Green Bethel Road.

7 Q. Doecher Green Bethel Road?

8 A. Yeah. Yeah.

9 Q. Like Bethel Methodist Church?

10 A. Yeah, B-e-t-h-e-l.

11 Q. Okay. And what town is that in?

12 A. Gaffney.

13 Q. In Gaffney.

14 A. South Carolina.

15 Q. What years did y'all live there?

16 A. I'm not sure about the exact year, but
17 it was around 1995.

18 Q. That was '95 to 2007, correct?

19 Roughly?

20 A. Yes. Yes.

21 Q. Okay. And did you own a house at
22 Doecher Green Bethel Road?

23 A. Yes, I own a mobile home.

24 Q. Okay. Y'all had a mobile home there?

25 A. That's right.

1 Q. And how about right now? Do y'all live
2 in a mobile home or a house?

3 A. House.

4 Q. Okay. Did you own the lot on
5 152 Doecher Green Bethel Road or rent a space at a
6 park?

7 A. Actually, the whole lot belonged to my
8 wife's cousin.

9 Q. What was his or her name?

10 A. Regina Ledbetter.

11 Q. And did y'all pay rent to
12 Regina Ledbetter?

13 A. Oh no. No, no.

14 Q. So she let y'all use the space?

15 A. Yes.

16 Q. Okay. When you moved to Doecher Green
17 Bethel Road in Gaffney, did you move your mobile
18 home there, or did you just -- did y'all buy a
19 house there?

20 A. When I bought a mobile home, just moved
21 the mobile.

22 Q. Just moved it. Oh, I see.

23 A. Yeah.

24 Q. So that's where y'all live now -- in
25 your mobile home on?

1 A. No. No. No, I live on --

2 Q. That's right.

3 A. I moved out of the mobile home and sold
4 it.

5 Q. So you said you sold your trailer in
6 '07; does that sound right?

7 A. Yeah, it was about '07 --

8 Q. About that --

9 A. Or after there -- maybe a little bit
10 after there, but I moved out -- I remember I moved
11 out in '07.

12 Q. Was it a single or a double trailer?

13 A. It was a single.

14 Q. Okay. And your place on 400 Pacolet --
15 is that a house or is that a mobile home?

16 A. It's a two-story house.

17 Q. Two-story house. Now before 1995 --
18 before 152 Doecker Green Bethel Road, where did
19 y'all live? I'm taking you backward one step at a
20 time.

21 A. Yeah. Okay. I lived in a mobile home
22 on Union Highway.

23 Q. Union Highway?

24 A. Yeah. Yeah.

25 Q. How long were y'all in that mobile

1 home, because I think you moved out of it in --

2 A. Yeah, in that one --

3 Q. -- 1995, it looks like?

4 A. Yes -- man it's hard to put the time
5 that way back.

6 Q. I know it's hard to remember sometimes
7 going backwards.

8 A. Yeah. That mobile home, I rented. It
9 was a mobile home lot, and I just rented in the
10 mobile lot right there. Yeah, I've -- before I
11 moved there --

12 Q. Tell you what, let's stay there for a
13 second.

14 A. Okay. Okay.

15 Q. I'm sorry to interrupt you. I'm trying
16 to get this residence before 152 Doecher Green
17 Bethel Road in Gaffney --

18 A. Yeah.

19 Q. -- the trailer that you had at
20 Ms. Regina Ledbetter's --

21 A. Yeah.

22 Q. -- property -- your cousin-in-law --

23 A. Yeah. Yeah.

24 Q. You lived somewhere else until about
25 1995 --

1 A. Yeah. Yeah.

2 Q. -- it sounds like a mobile home?

3 A. Yes.

4 Q. It was on Union Highway, I believe?

5 A. Yes, it was a mobile home. That's
6 right.

7 Q. And how long did you live there?

8 A. Whoa. It was at least a couple of
9 years.

10 Q. What was close -- Union Highway
11 unfortunately doesn't mean anything to me 'cause
12 I'm not from Gaffney; I'm from Charleston.

13 A. Okay.

14 Q. What town was this place on Union
15 Highway?

16 A. Gaffney.

17 Q. In Gaffney. And what was near there --
18 like a landmark? Maybe a store?

19 A. It was -- okay. That was Highway 18.

20 Q. So it was on Union -- Union Highway was
21 Highway 18?

22 A. Wait a minute. Wait a minute. Let me
23 think. Let me think. Oh man. Oh man, oh man, I'm
24 not sure -- Okay. It was the same -- I'm not sure
25 of the number of the highway now, but it was a --

1 it was a bowling alley close to it.

2 Q. Which one?

3 A. Oh, me, I can't think of the name of
4 it, but it's the same road that -- it's the same
5 road that goes in front of the Gaffney Middle
6 School -- that used to be the Gaffney High School
7 before they built another one.

8 Q. So Gaffney Middle was formerly Gaffney
9 High School?

10 A. Right.

11 Q. Okay. Did y'all live on a lot? Did
12 y'all live in a park? Did you live on a property
13 that you owned?

14 Where did you live?

15 A. No. I lived -- oh, wait a minute.
16 Wait a minute. Douglas, Douglas, Douglas.

17 Q. What -- Douglas --

18 A. It was Douglas Trailer Park. I thought
19 that's what it was, but it had to come up in my
20 memory. It was Douglas Trailer Park.

21 Q. Douglas Trailer Park. All right.

22 A. Yes, that's what it was.

23 Q. And that was roughly a couple of years
24 up until 1995?

25 A. Yes, sir.

1 Q. Like when we say a couple -- do you
2 mean two or three?

3 A. About two.

4 Q. All right.

5 A. I don't know exactly, but it was about
6 two.

7 Q. I tell you what -- I'm going cut to one
8 chase. Did you all live in a mobile home or a
9 series of mobile homes before you moved finally to
10 your two-story house on 400 Pacolet Highway?

11 A. Oh, yes, yes, yes, because before I
12 moved to Douglas, I was in Smith's Trailer Park.

13 Q. All right. Let's -- so you were in
14 Smith's Trailer Park until about 1993, maybe?

15 A. Yes, somewhere along there.

16 Q. How long had you been at Smith's
17 Trailer Park?

18 A. Oh, boy. It was like -- roughly two or
19 three years.

20 Q. Two or three years in Smith's Trailer
21 Park?

22 A. Yes, sir.

23 Q. Okay. And what kind of trailer y'all
24 got? What kind of trailer did you have? What
25 brand; do you remember?

1 A. At the Goucher Green Bethel Road?

2 Q. Yeah, I'm sorry. I was just wondering
3 what brand of mobile home it was.

4 A. Oh, that's the only one I owned. The
5 other ones I rented.

6 Q. Oh, I see. You rented those. How
7 about the one you owned at Doecher Green Bethel
8 Road -- what kind of was it?

9 A. Doggone it. Well, I used to know. Oh,
10 man. Yeah, I used to know, but now I just can't
11 think of the name of it. I'm sorry.

12 Q. Okay. How about the rental on Union
13 Highway in Douglas Trailer Park -- do you know what
14 kind you were renting?

15 A. No, sir, I don't. I'm sorry.

16 Q. It's okay. Were you renting one at
17 Smith's Trailer Park also?

18 A. Oh, yeah. Yeah.

19 Q. So it was basically a place where you
20 could move in because they had trailers and lots --

21 A. That's right.

22 Q. -- that you could rent?

23 A. That's right.

24 Q. But you don't remember the brand of the
25 trailer there?

1 A. No, I just don't.

2 Q. Okay.

3 A. I know the trailer's still sittin'
4 there, but -- but I --

5 Q. Do you know what unit number it was or
6 what lot number it was?

7 A. No. But I know exactly where it was
8 sittin'. It was all the way -- all the way down
9 there on the end.

10 Q. Okay.

11 A. On the your right-hand side going -- on
12 your left-hand side going down -- all the way to
13 the end.

14 Q. How about the Douglas Trailer Park --
15 do you remember what lot that y'all were in?

16 A. No, I don't. All I remember was -- I
17 don't know if it went by lot number because I had a
18 post office -- I had a mailbox up at the end. I
19 always went by that.

20 Q. Is that when you were at Smith's
21 Trailer Park or at Douglas Trailer Park?

22 A. Douglas.

23 Q. What box number were y'all there?

24 A. Oh, man. I just can't remember.

25 Q. That's all right. We're just trying to

1 -- we need these addresses if we can get them --

2 A. Yeah, I understand.

3 Q. -- so we can kind of check up on some
4 stuff.

5 How about Smith's Trailer Park -- do
6 you remember what box number y'all had?

7 A. Smith's, no. But I can tell you
8 exactly where it was at. You go down a hill -- it
9 was like a hill -- and you go down --

10 Q. Yes, sir.

11 A. -- and it was the last one on the left.
12 And back up there before that at the Douglas
13 Trailer Park on the Union Highway, there was just
14 one line of mobile homes there, and I was -- I
15 lived in the last one on the left.

16 Before that I lived in about -- about
17 two -- yeah, I lived in about two above it, and my
18 wife wanted -- wanted to change out to the other
19 one. And she talked to Miss Douglas about changing
20 and we moved all the way down to the last one -- at
21 that time on the left.

22 Q. Now --

23 A. Well, it was just one-way, but the road
24 went down on the right.

25 Q. What town was Smith's Trailer Park in?

1 A. Gaffney.

2 Q. Gaffney?

3 A. Gaffney.

4 Q. Okay. And what was it near? I know
5 you told me that Douglas Trailer Park was near a
6 bowling alley and near the old Gaffney High School
7 and became Gaffney Middle School.

8 A. Okay.

9 Q. What was a good marker --

10 A. Okay.

11 Q. -- for me for Smith's Trailer Park?

12 A. Okay. Smith's? Okay. Wait a minute.
13 Daddy Joe's Restaurant and -- doggone it. There
14 was a drugstore right beside of it. Right across
15 the road from it there was a drugstore. Okay. I
16 can't think -- I can't even think of the name of
17 the drugstore.

18 Q. Okay. Does Daddy Joe's Restaurant
19 still exist?

20 A. Huh?

21 Q. Does Daddy Joe's Restaurant still
22 exist?

23 A. Oh, yes.

24 Q. Okay.

25 A. Daddy Joe's is right -- right up here

1 on Floyd Baker Boulevard. Right up here on Floyd
2 Baker Boulevard.

3 Q. Oh, that will help us find it.

4 A. Yeah. Yeah.

5 Q. All right.

6 A. Let me see. It's right in front of --
7 oh, boy. Wait a minute. Advance is right
8 beside -- Advance is right beside of it.

9 Q. Smith's?

10 A. Right beside of Daddy Joe's. It sure
11 is -- no, wait. Wait a minute. Wait a minute. If
12 you get to Advance and then a little gas station
13 and then Daddy Joe's. Daddy Joe's is right there
14 on the corner.

15 Q. So Advance, and a gas station is near
16 Daddy Joe's which is near --

17 A. Oh, you start at the corner -- you go
18 -- it's Daddy Joe's and then there was a gas
19 station and then Advance and then right beside
20 Advance is the furniture store. It's a furniture
21 store. Oh my goodness. I got chemo working on --
22 working on my mind.

23 Q. Uh-oh. Well, what we know is is that
24 Advance Auto is close by, Daddy Joe's Restaurant's
25 close by, there's a drug store close by, and a

1 furniture store close by.

2 A. Kimbrell's. Kimbrell's. Kimbrell's.

3 Q. Sir?

4 A. It come to me. Kimbrell's is the name
5 of the furniture store.

6 Q. Can you spell that?

7 A. It's -- oh, man, I can't. No, I really
8 can't. It starts with k-I-l -- and I've used that
9 -- I've used that furniture store for decades.

10 Q. It's not Ikea, is it?

11 A. No, Kimbrell's.

12 Q. I don't shop much myself, so...

13 A. They had a store downtown before they
14 moved -- before they built that new building --

15 Q. Out there.

16 A. -- yeah, on -- before Floyd Baker
17 Boulevard, yeah.

18 Q. That's Baker Boulevard? I'll write
19 that down.

20 A. Yeah, Floyd Baker Boulevard.

21 Q. Okay. Oh, did you say -- does Baker
22 got a first name? Something Baker Boulevard?

23 A. No -- wait a minute. Wait a minute.
24 My mind -- I'm sorry. My mind is going down.

25 Q. Let me tell you what --

1 Mr. Dave Henderson will tell you, if you need to
2 take a break -- if you would like to take a break,
3 you are welcome to take a break. If you want to go
4 get some lunch at that Bojangles', you can do that
5 too.

6 A. No -- okay. It's not because I'm in
7 here. At this time period, I forget a lot of
8 stuff. My mind is -- I'm losing my memory at this
9 time period.

10 Q. During lunchtime or --

11 A. No, cancer. Ever since I started
12 taking chemo --

13 Q. You have trouble with your memory?

14 A. Yes.

15 Q. Okay.

16 MR. HENDERSON: Mind if we take a
17 ten-minute break?

18 MR. PHILLIPS: Why don't we take ten
19 minutes and y'all can decide if you want to take a
20 lunch or not. You can go get a Diet Coke --
21 whatever you want to do.

22 THE WITNESS: Okay. Thank you..

23 BY MR. PHILLIPS:

24 Q. The only thing is in South Carolina,
25 we've got a funny rule.

1 A. Okay.

2 Q. You can't talk about the case with
3 Mr. Henderson.

4 A. Yeah. Okay.

5 Q. All right.

6 THE VIDEOGRAPHER: The time is
7 12:05 p.m. We are going off the video record.

8 (A recess transpired.)

9 THE VIDEOGRAPHER: The time is
10 12:16 p.m. This ends media unit number one of
11 today's deposition of Mr. Crawford. We are going
12 off the video record.

13 (A recess transpired.)

14 THE VIDEOGRAPHER: Here begins Media
15 Unit Number 2 in today's videotaped deposition of
16 Mr. Crawford. The time is 12:27 p.m.

17 BY MR. PHILLIPS:

18 Q. Mr. Crawford, you took a little
19 break --

20 A. Yeah.

21 Q. -- for about ten minutes or so and got
22 some air, I hope. And I think you just told me
23 there was something -- right before we went on
24 camera that helped you remember -- by the way, I'm
25 Mark Phillips, again.

1 What did you -- you were about to tell
2 me that you remembered something -- maybe about
3 your addresses?

4 A. Oh, we was talking about the addresses
5 in Gaffney in relation to Smith Trailer Park.

6 Q. Yes, sir.

7 A. Okay. I just remembered that right up
8 the road from Smith Trailer Park was a drugstore --
9 I just remembered the name of the drugstore. It
10 was Rite Aid's.

11 Q. Okay. Yeah, you mentioned a drugstore.
12 I'm glad you remembered. So it was a Rite Aid?

13 A. Yeah. Rite Aid.

14 Q. And there was a Advance Auto Parts
15 close by as well?

16 A. That's right.

17 Q. And do you know right now if that's the
18 one where your brother-in-law shopped about 20,
19 30 years earlier?

20 A. Oh, yeah, because --

21 Q. That's the one?

22 A. Right. I was there with him.

23 Q. Because I don't remember Advance Auto
24 existing back in the '60s, but you believe it was?

25 A. Well -- wait a minute. Well, I know he

1 went there after that.

2 Q. Yeah, I'm talking about back when you
3 was his neighbor.

4 A. Oh, yes. Wow. No, I can't -- I really
5 can't remember way back then --

6 Q. Okay.

7 A. -- exactly when.

8 Q. Okay. Is it fair to say that way back
9 when --

10 A. Yeah. Oh, yes.

11 Q. -- that -- I'm talking about in the
12 '60s when you lived next door to your
13 brother-in-law.

14 A. Yes.

15 Q. Is it fair to say that way back when
16 you are not able to remember which auto parts store
17 he was buying his replacements from?

18 MR. HENDERSON: Object to form.

19 THE WITNESS: Okay. Not exactly. I
20 knew that he went up there at Harris's.

21 BY MR. PHILLIPS:

22 Q. Okay. So if I'm not mistaken, you
23 don't think or you can't say under oath that he
24 shopped at Advance Auto, but you do think he
25 shopped at Harris's?

1 MR. HENDERSON: Object to the form. It
2 mischaracterizes his testimony.

3 BY MR. PHILLIPS:

4 Q. And I'm going to let you straighten
5 this out. Straighten us both out.

6 A. Yeah, I can't remember if Advance was
7 up there during that time period.

8 Q. Okay. You don't know if Advance was up
9 there?

10 A. That's right.

11 Q. Okay. But you do think Harris's was up
12 there?

13 A. Oh, yeah. It was -- it was over there
14 on the -- on 29 -- what they call Cherokee Street.
15 Right down from Blacksburg, but it's closed up. He
16 closed it up after that.

17 Q. Where was -- we're going to have to
18 look into that one a little bit, I guess.

19 A. Okay.

20 Q. Do you know who owned Mr. Harris's auto
21 part store?

22 A. Mr. Harris. I think his name was
23 Harris. It's -- he still lives up there, right
24 across -- he lives right across the road right now.

25 Q. Okay.

1 A. I'm sure, because he --

2 Q. And you told us a minute ago, but I
3 don't remember already -- if you believe that --
4 that one of your trailers wasn't too far from --
5 one of them was close to Advance Auto wasn't it?

6 A. Oh, yes. That's right.

7 Q. But not close to Harris's?

8 A. Oh, no. No.

9 Q. Help me understand, please, so we can
10 kind of check back --

11 A. Okay.

12 Q. -- where Harris's auto parts is. You
13 mentioned -- where it used to be on Highway 29,
14 Cherokee Street. Mr. Harris still lives right
15 across the --

16 A. Yeah -- wait a minute. But I think the
17 name was Harris's -- I think it was.

18 Q. Is that like Mr. Harris, H-a-r-r-I-s?

19 A. Yeah, I think.

20 Q. Okay.

21 A. As far as I can remember, that wants to
22 ring a bell -- Harris.

23 Q. Okay.

24 A. But I know exactly where the building
25 was. The building's still there.

1 Q. The building's still there?

2 A. Well, I can tell you exactly where it
3 is.

4 Q. Okay. Tell me where it is.

5 A. Okay. Okay. Over on 29 -- they call
6 that Cherokee Street. Okay.

7 Right there -- if you're coming from
8 Gaffney -- all right. And then you go -- you go
9 over the river bridge going towards Blacksburg --
10 Broad River Bridge. Okay. About two or three
11 miles you'll see a road on the right. They call it
12 Cherokee Falls Road.

13 Q. Turkey Falls?

14 A. Cherokee -- Cherokee Falls Road.

15 Q. All right, sir.

16 A. And there's a fish camp right there on
17 the corner, and they call it the -- I'm not sure if
18 they changed the name, but it was Crystal C --
19 right on your right-hand side. Well, Cherokee
20 Falls Road is on the right-hand side, too. And
21 like about -- (Someone sneezed.)

22 MR. HENDERSON: Bless you.

23 BY MR. PHILLIPS:

24 Q. I'm going to borrow one of your
25 Kleenexes.

1 A. About a mile or so past that, there's a
2 little gas station there on the left. And it was
3 -- a friend of mine runs it. Ted Darr runs it.
4 It's a gas station, and they sell food in there
5 too. But I just can't think --

6 Q. What's -- what's your friends's name
7 that owns that gas station?

8 A. Huh?

9 Q. What's your friend's name that ran that
10 gas station?

11 A. Ted Darr.

12 Q. I'm sorry. I can't --

13 A. Ted, T-e-d.

14 Q. Ted. Sure.

15 A. And Darr, D-a-r-r..

16 Q. Two R's you think?

17 A. They used to live down there on
18 Cherokee Falls.

19 Q. All right. Now, I'm going to recap if
20 you don't mind.

21 A. Okay.

22 Q. For Harris's auto parts -- Highway 29
23 Cherokee Street -- also known as Cherokee Street.
24 Later, it was closed. Was owned by Mr. Harris. We
25 think he still lives right close by.

1 And if you're coming from Gaffney
2 towards Blacksburg, you go over the Broad River
3 Bridge. Go about two or three miles on the right?

4 A. Uh-huh.

5 Q. And you say yes or no, if you don't
6 mind --

7 A. Okay.

8 Q. -- because we got to try to get this
9 thing down in a transcript.

10 A. All right.

11 Q. And then you're still on the Cherokee
12 Falls Road; is that right?

13 MR. HENDERSON: Object to the form.

14 THE WITNESS: No, you -- no. You go --
15 bypass the Cherokee Falls Road.

16 BY MR. PHILLIPS:

17 Q. You bypass it?

18 A. Yeah.

19 Q. There's a fish camp on the corner?

20 A. Yeah, on the right-hand side.

21 Q. Used to be called Crystal C?

22 A. That's right.

23 Q. And then about a mile past that,
24 there's a gas station that's got food?

25 A. Yeah, on the left.

1 Q. On the left. And that was Ted
2 Darr.

3 A. Yeah, but I think they call it a name
4 like Giddy's or something like that.

5 Q. It might be Giddy's?

6 A. Giddy's -- something like that. I wish
7 I had a phone book.

8 Q. I wish I had a phone book too.

9 A. I know it.

10 Q. We're both on our own.

11 A. Oh, my goodness. I just can't think of
12 the name of it. I haven't been by it lately.
13 That's why I don't know.

14 Q. Well, we're going to figure it out.

15 And if you're going from Ted Darr's gas
16 station, which might be called Giddy's now, how do
17 you get from there to what used to be Harris's auto
18 parts?

19 A. It's like about -- less than a quarter
20 of a mile on the left, I'd say.

21 Well, I got to reframe something. The
22 Harris's -- it was something -- it was a long time.
23 It's hard to remember the name, but I -- what comes
24 up in my mind is like Harrison or Harrison's.
25 Harris or Harrison.

1 Q. I see. Do you believe it was Harrison?

2 A. It could have been either one.

3 Q. Or Harris -- you're not sure?

4 A. Oh, it was -- see it was back in the
5 '60s. I used to know the name. I used to shop
6 there a lot.

7 Q. I see.

8 A. I used to buy my gas there.

9 Q. At the auto parts store?

10 A. Yeah, absolutely. At a gas pump, sure
11 did.

12 Q. Oh, it was gas station where you had
13 some parts to sell --

14 A. Well, no, it was a big -- it was a
15 great big parts place, but he also sold gas. At
16 the same time, he also changed oil and worked on
17 people's mufflers. He sold mufflers and had a guy
18 install mufflers and change oil.

19 Q. So he had -- he did a little bit of
20 everything?

21 A. Yeah, yeah, it was.

22 Q. Do you remember Mr. Harris's first
23 name?

24 A. No, I don't.

25 Q. Is he --

1 A. I remember his face. It's just like
2 right in front of me.

3 Q. Is his building still there?

4 A. Last time I came by it was.

5 Q. Okay. And when was that, you reckon?

6 A. It was -- maybe close to a year ago,
7 I'd say.

8 Q. And do you remember how many service
9 bays he had in his shop, because I think you said
10 he changed mufflers, oil, that kind of thing?

11 A. Oh, yeah. It was like an old building.
12 It was like -- but it was -- it had one. You had
13 to drive up, you had to drive up a little -- up a
14 little piece.

15 Q. Was it outside where it lift or was it
16 an indoor service bay?

17 A. It was inside. But it wasn't a lift.
18 You had to drive the car up there.

19 Q. Did it have the pit underneath it?

20 A. Yeah. You had to drive the car up
21 under it and then it went up.

22 Q. Like a little hill?

23 A. Yeah. And it was -- I remember it was
24 real narrow. It was like doing a magic trick,
25 just --

1 Q. A magic trick?

2 A. Yeah, cause driving up to it -- because
3 you had to keep --

4 Q. You had to stay on those two tracks?

5 A. That's right. You had to stay right
6 smack in the middle of it.

7 Q. Otherwise, you were going to fall in
8 the pit, right?

9 A. That's right. The wheels would run
10 off, yeah.

11 Q. All right. I think I understand that.

12 A. Yeah.

13 Q. Now, it sounds like we ought to be able
14 to find it.

15 You don't remember Mr. Harris's first
16 name?

17 A. No.

18 Q. You're 72 years old, right?

19 A. Yes.

20 Q. I know you were born on July 20th, just
21 like I was.

22 A. Okay.

23 Q. Was Mr. Harrison older than you,
24 younger than you, about the same age as you?

25 A. No, he was older.

1 Q. Okay. Do you know the name of anybody
2 who worked for him?

3 A. No, I don't. No, I don't.

4 Q. Did he carry any flag on his business
5 -- like a gas station logo, or you know, like a
6 car-parts logo, oil logo -- some people used to
7 have like a little shell.

8 Any kind of logo on his business --
9 like on his sign --

10 A. Uh-huh.

11 Q. -- where any auto part, muffler part --
12 anything that you remember? I know it was a long
13 time ago.

14 A. Yes -- no, I really don't.

15 Q. Okay.

16 A. Yep.

17 Q. Do you remember the name of anybody who
18 worked for Mr. Harrison?

19 A. He had a guy working with him, but I
20 don't -- I don't know his name.

21 Q. And you said, I think that Mr. Harrison
22 might still live over yonder?

23 A. I think so -- I'm pretty sure he lives
24 across the road. Matter of fact, I think he built
25 a church right cross the road -- right across the

1 road from it.

2 Q. And he's retired, or he shut his
3 business down, at least as best you know?

4 A. Oh, yeah, he closed that down. He sure
5 did.

6 Q. Do you know when he closed it?

7 A. Oh, man. Let me see. Goodness
8 gracious, I don't know exactly when. I don't know
9 if it was the '70s or '80s, 'cause when I moved --
10 after I got married, I didn't go back toward
11 Blacksburg too often.

12 Q. Right. I'm going to get back to where
13 we were. I've obviously got a little side tripped
14 to Mr. Harrison's?

15 A. Okay.

16 Q. What kind of church did he build across
17 the street? And the real reason I'm asking is do
18 they have a denomination that I can recognize it?

19 A. I'm not sure, but I believe it's
20 Baptist. I'm not sure.

21 Q. Is it a big church or really sort of a
22 little meet in the house?

23 A. Well, really I've never been to it, but
24 I remember seeing it out there. I remember seeing
25 it.

1 Q. Oh, I see. So you've never worshiped
2 there, but you've --

3 A. No, no, no.

4 Q. -- seen it from the road?

5 A. Yeah, from the road. From the road.
6 From the road.

7 Q. Got it. Tell you what. I'm going to
8 take us off the record for a second. I'll tell you
9 why. I know you faded a little bit before we took
10 that break --

11 A. Uh-huh.

12 Q. It's makes me -- it's hot in here.

13 A. Uh-huh.

14 Q. And does that make you sleepy?

15 A. A little bit.

16 Q. Do you mind me turning the heat down?

17 A. No, no, no.

18 Q. All right. Let me take -- if you
19 please, let's take a short break and let's do that.

20 THE VIDEOGRAPHER: Time is 12:42 p.m.
21 We are going off the video record.

22 (A recess transpired.)

23 THE VIDEOGRAPHER: The time is
24 12:45 p.m., we are back on the video record.

25 BY MR. PHILLIPS:

1 Q. When -- I'm going to sneak back to your
2 brother-in-law, Eddie Gene's garage days -- back in
3 the 1960s --

4 A. Uh-huh.

5 Q. When he went to buy parts, is the
6 Harrison's place the only one that you know for
7 sure -- that you believe for sure that he bought
8 parts from?

9 MR. MCLEOD: Object to the form.

10 THE WITNESS: No. No, he's not the
11 only one, because I know he bought -- there was a
12 parts -- a parts place in Blacksburg -- in the
13 middle of the town of Blacksburg. And I know he
14 went there a lot, too.

15 BY MR. PHILLIPS:

16 Q. Okay. Any idea what the name of that
17 store was or what kind of flag it had, if you will?

18 A. No, I don't. I really don't.

19 Q. It was in the town of Blacksburg?

20 A. In the town of Blacksburg, yeah.

21 Q. Did Eddie Gene live in Blacksburg more
22 -- was it more like Blacksburg than Gaffney?

23 A. Well, it was actually Cherokee Falls.

24 Q. Okay.

25 A. But now, they call Cherokee Falls --

1 they call it -- they got the address of Blacksburg.

2 Q. Okay.

3 A. Because at one time there was a post
4 office at Cherokee Falls and that's when the mill
5 was running. It was the Burnett mill down there --
6 Burlington. It was a Burlington.

7 Q. A Burlington?

8 A. Yeah. Burlington, yeah.

9 Q. So what was referred to as Cherokee
10 Falls is now referred to as Blacksburg?

11 A. Oh, yeah, that's right.

12 Q. Okay. And as you said -- a marker that
13 might help us is that there was a Burlington
14 mill --

15 A. Right.

16 Q. -- sewing mill in that part of the
17 world?

18 A. Yes. And they closed the -- when
19 Burlington closed the mill down --

20 Q. Yes, sir.

21 A. -- in Cherokee Falls, then they closed
22 the post office down.

23 Q. Okay.

24 A. And then everybody's address changed to
25 Blacksburg.

1 Q. I see. Burlington mills left and the
2 jobs left and the people left; is that right?

3 A. Yeah -- well -- yeah, the town changed
4 its name because it's -- all that's Blacksburg now
5 -- just Blacksburg country.

6 Q. Got it. How far is Blacksburg from
7 Gaffney?

8 A. Wait a minute. I got to -- I've got to
9 think about that, okay. Roughly -- approximately
10 ten miles.

11 Q. All right. Before we head back to
12 where some of your residences and your family, tell
13 me this -- are Harrison's -- was Harrison's called
14 Harrison's garage over there at Cherokee Falls? Or
15 was it called Harrison's -- it wasn't a Harrison's
16 auto?

17 A. I think it was Harrison's auto -- auto
18 but I can't -- I can't -- I can't remember what the
19 sign.

20 Q. You can't remember for sure?

21 A. Yeah, I can't remember for sure, but it
22 was -- it was Blacksburg --

23 Q. Used to be --

24 A. -- on 29. Yeah, I think they call that
25 Cherokee -- when it goes through Blacksburg, they

1 call it Cherokee Street. And I think they still
2 call it Cherokee Street that far out.

3 Q. And it's still got a church across the
4 street?

5 A. Yeah, that's right.

6 Q. Or across the highway from it?

7 A. That's right. That's right.

8 Q. Is it fair to say under the oath --

9 A. Uh-huh.

10 Q. -- that you took this morning that the
11 only auto places that you remember your
12 brother-in-law, Eddie Gene, buying parts from was
13 what used to be Harrison's auto and what used to be
14 a place in downtown Blacksburg?

15 MR. HENDERSON: Object to form.

16 THE WITNESS: Yes, I can't remember. I
17 can't remember no further than that, but --

18 BY MR. PHILIPS:

19 Q. But those are the only two -- I'm sorry
20 to interrupt you.

21 The only two you know for sure are
22 Harrisons' auto parts and the place in downtown
23 Blacksburg?

24 A. Yeah. Yeah.

25 Q. Okay. And that was during the years

1 that you lived next to your brother-in-law?

2 A. Oh, yeah. Yeah.

3 Q. Now, back to the family. Tell you
4 what, I'm going to skip around just a second.
5 You've got three children?

6 A. Oh, that's right.

7 Q. What are their names? I couldn't hear
8 real good --

9 A. Okay.

10 Q. -- when Mr. Henderson -- but I'm
11 getting used to hearing from you and you hearing
12 me.

13 MR. HENDERSON: Object to the form.

14 THE WITNESS: Okay. Patty Kay Giles.

15 BY MR. PHILLIPS:

16 Q. Giles?

17 A. Yeah.

18 Q. That's her last name now?

19 A. Yeah.

20 Q. And how old is Patty Kay? Or when was
21 she born -- that would be even better.

22 A. She was born in '71.

23 Q. Okay. Do you remember her -- can you
24 nail down her birthday offhand?

25 A. March 31st.

1 Q. Outstanding. And what's her husband's
2 name?

3 A. Mark.

4 Q. And have they been married pretty well
5 all along since whenever they got married?

6 A. Oh, yeah. Yeah.

7 Q. Better way to put it -- is that her
8 first and only husband?

9 A. Oh, yeah.

10 Q. Good. And Patty and Mark have how many
11 grandkids, if any?

12 A. Three -- well, they got three. Yeah,
13 those two got three, but Mark has a daughter and a
14 son too.

15 Q. From a previous relationship --

16 A. Right.

17 Q. -- or previous marriage?

18 A. Yeah. Yeah.

19 Q. Do you know who his first wife was?

20 A. I don't know her name. I heard
21 repeated of her, but I just --

22 Q. Don't know it?

23 A. I haven't heard it in a long time.

24 Q. Okay. That daughter and son -- do
25 y'all treat them as your grandchildren? Do you

1 treat them as your own grandchildren -- Mark's
2 daughter and son -- or not really?

3 A. No, they never do come around. No,
4 those two never come around.

5 Q. Okay. So Patty didn't raise those two?

6 A. No. No.

7 Q. Oh, I see. Okay. That's fine.

8 And which three kids are Patty and Mark
9 Giles's? Three of your grands?

10 A. Okay. Okay. Mallory.

11 Q. Mallory?

12 A. Yeah, Mallory.

13 Q. Mallory.

14 A. Yeah, Mallory. Mallory.

15 Q. Okay. A daughter --

16 A. M-a-l --

17 Q. L-o-r-y?

18 A. Oh, yeah, I think that's it.

19 Q. Okay. Who's next?

20 A. That's -- that's her daughter -- that's
21 Miranda's daughter.

22 Q. Excuse me?

23 A. Miranda's daughter. That's Miranda's
24 -- Mallory is Miranda's daughter.

25 Q. Oh, I see. We jumped ahead. How about

1 -- I'm just working on Patty's kids right now.

2 A. Well, that is -- oh yeah, Patty's kids?

3 Q. Yes, sir. Your three grands with Patty

4 -- through Patty.

5 A. Oh, wait a minute. Wait a minute.

6 Wait a minute. I'm sorry.

7 Q. It's all right.

8 A. Patty has got two daughters.

9 Q. Two daughters?

10 A. Yeah, two daughters.

11 Q. Oh, I thought -- I wrote down three.

12 A. Oh, I'm sorry.

13 Q. That's all right. We're getting

14 through it. What are Patty's girls' names?

15 A. Miranda.

16 Q. Miranda.

17 A. Miranda Giles.

18 Q. Excuse me?

19 A. Miranda Giles.

20 Q. Miranda Giles?

21 A. Yeah.

22 Q. How about the other one?

23 A. Is Pamela.

24 Q. Pamela?

25 A. Pamela.

1 Q. Her last name is Giles, too?

2 A. Yeah.

3 Q. Neither one of those girls are married
4 yet?

5 A. No, no, no, sir.

6 Q. Is either one of those the one going
7 off to college up in Boston, Massachusetts?

8 A. No.

9 Q. Okay. And do you know about how old
10 Miranda and Pamela are?

11 A. Okay. Miranda is about 25.

12 Q. About 25. And Pamela?

13 A. Oh, about 28.

14 Q. So Pamela was born first?

15 A. Uh-huh, that's right. That's right.

16 Q. That's fine. Do either of those two
17 girls have husbands or great-grandchildren for you?

18 A. Yes, they have great-grandchildren for
19 me.

20 Q. Miranda did or --

21 A. Both of them.

22 Q. -- both of them?

23 A. Both of them.

24 Q. All right. And what's Miranda's
25 child's name or children's names?

1 A. Oh, Mallory.

2 Q. That's where Mallory came from?

3 A. Oh, yeah. Yeah.

4 Q. And did she have any other children?

5 A. No, just one.

6 Q. And Pamela?

7 A. Two.

8 Q. She's got two. Where are their names?

9 A. Okay. Teagan.

10 Q. Kevin?

11 A. No, Teagan, T.

12 Q. T?

13 A. T-e-a-g-a-n.

14 Q. Do you think it's two Es?

15 MR. BOGLE: T-e-a-g-a-n.

16 MR. PHILLIPS: Teagan.

17 THE WITNESS: Oh, yeah. Okay. Wait a

18 minute. T-e-a -- oh, yeah.

19 BY MR. PHILLIPS:

20 Q. Maybe T-e-a-g-a-n -- does that sound

21 right?

22 A. Yeah. Yeah. I believe that's the way

23 you spell Teagan.

24 Q. All right. Is Teagan a little boy?

25 A. No. No, no, no. A girl.

1 Q. Oh, that's a she.

2 A. Yeah. Yeah.

3 Q. And does Pamela have any other children
4 or just one?

5 A. No, she's got two.

6 Q. What's the other one's name?

7 A. Carson.

8 Q. That's also girl?

9 A. Yes.

10 Q. Now, I'm going to really test you. Do
11 you know the name of Miranda -- is Miranda married?

12 A. No.

13 Q. Is Pamela married?

14 A. No.

15 Q. Do you know Miranda's -- who the boy
16 was -- that is, who's the father of Mallory?

17 A. Mark -- Mark Watts.

18 Q. Watt?

19 A. Watts, I think.

20 Q. Do you think it is W-a-t-t-s?

21 A. I think so.

22 Q. Okay. And I'm going to tell you why
23 I'm asking this question in a second, okay?

24 A. Okay.

25 Q. How about Pamela's -- is -- both Teagan

1 and Carson have the same father?

2 A. Oh, yes.

3 Q. Same father. Okay. What's his name as
4 best you know?

5 A. Gabe.

6 Q. Gabe.

7 A. Ware.

8 Q. W-a-r-e, Ware?

9 A. Yeah. Yeah.

10 Q. Do both of those boys live in
11 Spartanburg County?

12 A. No. Mark lives in -- he's in
13 Greenville County right now.

14 Q. Okay. Does he still -- does he live
15 with Miranda still?

16 A. Oh, wait a minute.

17 Q. Does Mark Watts live with your
18 grandchild, Miranda Giles?

19 A. No.

20 Q. Doesn't live with her. Okay.

21 A. Okay. Mark -- Mark -- no, he lives in
22 Gaffney.

23 Q. Lives in Gaffney. Okay.

24 A. Over there in Greenville community to
25 be exact.

1 Q. Is he still living with Miranda, or are
2 they kind of broken away?

3 A. No, they don't.

4 Q. They're not he-ing and she-ing together
5 still?

6 A. No they're not.

7 Q. How about Pamela's man, Gabe Ware -- is
8 he still with Pamela?

9 A. He was until about -- about two months
10 ago.

11 Q. Okay.

12 A. He was living in -- they did live in
13 Simpsonville.

14 Q. Right.

15 A. For I say about three years.

16 Q. That's when he and Pamela were
17 together, right?

18 A. Well, before that they was in Cherokee
19 County at Corinth.

20 Q. What's that town called?

21 A. It's Corinth community.

22 Q. Corinth?

23 A. It's Corinth community. That's down
24 Union Highway --

25 Q. Yeah.

1 A. -- on the left. They call that
2 Corinth.

3 Q. Corinth.

4 A. It's still in Gaffney, though.

5 Q. Yeah. Is that Corinth -- like
6 Corinthians?

7 A. No, no. The name of the communities is
8 Corinth.

9 Q. Oh wren?

10 A. Corinth -- wait a minute. Corinth.

11 Q. Corinth. Okay. We'll figure that out.

12 A. I don't know how to spell it.

13 Q. Okay. Tell you what the reason is --
14 if we ever have to go to trial, we need to know
15 where these folks live --

16 A. Okay.

17 Q. -- it's because we got to get jurors
18 from Spartanburg County --

19 A. Okay. Okay.

20 Q. So Miranda and Pamela are 25 and 28,
21 roughly?

22 A. Roughly. Roughly.

23 Q. So they don't go out for ice cream with
24 you anymore, do they?

25 A. No.

1 Q. Okay. Now, those are the only two
2 children that your Patty Kay Giles and Mark Giles
3 have --

4 A. Right.

5 Q. -- those two? And your second child's
6 name is what?

7 A. Tessa.

8 Q. Tessa?

9 A. Yeah, T-E-S-S-A.

10 Q. T-E-S-S-A. What's her middle name?

11 A. Lynn.

12 Q. L-y-n-n, maybe?

13 A. Yeah. Yeah.

14 Q. And her last name?

15 A. Wait a minute. Quinn.

16 Q. Quinn?

17 A. Yeah, Quinn.

18 Q. Got it. How old is Tessa Lynn Quinn or
19 when was she born?

20 A. 1972.

21 Q. You know --

22 A. Whoa. Whoa. I'm sorry. Oh, that's
23 right, '72, '72.

24 Q. '72?

25 A. Yeah, '72.

1 Q. All right. It's hard to remember
2 sometimes.

3 A. Oh, yeah.

4 Q. All right. What was her birthday?

5 A. July the 6th.

6 Q. Close to yours.

7 A. Yeah, yeah it was.

8 Q. About two weeks from yours.

9 Now, is Tessa Lynn got any of your
10 grandchildren -- that is, does she have any
11 children?

12 A. Yes.

13 Q. How many?

14 A. Three.

15 Q. Three. Would you give me their names.

16 A. Yes. Tyler.

17 Q. Tyler. Is that a he Tyler or she
18 Tyler?

19 A. A he Tyler. It's a he Tyler.

20 Q. All right. Do you know Tyler -- the
21 rest of his name? Do you know if Tyler -- what the
22 rest of Tyler's name is?

23 A. Okay. Wait a minute. Just give me a
24 minute. I think it's Jerry Reed Tyler.

25 Q. Jerry Reed -- Jerry like the singer?

1 A. Tyler Quinn.

2 Q. Tyler Quinn?

3 A. Right.

4 Q. And reckon how old is Tyler Quinn --
5 best you know approximately?

6 A. I think he's born about 1990 -- I
7 think.

8 Q. I got one about that age, so he's about
9 27 years old, something like that?

10 A. Yeah, I think so.

11 Q. And by the way, Tessa Lynn Quinn --
12 what is her husband's name?

13 A. Michael.

14 Q. And you don't reckon -- you don't know
15 Michael's middle name, do you?

16 A. I really don't.

17 Q. That's all right. Michael from a --
18 those two still married?

19 A. Oh, yes.

20 Q. Still married. Where do they live?

21 A. They live in Gaffney.

22 Q. And by the way, daughter Patty Kay
23 Giles and Mark Giles -- what town do they live in?

24 A. They live in Gaffney, too.

25 Q. In Gaffney. Good. Both in Spartanburg

1 County?

2 A. No, no, no, Cherokee County.

3 Q. Oh, Cherokee County.

4 A. Yeah, Cherokee County.

5 Q. All right. Do you live in Cherokee or

6 Spartanburg right now? Do you live in Cherokee

7 County or Spartanburg --

8 A. Oh, Cherokee County.

9 Q. Cherokee County.

10 A. We are in Cherokee County right now.

11 Q. Yes, sir. All right.

12 A. I live about -- about three miles away.

13 Q. All right. And does Jerry Reed Tyler

14 Quinn, your grandson, have any children?

15 A. No.

16 Q. Okay. Is he the one -- he's not the

17 one going off to college 'cause he's already too

18 old to go to college, right?

19 A. No. No.

20 Q. Now, does Tessa Lynn Quinn, your

21 daughter, have any other children?

22 A. Yes.

23 Q. What's the name? His name or her name?

24 A. Her name is Samantha.

25 Q. Samantha. Do you remember her middle

1 name by chance?

2 A. No, I can't remember.

3 Q. Is Samantha married?

4 A. No.

5 Q. She's still a Quinn?

6 A. Yes.

7 Q. And how old is Samantha?

8 A. Samantha is --

9 Q. Or when was she born if you know that,
10 roughly?

11 A. I'm going to make a guess about --
12 close to '93.

13 Q. Okay. So she's about -- somewhere
14 around 24 years old?

15 A. Yeah, I think so.

16 Q. Does she have any children?

17 A. Oh, yes, she does. She has one.

18 Q. One child. What's his or her name?

19 A. It's Branlin.

20 Q. Grandlin?

21 A. No, Branlin.

22 Q. Branlin?

23 A. Branlin. Branlin. Yeah.

24 Q. Is that the first name or last name?

25 A. First name.

1 Q. Oh, I see. Branlin. And that's a she?
2 Is that a daughter?

3 A. No, no. That's her son.

4 Q. Son?

5 A. Branlin, yeah.

6 Q. Is Branlin the first name?

7 A. Right.

8 Q. Like Brandon?

9 A. Branlin, l-I-n.

10 Q. Okay.

11 A. Branlin.

12 Q. All right. And what -- his last name
13 is Quinn, right?

14 A. No -- well, I really don't know that.
15 I really don't know that.

16 Q. Oh, I see. She -- Samantha's not
17 married?

18 A. No.

19 Q. I see. Do you know what little
20 Branlin's last name is?

21 A. I sure don't. I don't.

22 Q. Okay. And do you know about how old he
23 is -- the great grandson?

24 A. He's over a year.

25 Q. Sir?

1 A. Over a year old.

2 Q. Very good. Now, Tessa has -- I think
3 you said four children, right?

4 A. No, three.

5 Q. Three. All right. Let's talk about
6 the third child.

7 A. Third child is --

8 Q. I'm so sorry. Let me interrupt myself
9 one time.

10 A. Okay.

11 Q. Samantha, the second child -- that is
12 your second grandchild through Tessa?

13 A. Right.

14 Q. She was with somebody who helped them
15 make Branlin?

16 A. Uh-huh.

17 Q. What -- do you know his -- you didn't
18 know his last name; do you know his first name?

19 A. I really don't.

20 Q. Just don't know what the old
21 boyfriend's name was?

22 A. No, I don't. I don't. I really don't.

23 Q. Okay. No, problem. We're just trying
24 to get as many names as we can --

25 A. Okay.

1 Q. -- on the canvas. What is Branlin --

2 so Samantha's third child is who? Excuse me.

3 Tessa Lynn Quinn's third child's name is who?

4 A. Erie.

5 Q. Harry?

6 A. No, Erie.

7 Q. Eric.

8 A. E-r-I-e, I believe is the way you spell

9 it. Erie

10 Q. Oh, E-r-I-e.

11 A. I think. I think.

12 Q. And that's a boy or girl?

13 A. Boy.

14 Q. And Erie Quinn? That's his last name?

15 A. Yeah, Erie Quinn. Right.

16 Q. All right. Okay. Good. And do you

17 know about how old Erie is -- about when he was

18 born?

19 A. I'm going to make a guess around '90 --

20 Q. Okay. Now, we got Jerry Reed Tyler

21 born about 1990 also?

22 A. Okay. About 19 -- well, no. About

23 1996.

24 Q. Okay. '96 -- so about 22 years old?

25 A. Yeah, I think so.

1 Q. Does he have any children?

2 A. No.

3 Q. And is Erie in school or do you know
4 where he is?

5 A. Well, he's right -- now he lives in
6 Spartanburg.

7 Q. Do you know where he works?

8 A. Yes.

9 Q. Where does he work?

10 A. He works at Freightliner.

11 Q. Okay. Very good. Let's talk about
12 your third child. So that's it for all the kids
13 that Tessa Lynn has, right?

14 A. Right.

15 Q. Jerry Reed Tyler Quinn, Samantha Quinn
16 who's got a child, and Erie Quinn who's about
17 20 years old; is that right?

18 A. Roughly. Roughly.

19 Q. About -- that's right?

20 A. About.

21 Q. Now, we've identified two of these --
22 three of these four great-grandchildren?

23 A. Yes.

24 Q. Erie doesn't have any of those
25 children, right?

1 A. No.

2 Q. Okay. Very good. Now, your third
3 child -- what is his or her name?

4 A. His name is Danny Ray Crawford.

5 Q. Danny Ray Crawford?

6 A. Right.

7 Q. How old is Danny Ray or when was he
8 born?

9 A. He was born in 1975.

10 Q. Okay. Do you remember his birthday?

11 A. Yes. It's February the 5th.

12 Q. And how many children does he got?

13 A. Well, he's got -- he's got two children
14 of his own.

15 Q. Yes, sir.

16 A. Plus one stepdaughter when he was
17 married.

18 Q. And does he raise that child?

19 A. Oh, yes, he does.

20 Q. So that's one of your grandkids then?

21 A. Yeah, yeah, he did raise them, he did.

22 Q. Okay. Who is Danny Ray married to?

23 A. Tiffany. Uh-huh, Tiffany.

24 Q. Yes, sir. And do you know what her
25 maiden name was?

1 A. I really know, but I just can't bring
2 it up.

3 Q. Okay. Where do those two live -- Danny
4 and Tiffany?

5 A. Okay. Well, right now, Danny lives in
6 Dallas, Texas.

7 Q. What kind of work is he doing in
8 Dallas?

9 A. He's an engineer.

10 Q. Okay.

11 A. On a -- on an automotive.

12 Q. Okay. Is he like an automaker?

13 A. No, no. No, no. I'm sorry. On a
14 train.

15 Q. Oh, a train engineer?

16 A. Yeah, train engineer. I'm sorry.

17 Q. And does he operate a train -- like
18 drive it?

19 A. Yes, he does. He's an engineer.
20 Right.

21 Q. Do you know which company -- which
22 railroad he works for?

23 A. No, I don't. I know it's one out west.

24 Q. Okay.

25 A. He said there was two rail lines. He

1 said one's out west. One's on the west coast and
2 one's on the east coast. And he had chance to go
3 to work with the one on the east coast, but he
4 chose the one on the west coast.

5 Q. Okay. And Danny's wife, Tiffany, is
6 she out there with him in Dallas?

7 A. No, she's in Colorado Springs,
8 Colorado.

9 Q. Are those two separated? Are they
10 still married or do you know?

11 A. They still married. Yeah, they still
12 married.

13 Q. Okay. And let's see -- does she have a
14 house out in Colorado Springs, or do you know?

15 A. Oh, yeah. Yeah. I think -- I think --
16 I'm not sure, but I think she rents it.

17 Q. She rents out there?

18 A. I think so. I think so now.

19 Q. And are the -- he's got two children of
20 their own and one stepchild?

21 A. Right.

22 Q. And let's -- before I go there, let me
23 just understand where Danny lives. Does he live in
24 a house in Dallas, or have you been out there
25 before?

1 A. No, I haven't --

2 Q. In other words, would you know?

3 A. No, I wouldn't because I never been out
4 there since he moved out there.

5 Q. Okay. How long has Danny been gone?

6 A. Close to two years.

7 Q. And best you know, he and Tiffany are
8 not separated but they just live in different
9 towns?

10 A. Yes.

11 Q. Now, their two -- well, let's start
12 with the stepchild that was sort of raised as
13 Danny's kid and your grandchild. What's that
14 child's name? It's probably a grownup child?

15 A. Yeah. Well, I call her Nikki, but her
16 real name is Nachalie.

17 Q. Yeah, Nicole or something?

18 A. No.

19 Q. Nachalie.

20 A. Nachalie.

21 Q. Like N-a-c-h-a-l-I-e or something like
22 that?

23 A. Yeah, something like that. Yeah.

24 Q. All right. And how old is Nachalie now
25 -- or Nikki? Approximately?

1 A. She was about three years old when
2 Danny was married to Tiffany.

3 Q. Okay.

4 A. And that was in 1999 or 2000. I'm not
5 sure exactly but --

6 Q. One of those two?

7 A. Yeah, close to one of those.

8 Q. So I'm thinking that Tiffany might be
9 about 21 years old, and I added 18 -- this is 2018
10 plus about three years?

11 A. Oh.

12 Q. Does that sound reasonable?

13 A. No, no.

14 Q. U-oh.

15 A. Tiffany is about four years younger
16 than Danny.

17 Q. Oh, Danny, your --

18 A. My son.

19 Q. Oh, okay.

20 MR. HENDERSON: You said Tiffany. Did
21 you mean to say Tiffany or Nikki?

22 MR. PHILLIPS: Please forgive me. I
23 meant to say -- I meant to talk about Nikki.

24 THE WITNESS: Okay.

25 BY MR. PHILLIPS:

1 Q. Is Nikki about 21 years old?

2 A. Wait a minute. Yeah. Yeah.

3 Q. Let me tell you how I do my math.

4 She's about three years old in 2000 when they got
5 married.

6 A. That's right. That's right.

7 Q. Tiffany is about 21. Is Tiffany in
8 college? Oh, I said it again. I didn't mean to.

9 A. Okay.

10 Q. I was writing my notes wrong.

11 A. Okay.

12 Q. Nikki, is she in college right now?

13 A. No. No, she's not.

14 Q. Where does she live, best you know?

15 A. She lives out there in Colorado Springs
16 with her mother.

17 Q. Okay. We're almost there now on these
18 kids.

19 A. Okay.

20 Q. I think we got two more. Danny and his
21 wife, Tiffany -- we're not sure what the maiden
22 name was -- had two other children of their own.
23 What are those two names --

24 A. Oh, yeah. Yeah.

25 Q. -- your two grands?

1 A. Yes. Yes. Haley.

2 Q. Haley. That's a she?

3 A. Yes.

4 Q. H-a-l-e-y, maybe?

5 A. Yeah, Haley. H -- yeah, yeah something
6 like that.

7 Q. Something like that. Haley's last name
8 is Crawford --

9 A. Right.

10 Q. -- just like Danny?

11 A. She's -- she's the one that's got
12 the --

13 Q. She's got the good grades?

14 A. Well, she got accepted for Harvard.

15 Q. She got accepted for Harvard?

16 A. Yeah, recently. Yeah.

17 Q. All right. Good for her. Where did
18 she go to high school?

19 A. Well, out there in Colorado Springs.

20 Q. How about that. Yeah, I guess she's a
21 senior in high school, then?

22 A. Yes. This is the last year, yeah. I'm
23 thinking it's the last year.

24 Q. I bet it is. Okay. We have -- that's
25 good. Congratulations on that child.

1 A. Thank you.

2 Q. She obviously worked hard.

3 And what is their other child's name --

4 Danny and Tiffany?

5 A. Kaylin.

6 Q. Kaylin?

7 A. Kaylin.

8 Q. K-a-y-l-I-n?

9 A. Let me see. Wait a minute. Wait a
10 minute. I really don't know the spelling.

11 Q. I don't either, but we're going to call
12 it Kaylin.

13 A. Yeah, Kaylin. That's it. That's what
14 they name --

15 Q. Let's see K-a-y-l, maybe, y-n?

16 A. Okay.

17 Q. And that's a grandchild. How old is
18 she? Is she a little bit older --

19 A. No, that's a grandson.

20 Mr. Henderson: That's a boy.

21 BY MR. PHILLIPS:

22 Q. Grandson?

23 A. Yes.

24 Q. Oh, Kaylin -- I bet that's K-I-a-l-e-n,
25 maybe. We'll just have to figure it out one day.

1 A. Okay.

2 Q. All right, sir. And his name is
3 Kaelan Crawford?

4 A. Right.

5 Q. Do you know his middle name offhand?

6 A. No, I don't.

7 Q. Probably about 16 years old or a little
8 bit younger than his sister?

9 A. Oh, Kaelan was born in '04.

10 Q. Born in '04. So that's I'm saying --
11 thinking he may be 14 years old?

12 A. Yeah. Yeah.

13 Q. And he probably goes to school out in
14 Colorado Springs?

15 A. Oh, yeah. Yeah.

16 Q. Do you -- you've never been out to
17 Colorado Springs to see Tiffany and the kids out
18 there, have you?

19 A. Yeah, I have.

20 Q. You have? Okay. When did y'all go out
21 there?

22 A. When Kaelan was born.

23 Q. Oh, good. And that was in '04?

24 A. Yes, that's right.

25 Q. Have you been out there since?

1 A. Yes, I was.

2 Q. When did you do that?

3 A. I believe it was a few years after
4 that.

5 Q. A couple of years after that?

6 A. Yeah. I moved -- I went out there to
7 help Tiffany to move back.

8 Q. And she was going move back where?

9 A. To --

10 Q. Colorado Springs to Dallas or back --

11 A. No.

12 Q. -- to this part of the world?

13 A. When -- when I went out there and she
14 moved back, she was living in -- I believe it was
15 Golden, Colorado.

16 Q. Oh, you helped her move from Golden to
17 Colorado Springs?

18 A. No, I helped her move to Colorado to --

19 Q. Golden?

20 A. -- Raleigh, North Carolina.

21 Q. Okay. That was Tiffany and the
22 grandkids moving --

23 A. Right. Right.

24 Q. -- from Colorado to Raleigh?

25 A. Right.

1 Q. And that was a couple of years after
2 Kaelan was born?

3 A. Yes.

4 Q. About 2006?

5 A. Yeah. Pretty close.

6 Q. Did y'all drive a caravan full of
7 furniture and all of that kind of stuff?

8 A. Well, at the time my son was in the
9 army and he was stationed overseas.

10 Q. Oh.

11 A. So that's why I moved out there to help
12 her. They had two cars to pull. And I pulled --
13 she drove her car, and I drove the U-Haul hooked to
14 the --

15 Q. And pulled her car?

16 A. -- jeep. Yeah. It was a jeep hooked
17 up to -- it was Danny's jeep hooked to a U-Haul --

18 Q. I see.

19 A. -- with all of her stuff she wanted to
20 keep in it.

21 Q. I understand. I understand. And why
22 did she go to Raleigh? Is that where her parents
23 are from?

24 A. Danny didn't like Colorado so he got
25 her to move out here, but that's where she decided

1 to go too.

2 Q. To Raleigh, North Carolina?

3 A. Right. Right.

4 Q. And did you see the grandkids more when
5 they were in Raleigh?

6 A. A pretty good bit because they was --
7 they was staying in Goucher with me for just a
8 little while -- oh yeah, she was -- when she moved
9 out here, the kids started staying with me and
10 Tiffany was staying up there in Raleigh. And they
11 went -- they went to school down here when they
12 moved back -- in Goucher School. Goucher
13 Elementary School.

14 Q. Is it Doecher with a D or Goecher with
15 a G?

16 A. A g.

17 Q. Excuse me?

18 A. G-o-u-c-h-e-r.

19 Q. Okay. Some people might look at it and
20 say Goucher.

21 A. Well, they call it that too.

22 Q. It's supposed to be Goucher. Okay.

23 A. Well, I don't know which one it's
24 supposed to be, really.

25 Q. All right. How many years did they

1 stay here and go to school -- Danny and Tiffany's
2 kids?

3 A. They went to school -- okay. About a
4 year.

5 Q. About a -- about a -- say a school year
6 with you?

7 A. Yes. Yes.

8 Q. Okay. And at some point she made her
9 way back out to Colorado?

10 A. Yeah. Okay.

11 Q. Is that right?

12 A. Oh, that's right.

13 Q. So maybe a year later she went back to
14 Colorado?

15 A. Well, let's see. The kids started
16 living with her for just a little while up there in
17 Raleigh.

18 Q. Raleigh, North Carolina?

19 A. Yeah. And matter of fact, they were --
20 Tiffany was going to come by here and let us see
21 the kids and she took off out back to Colorado.

22 Q. All right. She must like that weather
23 out there?

24 A. Oh, I guess so. I guess so. That's
25 where she grew up, around Oklahoma.

1 Q. Okay. She's from out West?

2 A. Yes. That's right.

3 Q. Now, back to their first child, Nikki.

4 Nikki has -- does Nikki have any children?

5 A. Oh, no. No, no.

6 Q. And I'm sure Haley, the granddaughter

7 who's heading up to Harvard, does not have

8 children?

9 A. No.

10 Q. Nor does Kaelan, the little boy who's

11 about 14 years old?

12 A. No.

13 Q. We identified three

14 great-grandchildren, I think, throughout this

15 exercise, and so we're missing one. Didn't you say

16 you had four great-grandchildren?

17 A. Yes.

18 Q. All right. Here's the way I count

19 them.

20 Pamela Giles, who is your daughter,

21 Patty Kay's child, has two great-grands. Excuse

22 me. Your child Patty has two daughters -- Miranda

23 and Pamela, right?

24 A. Right. Right.

25 Q. And Miranda's got one child named

1 Mallory?

2 A. Right.

3 Q. Pamela's got a child named Teagan and
4 one named Carson?

5 A. Right.

6 Q. Okay. And then -- Okay, there's the
7 three. And fourth is your daughter, Tessa Lynn
8 Quinn, has a child named Samantha who's got a child
9 named Branlin who's a male?

10 A. Right.

11 Q. We're not sure of his last name?

12 A. Right.

13 Q. Okay. Very good.

14 MR. HENDERSON: Mr. Crawford, how you
15 holding up?

16 THE WITNESS: I'm okay.

17 MR. PHILLIPS: We can go get lunch or
18 just keep on plowing. Whatever y'all want to do is
19 fine with me.

20 THE WITNESS: Just whatever y'all want
21 to do.

22 MR. HENDERSON: No, no, no. We're
23 going to go by what you say. You are the one we
24 are concerned about.

25 He doesn't like to say if he needs a break;

1 that's my concern. Why don't we take a break real
2 quick. Let's just. Let's just. Let's just.
3 Let's just chat for a few minutes, okay?

4 THE WITNESS: Okay.

5 MR. PHILLIPS: And then y'all figure
6 out what you want to do. We'll just step off the
7 camera for a minute, all right?

8 THE VIDEOGRAPHER: The time is
9 1:26 p.m. We're going off the video record.

10 (A lunch recess transpired.)

11 THE VIDEOGRAPHER: The time is
12 2:33 p.m. We are back on the video record.

13 BY MR. PHILLIPS:

14 Q. Mr. Crawford, Mark Philips, again. We
15 had lunch. I hope everything's all right. As you
16 told me a minute ago, you're a little
17 uncomfortable, but we're going to try to get
18 through it this afternoon. Are you ready?

19 A. I'm ready.

20 Q. Let's do it. We covered the kids
21 pretty hard.

22 A. Uh-huh.

23 Q. And we talked about the grandkids and
24 we had been talking about your old residences.
25 What I didn't ask about the family was your wife,

1 Evelyn Kay Crawford.

2 Are you y'all married?

3 A. Yes.

4 Q. When did you get married?

5 A. May the 10th, 1970.

6 Q. All right. Is Evelyn Kay your first
7 and only wife?

8 A. Yes.

9 Q. Are you her first and only hubby --
10 husband?

11 A. Yes.

12 Q. All right. Where is she from?

13 A. From Gaffney.

14 Q. So did y'all grow up together?

15 A. No, she --

16 Q. Is she older or younger?

17 A. She's younger.

18 Q. How much younger?

19 A. About close to five years.

20 Q. About five years?

21 A. Yeah.

22 Q. Okay.

23 A. But she was from Cherokee Creek --
24 Cherokee Creek, and I was from Cherokee Falls.

25 Q. How far is Cherokee Creek from Cherokee

1 Falls?

2 A. Oh, good gracious. That is -- that's a
3 piece up Number 11.

4 Q. Oh, yeah, sure.

5 A. Cherokee --

6 Q. Toward -- toward Table Rock?

7 A. Not that far. Not that far.

8 Q. I know not that far.

9 A. Yeah, I know it's that way, but not
10 that far. Like about -- wait a minute. Let me
11 see.

12 Q. I know Highway 11 pretty good.

13 A. Yeah, I know how many miles -- I'd say
14 about five miles..

15 Q. Away from --

16 A. North of Highway -- Interstate 85.

17 Q. Yeah, sure. I think I know about where
18 that is. So she's up closer to the mountains,
19 anyway, right?

20 A. Yes, she was.

21 Q. And y'all met somewhere and ultimately
22 got married?

23 A. Yes, sir.

24 Q. Okay. And you got married in 1970?

25 A. Yeah.

1 Q. Now, you mentioned sometimes working
2 around -- let me tell you his name -- Eddie Gene?

3 A. Uh-huh.

4 Q. Who is your brother-in-law?

5 A. Uh-huh.

6 Q. And that's a yes, right?

7 A. Yes.

8 Q. Okay. Eddie Gene is your
9 brother-in-law through who? Through your wife?

10 A. No, no, my sister.

11 Q. Through your sister?

12 A. Yeah.

13 Q. Your sister's name is what?

14 A. Faye.

15 Q. Faye.

16 A. Yes.

17 Q. Okay. What is Faye's last name?

18 A. Clary.

19 Q. Cleary?

20 A. Yeah.

21 Q. Like C-l-e-a-r-y?

22 A. C-l-a-r-y. C-l-a-r-y.

23 Q. Got it. C-l-a-r-y. Is she still
24 married to Eddie Gene?

25 A. Well, Eddie Gene is deceased.

1 Q. Eddie Gene is deceased. When did Eddie
2 Gene die?

3 A. About two years ago.

4 Q. Did sister Faye and Eddie Gene still
5 live at his old house with the garage close by when
6 he died?

7 A. No, he lived at Bear Creek over on
8 Cherokee Falls Road, but he still had a garage --
9 better garage built behind his motor home.

10 Q. So he and Faye moved to Bear Creek
11 right by Cherokee Falls, did you say?

12 A. Yeah. Yeah, close to Cherokee Falls
13 which is -- which is Blacksburg now.

14 Q. Which is Blacksburg?

15 A. Right. Blacksburg address.

16 Q. It's kind of close -- it sounds like
17 it's the area where that Harrison auto is? I might
18 be wrong.

19 A. About three or four miles from it.

20 Q. We are going to talk about Eddie Gene
21 in just a minute.

22 A. Okay.

23 Q. Back to your own residences. We've got
24 -- we've got a little bit of information that we
25 can get a little bit, and I had -- I counted that

1 from 1983 forward, if this information is
2 accurate --

3 A. Okay.

4 Q. -- that y'all lived in about 18
5 different addresses from 1983 until you moved to
6 your big house at 400 Pacolet.

7 Did y'all move a lot?

8 A. Well, a pretty good -- pretty good bit.
9 I don't know exactly how many.

10 Q. Is it possible that y'all moved your
11 trailer every year or two?

12 A. No, I never did move my trailer. I
13 bought it and had it put there -- down there at
14 Goucher.

15 Q. Yes, sir.

16 A. It stayed there until I moved out of
17 it.

18 Q. Oh, I see. So is that trailer you
19 lived in on Goucher -- on Goucher Green Bethel Road
20 -- the only trailer you actually owned?

21 A. Yes.

22 Q. Okay. And that was the one that you
23 lived in from about 1995 to 2007 for about
24 12 years?

25 A. Yes.

1 Q. And in 2007, did you buy the house on
2 400 Pacolet Highway?

3 A. No. My son bought it.

4 Q. That's what I thought I saw
5 somewhere --

6 A. Yeah.

7 Q. -- That was Danny's house?

8 A. Yeah, Danny. That's right.

9 Q. And I guess he had been in the military
10 and he'd been a train engineer and he was -- he
11 bought the house and let you and Mrs. -- excuse me
12 -- Ms. Evelyn Kay live in the house?

13 A. Right.

14 Q. Does Danny still own that house?

15 A. Yes, he does.

16 Q. Okay. And the kids lived with y'all
17 for about a year or two when they went to school,
18 didn't they?

19 A. Oh, yes, yes.

20 Q. They spent --

21 A. When the kids lived with us, we was
22 living down there on Goucher Green Bethel Road.

23 Q. Oh, still in the tailer you had bought?

24 A. That's right. That's right.

25 Q. Did you ever buy any real estate of

1 your own?

2 A.. No.

3 Q. Okay. So it is -- and does Danny still
4 got that house? Oh, y'all are still living the
5 house?

6 A. That's right. That's right.

7 Q. I see. So he kind of bought it for an
8 investment, I guess, and let's mom and dad use it;
9 is that fair to say?

10 A. Probably.

11 Q. Did -- he kept the title to the house?

12 A. Yes.

13 Q. Okay. And it's a big house -- it's a
14 two-story house, isn't it?

15 A. Yes.

16 Q. And y'all been there for about -- how
17 long now? '08 to '18, so about ten years?

18 A. No, April '07.

19 Q. April '07. So it would be 11 years
20 this April?

21 A. I think so.

22 Q. Okay. That's good. When did you
23 retire from your regular jobs?

24 A. Well -- now, before I retired, I went
25 on disability.

1 Q. I see. I got it. We'll talk about
2 disability in just a minute then.

3 A. Okay. Okay.

4 Q. So at some point you retired on
5 disability; is that right?

6 A. That's right. That's right.

7 Q. Okay. Tell you what -- do you know
8 what year that was? Best you know?

9 A. '02.

10 Q. About 2002?

11 A. Yeah.

12 Q. So that was -- let's see -- let's think
13 -- do some mathematics -- 16 years ago? About 16
14 years ago? It's '018 now.

15 A. Yeah.

16 Q. And at the time I would think --
17 because you and I are born on the same day, July 20
18 -- that you were about 55 years old, 56 years old?
19 I think 56 years old?

20 A. Yes, I think so.

21 Q. You know how old I am? 56.

22 A. Yeah. Okay.

23 Q. I just figured it all out.

24 What was your disability back then?

25 A. I had two knee replacements.

1 Q. Yes, sir.

2 A. Total knee replacements.

3 Q. Did you get an injury?

4 A. Well, what happened at first I went
5 to -- to Dr. Gardener.

6 Q. Yes, sir.

7 A. My knees -- he cleaned them up, you
8 know.

9 Q. Yes, sir.

10 A. And then it done good.

11 Q. Did pretty good?

12 A. It done pretty good. But I had to go
13 back to work at Wise Food, and I had to climb up
14 and down those ladders -- up and down so much, it
15 just damaged --

16 Q. Couldn't get up and down the ladder?

17 A. Well, no, it damaged my knees -- what
18 he fixed. If I had went on disability first --
19 well, I couldn't go on disability first -- but I'd
20 been okay.

21 I'd been -- I wouldn't needed the knee
22 replacement -- I wouldn't have needed them. But
23 see, it just -- it just broke them down on -- at
24 Wise Food.

25 Q. Oh, so that made it worse?

1 A. It did. It completely started swelling
2 up, and that's why I had to have knee replacements.

3 Q. All right. And I saw that you worked
4 at -- let me just get my notes right.

5 Yeah, Wise potato chips; is that right?

6 A. That's right.

7 Q. Were you like driving a cracker truck,
8 or what were you doing for them?

9 A. No, I was doing a seasoner.

10 Q. Sir?

11 A. Seasoner.

12 Q. What's -- oh, oh, you worked at making
13 Wise potato chips?

14 A. Well, potato chips and also the corn
15 puffs.

16 Q. Yes, sir.

17 A. The cheese puff -- the cheese puffs and
18 the popcorn and potato chips, too. Let's see.

19 Q. Let's see. Popcorn, corn puffs, potato
20 chips?

21 A. Uh-huh. Yes, sir.

22 Q. Anything Wise made, I guess, at that
23 plant?

24 A. Well, yeah -- pretty well. Pretty
25 well.

1 Q. And where was the Wise potato chip
2 plant?

3 A. It was in Spartanburg.

4 Q. Okay.

5 A. Matter of fact, Whitney community --
6 Whitney.

7 Q. Spartanburg County, I guess?

8 A. Yes, it was right close to 221.

9 Q. In the Whitney community?

10 A. Whitney, yeah. Yes, sir.

11 Q. That's all right. Near Highway 221?

12 A. Yes, sir.

13 Q. Is that place still operating?

14 A. No, it's closed down.

15 Q. How many -- when did it close?

16 A. After I left it closed.

17 Q. How many years? I mean, a good bit
18 longer?

19 A. Yeah, I think about two or three years
20 later.

21 Q. Okay. And how long did you work at
22 Wise -- I know you probably retired -- it sounds
23 about '02?

24 A. Uh-huh.

25 Q. Excuse me. Did you say yes?

1 A. Yeah, yes.

2 Q. That's right. I thought you did.

3 And so how long had you been there
4 working at Wise?

5 A. I think I started in 1990.

6 Q. Okay. So a good 12 years then, right?

7 A. Yes, sir.

8 Q. And I saw that before that, it looked
9 like a good chunk of the '80s you worked at a
10 Nestle Stouffer's plant; is that right?

11 A. Yeah, I remember working there, yeah.

12 Q. How long did you work -- was it
13 Nestles, Stouffer's, or was that the same place?

14 A. Oh, that was the same place.

15 Q. Same place. And what were you doing
16 there?

17 A. Oh, I had a lot of jobs there.

18 Q. Okay. Like what?

19 A. First, I started off -- I was an
20 ingredient handler.

21 Q. A what?

22 A. An ingredient handler.

23 Q. Yes, sir.

24 A. And then after that I was a extruder
25 operator.

1 Q. Extruder operator?

2 A. Yeah.

3 Q. I got it.

4 A. That's right where they --

5 Q. Were you extracting something?

6 A. The noodles. Making noodles.

7 Q. Making noodles.

8 A. It started off with dough at the top
9 and it had, you know, mixtures in there and then it
10 came out in -- and the noodles came out and it went
11 through --

12 Q. You operated a machine that was --

13 A. That's right. And it went through the
14 cooker, you know.

15 Q. Yes, sir.

16 A. And it went through and come out on the
17 other end. And it went through the coolers that
18 cooled it down and it dropped out in what they call
19 a V-wag.

20 Q. Yes, sir. So your making Stouffer's
21 bowls of soup and pasta and stuff like that?

22 A. It's a spaghetti.

23 Q. Spaghetti?

24 A. Yeah.

25 Q. All right.

1 A. Spaghetti noodles.

2 Q. So both at Stouffer's and at Wise
3 potato chips you were in the factory working --

4 A. Right.

5 Q. -- to help -- both places making food?

6 A. Right. Now, after that --

7 Q. Yes, sir.

8 A. I was a cook.

9 Q. At Stouffer's?

10 A. That's right.

11 Q. All right. How long were you at
12 Stouffer's?

13 A. Okay. Wait a minute.

14 Q. Best you know.

15 A. Oh, man, that's hard. I think it's
16 about roughly -- about 12 years.

17 Q. About the same as Wise?

18 A. I think so. I think so.

19 Q. Okay.

20 A. Okay. I remember - wait a minute. I
21 started working at Nestles in about --

22 Q. I think we said --

23 A. About '82.

24 Q. All right.

25 A. 1982.

1 Q. Okay.

2 A. About 1982. I think it was about
3 February. It was the first of the year in '82.

4 Q. That was Nestles. Is Nestle and
5 Stouffer's the same thing?

6 A. That's right.

7 Q. Sort of Nestle/Stouffer's?

8 A. Right.

9 Q. So if you were there until about
10 1990, -- it might have been closer to eight years;
11 does that sound right?

12 A. Bear with me. Oh, yeah. Yeah.

13 Q. And then about 12 years at Wise potato
14 chips?

15 A. Yeah, I think so.

16 Q. I think you said at Wise you were a
17 seasoner --

18 A. Right.

19 Q. -- so you -- what did you do? You
20 climbed up a ladder and --

21 A. Well --

22 Q. You tell us.

23 A. Okay. That was on the potato chip
24 line. Okay. What happens -- it goes through --
25 the potatoes is cooked -- I mean, it's sliced and

1 cooked at the back and it comes through -- like a
2 -- what they call buckets.

3 Q. Yes, sir.

4 A. It's a elevator with chips on it. It
5 just vibrates and shakes -- causes them to move up.
6 And they just dump in a -- it's like a belt chain.
7 It's got what they call buckets hooked to it.

8 Q. Yes, sir.

9 A. It's this long (Indicating). They are
10 made long like -- well like that (Indicating). And
11 they came up and the chips dump on them when it
12 goes up -- and when it goes over the top, it dumps
13 them out onto the conveyor.

14 Q. Yes, sir.

15 A. And the conveyor don't move though; it
16 just shakes. And that shaking cause them to move.
17 The vibrations cause them to keep moving. And then
18 they move around and they was dropped in -- on the
19 top up here, it's got the conveyor. And it's got a
20 little hole -- the doors open up and it drops down
21 and it goes down and it runs through a little
22 tumbler. And goes through a machine.

23 If there's no chips on it -- if there's
24 no seasoning on it, it goes straight through. But
25 some of it has got to have a certain -- different

1 kind of seasoning on it. All right. You put the
2 seasoning in the machine -- at the end of the
3 tumbler -- and it goes -- the tumbler goes around
4 and the seasoning goes out and that's the way it
5 gets seasoning on it. And then it drops down into
6 what they call scales. They was like a round piece
7 and like -- well, like a mushroom like right over
8 the top --

9 Q. Uh-huh.

10 A. -- and the conveyors run out and then
11 they come out. If you never seen a seasoning
12 machine -- I mean a potato chip machine, that's
13 what it looked like.

14 And they got little things over here
15 that opens up --

16 Q. Yes, sir.

17 A. -- when it get's filled up. They just
18 open up one a time and it drops -- each one of
19 them --

20 Q. And they bag it up and seal it?

21 A. Yeah, when it goes down and it drops
22 down in a bag.

23 Q. I see.

24 A. And on the floor, the operators have to
25 keep the film on it and then they keep it in and

1 out.

2 Q. They keep it moving?

3 A. What I did is just put -- at that part
4 is putting -- keep the seasoning -- different kind
5 of seasoning.

6 Q. Yes, sir.

7 A. And when I go to another kind of
8 seasoning, have to clean it off -- everything up,
9 and change it to another kind of seasoning. That
10 was the last thing I did, though.

11 Before that, I was over on the puff
12 machine -- the cheese puffs -- cheese puffs before
13 that.

14 Q. Yes, sir.

15 A. And on that, the puffs come out --
16 well, it starts off like a great big ol' bags of
17 grits -- well, it looks like grits, you know, and
18 then they came through.

19 Q. That's when they make it -- turn it
20 into the --

21 A. The puffs.

22 Q. The cheese puffs?

23 A. Yeah, that's right. That's right.

24 Well, it turns into the puffs.

25 Q. Yes, sir.

1 A. And it goes through these hot dye --
2 you know, what we call dye.

3 Q. Is that what makes them orange?

4 A. No, that's not what makes them orange.
5 It doesn't make them orange.

6 Q. I see. Okay.

7 A. But see, what happens, it just puffs --
8 it puffs up.

9 Q. Okay.

10 A. And then it cuts off. Okay. And then
11 it goes through a big -- it blows through a big
12 pipe, and it goes into a great big --

13 Q. Hopper?

14 A. Uh-huh, hopper. It's what they call
15 the hopper.

16 Q. Yes, sir.

17 A. Yeah, a big container. That's what
18 they call a hopper. And at that point is where I
19 took over.

20 First, I had the cheese -- I had to
21 make it. I used about 15 different ingredients.

22 Q. How about that.

23 A. Yeah.

24 Q. So you would make the cheese for those
25 chips?

1 A. That's right.

2 Q. All right.

3 A. Then -- all right. Okay. The
4 seasoning -- okay. All right. When it comes out
5 of the hopper, it goes through --

6 Q. Yes, sir.

7 A. -- it goes up through a -- on a
8 conveyor.

9 Q. Yes, sir.

10 A. And on the top of it, it goes back and
11 forth. It drops them off at the top -- the top of
12 the oven. There's an oven up there -- the top of
13 the oven. And the oven just made it go back and
14 forth and cook it. It was real hot in there in the
15 summertime 'cause it was an oven.

16 Q. I guess it was.

17 A. And they cooked it -- the chips were
18 going back and forth. You know the way that the
19 belt was made was low here on one side -- it was
20 made on -- to drop off. It would drop off on
21 one -- on a line of belts.

22 Q. Right.

23 A. See, the belts went back and forth all
24 the way up -- all the way up to top. It went real
25 high.

1 Q. I see.

2 A. And then they drop off -- drop off on
3 the conveyor, and then it would go off and drop off
4 on this side. It'd keep doing that until it went
5 all the way down.

6 Q. And you were the one who made it --
7 dyed it and turned the color?

8 A. Yes, that's right. Then, it come
9 through a little belt in the back.

10 Q. Yes, sir.

11 A. And it went in the back of the tumbler.

12 Q. Yes, sir.

13 A. It tumbled around and it had the sprays
14 in there, and I had to put that cheese -- went
15 through that spray and sprayed on it.

16 Q. Yes, sir.

17 A. Sprayed cheese on it -- a certain
18 amount, you know.

19 Q. Did it --

20 A. You have to keep weighing it. Make
21 sure you have the same weight, you know.

22 Q. Did it smell good in there?

23 A. Well, no.

24 Q. You get kind of used to that, don't
25 you?

1 A. Yeah, you get used to it. You get used
2 to it.

3 Q. It's not good anymore?

4 A. Yeah.

5 Q. Okay.

6 A. And then after it left there it went on
7 the conveyor belt went over to the -- on to
8 packaging.

9 Q. When you finished working at Wise --

10 A. Uh-huh.

11 Q. -- were you paid on a salary or hourly
12 or both?

13 A. Salary.

14 Q. Salary. What was -- what were they
15 paying you when you were about finished with Wise
16 in 2002?

17 A. \$10.65.

18 Q. \$10.65 --

19 A. That's right.

20 Q. -- times 40 -- that's 400 times 50 --
21 is that about 20,000 bucks a year, maybe? A little
22 bit more?

23 A. Probably more because I worked a lot of
24 overtime.

25 Q. Worked some overtime.

1 A. A lot of overtime.

2 Q. Was it like 30 -- \$35,000, maybe?

3 A. No, not that much.

4 Q. About 25? 28?

5 A. I would say somewhere in the 20s.

6 Q. Yes, sir. All right. In the 20s?

7 A. Yeah.

8 Q. And two questions on the follow-up --
9 have you seen yet -- and we always work on this in
10 these kind of cases -- an earnings history, an
11 employment history generated by the Social Security
12 Administration?

13 Social Security Administration can sort
14 of reproduce everywhere you've ever worked and all
15 the money you made for every quarter. Have you
16 seen that for you yet?

17 A. I haven't.

18 Q. Okay. I don't know if we've got it
19 yet, 'cause I don't -- we're kind of in a hurry in
20 this case, so -- it's okay. We'll get it directly.

21 When you got your disability, was it
22 through the Social Security Administration or
23 through Wise potato chips?

24 A. At first when I started off, it was
25 through Wise.

1 Q. Okay. And then what happened?

2 A. And then when I got -- had the total
3 knee replacement, I got -- I got social security
4 disability.

5 Q. Yes, sir.

6 A. And what I was getting paid from --
7 disability from Wise -- was Liberty.

8 Q. Liberty Insurance?

9 A. Yeah, Liberty Insurance.

10 Q. They must have had some insurance?

11 A. That's right. And then -- but when I
12 got disability, though, I had to pay all the -- all
13 the --

14 Q. They wouldn't let you have both?

15 A. I had to pay them back.

16 Q. Okay.

17 A. I paid them like about -- it was
18 38,000 -- 3,800, I believe. No. Wait a minute. I
19 forgot exactly what it was. It might have been --
20 I had to pay them back. I had to pay them back.

21 Q. Tell you what, when Wise was paying you
22 a check through Liberty Mutual, how much were they
23 paying you -- like a month -- on a month basis?

24 A. Oh, it's hard to remember.

25 Q. It's a long time ago -- 60 years ago.

1 A. Yes. Yeah, I think it was about month.

2 Q. Do you remember how much they were
3 paying?

4 A. I really don't. I really don't.

5 Q. Okay. How much does the Social
6 Security Administration give you for the
7 disability?

8 A. I think it was around 1,400 a month.

9 Q. Okay.

10 A. I think.

11 Q. How about these days -- today -- right
12 now?

13 A. Well, let's see. I'm going to say --
14 well, it was close to 14.

15 Q. Well, I got --

16 A. It might have been 13. I'll tell you
17 exactly what it is right now, though.

18 Q. I was going to say, what did they pay
19 you last month?

20 A. \$1,423.

21 Q. Okay. So that's the --

22 A. That's the -- the --

23 Q. Social security payment?

24 A. That's not the -- that's not the draws;
25 that's the net -- what was left over.

1 Q. Net. I see. After they draw some
2 taxes or whatever they're going to --

3 A. Yes, after that the draw -- after they
4 take out Medicaid.

5 Q. Medicaid?

6 A. Medicaid, yes, sir.

7 Q. So net of Medicaid?

8 A. Right.

9 Q. And I don't even know -- I guess you're
10 72 now -- is it classified as social security
11 disability or social security retirement, or do you
12 know?

13 A. I know when I -- when I changed to
14 65 years old --

15 Q. Yes, sir.

16 A. -- then it changed over to social
17 security.

18 Q. Right.

19 A. Social security.

20 Q. Okay.

21 A. And before that it was disability.

22 Q. Disability. Right. So I know while
23 you were on social security disability and earning
24 those benefits you could not work; is that right?

25 I mean, you didn't work gainfully

1 employed after 2002 did you?

2 A. No, sir.

3 Q. Okay. Got it. Did you have any other
4 household income besides what was a Liberty Mutual
5 check and became the social security check after
6 2002 after you retired?

7 A. No, sir.

8 Q. Okay. And how about -- let's see --
9 make sure I get her name right --
10 Ms. Evelyn Kay Crawford -- did she ever work
11 outside the house once the kids were grown up -- or
12 during the kids growing up?

13 A. Yes. She worked at -- one time at
14 Hoechst.

15 Q. At Hoechst?

16 A. Yes, she went to Hoechst.

17 Q. Is that like the car place, Hertz?

18 A. No, no, Hoechst. Hoechst over on 85.

19 Q. Oh, it's a business over here?

20 A. Yeah, yeah, yeah.

21 Q. Oh, Hoechst Celeanese?

22 A. Yeah, that's right.

23 Q. I got you. Sure.

24 A. Yeah, Hoechst Celeanese.

25 Q. When did she work there? How long did

1 she work there?

2 A. It was around '74.

3 Q. That's about when you were there,
4 right?

5 A. Yes, yes, she was there when I was
6 there.

7 Q. I mean, did y'all drive in together or
8 anything like that?

9 A. Oh yes, we did.

10 Q. How about that. Which building did she
11 work in?

12 A. She worked over there -- the one -- the
13 one way at the back. Yeah. Now, before that --

14 Q. Yes, sir.

15 A. -- she worked at Musgrove Mills, but
16 she worked from the outside -- for the clean-up
17 company.

18 Q. Is that like janitorial or --

19 A. Something like that. Yeah, well that
20 too, and certain cloth machines. They had to go
21 clean that too.

22 Q. Okay. And after Hoechst Celanese
23 around '74, did she keep working outside the house?

24 A. No.

25 Q. Okay. And so after you were disabled

1 in '02, she did not work outside of the house?

2 A. No.

3 Q. Okay. And so you just got to retire a
4 little bit earlier at age 56?

5 A. Yes.

6 Q. Okay. But you had the bad knees to
7 show for it?

8 A. Yeah. Yeah.

9 Q. Okay. And we talked about one of the
10 girls has a swimming pool -- which one was that?

11 A. Patty.

12 Q. Patty's got a swimming pool?

13 A. Yeah, Patty.

14 Q. I'm not going to even try to start
15 renaming their last names or anything. Let me just
16 look at my notes to tell me who it is.

17 A. Okay.

18 Q. Patty's got two girls -- Mallory and --
19 she has Mallory and she's got a son [sic] named
20 Teagan, right? That's a girl named Teagan?

21 A. Oh, did you say Patty?

22 Q. Yeah. Your Patty. Your baby girl.

23 A. My Patty has two girls named --

24 Q. Miranda and Pamela.

25 A. That's right.

1 Q. Miranda and Pamela. And then she's got
2 some -- a couple of grandkids named Mallory,
3 Teagan, and Carson?

4 A. Right.

5 Q. Okay. And I know you got you're -- I
6 saw your disease was diagnosed -- looks like
7 November 9th, 2017; is that right? Your disease --
8 your mesothelioma -- was November 9th, 2017 -- is
9 when they diagnosed it.

10 A. That sounds right.

11 Q. Does that sound about right?

12 A. Yeah, I knew I had something going on.

13 Q. Yeah.

14 A. I had fluid in my lungs before that,
15 but the doctors didn't know what was causing it --

16 Q. Right.

17 A. -- before that.

18 Q. So I guess we were talking with
19 Mr. Henderson earlier about Patty's -- daughter
20 Patty's swimming pool. You haven't missed a
21 swimming season yet, but we got one coming up if
22 this cold weather ever quits with us, right?

23 MR. HENDERSON: Object to the form.

24 MR. PHILLIPS: Is that right?

25 THE WITNESS: Yeah.

1 BY MR. PHILLIPS:

2 Q. All right. I got you. Now, let's go
3 back to way back when Eddie Gene Clary and your
4 sister were your neighbors. And your sister's
5 name -- just let me refresh myself -- is Faye,
6 right?

7 A. Right.

8 Q. Is Faye older or younger?

9 A. Younger.

10 Q. She's younger?

11 A. Yeah.

12 Q. Was Eddie Gene older or younger?

13 A. Older.

14 Q. He was older.

15 A. Yeah.

16 Q. All right. And I know you're 72 years
17 old, born July 20, 1945.

18 A. Yeah. Yeah.

19 Q. When was Faye born?

20 A. April 8, 1947.

21 Q. Okay. So she's right at 70 years old?

22 A. Wait a minute. I said that wrong.

23 Q. That's all right. Take it back.

24 A. I have to take it back. She was born
25 in 1948 because she puts on her records 8/8/48.

1 Q. 8/8/48?

2 A. Yep, yep.

3 Q. Okay.

4 A. No, not 48 -- well, no, I said that
5 wrong again.

6 Q. (Sneeze) Excuse me. Sorry I sneezed.
7 I got a...

8 A. 4/8/48. Yeah, that's it.

9 Q. So that's sister Faye --

10 A. -- Yeah. Right.

11 Q. -- 4/8/48.

12 A. 4/8/48.

13 Q. You got it.

14 A. That's her birthday.

15 Q. Okay. So she's 69 years old.

16 And how old is Eddie Gene compared to
17 Faye and compared to Mr. Crawford -- you?

18 A. Well, he was -- I don't know how many
19 years older than me. I was -- probably at least
20 five.

21 Q. Okay.

22 A. About five older than me, I think.

23 Q. What kind of work did Eddie Gene do
24 when he wasn't in his garage?

25 A. One time he worked at Minnett Mills at

1 one time.

2 Q. Minnett --

3 A. I just can't remember the places he
4 worked.

5 Q. Did he work at most of these mills and
6 factories like you did? You had a lot of good jobs
7 at manufacturing facilities; is that right?

8 A. Yeah, yeah.

9 Q. You were in manufacturing, really most
10 of your whole career, weren't you?

11 A. Yea.

12 Q. From about age --

13 A. Something like that, yeah.

14 Q. -- 20 to 56?

15 A. Uh-huh.

16 Q. Okay. Now, one thing I didn't really
17 get a good hard understanding of was where -- what
18 kind of work you did in the 1960s?

19 A. Uh-huh.

20 Q. And I'm going to guess you would have
21 been about 17 or 18 years old around 1962, '63; is
22 that right?

23 A. Yeah, I think so.

24 Q. And I'm just going with you --

25 A. Yeah, that's right. That's right.

1 Q. -- being born in 1945?

2 A. Yeah.

3 Q. I gather that you were enlisted in the
4 Navy for a while?

5 A. Yeah, just a while.

6 Q. How -- where did you enlist -- in
7 Charleston?

8 MR. HENDERSON: You okay?

9 THE WITNESS: Yeah, I'm okay. Yeah, I
10 went out to --

11 MR. PHILLIPS: Let me know if you need
12 a break.

13 THE WITNESS: -- to California.

14 BY MR. PHILLIPS:

15 Q. Out in California?

16 A. Yeah.

17 Q. Okay. How did you get out there?

18 A. On a plane.

19 Q. Oh, oh you flew -- you signed up here
20 and then flew --

21 A. Oh yeah --

22 Q. -- out on a plane?

23 A. -- I know what you are asking now.

24 Yeah, I signed up in Gaffney.

25 Q. Okay. When was that? What year was

1 that?

2 A. '63.

3 Q. Okay. And at some point right after
4 that the Navy flew you out to California?

5 A. Yeah, that's right.

6 Q. Was that for like basic training?

7 A. Yes, sir.

8 Q. Had you ever been to California before?
9 Had you ever been to --

10 A. No, I hadn't. No, I hadn't.

11 Q. Had you ever been much out of South
12 Carolina before?

13 A. Maybe a little of North Carolina.

14 Q. Maybe a little bit of North Carolina?

15 A. Yeah, yeah, yes, sir.

16 Q. Sounds about like me.

17 And how long did you stay in the Navy?

18 A. I think two or three months.

19 Q. Okay. Did you get through basic
20 training?

21 A. Yeah, partly. Mostly.

22 Q. Got mostly through it.

23 A. Yeah.

24 Q. Did you graduate from basic training?

25 A. Huh?

1 Q. Did you graduate from basic training?

2 A. Oh, no, no.

3 Q. And what happened that made you decide
4 not to stay in the Navy?

5 A. What happened was -- first, I had to go
6 to talk to the psychologist and he suggested that I
7 was going to -- get me an honorable discharge to
8 get out. And I went before the board -- a great
9 big bunch of generals.

10 Q. Uh-huh.

11 A. I decided -- I had a choice whether to
12 get out or stay in.

13 Q. Yeah.

14 A. And then when I got -- when I said get
15 out -- I wish I would had changed my mind. I wish
16 I would stayed in, but --

17 Q. Yeah.

18 A. -- I was very young.

19 Q. But you got your honorable discharge,
20 right?

21 A. I did. I did.

22 Q. Yeah.

23 A. But I mean, I was young and made bad
24 decisions back then. I was too young. Yep.

25 Q. You were only 17 or 18 years old?

1 A. 18 -- fixing to turn 18.

2 Q. Did you get in trouble or anything?

3 A. No, I didn't. No I didn't.

4 Q. Didn't get in trouble. Did -- was --

5 A. It was peacetime.

6 Q. Was the Navy psychologist worried about
7 you being too young to be in the Navy or just --

8 A. Oh no, no.

9 MR. HENDERSON: Object to the form.

10 BY MR. PHILLIPS:

11 Q. So what was the problem?

12 A. We're talking about going under water,
13 you know.

14 Q. Yeah.

15 A. And then -- and then I told them -- I
16 just went on ahead -- it was uncomfortable doing
17 it, but I just went ahead and done it, you know,
18 because I swim around the swimming pool, you know.

19 Q. Oh, you had trouble -- did you have
20 trouble in the water?

21 A. No, not really, but I just -- my CO
22 decided let me -- I had to go with a different
23 bunch, and then I talked to psychology -- and like
24 I said, I decided --

25 Q. I see.

1 A. -- take it to go out because I had the
2 opportunity to go out with an honorable discharge.

3 Q. I got you.

4 A. See, I had the chance to get out with
5 an honorable discharge, so I went and took the
6 honorable discharge. I wouldn't have took anything
7 else but an honorable discharge, you know.

8 Q. Right. I get that.

9 A. If they had said something different, I
10 would have stayed in.

11 Q. Okay.

12 A. I said I want to stay in.

13 Q. So -- yeah. So you got -- you had a
14 chance -- you were at a crossroads and you had to
15 decide whether to try to stay in and tough it
16 out --

17 A. That's right.

18 Q. -- or come on home with an honorable
19 discharge and -- and come on home; is that right?

20 A. That's right. That's right.

21 Q. And you came home?

22 A. That's right.

23 Q. Good.

24 A. Right.

25 Q. Now, you got home. Were your mom and

1. dad still alive?

2. A. Yes, sir.

3. Q. What was your mom's name?

4. A. Mary Irene.

5. Q. Yeah, for you, it was just mama.

6. A. That's right. It was just mama.

7. Q. Okay.

8. A. Her married name was Moss.

9. Q. Moss, like moss on the tree?

10. A. M-o-s-s, right.

11. Q. M-o-s-s, and of course, the last name
12. Crawford?

13. A. Right.

14. Q. Is she still alive?

15. A. No.

16. Q. And -- well, I guess, she would be real
17. old now. Do you know when she died -- how old she
18. was and when she was?

19. A. It was in early '90s -- I think about
20. '92.

21. Q. Do you know what took her?

22. A. Heart attack, but she had an enlarged
23. heart, and she died right before Christmas.

24. And the doctor told her before she died
25. -- the doctor told her that she wouldn't make it to

1 the next Christmas, but she didn't make it to that
2 Christmas when she died.

3 Q. How old was she?

4 A. Wait a minute. Well, she was born in
5 1919 -- November.

6 Q. Okay.

7 A. Let me see. Let me see. I'm
8 thinking --

9 Q. Let me help you. Probably about 73,
10 74 years old, maybe?

11 A. Probably, I think so. Probably.

12 Q. All right. And your father -- what was
13 his name?

14 A. Howard Wesley Crawford.

15 Q. And what year was he born -- as best
16 you know?

17 A. 1914.

18 Q. 1914 --

19 A. Wait a minute. I got to take that
20 back.

21 Q. Take it back.

22 A. Wait a minute. No, I think it was
23 1913. I think it was 1913.

24 Q. Okay. And let's see, is he -- he's not
25 still alive, is he?

1 A. No.

2 Q. Okay. And when did he pass?

3 A. I think he passed about -- away about
4 two years before my mother passed away.

5 Q. So he was probably a little over
6 mid-70s, like 76 maybe or so?

7 A. Yes, sir. Yes, sir.

8 Q. And what was his ailment? What took
9 your father?

10 A. A stroke. But he had old-timers too,
11 before, because he was in a nursing home. But it
12 was a stroke that what took him.

13 Q. Okay. But he already had the
14 Alzheimers?

15 A. That's right.

16 Q. Has he had -- did he have it for a
17 while?

18 A. Oh yes, for a good while. He knowed he
19 was getting it before he got it. Because the
20 doctor already told him it was -- he was going to
21 have trouble with his mind. The doctor already
22 warned him about it --

23 Q. Yeah.

24 A. -- and he already knew about it.

25 Q. I got you.

1 A. And he told everybody he knowed it was
2 coming.

3 Q. All right. When you came home from the
4 Navy, sometime around 1963 -- did you come back to
5 your mom and dad's house for a while?

6 A. Yes, I did.

7 Q. Where did they live?

8 A. At Cherokee Falls then. I don't know
9 what they call it -- Cherokee Falls or Blacksburg.
10 It was --

11 Q. Cherokee Falls/Blacksburg.

12 A. I don't know. I said I don't know
13 which one to call it because back at that time it
14 was Cherokee Falls because they still had a post
15 office.

16 Q. So it was either Cherokee Falls or
17 Blacksburg?

18 A. Well --

19 Q. Probably, really was Cherokee Falls?

20 A. It was Cherokee Falls back then. Like
21 I said, they had a post office at that time.

22 Q. Did they live in a house?

23 A. They did.

24 Q. Do you know what the address was or
25 what highway it was on?

1 A. On Dill Street.

2 Q. Dell?

3 A. D-I-l-l.

4 Q. Okay.

5 A. Dill Street.

6 Q. And do you remember how long you stayed
7 with them I guess to get on your feet after you
8 were in the Navy and all of that?

9 A. I moved out, but I can't think exactly
10 when I moved out, but --

11 Q. How about we go backwards. Do you know
12 how many years you lived with your mom and dad
13 after 1963?

14 A. Well, it was up to '65 to '66 when I
15 moved out, but Daddy come -- my father --

16 Q. Yes, sir.

17 A. -- and my mother, they wanted me to
18 move back, so I gived over and I moved back.

19 Q. They wanted to have you at home.

20 A. I gived up to them and then --

21 Q. Were you the only --

22 A. -- I should have stayed away.

23 Q. Were you the only adult child living at
24 the house at the time you decided -- you didn't
25 have any sisters or brothers living there with your

1 parents?

2 A. Well, there for a while, my sister -- I
3 got a another sister --

4 Q. I see.

5 A. -- named Evelyn.

6 Q. Yes, sir.

7 A. Well, she moved over there for a while
8 and her three children lived there for a while.

9 Q. Okay.

10 A. And then -- and then she bought a
11 mobile home in Blacksburg and she moved out.

12 Q. Okay. Was Evelyn -- she didn't stay
13 married?

14 A. Well, she was married, but her husband
15 was living in Oakland, California.

16 Q. Okay. Working out there somehow?

17 A. Yeah, he was a truck driver.

18 Q. That's what you call long-haul
19 trucking.

20 A. Yeah, yeah. Well, she moved out here
21 so she can -- she can -- to visit and she didn't
22 move back.

23 Q. I see.

24 A. Because her husband's name was Bud and
25 he had some issue with where he lived and some kind

1 of issue with the house.

2 Q. What was Bud's last name?

3 A. McKinney.

4 Q. McKinney?

5 A. Yeah.

6 Q. And your sister's last name -- is it

7 still McKinney or was it --

8 A. It's still McKinney.

9 Q. Okay. Is Evelyn still alive?

10 A. Yes, she is, but she's in a nursing
11 home up there in Shelby, North Carolina.

12 Q. Shelby?

13 A. Shelby -- Shelby, North Carolina.

14 Q. How old is Evelyn? Is she the oldest?

15 A. Well, no, she's the oldest -- she's the
16 oldest sister and she was born in July either 5 or
17 6 -- I believe the 5th. She was born in '42.

18 Q. Okay. I know we talked a little bit
19 about Evelyn. We talked about sister Faye. What
20 other siblings -- brothers and sisters are there?

21 A. I have two brothers.

22 Q. Two brothers.

23 A. Yes.

24 Q. All right. Older or younger?

25 A. One older and one younger.

1 Q. Who's the older one?

2 A. The older one was Joe Dean.

3 Q. Joe Dean?

4 A. Yeah.

5 Q. Oldest brother. Is he the oldest of
6 all of y'all?

7 A. Yes.

8 Q. Joe Dean Crawford?

9 A. Yes.

10 Q. Is Joe Dean still alive?

11 A. Yes.

12 Q. Okay. When was he born?

13 A. Several years before me to the day.

14 Q. To the day?

15 A. To the day.

16 Q. July 20th, just like you and me?

17 A. That's right. That's right, just like
18 you and me.

19 Q. Okay. 1938?

20 A. That's right.

21 Q. Okay. And he retired now?

22 A. Oh yes.

23 Q. I figured he probably was.

24 A. Yes, he was.

25 Q. So he's about 80 years old, isn't he?

1 Or he's going to be 80 this July 20th?

2 A. He's seven years older than me exactly.

3 Seventy-nine, I believe. I think he's supposed to
4 turn 80 July the 20th.

5 Q. That's what I'm thinking. Where did he
6 retire from?

7 A. Huh.

8 Q. Sir?

9 A. What was that?

10 Q. I'm sorry. What did retire from?

11 MR. HENDERSON: Object to form.

12 THE WITNESS: The last was -- he was in
13 the Army Reserves.

14 BY MR. PHILLIPS:

15 Q. So he was a long time military --

16 A. Right.

17 Q. -- reserve guy?

18 A. Yes. Yes.

19 Q. Okay. And Joe Dean -- does he live in
20 Cherokee County or Spartanburg County?

21 A. Cherokee County.

22 Q. And your younger brother -- what's his
23 name?

24 A. Jimmy Ray.

25 Q. When was he born?

1 A. I think 1950.

2 Q. So Jimmy Ray is about 68 years old?

3 A. I think so.

4 Q. About 68.

5 A. Yeah.

6 Q. And what does he do for a living -- I
7 guess is he retired now?

8 A. I think so.

9 Q. Is he living --

10 A. I'm pretty sure.

11 Q. Is he living in Cherokee County?

12 A. Yeah.

13 Q. Okay. And do you remember what he did
14 when he was working full-time?

15 A. The last place he worked he was a guard
16 over there at the hospital -- security guard.
17 Security guard.

18 Q. Okay. All right, now. Let me tell you
19 what we got. We are about out of tape. We are
20 going to have to replace our tape. Doesn't take a
21 minute. It will take about five minutes, so we're
22 going to take a short break if that's all right --

23 A. Okay. Okay.

24 Q. -- with Mr. Henderson.

25 MR. HENDERSON: I think we have to.

1 THE VIDEOGRAPHER: This will conclude
2 Media Unit Number 2 in today's videotaped
3 deposition of Mr. Crawford. The time is 3:24 p.m.
4 We are going off the video record.

5 (A recess transpired.)

6 THE VIDEOGRAPHER: Here begins Media
7 Unit Number 3 in today's videotape deposition of
8 Mr. Crawford. The time is 3:39 p.m. We are back
9 on the record.

10 BY MR. PHILLIPS:

11 Q. All right. Mr. Crawford, we're going
12 to move fast now, and I will tell you why. We may
13 have to knock off today a little after 4:15 or 4:30
14 or something like that, so let's see what we can
15 do.

16 We left off with your brother
17 Jimmy Ray Crawford -- born about 1950, about
18 68 years old. Lives in Cherokee County. He
19 retired from being a security guard at the
20 hospital; is that right?

21 A. That's right.

22 Q. Did he work at Mary Black?

23 A. At the time he was working there, it
24 wasn't Mary Black at that time.

25 Q. I see. He was working at a hospital?

1 A. The one in Gaffney.

2 Q. The one in Gaffney?

3 A. The one that is Mary Black now.

4 Q. Oh, Mary Black's in Gaffney?

5 A. Yeah.

6 Q. Okay.

7 A. That's it. It's the one hospital in
8 Gaffney. Yeah, Mary Black bought it over recently.

9 Q. Is the one in Spartanburg also named
10 Mary Black?

11 A. That's right.

12 Q. Oh, it's a system now or something?

13 A. That's right.

14 Q. I see. Let me ask you another
15 question. When -- as I mentioned -- if my records
16 are correct --

17 A. Uh-huh.

18 Q. -- y'all lived at a lot of places --
19 different addresses for about 18 years -- I mean,
20 18 different places between 1983 and now.

21 Does that sound about right?

22 A. Not sure how many places we lived,
23 really.

24 Q. Yeah. The ones we talked about -- and
25 I can go through all of them or somebody can

1 tomorrow --

2 A. Okay.

3 Q. -- were -- until you bought your own
4 trailer, it sounded like y'all might move from a
5 park to a different park from time to time; does
6 that sound right?

7 MR. HENDERSON: Object to form.

8 THE WITNESS: Well, like I say, we
9 moved a lot of different places. We lived in
10 houses and mobile homes also.

11 BY MR. PHILLIPS:

12 Q. Right. So y'all would maybe rent a
13 house for a time, or rent a mobile home for a time,
14 and just kind of move with your family as you
15 needed to or as --

16 A. Oh yes. Yes, sir.

17 Q. As you found a different housing
18 situation?

19 A. Yeah, yeah.

20 Q. And did Ms. Evelyn Kay Crawford
21 sometimes decide she wanted to live somewhere else
22 and you just had to follow her?

23 A. Some -- no. Well, sometimes the people
24 that owned the house, sold the house.

25 Q. I see. You'd lose your landlord that

1 way?

2 A. Yeah, yeah. A lot of places there was.

3 Q. Okay. But you always rented places,
4 right?

5 A. Yes, until I bought the mobile home.

6 Q. Until you bought your mobile home.

7 A. That's right.

8 Q. Do you know the brands of any of the
9 mobile homes y'all lived in over the years?

10 A. I really don't.

11 Q. Okay. And none of those were campers
12 like -- the only camper I had ever heard of was the
13 Airstream. Y'all never lived in campers; y'all
14 lived in regular mobile homes?

15 A. That's right.

16 Q. And then they usually have two or three
17 bedrooms in them?

18 A. That's right.

19 Q. Did y'all have your own furniture that
20 you moved around?

21 A. Yeah, we owned our own furniture.

22 Q. Okay. And do y'all have one car or two
23 cars at the house now -- you and Ms. Crawford?

24 A. I have two.

25 Q. Sir?

1 A. I have two cars.

2 Q. Now, your mom and dad's house -- we
3 were close. I thought we had it nailed down. Was
4 it somewhere Cherokee Falls, Blacksburg on Dill
5 Street and you lived there until about 1966; is
6 that right?

7 A. No, I actually lived there to -- I
8 moved out shortly and then I moved right back.

9 Q. That's what I heard. That's right. So
10 you went into the Navy, you came back home, lived
11 there shortly, moved out for a little bit, and came
12 right back --

13 A. Yes.

14 Q. -- your mom and dad wanted you back?

15 A. Yes, yes. Okay.

16 Q. Does that sound right?

17 A. Yes, that's right.

18 Q. And I think you said you moved -- did
19 you stay there until 1970 when you got married?

20 A. That's right.

21 Q. I see. Now, did you sister, Faye --
22 did she live next door?

23 A. Yes.

24 Q. To your mom and dad?

25 A. Yes.

1 Q. Did -- and your mom and dad lived in a
2 house on Dill Street?

3 A. She lived in a house.

4 Q. Who did?

5 A. My mother and father lived in a house.

6 Q. On Dill Street?

7 A. Yeah, on Dill Street.

8 Q. D-I-l-l?

9 A. Yeah, that's right.

10 Q. Like dill pickle?

11 A. Yeah, that's what they call it.

12 Q. Yeah. Okay. Dill Street. And where
13 was sister Faye's house?

14 A. Right down next -- right down below.
15 Actually, my mother and father lived with Faye at
16 her mobile home. And see, what happened was, when
17 the Burlington sold --

18 Q. The mill?

19 A. Yeah, the mill. They sold the mill
20 houses for the people that was living in them.

21 And then they had the surveyor come in
22 and lot the houses off. At that time, mother and
23 father moved one house up, you see.

24 Then, somebody else moved in a house --
25 Owensbys. Owensbys live in it -- Owensbys.

1 Owensbys. Owensbys lived in the house -- lived in
2 the house, and then it burned down when they lived
3 in it.

4 And then Faye and Eddie Gene bought the
5 lot and put a mobile home on it.

6 Q. Okay. I'm listening.

7 A. That was sometime in the -- sometime in
8 the '60s.

9 Q. It was after you got back from the
10 Navy?

11 A. Yeah, yeah.

12 Q. After 1966 because you had moved out
13 for a while and came back?

14 A. No, I only -- but I only moved out for
15 about -- I don't know if it was a whole month or
16 not --

17 Q. Okay.

18 A. -- you see, then shortly moved back.

19 Q. So Faye and Eddie Gene at some point
20 bought a lot and put a mobile home on it?

21 A. Yes, that's right.

22 Q. Was that about 1966 -- best you know?

23 A. Let me see. Yeah, somewhere close to
24 there. Yeah, somewhere close to there. It was
25 either '65 or '66.

1 Q. And Faye and Eddie Gene Clary -- I
2 guess we could check the real estate records and
3 find out for sure --

4 A. Okay. Okay.

5 Q. -- and put a mobile home on that lot?

6 A. That's right.

7 Q. And what's the address of it?

8 A. Well, the street name -- Dill Street
9 was the name of it.

10 Q. Dill Street. That would help. It was
11 either Cherokee Falls or Blacksburg, right?

12 A. Yeah, it was --

13 Q. Which one you think it was?

14 A. Well, at that time it was Cherokee
15 Falls, you see, that's where they got their mail.
16 Their address was Cherokee Falls on their address.

17 Q. And at some point they closed the post
18 office and it became Blacksburg?

19 A. Well, when they sold the mill and --
20 well, Paul was the postmaster and he got in bad
21 health and then he had to quit when they closed the
22 post office up. I don't know which one happened
23 first -- his health or closed the post office.

24 But they closed the post office and
25 then they changed everybody's address to -- I mean,

1 the post office department changed everybody's
2 address to Blacksburg.

3 Q. To Blacksburg?

4 A. That's right.

5 Q. All right. Got it. It's all right.

6 It gets kind of circular, doesn't it?

7 A. Yeah, that's right.

8 Q. Your mom and dad wound up moving into
9 the trailer with Eddie Gene and Faye?

10 A. No. No.

11 Q. No?

12 A. They stayed in the house.

13 Q. They stayed in their house?

14 A. That's right.

15 Q. And that was a mill house?

16 A. It was.

17 Q. And how long did they stay in the
18 house?

19 A. Until they passed away.

20 Q. Oh, until they the passed away. Okay.

21 So you were living in your mom and dad's house,
22 Faye and Eddie Gene were living in the trailer down
23 the street?

24 A. That's right. That's right.

25 Q. And how many doors down was Faye and

1 Eddie Gene's place?

2 A. The next -- just the next door down.

3 Q. Next door?

4 A. That's right.

5 Q. And you stayed at your parent's house
6 until 1970 when you got married?

7 A. That's right.

8 Q. Okay. So now, let's talk about 1966 to
9 1977.

10 A. Okay.

11 Q. Faye and Eddie Gene bought a lot and
12 put a trailer on it?

13 A. That's right.

14 Q. And this was a mill neighborhood?

15 A. It was.

16 Q. Was Eddie Gene working at the mill --
17 and you told me and I forgot. Yeah, he -- you tell
18 me. Where was he working?

19 A. I'm not sure where he was working, but
20 he did -- he did a lot of mechanic work.

21 Q. Okay.

22 A. Like take motors -- take motors apart,
23 transmissions apart, and there was a lot of people
24 came looking for him.

25 Q. Okay.

1 A. I think that's where he made most of
2 his income -- mechanic.

3 Q. Okay.

4 A. He had a '57 Chevrolet and he took that
5 apart several times and put it back together.
6 'Cause one time it rolled into the mobile home and
7 tore the whole front end up, and he rebuilt the
8 whole front it.

9 Q. Front of the car or the front of the
10 mobile home?

11 A. You couldn't tell. You couldn't tell.

12 Q. Yeah.

13 A. You couldn't even tell it was even
14 changed.

15 Q. Okay.

16 A. I mean, it was just like it had come
17 from the factory.

18 Q. All right.

19 A. He had to buy new parts to put on the
20 front end.

21 Q. So he fixed that Chevy?

22 A. That's right.

23 Q. Okay. Now, I got on something called
24 interrogatory answers -- this is sort of your
25 lawyer's first cut 'cause we got some things we

1 filled in today --

2 A. Uh-huh.

3 Q. -- that you worked at -- in the
4 1960s --

5 A. Uh-huh.

6 Q. -- I got Hamrick textile mill, Minnett
7 Mill in Grover, Magnolia Finishing in Spartanburg
8 and Burton and Dixie Mill in Blacksburg.

9 Did you work at all four of those
10 places, or do you want me to take them one by one?

11 A. Wait a minute. Magnolia is in
12 Blacksburg.

13 Q. All right, sir. So I had Spartanburg.

14 So let me ask you this: You in the --
15 this 19 -- maybe '66 to 1970 time period, did you
16 work at Hamrick textile mill in Gaffney?

17 A. In early '63.

18 Q. Sir?

19 A. It was in early '63.

20 Q. So that would be before you went into
21 the Navy?

22 A. I think so, yes. Yes.

23 Q. All right. Let me write that down.

24 What were you doing over at Hamrick?

25 A. Oh, my goodness. I was --

1 Q. I know you were young.

2 A. Oh wow. The first job I did was turned
3 the pick locks on the looms.

4 Q. Yes, sir.

5 A. That took about less than an hour
6 'cause I had to run through and do that. I took a
7 key and all the looms -- I turned the -- they have
8 looms on all the clocks. I had to turn the clock
9 back and somebody else come behind me and read the
10 numbers off, and that's how the -- it had do with
11 how much -- how long each loom ran. That's what I
12 did it for.

13 Q. So it was like a clock?

14 A. Yeah. But that just took less than an
15 hour.

16 After that I took off cloth all night.
17 Took off cloth.

18 Q. Took off cloth?

19 A. Took off cloth, yeah.

20 Q. That means after it was processed or
21 made, you'd take it off of the machine?

22 A. Yeah, when they -- when -- when the
23 flag went up it showed the time to top it off.
24 They'd put a flag up, and I'd go -- I'd put a
25 little ole buggy behind he me --

1 Q. Yes, sir.

2 A. -- it was -- it was like a little
3 narrow wagon with wheels on it and a little string
4 on it, and I'd pull it up to the long -- to the
5 loom --

6 Q. Yes, sir.

7 A. -- and I'd pull it off -- take it off
8 and put another -- I put another tube on it and
9 start it off and get ready to go to the next one.

10 Q. Yes, sir. I got you.

11 A. And I would just keep taking the cloth
12 off all night.

13 Q. And put the tubes?

14 A. Yeah, yeah, putting another one on to
15 get it started on.

16 Q. And that was the 1963 work -- that was
17 probably right before you went in the Navy -- right
18 after you finished school; does that sound right?

19 A. Yeah. Yeah.

20 Q. How about the Minnett Mill,
21 M-I-n-n-e-t-t, or Monet --

22 A. It's Minnett. Minnett.

23 Q. In Grover?

24 A. Yeah, I worked up there because
25 Eddie Gene Clary worked up there. I worked up

1 there with Eddie Gene. I rode to work with him.

2 Yep.

3 Q. And so that was after Eddie Gene and
4 Faye moved on Dill Street --

5 A. Oh yeah.

6 Q. -- close to your parents?

7 A. Yeah.

8 Q. And so that was between 1966 and 1970?

9 A. Somewhere along in there, yeah.

10 Q. Okay. What did y'all do at Minnett or
11 what did you do at Minnett?

12 A. I was a quill skinner.

13 Q. Sir?

14 A. What they call a quill skinner. I took
15 the quills --

16 Q. Yes, sir.

17 A. -- the thread run-on, and when they get
18 broke off I would go and clean them off. And --
19 and I would clean them off. Clean the --

20 Q. Clean off the quills?

21 A. Yeah, because some of the thread would
22 be all broke up --

23 Q. Yes, sir.

24 A. -- it would be no good and have to take
25 them off so they could reuse the quill. So that's

1 what they -- the bobbins -- what they call bobbins
2 and -- off the looms. Okay.

3 What they call the battery filler -- we
4 would go put the little bobbins on the looms and
5 then it would shoot back and forth, and that's how
6 they made the cloth.

7 Q. Okay. I got you.

8 A. And then when they get at the end of
9 them, they'd throw them off -- they fall off in a
10 little container, and I had to go around picking
11 them up. And some of them would be off -- it
12 wouldn't be completely off. Ones that wasn't
13 completely off, I had to make sure they were clean.
14 They had to be clean to start all over with the
15 next one.

16 Q. That's how it worked.

17 A. It is the next -- and where they doff
18 in the doffing department.

19 Q. And that would be the quills?

20 A. Yes.

21 Q. Clean them up and save them.

22 A. Right.

23 Q. And you and Eddie worked 40-hour weeks?
24 50-hour weeks?

25 A. I just don't remember how many -- how

1 many really.

2 Q. Was it full-time work?

3 A. It was full-time, yeah. Back at that
4 time we was on third shift at that time.

5 Q. Third shift?

6 A. Third shift. It was, yeah.

7 Q. And when y'all went home, he went to
8 the mobile home with your sister Faye as newlyweds,
9 and you went to stay with your parents?

10 A. Yes, I think.

11 Q. Is third shift midnight to eight
12 o'clock or eleven o'clock to 7 o'clock?

13 A. I'm not sure which one it was. I
14 believe -- I'm not sure. I'm not sure if it was
15 11:00 to 7:00 or 12:00 to 8:00.

16 Q. But it was after midnight?

17 A. It was -- it was eight hours anyway.
18 It was eight hours.

19 Q. What we call a graveyard shift?

20 A. Yeah, that's right. That's what they
21 called it. Absolutely.

22 Q. Okay. Tell me one more, Mr. Crawford,
23 please. You worked at Magnolia Finishing -- you
24 said it wasn't Spartanburg, though?

25 A. It was in Blacksburg, over on Highway

1 -- right off between Highway 105 and 85.

2 Q. And how many years -- let me go
3 backwards. How many years did you work at Minnett
4 Mill with Eddie Gene Clary?

5 A. I don't -- I really don't know exactly.
6 I don't know.

7 Q. How about Magnolia Finish --

8 A. I think --

9 Q. -- Finishing. Excuse me.

10 A. Yes. I think to the best of my
11 knowledge I started back then -- I think it was
12 year -- was 1964.

13 Q. All right. So that was right after the
14 Navy, then?

15 A. I'm not sure if I worked Magnolia first
16 or Minnett first. Tell you the truth, I don't
17 remember which one but both of them is right close
18 together.

19 Q. Well, it makes sense to me, and I could
20 -- this is your testimony -- is that you worked
21 later at Minnett because you were there with Gary
22 -- I mean, with Andy Gene [sic] and because that's
23 after Andy Gene -- what's your brother-in-law's
24 name again?

25 A. Eddie Gene Clary.

1 Q. Eddie Gene. Excuse me. I said
2 Andy Gene and I meant Eddie Gene.

3 So that's about the time Eddie Gene was
4 living next door close to your parents?

5 A. Yeah.

6 Q. So when Eddie Gene and Faye lived next
7 door to your parents, that's when y'all were
8 working together at Minnett mill; right?

9 A. I think so. Right.

10 (Interruption)

11 MR. PHILLIPS: We were going to take a
12 short break.

13 THE VIDEOGRAPHER: The time is
14 3:58 p.m. We are going off the record.

15 (A recess transpired.)

16 THE VIDEOGRAPHER: The time is
17 4:12 p.m. We are back on the video record.

18 BY MR. PHILLIPS:

19 Q. All right. Mr. Crawford, before we
20 took our break, we are just finishing your job at
21 Magnolia finishing --

22 A. Uh-huh.

23 Q. Between Highway 105 and 85 in
24 Blacksburg. You worked there you think around
25 1964?

1 A. I started in '64.

2 Q. Okay. So that was -- and that was
3 before the Minnett Mill job that we talked about?

4 A. Wait a minute.

5 Q. Tell -- I'll wait. You tell me.

6 A. From Magnolia --

7 Q. Yes, sir.

8 A. I went to Hoechst.

9 Q. You went to Hoechst Celeanese?

10 A. Yeah, I went to Hoechst Celeanese. I
11 sure did.

12 Q. All right. So Magnolia must have been
13 the late '60s then? Since you went to Hoechst in
14 1970?

15 A. Yeah. Yeah.

16 Q. Okay. I bet you you were at Minnett
17 with your brother-in-law and then you went to
18 Magnolia from there; is that possible?

19 A. That's possible, yeah.

20 Q. All right, sir. How about
21 Burton and Dixie? That's the one last one I got.
22 I got it being a Blacksburg mill?

23 A. Blacksburg. It was a foam plant.

24 Q. Sir?

25 A. It was a foam -- it was some kind of a

1 foam -- it was a foam.

2 Q. Okay.

3 A. Where they -- and then they cut them
4 out to go in furniture -- different shapes to go in
5 furniture.

6 Q. Like a Styrofoam, almost?

7 A. Yeah, yeah, yeah.

8 Q. I used to have a beanbag chair way back
9 when -- it wasn't like that was it?

10 A. I'm not sure.

11 Q. Okay. Anyway, you made foam that was
12 stuffed into furniture?

13 A. That's right.

14 Q. Do you remember what year that was?

15 A. I really don't. I really don't.

16 Q. I see. And sometimes that foam goes
17 underneath the leather like on a couch pillow
18 doesn't it?

19 A. Yeah. Yeah, it goes in like the
20 cushions for chairs and all kind of couches and
21 recliners -- recliners.

22 Q. Okay. Two questions. Let's go
23 backwards one second to Magnolia Finishing, which
24 evidently was one of your last jobs before you got
25 to Hoechst Celanese in 1970?

1 A. Uh-huh.

2 Q. And that's a yes? Again, we think
3 Magnolia Finishing, the job in Blacksburg -- the
4 place in Blacksburg, was the last job you had
5 before Hoechst Celanese?

6 A. I think so. I think so.

7 Q. When you were working at Magnolia
8 Finishing, was Eddie Gene Clary, your
9 brother-in-law, working with you, or were you on
10 your own there just driving to work?

11 Did Eddie Gene work with you at --

12 A. No, Eddie Gene didn't work at Magnolia
13 with me.

14 Q. Okay. He did work with you at Minnett
15 Mill?

16 A. That's right. That's right.

17 Q. How about at Burton and Dixie when you
18 were making that furniture cushions -- cushions for
19 furniture?

20 A. No, I was actually -- when I started
21 off working there --

22 Q. Yes, sir.

23 A. -- I was riding to work with a neighbor
24 because I didn't have a car at that time, and I
25 think I bought a car when I worked at Burton Dixie.

1 Q. Okay. So you were still living with
2 your parents for all four of these?

3 A. Oh yeah, yes, sir.

4 Q. Now, if -- as I understood it, sister
5 Patty [sic] and brother-in-law, Eddie Gene Clary,
6 bought that lot and moved that trailer in about
7 1966?

8 A. Close to there. Somewhere in there.

9 Q. Close to there. All right. When was
10 it that he built a garage?

11 A. It was right after -- right after he
12 had the mobile home moved in. He built it real
13 fast. It was made out of tin. It was -- well, it
14 was aluminum -- it was big beams -- great big beams
15 put in the ground and it had -- it had aluminum
16 siding connected to it.

17 Q. So sort of sheet metal -- aluminum
18 building built around beams?

19 A. Yeah, that's right. At that one, it
20 was.

21 Q. And was the garage a place he could
22 store his tools and his parts and stuff?

23 A. Oh yes, yes. And it had a workbench
24 built at the back of it.

25 Q. Did he have a lift -- like a -- oh, not

1 a block and tackle -- something to lift a motor out
2 of a car? Any kind of rig to lift a motor or
3 engine out of a car?

4 A. Oh yeah, he had to.

5 Q. Where was that? Was that inside or
6 outside?

7 A. Wait a minute. I believe -- I believe
8 that was on the inside. I believe it was. I
9 believe it was.

10 Q. Okay. And how big was that garage?
11 And you and I are in a room that looks to me about
12 the size of a garage, but you tell me.

13 A. Yeah, it was the size -- as big as this
14 room. It was as big as this.

15 Q. Was it a little bit smaller or a little
16 bit bigger?

17 A. It was about the same size. It was the
18 same size because he had room to move a car in, and
19 then there was more room before he got to the
20 workbench.

21 Q. I see.

22 A. He had a little bit of space to walk
23 before you got the workbench.

24 Q. Is that building still standing as best
25 you know?

1 A. I'm not sure because when they moved
2 out -- he moved out and left it.

3 Q. Yes, sir.

4 A. He moved out and left it, so...

5 Q. Do you know when he --

6 A. I believe I went by there a while back.
7 I believe the other people moved it. I believe
8 it's missing.

9 Q. Okay.

10 A. But when he moved to Bear Creek, he
11 built like one of these -- he had one of these
12 buildings built with a -- it was a building a
13 company built.

14 Q. Prefabricated?

15 A. Yeah, it's the one with the dome roof
16 over it. Yeah, it had a dome roof. It's still
17 standing there now. It's still there.

18 Q. Did he make a garage in that one too?

19 A. Oh yes. In that one he had -- it was a
20 lot bigger -- it was a lot because he had a place
21 to drive a car in.

22 Q. Yeah.

23 A. And it had a lift where you mash the
24 button on the wall over there.

25 Q. It lifts the car?

1 A. Yeah, lift the car way up under it and
2 walk under the car.

3 Q. Okay. The first place we know about --
4 when did Eddie Gene and Faye Clary move out of the
5 house on Dill Street -- I mean, the trailer which
6 had a garage in the yard?

7 A. Oh wow.

8 Q. Best you know?

9 A. Oh man.

10 Q. Maybe you think about when you were
11 working at Hoechst. Was it before or after that?

12 A. Well, I think he moved out when -- wait
13 a minute. It was after mother passed away.

14 Q. Oh, it was in the 1990s then?

15 A. Yeah, it must have been. Yeah, 'cause
16 I know mother was still living there.

17 Q. And what's the address -- what's the
18 town called? You said Bear Creek?

19 A. Well, no, that's just the street. It's
20 the street he was living on. It's just a street.

21 Q. Was it called Bear Creek?

22 A. Bear Creek. Yeah, Briar Creek Road.
23 Briar Creek Road.

24 Q. And let me make sure I got it right
25 because I'm from a different country --

1 A. Yeah.

2 Q. -- town in South Carolina. Did you say
3 Briar Creek or Bear Creek?

4 A. Bear. B -- yeah, bear, Bear Creek.

5 Q. Like b-e-a-r, bear?

6 A. Yeah, yeah.

7 Q. Like Smokey the Bear.

8 A. Yeah, Smokey. That's right. Yeah.

9 Q. Sorry. Big bear in the woods, that's
10 what my mom used to say.

11 A. Yeah.

12 Q. Okay. All right. So Bear Creek -- I
13 say bear, you say bar -- is where you moved to
14 later with your sister.

15 A. Yeah.

16 Q. And was that -- did you take over your
17 parents' --

18 A. No, no.

19 Q. Okay. That was the a different house.
20 Bear Creek was in what town?

21 A. Between Cherokee Falls and Blacksburg,
22 actually. Well, right now it's Blacksburg right
23 now, though.

24 Q. Blacksburg?

25 A. All the way down through there is

1 Blacksburg now. It's Blacksburg now.

2 Q. It's now known as Blacksburg?

3 A. Right now.

4 Q. Okay. Bear Creek -- anyway, he built a
5 garage over there too? And a big one?

6 A. Well, I don't think he built it; I
7 think he had it built.

8 Q. Had somebody built it and bring it in
9 and put it on his place?

10 A. They might. They must have built it
11 right there because it was so big --

12 Q. Yes, sir.

13 A. It was behind it. They couldn't move
14 it; they had to put it together right there.

15 Q. All right.

16 A. -- because it's too -- it's too big.

17 Q. All right. Let's go back to the late
18 '60s. I'm focused on 1966 to about 1970 when you
19 went to work at Hoechst. Eddie Gene had that
20 garage in the back -- in his yard. Was it his
21 backyard or front yard from the street?

22 A. Well, Daddy took his father -- when we
23 lived on Dill Street, it was in the front -- in the
24 front part of his mobile home.

25 Q. Okay. You said daddy took what?

1 A. It -- on Dill Street -- when Eddie was
2 on Dill Street, it was in the front.

3 Q. Okay.

4 A. It was in the front of his mobile home.
5 And then when he moved to Bear Creek -- on Bear
6 Creek Road --

7 Q. Uh-huh.

8 A. -- he put a mobile home there and he
9 had the garage built behind his mobile home.

10 Q. Got it. And I'm interested in the time
11 between '76 -- excuse me -- 1966 to 1970 when you
12 were living next door.

13 A. Uh-huh.

14 Q. Is that right? Do you understand?

15 A. Yeah.

16 Q. Okay. Good. So let's focus on that a
17 minute. It sounds like to me the shop was in the
18 front yard and the trailer was behind it --

19 A. That's right.

20 Q. -- facing Dill Street?

21 A. That's right. That's right.

22 Q. Okay. Did cousin -- I mean, not cousin
23 -- brother-in-law, Eddie Gene, have a business
24 there that was with a business license and paying
25 business taxes and with an arrangement with the

1 city or the township of Cherokee Creek or
2 Blacksburg, or did he just run a little shop for
3 cash?

4 A. I think he just run a little shop. He
5 had a lot of customers come in.

6 Q. Did he take credit cards?

7 A. I'm not sure. I really don't know.

8 Q. Okay.

9 A. If I had to make a guess, I would say
10 it was probably cash.

11 Q. Okay. Did the business have a name or
12 did the shop have a name?

13 A. No, it really didn't.

14 Q. Okay.

15 A. Everybody knew his name, Eddie Gene,
16 you know?

17 Q. So basically people come over on
18 Saturdays and he'd do work on cars?

19 A. Uh-huh. Yeah.

20 Q. And on Sunday, I guess y'all went to
21 church, right?

22 A. That's right. That's right.

23 Q. Okay. Where did y'all go to church, by
24 the way?

25 A. Up there at Wesley Church at that time

1 on Pecan Street in Gaffney.

2 Q. Okay. Is it Wesleyan or Wesley?

3 A. Wesley.

4 Q. Yeah.

5 A. Oh, Wesley's -- Wesley Methodist.

6 Q. John Wesley or Charles Wesley, one of
7 the two?

8 A. Yeah, it was Pecan Street.

9 Q. In which town again?

10 A. It's in Gaffney. The church is still
11 there, but I believe -- I believe it's got a
12 different name now.

13 Q. Okay. But you -- but you would go
14 there with your mom and dad?

15 A. Yeah, that's right. Yeah.

16 Q. And then she'd cook a big lunch and
17 y'all take a long nap; is that about right?

18 A. Yeah. I guess so.

19 Q. All right. That's the way it was at my
20 house. All right.

21 Now, let's talk about Saturdays at the
22 garage?

23 Did you get paid to work over there?

24 A. Oh, no, no, no.

25 Q. Oh, I see. So --

1 A. I just played around with him -- fooled
2 around, went bowling together, went out to eat,
3 mostly fish -- to fish places.

4 Q. Okay. That's what I figured. You had
5 to do something for fun just to get work off your
6 ahead.

7 So you'd fish, you'd bowl, sometimes
8 you'd hang around the garage?

9 A. Yeah. Yeah.

10 Q. When would Eddie buy his -- where would
11 he buy his car parts if he went to Harrison's or to
12 the place --

13 A. Oh, I'll tell you the truth. I never
14 was with him when he bought them. I just knowed he
15 just brought them back.

16 Q. Okay.

17 A. And somebody need something done, he'd
18 go get them and he'd have it.

19 Q. Okay. So if he would --

20 A. Now, wait a minute.

21 Q. Yeah?

22 A. He had a business license because I
23 know -- I know when he bought some -- up there at
24 the at the V -- V -- V --

25 Q. Are you talking about Harrison's?

1 A. No, up there at Gaffney. Advance.

2 Advance. When he was at Advance 'cause he got a
3 discount -- he got a discount on them.

4 Q. Now, was this when he was operating on
5 Bear Street, or was this back in the Dill Street
6 days?

7 A. Wait a minute.

8 Q. Because I just don't remember Advance
9 auto parts being around in the 60s.

10 A. Well -- okay. Oh man, I'm not sure
11 which year it was, but -- let me see. Oh man, let
12 me see.

13 Q. You know what? It doesn't matter too
14 much right this second.

15 A. Okay.

16 Q. Do you know if he had a business -- if
17 he called it anything besides -- anything but a
18 shop where he worked on Saturdays?

19 A. He worked all through the week.

20 Q. Yeah. Yeah. But he also worked full
21 shift at Minnett mills too?

22 A. At that time he was, but I'm not sure
23 how long he worked there. I'm not sure.

24 Q. How long he worked where?

25 A. At Minnett.

1 Q. Okay. But you used to ride into work
2 with him?

3 A. Yeah, I did. I did, yeah.

4 Q. Okay. But you can remember that part
5 at least?

6 A. Yeah. Yeah.

7 Q. Okay. Now, so he had a license at some
8 point but you just don't know when -- a business
9 license that is, right?

10 A. Yeah. Yeah.

11 Q. Okay.

12 A. Because he had -- well, he had -- he
13 was able to get parts up there and get a discount
14 on it.

15 Q. Okay.

16 A. At Advance.

17 Q. And that was at Advance Auto?

18 A. Yeah.

19 Q. But we're not sure when that was
20 because we don't know when Advance existed; is that
21 right -- fair?

22 A. I believe it was in the '70s when he
23 bought that 'cause I remember he bought some drums
24 to go on my car.

25 Q. He bought some what, sir?

1 A. Some -- them there drums to go on it.

2 Q. Drums?

3 A. Yeah. Them there. The rotors --
4 rotaries, yeah rotaries. They call them rotaries.

5 Q. Rotors?

6 A. Yeah. Yeah. He bought them when he
7 was up there.

8 Q. Bought drums and rotors?

9 A. Yeah, rotaries.

10 Q. But he was the one working on the cars,
11 not you?

12 A. Oh yeah, yeah.

13 Q. Okay. And same thing -- even when your
14 brother -- son-in-law later on helped you with
15 cars --

16 A. Oh, yeah.

17 Q. -- he would do it and not you?

18 A. He sure would.

19 Q. Which son-in-law was it by the way?

20 A. Michael.

21 Q. Michael Quinn?

22 A. Yeah. Okay.

23 Q. Tessa Lynn's husband?

24 A. Yeah, yeah.

25 Q. And what year those two got married?

1 She was born in 1972, I know that.

2 A. Okay. Yes. Oh man.

3 Q. How about this: How about how old was
4 your girl Tessa Lynn Quinn -- Tessa Lynn when she
5 married Michael Quinn?

6 A. She was around 18. I don't know
7 exactly. She was around 18.

8 Q. So they get married around 1990?

9 A. I know exactly where we was living,
10 yeah. I know I was living on Jackson Street when
11 she got married, yeah.

12 Q. And you were living on where?

13 A. Jackson Street.

14 Q. Jackson?

15 A. Jackson Street.

16 Q. Like Andrew Jackson?

17 A. Yeah, that's right. Up here in
18 Gaffney.

19 Q. Okay. One second. Let me take a look
20 at something. Yeah. Jackson Street, Gaffney.

21 Was it 255 Jackson Street, Gaffney?
22 Does that sound right?

23 A. I'm not sure, but I -- it sounds like
24 it wants to ring a bell. It might have been.

25 Q. Could it have been 1996? Somewhere

1 between 1996 and 1998 that you lived there? On
2 255 Jackson Street, Gaffney 29340?

3 A. Yeah, I think so. I think so. Yeah,
4 the reason I moved out of there was because the
5 house got sold.

6 Q. I see.

7 A. You see.

8 Q. Yeah, you mentioned sometimes those
9 places get sold.

10 A. Oh, that's true. I was going to buy
11 it, but somebody bought it in front of me. Matter
12 of fact, it was the Littles up here.

13 Q. Oh, is that right?

14 A. Littles oil place. Johnny Littles --
15 he bought it.

16 Q. All right, sir. Then you moved from
17 there to 152 Goucher Green Bethel Road?

18 A. Yeah, wait a minute. Wait a minute.
19 No, I didn't move from there.

20 Q. Okay.

21 A. I didn't move from there from there --

22 Q. And move to there?

23 A. -- I moved from Goucher Green Bethel
24 Road from 12th Street.

25 Q. Okay.

1 A. Yeah, right there at the end of
2 12th Street.

3 Q. 12th Street. All right, sir. So --

4 A. That was in -- wait a minute.

5 I moved from 1980 -- 1980 is when I --
6 'cause that's when they closed the plant down and I
7 moved in a house -- wait a minute.

8 Q. Go ahead.

9 A. I moved out first -- before I moved in
10 that mobile house, I lived in a house.

11 Q. Yes, sir.

12 A. On -- right there in the -- right there
13 on the -- on Green Bethel Road -- right off Green
14 Bethel Road.

15 Q. Yes, sir.

16 A. And that's when they closed the plant
17 down over at Collins and Aikman. When they closed
18 the plant down -- I remember it. I moved in a
19 house -- it was a my wife's aunt's house and it was
20 empty and she told Kay she could move in it.

21 Q. So y'all took it?

22 A. We took it; that's right.

23 Q. I would have.

24 A. Yeah.

25 Q. Now, we're really working on your

1 daughter -- Tessa Lynn was born in '72, so maybe
2 she was 24 when she got married in 1996?

3 A. Whoa, whoa. Tessa?

4 Q. Yes, sir. Oh, I'm sorry. It was
5 Michael Quinn, who was the son-in-law who did --

6 A. That's right. Michael Quinn.

7 Q. -- the car work for you?

8 A. Yeah.

9 Q. I got she was married in 1972 and it
10 looks like to me that y'all lived on --

11 A. Wait a minute. '72?

12 Q. -- Jackson Street in 1976 -- 1996?

13 A. No, she couldn't be married in '72
14 because she born in '72.

15 Q. I'm sorry. I miss spoke.

16 A. Yeah. Yeah.

17 Q. And she got married in 1996 when she
18 was about 24?

19 A. Wait a minute. Well -- wait a minute.
20 It was around 1990 when she got married.

21 Q. Okay. But you're sure she lived on
22 Jackson Street when she got married?

23 A. I'm pretty sure.

24 Q. Pretty sure. All right.

25 I've got a record indicating that you

1 lived on Jackson Street from 1996 to 1998.

2 A. Oh, really? Okay. Okay.

3 Q. So that would have made her 24 when she
4 got married; if that's accurate.

5 A. I remember when I lived on Jackson
6 Street -- Michael coming there to date her and
7 that's when I took a vacation up to Virginia when
8 Virginia lived in the Kentucky.

9 Q. Yes, sir.

10 A. Yeah, Virginia lived in Kentucky.
11 Okay. Okay. It was around '90.

12 Q. Okay. We'll leave it right there. And
13 you know what, there's probably a record at the
14 courthouse --

15 A. Okay. All right.

16 Q. -- so we can figure it out.

17 A. Yeah. Okay.

18 Q. Now, so you didn't work at Eddie Gene's
19 garage, but if you weren't hunting -- I mean, if
20 you weren't fishing, if you weren't bowling,
21 sometimes you were there?

22 A. Oh yeah, yeah.

23 Q. There when he was working on cars?

24 A. Oh yeah, yeah.

25 Q. And when Mr. Henderson asked you this

1 morning -- several hours ago --

2 A. Uh-huh. Okay.

3 Q. -- about if you remember any brakes,
4 the first thing you said was Dow?

5 A. Oh yeah.

6 Q. And then he asked you again if there
7 were any others and you didn't remember; does that
8 sound right?

9 A. It was a long time back. It was
10 Bendix. It was Bendix.

11 Q. Okay. And then you said Bendix when he
12 suggested had you ever heard of the name Bendix; is
13 that right?

14 A. Yeah, it was a long time back. It was
15 hard to -- yeah.

16 Q. I mean, are you -- I guess my question
17 is: You're under oath and we're working through
18 this thing, and it was a long time back --

19 A. Yeah.

20 Q. -- do you know for sure if your
21 brother-in-law was working with Bendix brakes at
22 that time or not?

23 MR. HENDERSON: Object to form.

24 MR. PHILLIPS: You can answer.

25 THE WITNESS: I think so. I think so.

1 I'm not sure. I think so.

2 BY MR. PHILLIPS:

3 Q. Okay. Now, what you just said -- just
4 so we're clear -- you said I think so, I'm not
5 sure.

6 A. Yeah. Okay.

7 MR. HENDERSON: Object to form.

8 BY MR. PHILLIPS:

9 Q. Is that right?

10 A. Yeah.

11 Q. That's what you said, isn't it?

12 A. Yeah.

13 Q. Now, when your son-in-law worked on
14 brakes with you or changed brakes -- car brakes for
15 you --

16 A. Yeah.

17 Q. -- do you know what kind of brakes he
18 used?

19 A. I know that was Bendix. I know that
20 was.

21 Q. Okay. And -- how do you know?

22 A. Because it was on the -- it was wrote
23 on it.

24 Q. It was wrote on it. All right.

25 Tell you what. Let me show you

1 something.

2 A. Okay.

3 Q. All right.

4 (DFT. EXH. HW1, HW2, HW3, HW4, HW5,
5 HW6, and HW7, Pictures, were marked for
6 identification.)

7 MR. PHILLIPS: I'll give you one in a
8 minute.

9 BY MR. PHILLIPS:

10 Q. I've got seven exhibits with stickers
11 on it.

12 A. Okay. All right.

13 Q. And they say HWI -- remember that I
14 said I was Honeywell?

15 A. Okay.

16 Q. Honeywell 1, HW2, HW3, HW4, HW5, HW6
17 and HW7.

18 A. Okay.

19 Q. And I represent to you that these are
20 packagings of Bendix boxes?

21 A. Okay.

22 Q. Would you look at those and tell me
23 which one you recognize --

24 A. Okay.

25 Q. -- if any of them --

1 A. Okay.

2 Q. -- from your son-in-law?

3 A. Okay.

4 MR. HENDERSON: Objection. Foundation.

5 BY MR. PHILLIPS:

6 Q. You can name them by number or just
7 tell me -- or you can put them on one side if you
8 think you recognize them. Each one of them are
9 several photographs of the same thing.

10 MR. HENDERSON: Also object as to the
11 form.

12 (Witness complying)

13 MR. HENDERSON: Counsel, I'm a little
14 concerned about what he knows you want him to do.

15 BY MR. PHILLIPS:

16 Q. Yeah, my question was, Mr. Crawford",
17 if you recognize any of those sets of pictures --

18 A. Okay.

19 Q. -- as Bendix packages? I can tell you
20 this was over about a 30-year period --

21 A. Oh, okay.

22 Q. -- of manufacturing.

23 A. Oh wow.

24 MR. HENDERSON: Object again as to
25 form.

1 THE WITNESS: I think it's right there.

2 BY MR. PHILLIPS:

3 Q. All right, sir. And that's marked
4 HW Exhibit 6. So that looks like a -- that box is
5 familiar to you?

6 A. Yes, sir.

7 Q. All right. And that's through your
8 son-in-law doing the work -- Mr. Michael Quinn --
9 is that right?

10 (No verbal response)

11 MR. HENDERSON: Object to the form.

12 BY MR. PHILLIPS:

13 Q. Is that where you believe you saw that
14 box or something like that box?

15 MR. HENDERSON: Object to the form.

16 THE WITNESS: Yeah. Yeah.

17 BY MR. PHILLIPS:

18 Q. All right, sir. And that's when
19 Michael would come over to y'all's place and work
20 on your cars?

21 A. Oh, I take it over there. A lot of the
22 time I take it over to his house.

23 Q. All right, sir. Take the car over to
24 his house?

25 A. Yes.

1 Q. And he didn't have a garage at his
2 house, did he?

3 A. No, he didn't. He didn't.

4 Q. Did he just work on it outside?

5 A. Uh-huh. Yeah.

6 Q. Did you ever help him -- did you ever
7 help him jack up the car or anything like that or
8 did he just pretty well do it?

9 A. Yeah, he just pretty well do it. Yeah,
10 he just pretty well do it.

11 Q. Okay. And that packaging, HW6, looks
12 like the package of brakes he would be working from
13 if he was working with Bendix brakes?

14 A. I say yes. I say yes.

15 Q. All right, sir. Let me ask one more
16 question. Y'all -- have you ever had any other
17 lawsuits -- I know you had to bring a disability
18 claim for the -- against Wise potato chips, right?
19 Was that a lawsuit or was that just --

20 A. No, no, no, no, no.

21 Q. -- when you had your disability?

22 A. That was just -- I just used the
23 insurance.

24 Q. Oh, you didn't have to hire a lawyer or
25 anything?

1 A. No, no. It wasn't anything like that.
2 It was -- it was the fact that I used the insurance
3 -- they had insurance. Disability insurance.

4 Q. So all you had to do is apply?

5 A. That's right. That's all.

6 Q. And then same thing with the Social
7 Security Administration?

8 A. Just applied for it. Just applied for
9 it.

10 Q. Okay. And are -- you said both knees
11 had to be replaced?

12 A. Well, my left knee was replaced in
13 '02 --

14 Q. Give those to her.

15 A. -- and my right knee was replaced in
16 '03.

17 Q. So it was already shot and you had to
18 finally get it replaced?

19 MR. HENDERSON: Object to the form.

20 THE WITNESS: Yeah, that's right.

21 BY MR. PHILLIPS:

22 Q. You can give those to her if you'd
23 like, whatever you want to do with them.

24 A. All right.

25 Q. Have you ever been in a lawsuit where

1 somebody brought an action against you for
2 anything?

3 A. No.

4 Q. Okay.

5 A. I can't -- I don't remember anything.

6 Q. Not that you remember?

7 A. Not that I remember.

8 Q. And -- let's see. Have you ever gotten
9 hurt where you had to bring a lawsuit, like in a
10 car wreck or fall down or anything like that?

11 A. Now, wait a minute. Okay.

12 Q. Yes, sir.

13 A. When I was a -- I was on the way home
14 over here on Furnace Road.

15 Q. Yes, sir.

16 A. And another car pulled in front of me.

17 Q. Uh-huh.

18 A. And I hurt my back and I had to go in
19 the -- I had to go in the hospital and lay in a
20 contraption. First, for a while I had to wear a
21 back brace, and I tried to work with it and I -- I
22 had to -- yeah, it hurt my back. So I had to --
23 yeah, I had to get a lawyer then because --

24 Q. Insurance wouldn't pay you?

25 A. -- I had to get a lawyer to decide how

1 much the insurance was going to pay. They --

2 Q. Right.

3 A. -- they didn't pay much. It was like
4 about -- they paid \$600 on my car to get my car
5 replaced. I had to go the hospital, though. I had
6 to go the hospital and get -- I had bills at the
7 hospital --

8 Q. Right.

9 A. -- where I laid in a contraption.

10 Q. You had to go spend the night in the
11 hospital and stay there for a while?

12 A. Yeah, I stayed there for a while.

13 Q. Do you remember when that was?

14 A. I believe -- I'm not sure, I believe it
15 was in the '70s.

16 Q. Oh, it was a long time ago?

17 A. It was -- it was a long time ago.

18 Q. Do you remember who your lawyer was
19 back then?

20 A. Yeah.

21 Q. Who was it?

22 A. Ray Godshall.

23 Q. Goshel?

24 A. Yeah, Ray Godshall.

25 Q. How do you spell Ray's last name?

1 A. Something like G-o-d-s-h-a-l-l.

2 Something like that.

3 Q. Okay. Got it. Last set for today.

4 You've -- how far did you get in school?

5 A. Well, 8th grade. And I went to night
6 school but I couldn't keep up with it because I was
7 working the swing shift at the same time.

8 Q. Oh, Lord.

9 A. But I did take a test and -- for
10 English and math, so I got in 9th grade. I got
11 credit for 9th grade, English and math.

12 Q. Okay. By going to school while you
13 were working a shift?

14 A. Yeah, yeah. That was swing shift.
15 Swing shift. I was working.

16 Q. Is that --

17 A. -- like first, second, and third. That
18 was -- working at the -- I was working at Magnolia
19 then, but I worked at Magnolia two different times.

20 Q. I see. I was going to ask you about it
21 -- is it Magnolia or Hamrick that you might have
22 been working at when you're still taking some
23 school?

24 A. I remember it was Magnolia. It was the
25 second time -- I think it was the second time I was

1 working at Magnolia. I had to drop out because I
2 just couldn't go. I missed too much time 'cause I
3 take too much at one time, and see every three
4 weeks I had to be off because every three weeks I
5 was on second shift, and every three weeks I was on
6 the third shift, and every three weeks I was on the
7 first shift and every and -- yeah, that was in the
8 '70s.

9 Q. In the '70s?

10 A. Because -- the reason I know it was in
11 '70s because it was Lee -- the Gaffney Strangler
12 was LeRoy Martin was on the loose.

13 Q. Oh, I didn't know that.

14 A. Yeah, right before they caught him
15 'cause I remember when I was on the line -- wait a
16 minute.

17 Q. Wonder if that was the middle '60s
18 instead of '70s?

19 A. No -- wait a minute. Oh yeah, it was
20 in '70s when I had that car wreck.

21 Q. All right. Good --

22 A. I was on 14th Street..

23 Q. -- we're talking about -- I'm confused
24 because you're talking about car wrecks and I'm
25 talking about school and we're talking about the

1 Gaffney Strangler, so...

2 A. The reason the Gaffney -- I put the
3 Gaffney Strangler in there, that was a set of time
4 -- the same time.

5 Q. That marked your time for you?

6 A. Yeah, that marked the time.

7 Q. And that was -- the Gaffney Strangler
8 was the time you had your car wreck or when you
9 finished school?

10 A. Wow. Wow, wow.

11 Q. Tell you what, that might give you
12 something to think about tonight.

13 A. Okay. Okay. I know I had that car
14 wreck in the '70s.

15 Q. Yes, sir.

16 A. I was living on 14th Street.

17 Q. Okay.

18 A. As a matter of fact, I remember it was
19 one of my son-in-law's car. I bought it from my
20 son-in-law.

21 Q. Yes, sir.

22 A. So I bought it for my son-in-law.

23 Q. So it was probably even later than that
24 if -- since your girls were born in the early '70s
25 and your son -- don't you think? Yeah, maybe.

1 A. Well, I know right when I had that car
2 wreck I was working at Magnolia.

3 Q. Okay.

4 A. I was working at Magnolia. 'Cause I
5 was coming home from Magnolia and it was on the
6 Furnace Road when that car just jumped right out in
7 front of me. I didn't have no choice. You know,
8 it was right in front of me.

9 Q. Well, the reason I was thinking it
10 might be in the '60s because that's about when you
11 finished school and about when you went in the
12 Navy.

13 A. No, it wasn't then 'cause I went to
14 Gaffney night school after that.

15 Q. I see.

16 A. I was working. I was married and I was
17 working. I was working.

18 Q. Okay. Well, I know it's hard to
19 remember all those -- that's a long time ago.

20 A. Yeah, yeah.

21 Q. All right. I think we are going to
22 take a break for the day --

23 A. Okay.

24 Q. -- since we've been going really right
25 on -- about seven hours today.

1 A. Okay.

2 MR. HENDERSON: You know, during the
3 last break, Mr. Crawford actually asked me to have
4 y'all go as long as you can today.

5 MR. PHILLIPS: Okay.

6 MR. HENDERSON: It may not seem like it
7 -- he's having a good day today. He's tried to
8 hang tight for us --

9 MR. PHILLIPS: Let's hang tight for
10 him.

11 MR. HENDERSON: Unless you change your
12 mind, Mr. Crawford?

13 MR. PHILLIPS: You want to keep going,
14 my friend?

15 THE WITNESS: Huh?

16 MR. PHILLIPS: You want to keep going?

17 THE WITNESS: Yeah. Yeah.

18 MR. PHILLIPS: Sure. That's fine. All
19 right. I'll tell you --

20 MR. HENDERSON: He told me after the
21 last time we talked.

22 MR. PHILLIPS: That's fine. That's
23 fine. No, no, no, that's fine.

24 BY MR. PHILLIPS:

25 Q. Let's -- let's talk about a couple of

1 more things with me, and maybe one of these other
2 lawyers will get a chance to talk to you today.

3 A. Okay.

4 Q. Mr. Crawford, you --

5 MR. HENDERSON: How did you get more
6 questions once I said he wants to go longer?

7 MR. PHILLIPS: I'll tell you what --
8 I'll finish eloquently, and then we'll stop -- I'll
9 stop.

10 BY MR. PHILLIPS:

11 Q. This is easy. You finished -- I was
12 really wanting to chase this anyway. You were born
13 in 1945, July 20.

14 A. Okay.

15 Q. I think you were about 15 years old
16 around July 20, 1960 -- about 15 years old. In
17 fact, you were exactly 15 years old.

18 A. Okay.

19 Q. Here's my question: Is that about when
20 you finished 8th grade about -- around 1960, give
21 or take?

22 A. Yeah, probably because I got behind.
23 The reason I got behind -- I'll tell you why.

24 Q. Yes, sir.

25 A. Okay. When I was in the third grade, I

1 made -- I was in the 3rd grade -- on my report card
2 I had Cs. Okay. And I was sure I was going to
3 pass. The teacher wrote down that she declined me
4 for 3rd grade because I could have done better.

5 I know I could have done better, but
6 she used that to decline me. So that was saying if
7 I could have done better she would have passed me
8 on.

9 Q. So she made you take it again?

10 A. Yes, because I could have done better.

11 Q. I see.

12 A. Okay. And then the next year, I was so
13 stubborn -- okay, I didn't even try the next year.
14 I made Ds on my report card.

15 Q. I see.

16 A. I made Ds on my report card. On Ds --
17 they passed me on Ds.

18 Q. Okay.

19 A. And that caused me to get behind. If
20 she hadn't never -- if she hadn't never -- I'm
21 still -- I'm still PO'ed about it now and that was
22 back in the 3rd grade.

23 Q. That was a long time ago.

24 A. Yes. Yes.

25 Q. That teacher was mean to you.

1 A. That's right. Well --

2 Q. What was her name?

3 A. Ms. Pruett.

4 Q. Ms. Pruett.

5 A. Her name was Ms. Pruett.

6 Q. I tell you what, I knew some --

7 A. I'll never forget that. I'll never
8 forget that.

9 Q. So did you have to go through the 3rd
10 grade a third time?

11 A. No, I just done it two times.

12 Q. Just two times.

13 A. But that caused me to get behind the
14 next year.

15 Q. Right.

16 A. And --

17 Q. Plus your friends were ahead of you
18 then?

19 A. Yeah, they was ahead of me. And then I
20 was under a teacher -- a bully teacher. A bully
21 teacher.

22 Q. A male or female?

23 A. Female. And her name was Mr. Ferris
24 and when I came in -- but since I was lived on a
25 mill village --

1 Q. Right.

2 A. -- the same mill village that the
3 school was on -- I mean, the same hill --

4 Q. Yeah.

5 A. -- same street. Well --

6 Q. Right down the street from where you
7 were living?

8 A. Yeah, just right on over. And then --

9 MR. HENDERSON: Is this critical?

10 MR. PHILLIPS: I took -

11 MR. HENDERSON: You can stop him.

12 THE WITNESS: They took a lunch --

13 MR. HENDERSON: Hey, Mr. Crawford?

14 THE WITNESS: Yeah?

15 MR. HENDERSON: These folks still have
16 a questions to ask you.

17 THE WITNESS: Okay. Okay.

18 MR. PHILLIPS: I'll politely cut you
19 off -- I wasn't going to cut you off; that was your
20 lawyer.

21 THE WITNESS: All right. No, I walk in
22 and the preacher was there. I take lunch and I go
23 on break.

24 MR. PHILLIPS: Yes, sir.

25 THE WITNESS: I could go home, went to

1 lunch to eat, and then come back. When I came back
2 that first year and she told me, I'm going to show
3 you that cow horn's hook right in my face. I'm
4 going to show you. And I hadn't even said nothing
5 to her.

6 BY MR. PHILLIPS:

7 Q. And that was Ms. Paris?

8 A. Miss Ferris.

9 Q. Ferris.

10 A. Ferris. And I couldn't do -- I just
11 couldn't do no good in her -- in her class. If I
12 could have moved somewhere else, I could have done
13 better. And I got behind another year, so --

14 Q. I see. So you were a little bit older
15 when you were in 8th grade?

16 Here's the last question today from me.

17 A. Okay. All right.

18 Q. You were in a mill village --

19 A. Yes.

20 Q. Where your father worked --

21 A. That's right.

22 Q. -- which mill owned the village where
23 y'all lived when you were growing you up?

24 A. There was different -- different ones
25 that owned it. One time it was Minnett -- not --

1 not Minnett.

2 Q. Not Minnett.

3 A. Oh, up there -- up north.

4 Q. Take your time.

5 A. Wait a minute. Take one more minute.

6 Of course, I was thinking that a while ago. I
7 mean, I can't think of that one. It's the same
8 town up north.

9 Q. Okay.

10 A. But Burlington bought it.

11 Q. I see.

12 A. Yeah. Yeah. Burlington bought it
13 over.

14 Q. Not like New Hampshire or something?

15 A. It was the last one.

16 Q. Yeah. Okay. So it was a -- ultimately
17 it was a Burlington mill town?

18 A. Yeah. Yeah. When they closed down it
19 was Burlington.

20 Q. I got you.

21 MR. PHILLIPS: All right. Let me let
22 another lawyer ask you questions because I've had
23 you all day, besides your man, Mr. Henderson.

24 THE WITNESS: Okay.

25 MR. PHILLIPS: Thanks very much.

1 THE WITNESS: Thank you.

2 MS. SHOFNER: Can we take a quick break
3 and regroup?

4 THE VIDEOGRAPHER: The time is
5 5:04 p.m. We are going off the video record.

6 (A recess transpired.)

7 THE VIDEOGRAPHER: The time is
8 5:10 p.m. We are back on the video record.

9 EXAMINATION

10 BY MS. SHOFNER:

11 Q. Mr. Crawford, are you doing okay?

12 A. I'm okay.

13 Q. Okay. Can you hear me all right?

14 A. I can hear you.

15 Q. My name is Elaine Shofner, and I
16 represent CNA Industries in this case.

17 A. Oh.

18 Q. So I want to ask you some questions
19 about your work at the Hoechst plant in
20 Spartanburg, South Carolina --

21 A. Okay.

22 Q. -- all right?

23 A. Okay.

24 Q. I have a tendency -- usually my volume
25 is fine, but sometimes I get to talking too --

1 really fast, so if you need me to slow down just
2 let me know, okay?

3 A. Okay.

4 Q. I'm just going to try to get through
5 this as quick as I can.

6 A. Okay.

7 Q. I believe you testified earlier today
8 that you were employed at the -- by Hoechst
9 Celeanese or Hoechst in Spartanburg, South
10 Carolina, in 1970, correct?

11 A. Oh wow. I think so. I'm pretty sure.

12 Q. Okay. Are you -- you just can't
13 remember what years you were employed --

14 A. Wait a minute. Wait a minute.

15 Q. -- by Hoechst at this point?

16 A. At Hoechst.

17 Q. At Hoechst, yep.

18 A. Okay. 1970 -- 1974.

19 Q. Okay. That's great. Do you recall
20 what month you first started working at Hoechst in
21 1970 or what season -- what time of year it was?

22 A. I'm sure it was summer because I was --
23 I hadn't been working there but for a few months
24 because it was cold -- cold weather.

25 Q. Okay.

1 A. Because I remember I rode to work with
2 a friend that I worked with. Wayne worked at
3 Magnolia and he had trouble getting his car up --
4 heated up. Me and some of -- somebody else came by
5 and picked me up and took me over to -- the
6 friend's name was Boyd Humphreys. And I remember
7 the car was cold all the way -- all the way to
8 Hoechst and it got warmer when we got over there --

9 Q. Okay.

10 A. -- by the time we got there. It was
11 cold weather. It was before cold weather came.

12 Q. Okay. So you believe you started
13 working there sometime maybe in the late
14 summertime --

15 A. Yeah. Yeah.

16 Q. -- right before it got cold?

17 A. I think so, yes.

18 Q. All right. So it was a little bit cold
19 in the morning but then it warmed up by the time it
20 you got to the -- to the plant?

21 A. Yeah, it was real cold and the -- I'd
22 been living -- working there a few months and it
23 was real cold weather.

24 Q. Okay. And you carpooled with a person
25 named Boyd Humphreys --

1 A. That's right. Boyd Humphreys.

2 Q. -- to Hoechst? All right. Do you know
3 if Boyd Humphreys is still living?

4 A. No, he -- he passed away.

5 Q. Okay. How did you get the job at
6 Hoechst?

7 A. Through -- first, my brother was
8 working there. My older brother was working there,
9 Joe Dean Crawford, and he told me he was going to
10 recommend me to work. He recommended me and then I
11 went to the personnel, and then I put my oldest
12 brother's name down -- Joe Dean Crawford -- and so
13 then I got the job.

14 Q. Okay. And so while you were working at
15 Hoechst, was Joe Dean also working there?

16 A. Yes, for a while he was.

17 Q. Okay. Do you recall for how long were
18 you working the same time Joe Dean was working
19 there?

20 A. But Joe Dean was working in a different
21 department, but --

22 Q. Okay. Which department did Joe Dean
23 work for?

24 A. I'm really -- I'm really not sure.

25 Q. Okay. So you didn't see Joe Dean while

1 you were working?

2 A. Oh no, no.

3 Q. Okay. And I'm sorry. I know we talked
4 about your family, but -- is Joe Dean still living?

5 A. Yes, he is.

6 Q. Okay. And how is his health?

7 A. His health has been poor.

8 Q. It's poor health?

9 A. Yes, it's poor health.

10 Q. What's wrong with him?

11 A. He's got -- well he's got problems with
12 his mind.

13 Q. Okay. Okay. Is it anything related to
14 breathing issues or lung problems?

15 A. He can't get around good. He just
16 can't -- he can't see. He can't hear good, and he
17 can't -- he can't hear good, and he just can't --
18 can't move around good.

19 Q. Okay. Thank you. Did you work with
20 any of your other family members ever at Hoechst?

21 A. No.

22 Q. Oh, I think you also said you worked
23 with your wife at some point?

24 A. Oh yes, that's right.

25 Q. That's right. Okay. Sorry about that.

1 A. I didn't work with her, though; she
2 worked in a different part.

3 Q. All right.

4 A. That's right. She worked in a
5 different -- for a while, she worked in a different
6 part --

7 Q. Okay. We'll talk about that in just a
8 minute.

9 A. -- she sure did.

10 Q. But you didn't ride to work with
11 Joe Dean or home with Joe Dean at any time?

12 A. Oh no, no, no, I didn't.

13 Q. Okay. And the plant -- the Hoechst
14 plant that you worked in was in Spartanburg, South
15 Carolina; correct?

16 A. Yes.

17 Q. Do you recall the exact address or
18 where it was located in Spartanburg?

19 A. Okay. It was right off of -- right
20 off -- it was close -- right off of 85.

21 Q. Okay. And the plant was operational,
22 correct?

23 A. Yes.

24 Q. Okay. Do you know -- do you know how
25 long the plant had been in operation when you

1 started working there in 1970?

2 A. No, I don't. I really don't.

3 Q. And I think that you said that you
4 worked there from 1970 to 1974 -- do you know what
5 month you left in 1974? Or what season was it?
6 Cold? Hot?

7 A. It was hot. It was hot.

8 Q. So some time probably in the summer you
9 left?

10 A. Oh yeah.

11 Q. Summer of 1974?

12 A. Oh yeah. Uh-huh.

13 Q. All right. And why did you leave
14 Hoechst?

15 A. Wow.

16 Q. Just got a better job someplace else
17 or...

18 A. Oh, I moved down -- I was -- I was -- I
19 moved to -- to a -- to Florida with my -- my cousin
20 that was living in the Florida, and I moved down
21 there.

22 Q. All right. So were you married at the
23 time?

24 A. Yes, I was married.

25 Q. All right.

1 A. I went down there looking for --

2 Q. How long did you live in Florida?

3 A. Huh?

4 Q. How long did you live in Florida?

5 A. Oh, I stayed down there about -- about
6 a few weeks, but when I came back -- when I came
7 back thought I got a job at the -- I came right
8 back and I got a job at the Hills -- Terry
9 Construction Company.

10 Q. I'm --

11 A. Terry Construction Company when I come
12 back, 'cause I didn't work long --

13 Q. Okay. All right.

14 A. They was working up there at the filter
15 plant. I was living on the filter plant at that
16 time, and I got a job down there at the hills --
17 Terry Construction Company on filter plant.

18 Q. Okay. Let me go back and just -- so in
19 1974 -- in the summer of 1974, you decided that you
20 and your family were going to go down to Florida --

21 A. Yeah, I was thinking -- I was thinking
22 about it.

23 Q. -- to stay and that you had a cousin
24 that lived down there, correct?

25 A. Yeah, I was thinking about it.

1 Q. What part of Florida?

2 A. Tampa. Tampa.

3 Q. Tampa, Florida. Okay. And you just
4 stayed there a for about a couple of weeks and
5 decided it was not for you --

6 A. Yeah. Yeah.

7 Q. -- and came back to South Carolina?

8 A. Yeah, and then I got the job at Terry
9 Construction Company.

10 Q. All right. And we haven't talked about
11 your job at Terry Construction Company.

12 A. Okay.

13 Q. So you worked at Terry Construction
14 Company -- and where were you working -- what job
15 site were you working for Terry Construction
16 Company?

17 A. They was up there at the filter plant.

18 Q. Fielder plant?

19 A. Yeah, you know, the filter plant in
20 Gaffney.

21 Q. Okay.

22 A. The water filter plant.

23 Q. Oh, the water fill -- water filter --

24 A. Yeah, yeah, the water -- it was for
25 public works.

1 Q. Okay. Was this being built at the time
2 or was --

3 A. No. No. They was changing the
4 filters.

5 Q. All right.

6 A. Like they had about seven different
7 kind of sand and it goes in in this great big ol'
8 pits.

9 Q. Okay.

10 A. And it had balls in the bottom of it
11 and rocks. And when they go to filter it, it would
12 -- it would go up and it would go everywhere. And
13 then when it would come down, everything would fit
14 right in place. And when it come out, it would be
15 clean.

16 Q. How long did this job last with Terry
17 Construction?

18 A. Oh wow. I don't know how many -- I
19 really don't know how many months.

20 Q. Was it -- so it was less than a year?

21 A. I'm thinking it was probably was.

22 Q. Okay.

23 A. It probably was.

24 Q. Was the water -- water filter plant the
25 only place where you worked --

1 A. No.

2 Q. -- when you were working for Terry
3 Construction?

4 A. Oh yes, yes.

5 Q. Okay. All right. So getting back to
6 the Hoechst plant -- did the plant go by any other
7 name when you were working there from 1970 to 1974,
8 or was it always just called the Hoechst plant?

9 A. I think it was Hoechst Ceeleanese.

10 Q. Hoechst Ceeleanese?

11 A. I'm think now.

12 Q. Okay.

13 A. I know the Hoechst part.

14 Q. All right.

15 A. I know that for sure.

16 Q. And you just called it the Hoechst
17 facility or Hoechst plant?

18 A. Yeah. Yeah.

19 Q. All right. And you were -- you
20 received a wage when you worked at the Hoechst
21 plant, correct?

22 A. I'm sorry?

23 Q. You were paid to work at the Hoechst
24 plant?

25 A. Oh yes. Yes, I was.

1 Q. And you were paid by Hoechst Celanese
2 to work at the Hoechst plant, correct?

3 A. Oh yeah, yeah. Yes, I was.

4 Q. They gave you a paycheck, correct?

5 A. They did, yeah.

6 Q. Did you work hourly or did you have a
7 salary position?

8 A. Hourly.

9 Q. How -- do you recall how much you were
10 making per hour when you started there in 1974?

11 A. Oh man, I really don't know.

12 MR. HENDERSON: Object to the form.
13 Mischaracterizes his testimony.

14 BY MS. SHOFNER:

15 Q. Okay. Oh, I'm sorry. Sorry.

16 When you were working there in 1970, do
17 you recall how much you were first being paid?

18 A. No.

19 Q. Okay. Do you know how much you were
20 paid when you left in 1974 per hour?

21 A. No, but I knowed it was a lot more
22 money than I made at Magnolia.

23 Q. Okay.

24 A. I know that for sure.

25 Q. Do you remember how much you made at

1 Magnolia?

2 A. I really don't. I really don't.

3 Q. Okay. You just know that it was a
4 better job, so...

5 A. It was. It was more pay from what I
6 remember.

7 Q. How often did you get paid? Did you
8 get paid weekly or every month, every two times a
9 month?

10 A. Weekly.

11 Q. Weekly. And your paycheck when you got
12 it -- Hoechst Celanese had taken out the taxes
13 that they were required to take out, correct?

14 A. Correct.

15 Q. During this time period from 1974 -- or
16 1970 to 1974 when you were working for Hoechst, did
17 work for -- For any other jobs?

18 A. No.

19 Q. Did you work at any other Hoechst
20 facilities at any other time during your working
21 career other than the Spartanburg plant?

22 A. No. No more than the Spartanburg
23 plant.

24 Q. Okay. So you were only -- you only
25 worked for Hoechst at the Spartanburg plant?

1 A. That's true.

2 Q. And the Spartanburg plant -- the
3 Hoechst Spartanburg plant manufactured poly fiber,
4 correct?

5 A. Yes, but I worked in the part where
6 they made the poly itself.

7 Q. All right.

8 A. I didn't have nothing else to do with
9 after it left -- after it left there.

10 Q. Okay. So they actually made the
11 polyester or they had made the poly fiber and then
12 somewhere else in the facility they were doing
13 something with the polyester fiber that was being
14 made, correct?

15 MR. HENDERSON: Object to the form.

16 THE WITNESS: Okay. The poly itself
17 came out of chemicals.

18 BY MS. SHOFNER:

19 Q. Uh-huh.

20 A. And then it was like -- and it changed
21 then to like a hot paste. And then I changed it
22 over to cool it and changed it over and run it
23 through a grinder and it grinds it up in blocks --
24 little chunks.

25 Q. All right.

1 A. And then from there it was blowed over
2 to the big silos. And then it was -- took it
3 somewhere else -- To tell you the truth, I don't
4 know what happened to it after that because it
5 really wasn't my concern.

6 Q. All right. So -- so the process that
7 you were involved in was the manufacture from the
8 chemicals to blocks of poly?

9 A. Little chunks. Yeah, like little
10 dices.

11 Q. Okay.

12 A. It was like little dices.

13 Q. And then somewhere -- somebody else did
14 something with the little dice pieces of the poly
15 and they took it to someplace else to do something
16 else with it?

17 A. It would blow through pipes and put in
18 great big tall silos.

19 Q. Okay.

20 A. It was just blowed in there.

21 Q. And after it got to the silos, you know
22 what happened --

23 A. I knowed it was blowed out to other
24 parts, just everywhere they needed it.

25 Q. Okay. But you didn't have anything to

1 do with any other part --

2 A. No.

3 Q. -- after the manufacturing after the
4 silos?

5 A. I know they nailed it down, so I know
6 that. Nailed it down to make fiber out of it.

7 Q. Okay.

8 A. Yeah, that's right.

9 Q. But that wasn't your job to do to make
10 the fiber?

11 A. No, no, no.

12 Q. Okay. You were just making the actual
13 poly?

14 MR. HENDERSON: Object to form.

15 THE WITNESS: Yes, yes, it would change
16 it over to the liquid and to the hard little dices
17 so it could be blowed over -- transferring it by
18 blowing it over to the big silo.

19 BY MS. SHOFNER:

20 Q. How big was the Hoechst facility in
21 Spartanburg?

22 A. Oh --

23 Q. Can you give me an estimate of how many
24 -- how many acres it was?

25 A. I don't know exactly how many acres,

1 but it was big. It was big. It was real big.

2 Q. Okay. Do you know how many buildings
3 were actually on the Spartanburg site?

4 A. Okay. First, it was one long building
5 right at the -- over there at the top of the
6 guardhouse and there was a personnel part there and
7 there was a manufacturing parts in it and there
8 was -- there was like a canteen in it and there was
9 a -- matter of fact, there was a restaurant in it
10 too --

11 Q. Okay.

12 A. -- where they cooked the food. But
13 when I worked down at the poly building, it was so
14 far away, I didn't get to use that. I didn't use
15 that because I had to take my food with -- and
16 bring it from home --

17 Q. Okay.

18 A. -- or either go into the canteen and
19 get it -- something out of a machine, you see.

20 Q. So the poly building was separate from
21 this long building?

22 A. Oh yes, it was.

23 Q. Okay.

24 A. It was right across the road from it.

25 And there was another building where they -- it's

1 where my wife worked -- over in another one off
2 from it, by itself. And that was -- and she took
3 -- she -- she worked on the machine where they --
4 they spin the thread --

5 Q. Uh-huh.

6 A. -- and made thread out of it, and then
7 she doffed it off -- took it off and doffed it.

8 Q. Okay. So she worked in a building you
9 said that was sort of towards the back of the
10 facility?

11 A. Oh, yeah, yeah. It was back and over
12 to the side.

13 Q. And this was part of the spinning area?

14 A. Yes, that's right. That's right.

15 Q. Okay. Do you know if her title -- do
16 you know what her job title was?

17 A. I know she -- she -- I guess, I want to
18 say doffer. Doffer.

19 Q. Okay. I was about to ask if that was a
20 title.

21 A. Uh-huh. Yeah.

22 Q. A doffer. All right. You said that
23 your wife -- earlier -- that she worked there in
24 1974. Do you know exactly how long she worked at
25 the Celeanese or the Hoechst plant?

1 A. I'd say at least two years. And the
2 reason she quit because her -- her -- her mother
3 was keeping our child. Well, Patty was small then.
4 And she was keeping her -- her mother was -- and
5 they had a disagreement about -- over the
6 discipline, you know. Yep, that's right.

7 Q. Okay.

8 A. She went over there and said something.
9 She quit because she didn't have a babysitter.

10 Q. So she quit to take care of the kids?

11 A. That's right. 'Cause she didn't have a
12 babysitter.

13 Q. Did she stay working there after you
14 left in the summer of 1974?

15 A. No, she left first.

16 Q. She left first. Okay.

17 A. Oh yeah, yeah.

18 Q. And was she always a doffer when she
19 was working?

20 A. Oh yes, yes.

21 Q. And you never saw her do her work --

22 A. No, I didn't.

23 Q. -- because you were in the poly
24 building, correct?

25 A. That's correct.

1 Q. And she was in the spinning building,
2 correct?

3 A. Correct.

4 Q. So -- so you would come to work and you
5 would park and go your separate ways to whatever
6 building or area you needed to be in and then you
7 would meet up and drive back home?

8 A. That's right. I had to park in the
9 back parking lot because, you know -- right.
10 Right.

11 Q. Because it was closest to the poly
12 building?

13 A. Yes. See I had to walk across and she
14 worked -- she walked right in where she worked.

15 Q. Okay.

16 A. And I had to walk across.

17 Q. Okay.

18 A. To the poly building.

19 Q. So you parked closer to the spinning
20 building for her?

21 A. That's right.

22 Q. All right. How many employees were at
23 Hoechst in 1970 when you first started working
24 there?

25 A. Wow. I don't know. I just know there

1 was a lot.

2 Q. Okay.

3 A. I know there was a lot.

4 Q. A lot.

5 A. 'Cause I know the parking lot was a big
6 parking lot.

7 Q. Are we talking about hundreds of
8 employees or thousands of employees?

9 A.. I'd say hundreds. Hundreds.

10 Q. Hundreds.

11 A. Because at the end of the shift, there
12 would be a lot. I mean, like a big bunch of
13 people.

14 Q. And how many shifts did Hoechst have
15 going in 1970?

16 A. They had three shifts, but they had --
17 okay. Actually, they had four shifts, but they
18 worked three hours -- three -- eight hours a piece
19 and there was three shifts day. And it was
20 actually because they swing between four shifts.

21 Q. Okay. So they had four shifts and one
22 of those shifts was a swing shift?

23 A. Yeah, all of them were swing shift.
24 They swing from third, second, and first.

25 Q. Okay.

1 A. I think it went backwards.

2 Q. What shift did you work on?

3 A. Swing shift, but I worked on -- oh. I
4 worked on D. They had D shift -- A, B, C, and D.

5 Q. Okay.

6 A. And I worked on D.

7 Q. All right. And what were the hours of
8 the D shift?

9 A. Oh okay.

10 Q. Or is this the swing shift?

11 A. Okay. It was -- okay. Let me see.

12 When I was on the third shift, I believe it was
13 from eleven o'clock at night to seven o'clock in
14 the morning. And -- and yeah. Then when it was on
15 the second shift it was from 3:00 p.m. in the
16 evening to eleven o'clock at night.

17 Q. Okay. And what was the first shift?

18 A. And on the first shift, it was 7:00 in
19 the morning to three o'clock in the evening.

20 Q. All right.

21 A. 3:00 p.m..

22 Q. And the swing shift would change,
23 correct?

24 A. It would change --

25 Q. It's why they call it a swing shift.

1 A. It would change every seven days.

2 Q. Okay.

3 A. Every seven days, you get a day off or
4 so many days off, and then you'd start on the next
5 shift.

6 Q. All right. Did your wife work swing
7 shift or did she work A, B, or C shift?

8 A. Yeah, she worked on the swing shift
9 too.

10 Q. Okay. Did -- so you-all's schedule was
11 always the same?

12 A. That's right.

13 Q. All right. So the swing shift -- seven
14 days on one of the A, B, or C shifts and then a
15 couple of days off and then you'd go back to
16 whatever the next shift was?

17 A. Well, it was -- it was always the D
18 shift. And it was always A shift, B shift --

19 Q. Right. Okay. I guess -- I guess that
20 was a bad question.

21 So was the -- A shift was considered
22 the first shift and worked 7:00 a.m. to 3:00 p.m.,
23 correct?

24 A. No, no, that's not right.

25 Q. All right. What did A shift work?

1 A. Work the same hours A, B, C, and D.

2 Okay. The name of the shift didn't have anything
3 to do --

4 Q. With the hours?

5 A. That's right. They didn't. All of the
6 shifts worked -- worked -- okay. I think they --
7 the third shift worked Tuesday night at
8 eleven o'clock -- they worked seven days. And then
9 it was take a day off at least one or two or three
10 days off.

11 Oh, but when you got off of the -- when
12 I got off the first shift, I took a long break. It
13 was a long weekend. All A, B, C, and D were all
14 the same. They just work different days, you see.

15 Q. Okay. So did -- so did all of the
16 shifts, whether it was A, B, C, or D -- did they
17 all rotate --

18 A. Oh, yes.

19 Q. -- when they worked?

20 A. That's true. That's true.

21 Q. Okay.

22 A. They worked different days, but it was
23 different days of the month.

24 Q. Oh, did they all rotate different times
25 or was that only the D shift?

1 A. Oh, they worked -- all of them was
2 seven days a apart. Okay. Okay.

3 At all times one -- at all times one
4 shift would been on the first shift and one shift
5 would be been on the second shift and one shift
6 would be on the third shift and one shift would be
7 off.

8 Q. Okay.

9 A. All through the week.

10 Q. All right. And I guess what I'm asking
11 is if there was one shift -- like so did the people
12 that were on A -- 'cause you were the D shift,
13 right.

14 A. Right. Right.

15 Q. If people were on the A shift, did they
16 always work a certain time, they just changed
17 days --

18 A. Yes.

19 Q. -- from when they would report?

20 A. Yes. Okay. If -- I'm thinking in four
21 weeks' time, it would go all the way through and
22 start back over.

23 Q. Uh-huh.

24 A. And in four weeks' time you would be on
25 first shift seven days, you would be on second

1 shift for seven days, and you'd be on the third
2 shift for seven days, and you'd be off for seven
3 days and it would be spaced up.

4 Q. All right. That makes sense. All
5 right. Thank you. Sorry, I didn't -- I didn't
6 understand how that works, so...

7 A. Okay.

8 Q. So on any given day, there were -- they
9 ran three shifts with one of the A, B, C, or D
10 being off?

11 A. Yeah, 24-hours a day, seven days a
12 week.

13 Q. You got it. Okay. All right.

14 Okay. Now, I think you talked to us
15 about that you had three different jobs during the
16 time that you worked at Hoechst, correct?

17 MR. HENDERSON: Object to form.

18 THE WITNESS: Well, I always was
19 working in the poly building, but at the same time
20 I worked in -- oh, I started off working there was
21 I -- I worked in the part that runs off -- it runs
22 the poly off in batches.

23 BY MS. SHOFNER:

24 Q. Okay. And I just want to make sure
25 that -- that I'm clear is because when you earlier

1 testified you said that you worked -- that you had
2 -- that you worked in the poly building --

3 A. Uh-huh.

4 Q. -- on the batch line, that you worked
5 in the warehouse --

6 A. Uh-huh.

7 Q. -- and that you worked on the
8 continuous line --

9 A. Right.

10 Q. -- during 19 -- from 1974 to 19 -- to
11 1970 to 1974?

12 A. At that same time, the supervisor was
13 the same supervisor. When I worked -- I worked out
14 in the poly building, I had to box up some -- I
15 believe it was to box up some chips. And I had to
16 what you call a Hyster forklift, and we put -- put
17 the pallet down and put a great big box down and we
18 run some chips on top of it, and then we would box
19 it up.

20 And it was going in a tractor
21 trailer -- there was a trailer sitting there, but I
22 don't know where it went to. They sold it to
23 somebody.

24 Q. Okay. So when you -- you were first
25 hired at Hoechst in the summer of 1970, what was

1 your job title? Were you a laborer? Were you
2 production? Were you --

3 A. Well, I just worked in -- on the poly
4 building.

5 Q. Okay.

6 A. In the poly building.

7 Q. All right. In the poly building, this
8 was the batch line?

9 A. Right.

10 Q. Okay.

11 A. Well, both of them was poly building --
12 poly one, and when they built the new continuous
13 line, they called that poly two.

14 Q. Okay..

15 A. Poly one and poly two -- what they call
16 it back then.

17 Q. All right. So the batch line was --
18 was poly one?

19 A. Yeah.

20 Q. And then when they finished the
21 continuous line, that was considered poly two?

22 A. Right.

23 Q. Is that right?

24 A. Right.

25 Q. Okay.

1 A. But they did -- they did -- both of
2 them did the same thing. The continuous line run
3 continuously, you see.

4 Q. Okay. That makes sense. And the batch
5 line you had to stop each section for it to
6 complete whatever that run was doing, correct? It
7 wasn't continuous, so...

8 A. The first poly wasn't, yeah.

9 Q. Right. So the first -- so poly one --
10 you had certain things that that line did and you
11 would stop after each of those, I guess, sections
12 were completed and then move to the next section to
13 complete whatever happened next?

14 A. No, that's not true.

15 Q. Okay. How did the batch line work?

16 A. What happened was, they would -- when
17 it got ready, they'd call it down from upstairs.
18 When it got ready to come off -- they come off at
19 different times -- like about --

20 Q. What came off?

21 A. The poly got ready -- ready to run. A
22 big batch of it -- got ready to come out. It would
23 take about -- about an hour to run out. And then
24 after -- after it run out or so many hours later,
25 it would come off again, and all the lines was

1 doing that at different times.

2 Q. Okay. Got you.

3 A. There was a lot of -- there was six
4 guys working there and whoever was close to it, you
5 know, we would all work together to keep it going.

6 Q. All right. And that was going to be my
7 next question. Was -- how big was your crew during
8 your shift at the poly building?

9 A. Yeah.

10 Q. Six people?

11 A. Yeah, it was six people.

12 Q. Okay. And this was for the batch line
13 for poly number one?

14 A. That's right.

15 Q. All right. How long did you stay
16 working at -- on poly number one until you went to
17 the warehouse?

18 A. Well, at the warehouse it was just
19 temporary because they had to be something --
20 something blocked -- they had to be blocked --
21 these boxes -- boxes had to be filled up with poly.
22 And they would just put the -- it was -- oh, okay.

23 I worked in the warehouse. It was not
24 very long. Just had a job to do -- a week or two.
25 About a week or two. I remember that. About a

1 week or two.

2 Q. So for one to two weeks you worked in
3 the warehouse?

4 A. Yes, that's true.

5 Q. And that was just to help box up some
6 of the poly material to ship off some place?

7 A. Yeah, yeah. Yeah, that's right.

8 Q. Okay. And was this only time you had
9 to work in the warehouse was this one to two-week
10 period, or did you go whenever they needed extra
11 help in the warehouse?

12 A. It was one to two times.

13 Q. Do you recall when the first time you
14 would have gone to the warehouse would have been?

15 Would it have been -- do you recall a
16 year or a time? And if you can't remember, that's
17 fine?

18 A. I can't remember. I think it was in
19 the first year. I remember working there, but you
20 know.

21 Q. Okay. Now, do you recall when the
22 first time that you would have switched from the
23 poly number one to poly number two?

24 A. Okay. I think it was at least a year
25 before -- it was before I quit working there.

1 Q. Okay. So sometime in 1975, you began
2 doing work at the poly number two, correct?

3 MR. MAJOR: Object to the form.

4 THE WITNESS: No, before that.

5 BY MR. PHILLIPS:

6 Q. I'm sorry. Sorry. 1971. Sorry. I'm
7 getting my dates confused. Let me go back and
8 start that all over again.

9 So sometime in 1971 you may have
10 started working on poly number two?

11 A. No, it was after that. It was after
12 that.

13 Q. Okay. So sometime in the 1972?

14 A. I think it was after that. It was
15 after that. It was around '73.

16 Q. Okay. And other than these few times
17 that you would have had to go to the warehouse from
18 1970 to 1973, you spent on the batch line on poly
19 one in the poly building, correct?

20 MR. HENDERSON: Object to form.

21 BY MS. SHOFNER:

22 Q. Does that sound right?

23 A. Yeah, yeah.

24 Q. Okay. And who was your supervisor when
25 you were working on poly number one -- the policy

1 number one line?

2 A. I'm thinking it was Don Moe.

3 Q. And how do you spell his last name, if
4 you know?

5 A. Moe. Moe. Don Moe, M-O-E. M-O-E.

6 Q. Do you know where -- is Don Moe still
7 living, if you know?

8 A. I don't know. He lived in -- I know he
9 lived in Shelby.

10 Q. He lived in Shelby?

11 A. Yeah, he lived in Shelby. I think his
12 name was Don, now, but I know his last name was
13 Moe.

14 Q. Okay.

15 A. Oh, man.

16 Q. Was he your supervisor the entire time
17 you were in the poly building?

18 A. Oh yes. Yes, it was the entire time.

19 Q. All right. Did you always work with
20 the same six-man crew or did the crew change
21 depending on days or times or shifts?

22 A. Oh, yeah it did -- it did change some
23 -- a little bit.

24 Q. Some. Okay.

25 A. It did change some.

1 Q. Do you recall any of your coworkers who
2 were on your crew with you?

3 A. Well, there was -- there was a last
4 name, Coker.

5 Q. I'm sorry, Coker?

6 A. Yeah, C-o-k-e-r. Yeah.

7 Q. Okay. Anybody else?

8 A. It was one they called Buddy. I think
9 his last name was Smiley.

10 Q. Smiley?

11 A. I'm not sure. I think his last name
12 was Smiley. I think, but I'm not even sure about
13 that.

14 Oh, I do remember another one that
15 worked there. He lived in Gaffney. I worked at
16 Magnolia with him. Herman Humphreys -- because I
17 went to school with him too.

18 Q. Herman?

19 A. Herman Humphreys.

20 Q. Okay. How do you spell his last name,
21 if you can?

22 A. Let's see. Humphreys.

23 Q. Oh, Humphreys?

24 A. Yeah, Humphreys. Humphreys.
25 Humphreys.

1 Q. H-u-m-p --

2 A. H-u-m-

3 Q. -- p-h-r-e-y, something like that?

4 A. Yeah, that sounds right.

5 Q. Okay. And you also went to school with
6 him?

7 A. Oh yeah, yeah.

8 Q. Okay. And he was also working in the
9 poly building, correct?

10 A. Oh, yeah. Yeah. He started working
11 over there on the continuous line.

12 Q. Okay.

13 A. It might -- yeah.

14 Q. The person who gave you the ride into
15 work at the very -- Boyd Humphreys -- did you work
16 with him or was he in a different department?

17 A. He was in a different department.

18 Q. Okay. Was he -- was he
19 Herman Humphry's -- any relation?

20 A. No, no, no. They was different. They
21 was different.

22 Q. Okay. Just checking. Do you know if
23 Mr. Humphreys -- Mr. Herman Humphreys is still
24 living?

25 A. I really don't. But I've seen him

1 lately -- I mean, well, I seen him in the past, but
2 it's been a while since I saw him. I ran into him
3 uptown a few times.

4 Q. Was he still -- did you see him in the
5 Gaffney area?

6 A. I haven't seen him in a long time.

7 Q. Okay. But when you saw -- was the last
8 time you saw him -- was it in Gaffney?

9 A. Oh, yes. Yes.

10 Q. How about Coker -- do you know if he's
11 still living or do you know anything about him?

12 A. No, he passed away.

13 Q. Okay. All right.

14 A. I saw it in the paper. I hated to hear
15 about that.

16 Q. And this Buddy Smiley -- do you know if
17 he's still living?

18 A. No, I really don't. I haven't had no
19 contact with him since I left.

20 Q. All right.

21 A. I've run into Coker -- I run into him
22 before he passed away.

23 Q. Okay.

24 A. At the Big Lots.

25 Q. All right.

1 THE VIDEOGRAPHER: We've got about two
2 minutes that's left --

3 MS. SHOFNER: You want to go ahead --
4 we can take -- I'm going to switch gears so we can
5 take a break and change the tapes.

6 THE VIDEOGRAPHER: Here ends Media Unit
7 Number 3 in today's videotaped deposition of
8 Mr. Crawford. The time is 5:51 p.m. We are going
9 off the record.

10 (A recess transpired.)

11 THE VIDEOGRAPHER: Here begins Media
12 Unit Number 4 in today's deposition of
13 Mr. Crawford. The time is 5:56 p.m. We are back
14 on the record.

15 BY MS. SHOFNER:

16 Q. Can you describe the poly building for
17 me. How big was it? And let's describe it in 1970
18 when you first started working there.

19 A. It was -- it was at least three or four
20 floors.

21 Q. Okay. So three or four stories high?

22 A. Yeah.

23 Q. All right. How long was it? Can you
24 give me an estimate?

25 (Pausing)

1 (Sneeze)

2 MR. HENDERSON: Bless you.

3 THE WITNESS: I'm sorry. I'm trying to
4 visualize in my head how many car lengths it was.

5 BY MS. SHOFNER:

6 Q. It's okay.

7 A. It was like about -- I would say about
8 15 or 20 car lengths.

9 Q. Okay. How about the width of it?

10 A. Okay. Okay. About I'd say -- about
11 30 yards.

12 Q. And you said there was like three or
13 four floors -- were there actual, I guess, levels
14 that you went to with stairs, or how did you get --
15 or was it all open?

16 A. Oh no, it was -- when I got to it, I
17 had to go up the stairs and circle around to get to
18 it.

19 Q. Okay. So were there --

20 A. And --

21 Q. So were there three or four levels?

22 A. Yes.

23 Q. Was there an elevator in the building
24 or was just access through -- by stairs?

25 A. Oh wow.

1 Q. If you don't remember, that's fine.

2 A. I can't -- I can't remember 'cause I
3 always went up the stairs.

4 Q. All right.

5 A. You see, everybody always used the
6 stairs.

7 Q. All right. That's fine. On the
8 different levels, were there different, I guess,
9 equipment, and --

10 A. Oh, yeah.

11 Q. -- did each of the levels -- did they
12 do a certain task or function?

13 A. That's correct.

14 Q. Okay. Did you work -- were you mainly
15 assigned to one level, or did you -- were you
16 assigned to all of the different levels in the poly
17 building?

18 A. At different times I worked on
19 different levels, but it was mostly on the second
20 shift -- I mean, the second level --

21 Q. Okay.

22 A. -- second floor mostly.

23 Q. All right.

24 A. Mostly.

25 Q. And if you were on the second floor,

1 could you see what was going on the third level or
2 the first level?

3 A. Oh wow.

4 MR. HENDERSON: Object to form.

5 THE WITNESS: I remember -- I -- okay.
6 I know -- I know -- okay. All I can say -- I know
7 some of the floors had grates, because I remember
8 walking over the grates.

9 BY MS. SHOFNER:

10 Q. Okay. So if it had a grating -- if it
11 had -- the walkways were made out of grates, you
12 could look down and at least see part of the next
13 level, correct?

14 A. Correct.

15 Q. But you couldn't see the entire next
16 level. You could only see the part that was right
17 underneath the grate, correct?

18 It wasn't like it -- it was a balcony
19 or a loft --

20 A. No.

21 Q. -- that you could look over and see
22 down below?

23 A. Wait a minute. When I think back, I
24 know the fourth -- at least the fourth layer -- I'm
25 not sure, it might have had more than four, but the

1 fourth layer -- it had all grates.

2 Q. Okay.

3 A. Yeah.

4 Q. So possibly the fourth level or the top
5 level -- the whole floor was just a big grate --

6 A. Oh yeah, yeah.

7 Q. -- that you could look down --

8 A. Yeah, yeah.

9 Q. -- and see at least the third level?

10 A. Oh yeah, yeah.

11 Q. Okay. And then on the first, second,
12 and third level some of the walkways may have been
13 grates, but it wasn't -- you didn't have access to
14 see --

15 A. No, no.

16 Q. -- everything that was --

17 A. No.

18 Q. -- going on different levels if you
19 were on the first, second, or third level?

20 MR. HENDERSON: Object to form.

21 THE WITNESS: Well, on the first floor,
22 it had grates because it had a ditch there where
23 the pipes went in to where they had to change it.

24 It was like about as deep as this table
25 and about -- and about half as this -- half as wide

1 and as long as this table and it went all the way
2 down. And that's where the pipes run out and it
3 was -- you could -- they had to change it to go
4 where they wanted it to go.

5 And also they was in the control room,
6 they had plugs in where they -- they could direct
7 which silo went -- to something went outside -- the
8 big tall one outside.

9 BY MS. SHOFNER:

10 Q. All right. So -- and I understand that
11 on various levels there were grates?

12 A. Uh-huh.

13 Q. -- that you could see to the next
14 level, correct?

15 A. Yeah, yeah.

16 Q. But it wasn't like the fourth level
17 where you -- where it was completely open that you
18 could see everything that was happening on the
19 level above or level below, correct?

20 MR. HENDERSON: Object to form.

21 THE WITNESS: Oh yeah, yeah.

22 BY MS. SHOFNER:

23 Q. Okay. So you might be able to see down
24 below for a small area --

25 A. Yeah, yeah.

1 Q. -- but you really couldn't see what
2 everybody else was doing on the level below or
3 above you, correct?

4 MR. HENDERSON: Form.

5 THE WITNESS: Most of the time there
6 wasn't anybody up there.

7 BY MS. SHOFNER:

8 Q. Okay.

9 A. Most of the time, yeah.

10 Q. Was most of the work being done on the
11 second level?

12 A. Yeah, most of it was being done on the
13 second.

14 Q. All right.

15 A. The second and the third. And the
16 third -- back over to the backside they had what
17 they call the control room where they mash the
18 button and the different chemicals would go into or
19 mix together some way and it would cause the -- it
20 would make that liquid poly -- the hot poly --
21 that's where it was made right there.

22 Q. Okay. And that was on the third level?

23 A. And it had -- yes, on the third level
24 and it had on top of the ceiling, it had a big -- a
25 big tank and that's where all of that went in to.

1. Q. Okay.

2 A. You got time for it to come off until
3 it was ready.

4 Q. And in the second level, what was on
5 the -- what was going on the second level?

6 A. Oh, that's where the -- where the hot
7 liquid came -- it was white-looking. It was white
8 hot liquid. It was -- when it come out -- when it
9 got ready, somebody had opened up. It had a little
10 wheel on it and opened it up and let it come out
11 and then fall down on the drum. And that's where
12 it got cooled down and then it run through -- it
13 run through a trough with hot water in it.

14 Q. Okay.

15 A. And that's where the steam pipes went
16 in to the side of the trough where the hot water
17 was.

18 Q. Uh-huh.

19 A. 'Cause if it got too cool -- if the
20 poly got too cool when it was going through, it
21 would break up all the pieces. It had to keep it a
22 certain temperature -- had to keep it warm.

23 Q. All right. So you said that on the
24 third level was mostly the mixing of the chemicals
25 that would make sort of paste -- poly material, and

1 then that would be in a tank that would then come
2 down to the second level --

3 A. Right.

4 Q. -- where it would cool and you would
5 make it into the, I guess, the strands to where you
6 could slice it and dice it into the dice, correct?

7 A. Uh-huh. Uh-huh.

8 Q. And where was the slicing and dicing
9 occurring? Was that on second level as well?

10 A. Oh yes, yes.

11 Q. Okay.

12 A. It was behind -- it was behind the
13 door. There was a wall there and doors and little
14 window there -- there was a little window there
15 that the -- the -- okay the -- the poly ribbon went
16 through the hot water and it come out -- okay. The
17 trough that the water went through was about as
18 long as about here -- here to the wall.

19 Q. Okay. And do you -- the water
20 temperature -- do you know what the water trough
21 temperature needed to be?

22 A. No, I don't. I know it was hot.

23 Q. Okay. It was hot, but it wasn't steam,
24 correct?

25 A. No, no it wasn't.

1 Q. Is that fair?

2 A. The steam pipe run to it to keep it
3 hot.

4 Q. Okay. All right.

5 A. Okay. Then it runs through up over --
6 it runs up -- where it comes out the top it --

7 MR. HENDERSON: Wait for her to ask you
8 a question, Mr. Crawford. She hasn't asked you a
9 question yet.

10 MS. SHOFNER: Yeah.

11 THE WITNESS: Oh, okay.

12 MS. SHOFNER: Yeah, let me -- let me
13 just...

14 BY MS. SHOFNER:

15 Q. So the paste then was converted into a
16 poly ribbon that would then go to the slicing and
17 dicing place to where they cut it into the cubes,
18 correct?

19 A. Yeah, we had to sort it there. The end
20 of the machine to the wall was a little space where
21 you stand and you just push it in --

22 Q. Okay.

23 A. -- and then it would go over the top.
24 And about -- on the other side of the wall, it was
25 what they call the slicer-dicer and it run down and

1 runs a little piece off of the top. And this --
2 and then it was -- when it went in there it just
3 cut it up. First, it sliced it and then it diced
4 it.

5 Q. Okay. And then those would be then
6 sent some place through another -- how would the
7 sliced and diced little cubes get to the silo?

8 A. They would just fall down in it.

9 Q. Okay. So --

10 A. It would fall down to the first floor.

11 Q. All right. So how many people
12 typically worked on the second level during a
13 shift?

14 A. On the batch side, it was what you call
15 poly one after they built the new line, was six
16 people.

17 Q. Okay.

18 A. Six at one time.

19 Q. Okay. And would they all be on the
20 second level at the same time or would there be
21 some on the third and then some on the second?

22 A. Oh, no, no. It was six right there.
23 There was six right there.

24 Q. At the second level?

25 A. Yeah.

1 Q. And then how many would be -- would
2 anybody need to be at the third level?

3 A. Oh, the third level was the control
4 room.

5 Q. Right. So how many people needed to be
6 in the control room?

7 A. Oh wow. I'm not sure, about --

8 Q. Did you ever work in the control room?

9 A. No. No, I didn't.

10 Q. Okay. If you had to go to the third
11 level, what would you do at the third level?

12 A. Over there to mix chemicals.

13 Q. Okay.

14 A. To weigh them up -- to weigh up
15 chemicals.

16 Q. All right.

17 A. In a little bag, and then --

18 Q. Did the poly building have windows?

19 A. Windows?

20 Q. Yes.

21 A. Oh, it had windows all the way down the
22 back -- all the way down the back. It was windows
23 all the way down.

24 Q. All right. Did it have -- was it
25 air-conditioned?

1 A. No. No.

2 Q. Okay. Was there a ventilation system
3 in place in the poly building?

4 A. Well, it had windows all the way down
5 the back -- all the way down the backside.

6 Q. Okay. So in the summertime and spring
7 they would be open?

8 A. Oh yes, they could open them and close
9 them.

10 Q. Would they stay open all year?

11 A. I think we probably closed in the
12 wintertime.

13 Q. Okay. When the -- when the poly ribbon
14 would come out through the trough, was the poly
15 ribbon exposed to the outside -- just the outside
16 air?

17 A. No, no.

18 Q. Or was it contained in a pipe or
19 something?

20 MR. HENDERSON: Object to the form.

21 THE WITNESS: Oh, before it went to the
22 slicer-dicer?

23 BY MS. SHOFNER:

24 Q. Yes.

25 A. It was also inside.

1 Q. It was all inside the building,
2 correct?

3 A. Yeah, yeah.

4 Q. But when it come out, would it be
5 something you could walk up and touch the poly
6 ribbon?

7 A. Oh, yeah. Yeah.

8 MR. HENDERSON: Form. And
9 mischaracterizes prior testimony.

10 BY MS. SHOFNER:

11 Q. So during the time when it would be
12 cooled down, would you be able to touch and
13 manipulate the poly ribbon during the cooling down
14 process?

15 MR. HENDERSON: Form.

16 THE WITNESS: Oh, yeah.

17 BY MS. SHOFNER:

18 Q. Okay. And would you need to do that
19 to -- I think you said you that you took the poly
20 ribbon and sometimes wound it around a drum or
21 something to get it started; is that right?

22 A. Oh, yeah --

23 MR. HENDERSON: Object to the form.

24 THE WITNESS: It started off running
25 around the drum and around the bottom of it and up

1 over the -- out the other side -- up under the
2 other side. At the same time it had -- packs with
3 the sprink -- with the water sprinkler on it.

4 BY MS. SHOFNER:

5 Q. Okay. And would you be able to touch
6 that or would you have to touch it to get it
7 started through the drum machine?

8 A. Oh, yes, yes. You just -- you just --
9 first, you roll it up -- it come out hot. You got
10 to roll it up to get a roll -- get a good roll.
11 And take a piece of it and you just lay it down and
12 then you take your hand run it around -- hold it
13 all down -- (Indicating)

14 Q. And that would get it started, correct?

15 A. Yeah, to keep it going and then through
16 the trough, and then you let the flaps down on it
17 on the way -- on the way.

18 Q. Okay. All right. Was this area needed
19 to be kept fairly clean so you didn't okay. The
20 polyester ribbon or the materials as it was coming
21 from the machine cooling down?

22 A. It stayed wet because it was so much
23 water.

24 Q. Right.

25 A. It stayed wet.

1 Q. Right. But the -- but the environment
2 around it when it was going through the drums and
3 cooling down, before it went to the slicer-dicer,
4 did it have -- did the area and environment need to
5 be kept fairly clean so you --

6 A. Oh.

7 Q. -- so that you didn't okay. The poly
8 ribbon?

9 MR. HENDERSON: Form.

10 THE WITNESS: It never did -- it never
11 did touch the floor.

12 BY MS. SHOFNER:

13 Q. Okay.

14 A. It never did. It never did.

15 Q. Okay. But you couldn't -- you couldn't
16 have a whole lot of dust in the area because you
17 didn't want the dust to get in the poly ribbon,
18 correct?

19 MR. HENDERSON: Object to form.
20 Counsel's testifying. It's not a question.

21 MS. SHOFNER: It's a question. And I
22 can ask a direct and leading question if I choose.

23 MR. HENDERSON: You cannot testify in
24 cross-examination --

25 MS. SHOFNER: I'm not testifying --

1 MR. HENDERSON: -- you can lead.

2 MS. SHOFNER: -- I'm asking him a
3 direct question.

4 THE WITNESS: Okay.

5 BY MS. SHOFNER:

6 Q. Would the environment have to be kept
7 clean and not dusty so that you -- so that the poly
8 ribbon would not be contaminated during the cooling
9 down process?

10 MR. HENDERSON: Form.

11 THE WITNESS: It didn't matter what was
12 on the floor because the poly never did reach the
13 floor.

14 BY MS. SHOFNER:

15 Q. Right. And I'm not asking about the
16 floor; I'm asking about the dust in the air.

17 A. Oh, okay.

18 Q. That the -- that the area where the
19 poly on the second floor -- did that need to stay
20 clean or -- like this room today and not have a lot
21 of dust in the area so it did not contaminate the
22 poly ribbon as it was being cooled down?

23 MR. HENDERSON: Form.

24 THE WITNESS: Oh, I know what you're
25 saying. Okay. On the poly one, it was clean

1 'cause everything was already put together.

2 BY MS. SHOFNER:

3 Q. And that's what I'm asking: Is that
4 you couldn't have dust flying around in the area
5 because the poly ribbon needed to stay clean,
6 correct?

7 MR. HENDERSON: Form.

8 THE WITNESS: Yeah, okay. But the
9 other side --

10 BY MS. SHOFNER:

11 Q. And I'm just asking about poly one
12 right now?

13 A. Okay. Yes. Yes.

14 Q. Yes. Okay. Because if dust got into
15 the poly ribbon that may affect the overall
16 product, correct?

17 A. Yeah, probably so.

18 MR. HENDERSON: Form and foundation.

19 BY MS. SHOFNER:

20 Q. And the polyester and the poly product
21 had to go through inspections and testing to make
22 sure it met certain specifications, correct?

23 MR. HENDERSON: Form and foundation.

24 THE WITNESS: Yeah, it was -- they was
25 sent to the lab to check the what -- to see if it

1 was made right.

2 BY MS. SHOFNER:

3 Q. Right. Right. And if it had a whole
4 bunch of dust in it or other contaminants, it may
5 not have passed those inspections, correct?

6 MR. HENDERSON: Form and foundation.

7 THE WITNESS: Oh, yeah. Yeah.

8 BY MS. SHOFNER:

9 Q. Okay. Thank you. Now, I think that
10 you said that when you first started in 1970 --

11 A. Uh-huh.

12 Q. -- at Hoechst --

13 A. Uh-huh.

14 Q. -- poly number two, the continuous
15 line, was not built yet, correct?

16 A. No, no it wasn't.

17 Q. Was it in construction when you first
18 started there, or did the construction start on the
19 continuous line after you began there?

20 A. It was right after -- right after -- it
21 was right after I started.

22 Q. Okay. So sometime in the late summer,
23 mid-fall, the continuous line started to be
24 constructed, correct?

25 A. It was like about a year or two, so --

1 Q. Oh, okay.

2 A. First, it started off with the building
3 from the ground floor. And first they built a
4 building. And they put the building up pretty
5 fast. And it was right -- right close -- right
6 next to the poly building, but they had -- they had
7 to break the wall out -- bust the wall out to make
8 a door there so you could walk in between it.

9 Q. Okay. Let me ask you a little bit
10 about that. So you think they started the
11 construction of the building for the continuous
12 line poly number two about a year after you started
13 at Hoechst, correct?

14 A. I can't remember exactly when, but it
15 was after I started. It was a while after I
16 started.

17 Q. Okay. You're not sure when, but it
18 could have been?

19 A. Sometime in that time frame.

20 Q. Okay. Between 1970 and 1971?

21 A. No, between '70 and '74. I can't
22 remember the exact time frame.

23 Q. Okay. All right. And the first thing
24 they did was they built another entire building?

25 A. That's right.

1 Q. Right next to the poly one building --

2 A. That's right.

3 Q. -- correct? Okay. How -- what was the
4 -- how far away was the second building that they
5 built?

6 A. It was right next to it. It was
7 connected to it.

8 Q. Okay. Did that share a wall?

9 A. Well, they had -- the end of it had a
10 wall, but it had a -- it had a great big wide space
11 there that you could walk through.

12 Q. Well, obviously the space wasn't there
13 when they first started building the building,
14 correct? Let me go back.

15 Did they build the building first
16 before they made the -- connected the two
17 buildings?

18 MR. HENDERSON: Form.

19 THE WITNESS: Oh, well, at the same
20 time they was building it, they was connected at
21 the same time, see. And that's they way they build
22 it -- connected it at the same --

23 BY MS. SHOFNER:

24 Q. Okay. Where was the second building
25 being built in relationship to the poly building

1 number one? Was it at the end? Was it on the
2 side?

3 A. Yeah, it was on the long side. It was
4 like -- yeah.

5 Q. Was it exactly -- did it look exactly
6 the same as the building number one -- four levels?

7 A. Oh yes, yes.

8 Q. Okay. So the dimensions were pretty
9 much the same as the poly building number one?

10 A. Yeah, the width.

11 Q. Uh-huh.

12 A. Yeah, the width was the same.

13 Q. And the length?

14 A. It was shorter.

15 Q. Okay. How about the level -- floor
16 levels -- height? Was that the same?

17 A. I'm saying -- yeah, it was the same
18 because they had another control room too, for the
19 continuous line.

20 Q. So the only difference between the poly
21 number two building with the continuous line was
22 that it was a little bit shorter?

23 MR. HENDERSON: Object to the form.

24 THE WITNESS: Yeah. Oh, yeah. Yeah.

25

1 BY MS. SHOFNER:

2 Q. And then while they were building this
3 building was there any space between the building
4 number one and the building number two before it
5 was connected?

6 MR. HENDERSON: Form.

7 BY MS. SHOFNER:

8 Q. So could you walk between the two
9 buildings?

10 A. Oh, yeah. Yes, you could. It --

11 MR. HENDERSON: Form.

12 THE WITNESS: -- was just like -- like
13 the poly building was outside the door.

14 BY MS. SHOFNER:

15 Q. Okay. So --

16 A. Yeah. Yeah.

17 Q. So there was an outdoor space that you
18 could walk between the two buildings, correct?

19 MR. HENDERSON: Form.

20 THE WITNESS: No.

21 BY MS. SHOFNER:

22 Q. No?

23 A. No, you just walk from one floor to --
24 just like you were going in that hall.

25 Q. All right. So they shared a wall?

1 A. Well, they -- on the lower end of it
2 they shared a wall.

3 Q. Okay.

4 A. But they had a big wide space at the
5 top of the machine where the -- where it was open.

6 Q. All right. Well, that's going to be my
7 next question is the -- for poly number two, the
8 continuous line and the poly number one building,
9 where were they open to one another? Was it along
10 the long wall?

11 MR. HENDERSON: Form.

12 THE WITNESS: Yeah, it was the end of
13 the long wall because all -- what they call the
14 lines -- they ran the same way. You know, they ran
15 the same way.

16 BY MS. SHOFNER:

17 Q. Okay. So end of the long wall, you
18 could walk from one -- from the poly building
19 number one or the -- to the poly building number
20 two, correct?

21 MR. HENDERSON: Form:

22 THE WITNESS: Yeah, you'd just step
23 right over.

24 BY MS. SHOFNER:

25 Q. Okay.

1 A. You just walk right into it.

2 Q. How big was this opening?

3 MR. HENDERSON: Form.

4 THE WITNESS: Oh man. Okay. It was
5 like a -- about 8 or 10 yards.

6 BY MS. SHOFNER:

7 Q. Okay. Did the opening -- was it only
8 on one level or was it on all four levels?

9 A. Yeah, it had to be all levels.

10 Q. All four levels?

11 A. Yeah.

12 Q. All right. Was there any doors or
13 anything that separated it, or was it just a big
14 open space that you could just walk through?

15 A. Yeah, it was a big open space.

16 Q. Okay. The rest of the -- other than
17 this 8 to 10 yard opening at back end of the long
18 wall --

19 A. Uh-huh.

20 Q. -- everything else was separate from
21 the poly -- from poly one to poly two?

22 MR. HENDERSON: Form.

23 BY MS. SHOFNER:

24 Q. There was a wall separating the two
25 lines --

1 A. Okay.

2 MR. HENDERSON: Form.

3 THE WITNESS: Over on -- on two --

4 okay. On the second floor they had a wall to the
5 end -- to the end instead of separating it, and the
6 rest of it was just opened -- yeah, the rest of it
7 was just open. They was connected together. The
8 third floor and the one after that.

9 BY MS. SHOFNER:

10 Q. Okay. So on level number two, there
11 was this 8 to 10 yard opening at the back end,
12 correct?

13 A. Yeah, yeah.

14 Q. But then there was a wall for the rest
15 of the length of the building that separated level
16 two?

17 MR. HENDERSON: Form.

18 THE WITNESS: Yeah. From that way
19 toward the front and that way toward the back
20 (Indicating).

21 BY MS. SHOFNER:

22 Q. There was a wall?

23 A. Yeah.

24 Q. Okay. And then on level one, was it
25 completely open between the two buildings or was

1 there just a space?

2 MR. HENDERSON: Form.

3 THE WITNESS: It was open. They had
4 big -- they had great big beams there to hold it.

5 BY MS. SHOFNER:

6 Q. Okay.

7 A. 'Cause I remember that.

8 Q. So there were beams --

9 A. Yeah, yeah.

10 Q. -- in between where the wall would have
11 been but it was completely open that you could
12 see --

13 A. Yeah, yeah, on the first floor 'cause
14 it didn't need to be closed up.

15 Q. Okay. And then level three with the
16 control room in it, was there a wall or was it
17 completely open?

18 A. It was open. I remember it was open.
19 It was open.

20 Q. Did they have two control rooms?

21 A. Oh yes --

22 Q. Okay.

23 A. They had one for the batch line; had
24 one for the continuous line.

25 Q. And were the control rooms separate

1 buildings within the building area that housed all
2 of the instrumentation?

3 A. Well, actually, by that time it was
4 when they built the other building, it was the same
5 building, except it was a different part of it.

6 Q. Okay.

7 A. The other half of it -- the other
8 half --

9 Q. Level -- fourth level, was it
10 completely open?

11 MR. HENDERSON: Form.

12 THE WITNESS: Oh yeah, yeah.

13 BY MS. SHOFNER:

14 Q. How -- how long did it take to, if you
15 know, from start to finish, to build poly number
16 two?

17 A. Wow.

18 MR. HENDERSON: Object to form. Asked
19 and answered.

20 THE WITNESS: I can't -- I can't put no
21 time frame on it. I know it went up fast.

22 BY MS. SHOFNER:

23 Q. Okay.

24 A. I know they build it fast.

25 Q. All right. And when did they knock

1 down the walls in between the two buildings? Did
2 they wait until most of the poly two was already
3 built before they started knocking down the walls
4 in between the two buildings?

5 MR. HENDERSON: Form.

6 THE WITNESS: Okay. They put the
7 framework --

8 BY MS. SHOFNER:

9 Q. I'm assuming you wouldn't want the --
10 you wouldn't want --

11 MR. HENDERSON: Please let him finish
12 his answer. Were you finished with your answer?

13 MS. SHOFNER: You can go ahead and
14 finish your answer. I was just trying to help.

15 THE WITNESS: Oh, it was the same time
16 when they started putting the beams up. Yeah, they
17 knocked the wall out and they put something there
18 to hold -- like a big sheet -- like a canvas to
19 hold it.

20 BY MS. SHOFNER:

21 Q. So while they were constructing the
22 second building, they had a sheet barrier?

23 A. Oh, yeah. Yeah.

24 Q. To prevent the dust from the
25 construction from building number two to come into

1 the building number one?

2 MR. HENDERSON: Form.

3 THE WITNESS: Until they build it up,
4 you know, until they build it up and they got a
5 cover over the top.

6 First, they build all of that first
7 and then the cover over the top. And then they put
8 a -- they also build a new restroom and -- and --
9 and a new locker room and restroom. And they also
10 put some -- put some control room in there. That
11 was on poly number two.

12 BY MS. SHOFNER:

13 Q. Okay.

14 A. And they had great big controls where
15 they had -- that controlled the powers, you know?

16 Q. Uh-huh.

17 A. And they had a lot of them in there.

18 Q. And was that on level three?

19 A. No, level two. That was on level two.

20 Q. Okay.

21 A. It was right behind the continuous line
22 that was over there on the right. And the new
23 restroom was up there on the end.

24 Q. And this was all part of the new
25 construction?

1 A. Oh, yeah. Yeah, yeah.

2 Q. Okay. While this new construction was
3 going on, did they have barriers in between the new
4 construction and the poly continuing -- poly line
5 number one to prevent dust from coming into your
6 work space?

7 MR. HENDERSON: Form.

8 THE WITNESS: I'd say no, no.

9 BY MS. SHOFNER:

10 Q. Okay. Well, you already told me they
11 needed to keep the dust controlled so that it
12 didn't contaminate the poly ribbon coming through.

13 MR. HENDERSON: Object to the form.
14 Mischaracterizes his testimony.

15 BY MS. SHOFNER:

16 Q. So would they have allowed the
17 construction dust to come in while you were working
18 there and contaminate the poly ribbon on poly
19 number one?

20 MR. HENDERSON: Object to form.

21 THE WITNESS: They stayed over there in
22 their part, you see. They stayed over their in
23 their part.

24 BY MS. SHOFNER:

25 Q. And how did they keep the dust over on

1 their part?

2 MR. HENDERSON: Object to form and
3 foundation.

4 THE WITNESS: There wasn't any wind
5 blowing. It just fell straight down.

6 BY MS. SHOFNER:

7 Q. Okay.

8 A. It just fell straight down.

9 Q. So the construction didn't create a lot
10 of dust?

11 MR. HENDERSON: Object to form.

12 THE WITNESS: Yeah, it did, but it
13 stayed confined over there in poly number one,
14 where they was building -- where they was
15 building the --

16 BY MS. SHOFNER:

17 Q. I'm sorry. It stayed confined in poly
18 number two --

19 A. Yeah.

20 Q. -- correct?

21 A. Yeah --

22 MR. HENDERSON: Object to the form.

23 THE WITNESS: -- yeah. First, they had
24 to put -- before they started running it though,
25 they had to put -- had to build everything. Put

1 the hot water lines up and put the insulation on
2 those steam pipes, and it was all over on that
3 side.

4 BY MS. SHOFNER:

5 Q. And I understand what you are saying.
6 What I'm trying to understand is: If they were
7 having construction being done on the poly number
8 two area --

9 A. Uh-huh.

10 Q. -- and there nothing prevent -- no
11 barriers up, how did they prevent the dust from
12 coming over to poly number one and contaminating
13 the product that you were manufacturing at that
14 time?

15 MR. HENDERSON: Object to form. It's
16 the last time he's going to answer this question.

17 BY MS. SHOFNER:

18 Q. If they didn't --

19 A. They had a wall on the -- they left a
20 wall from the end of the machine back that way
21 (Indicating) towards the front. And there wasn't
22 no wind blowing to blow it over there.

23 Q. Okay.

24 A. It was just all over on that side.

25 Q. And at least on level two there was

1 still that wall there, correct?

2 MR. HENDERSON: Object to form.

3 THE WITNESS: Yeah, over on the end of
4 it, except where that big --

5 BY MS. SHOFNER:

6 Q. The big entryway?

7 A. Yeah, where we can go back and forth
8 and across.

9 Q. Okay.

10 A. I didn't think they -- it wasn't a
11 problem --

12 Q. Okay.

13 A. -- to go -- for it to go over to the
14 other side. It stayed over there in poly number
15 two; that's where it stayed.

16 Q. All right. And it's -- and then I
17 think you said that you went over to the poly
18 number two continuous line and started working as a
19 production person sometime in 1973; is that
20 correct? Is that fair? I think that's what you
21 said.

22 A. It was about around that time.

23 Q. And by the time you went over there the
24 construction was finished, correct -- completed?

25 MR. HENDERSON: Object to form.

1 Mischaracterizes his testimony.

2 BY MS. SHOFNER:

3 Q. The continuous line had to be
4 operational before you went over there and actually
5 worked on it, correct?

6 MR. HENDERSON: Object to the form. I
7 think he was trying to answer your last question.

8 THE WITNESS: Okay. First, the first
9 line was finished and then they started working on
10 it. And then they started building the second line
11 and the first line started running.

12 BY MS. SHOFNER:

13 Q. Right. The first line has always been
14 running, correct? Poly one has always been
15 operational --

16 A. No, no, no, no. I mean, over in poly
17 two continuous line.

18 Q. Okay. How many continuous lines did
19 they have in poly two?

20 A. Well, first, they started off with just
21 one. They started off with just one, and after a
22 while I think they built another one.

23 Q. When did they build the second
24 continuous line?

25 A. I think -- it was right before I left.

1 It was right before I left.

2 Q. Did they have to do any additions or
3 changes to the building or structure of the poly
4 building at all during -- when they started
5 building the continuous line number two?

6 A. Oh, I don't understand.

7 Q. Okay. You described the poly number
8 one building, correct?

9 A. Uh-huh.

10 Q. You said that they actually added on
11 and -- and added on width to the poly number one
12 when they built poly number two with the continuous
13 line, correct?

14 MR. HENDERSON: Objection. Form.

15 BY MS. SHOFNER:

16 Q. So the building changed? They added --
17 they made it wider, correct?

18 A. They made it longer.

19 Q. Made it longer, okay.

20 A. Yeah, made it longer.

21 Q. All right. For number two did they
22 have to add any length or width to the existing
23 poly building when they started building number two
24 continuous line?

25 MR. HENDERSON: Form.

1 THE WITNESS: Oh, are you asking me,
2 did they add on poly number one?

3 BY MS. SHOFNER:

4 Q. I don't -- I don't -- I think -- I
5 think -- we're miss -- we're getting confused here,
6 so --

7 A. Okay.

8 Q. -- let me see if I can fix this.

9 A. Okay.

10 Q. Okay. When you came in 1970, there was
11 only poly number one with one line that was a brake
12 line -- a batch line; is that fair?

13 A. There was a lot of lines there.

14 MR. HENDERSON: Object to the form.

15 THE WITNESS: A lot of them. A lot of
16 them.

17 BY MS. SHOFNER:

18 Q. Okay. But they were all batch lines,
19 correct? In 1970?

20 A. They run all the way through. They
21 started -- all of them started from the -- from the
22 drum up there where it come out of the wall --

23 Q. Okay..

24 A. -- and it run all the way to the back.

25 I don't know how many there was. It was in the

1 teens.

2 Q. Okay. But these were already in
3 existence and already in the poly building,
4 correct?

5 A. Oh, yeah. Yeah.

6 Q. And then when they came and built the
7 continuous line, which was a brand new separate
8 line, correct?

9 A. Uh-huh.

10 Q. They added on to the building -- on to
11 the length of the building?

12 A. Uh-huh. That's true.

13 Q. So they altered the building; they made
14 it longer, correct? They added walls and knocked
15 down walls, correct?

16 A. Well, the wall was already there, but
17 they just -- up there on the end -- it just made it
18 where you could walk across one to the other.

19 Q. Right.

20 A. It was up on the end of the machine.

21 Q. But where the continuous line was was a
22 brand new building?

23 A. That's right.

24 Q. All right. So when they built
25 continuous line number two did they have to add on

1 or change the building?

2 MR. HENDERSON: Object to form.

3 THE WITNESS: No, no, they built the --
4 they built the building as long as they needed
5 before they start off with, you see.

6 BY MS. SHOFNER:

7 Q. Okay. So then continuous line number
8 two was just -- they just added more equipment --

9 A. Oh, yeah.

10 Q. -- into the existing building?

11 A. True.

12 Q. And this was the new part of the
13 building that they had already added in 1973?

14 MR. HENDERSON: Form.

15 THE WITNESS: It was --

16 BY MS. SHOFNER:

17 Q. Or whenever they built continuous line
18 number two?

19 A. Yeah. Yeah.

20 Q. Okay. That's what I was asking. Thank
21 you.

22 A. Okay.

23 Q. All right. For the continuous line --
24 I know that you said the only difference was that
25 it was a continuous process, correct?

1 A. True.

2 Q. It was not the --

3 MR. HENDERSON: Object to form.
4 Mischaracterizes his prior testimony. When she
5 asks you a question, give me a second because I may
6 have some objections to some of the questions that
7 are asked --

8 A. THE WITNESS: Oh, okay.

9 MR. HENDERSON: -- So just give me a
10 second. I'll object and you can go ahead and
11 answer, okay?

12 THE WITNESS: Okay. Okay.

13 MR. HENDERSON: Same as before.

14 BY MS. SHOFNER:

15 Q. Continuous line -- Continuous line
16 number two or the continuous line -- the new
17 line -- was -- you were making the same type of
18 product, correct?

19 A. True.

20 Q. It was just not made in batches, it was
21 just made continuously, correct?

22 A. True.

23 Q. Okay. So it would go through the same
24 process including the cool-down process, correct?

25 A. True.

1 Q. Was the cool-down process similar to
2 what was the cool-down process in the -- the poly
3 number one?

4 A. True.

5 Q. When they added the continuous line for
6 poly two, did they increase the crew? Or did you
7 have a new crew do the continuous line?

8 MR. HENDERSON: Form.

9 THE WITNESS: It was -- it was one
10 operator on each line.

11 BY MS. SHOFNER:

12 Q. Okay.

13 A. I think it was one out on each line.

14 Q. Okay.

15 A. But I did work up there on the -- for a
16 while on the continuous line when they put it in.

17 Q. Were you ever an operator? Was that
18 ever your job title?

19 A. Oh, yes. Yes.

20 Q. Okay.

21 A. But what you did though, you just
22 watched it and kept it running. If it broke, you
23 had to push the drum out of the way. And if
24 something, you know -- and you had to do whatever
25 -- whatever you need to do -- whatever it took to

1 keep it running.

2 Q. Okay. You never worked in maintenance
3 at Hoechst plant?

4 A. Oh, no, no, no.

5 Q. Okay. If there was ever any repairs to
6 any of the machines or equipment, you would call a
7 maintenance person to come and do that, correct?

8 A. Oh, that's true. That's true.

9 Q. For poly number two on the continuous
10 line -- how many members -- how many members would
11 need to be in that crew per shift? Same?

12 A. No, there was one for each line. I
13 worked -- when I was first there -- when they first
14 build it, I worked over there a while until they
15 found somebody to run it, and then I went back over
16 -- then I went back over on the poly one.

17 Q. Okay.

18 A. But I had to go across there to go to
19 the restroom -- the new restroom they built -- and
20 the new locker room.

21 Q. Okay.

22 A. That's where my locker was.

23 Q. So what did they do with the old
24 restrooms that were in the poly one?

25 A. I'm thinking back -- I think it was --

1 they had the locker rooms over -- over in other
2 building.

3 Q. All right. So you had restrooms in
4 poly one and restrooms in poly two area?

5 A. Yeah, but I didn't -- we didn't use it
6 after they built the other side. We didn't use
7 them.

8 Q. Okay. But then they put the new locker
9 room over on poly two or in the poly two building,
10 correct?

11 A. Correct.

12 Q. Okay. So at the end of the day or at
13 the beginning of the day you would go to the locker
14 room, leave your stuff, and then go report to your
15 shift, correct?

16 A. That's right. That's true.

17 Q. And that what was in the poly two area?

18 A. That's right. That's right.

19 Q. How far away was the locker room to the
20 poly one area?

21 A. It was over there on the far corner --
22 all the way over to the corner. That was -- let's
23 see -- wow. Wow. Oh man, it's hard -- it's hard
24 to put a --

25 Q. If you don't know, that's fine.

1 A. Yeah.

2 Q. Okay. So at least twice a day you
3 would go into the poly two area to go to the locker
4 room? Once in the morning and once after your
5 shift ended?

6 A. That's true.

7 Q. Okay and --

8 A. And then when you had -- when you went
9 to -- took a break -- I mean, when --

10 Q. Was --

11 A. -- when you went to the restroom -- you
12 had to go use the restroom -- when you needed to
13 use the restroom over there.

14 Q. Why didn't you use the restroom that
15 was closer to you in the poly one building?

16 MR. HENDERSON: Object to form.

17 Assumes facts not in evidence.

18 BY MS. SHOFNER:

19 Q. I mean, you might have; did you? Did
20 you use the restroom in the poly one building when
21 you were working there?

22 A. At first, I was using -- let me see.
23 Wait a minute. Wait a minute. Wait a minute.

24 I believe they closed it down. I
25 believe they put something else in there.

1 Q. Okay.

2 A. I think they rebuilt the whole thing.

3 Q. All right. And the new restrooms in
4 the poly two area -- they would not have been, I
5 guess, operational until the rest of the building
6 was completed?

7 A. First they built --

8 MR. HENDERSON: Object to the form.

9 THE WITNESS: -- they built the whole
10 building and then they put the -- they put that --

11 MR. HENDERSON: Actually, Mr. Crawford,
12 that wasn't a question. Madam court reporter, will
13 you read back the last statement for opposing
14 counsel, please.

15 MS. SHOFNER: I can add correct to the
16 end of it if you would like me to.

17 MR. HENDERSON: Maybe so. Let's hear
18 it.

19 (Requested portion was read.)

20 MS. SHOFNER: Correct?

21 MR. HENDERSON: Object to form.

22 Assumes facts not in evidence.

23 THE WITNESS: All right. Okay. I
24 remember when they built -- when the first line was
25 starting to be completed, the other restroom and

1 the new locker room was operational, you know, it
2 was operational.

3 Well, it had to be because the ones
4 working on the -- on line one had to use the
5 restroom there. They had to have somewhere for the
6 locker room and the restroom.

7 BY MS. SHOFNER:

8 Q. But the construction was -- wasn't
9 completed in the poly two area by the time you were
10 allowed to go and use those locker room and the
11 restroom?

12 MR. HENDERSON: That's not a question.
13 Mr. Crawford, that's not a question. Wait for her
14 to ask you a question.

15 MS. SHOFNER: Correct?

16 MR. HENDERSON: Still not a question.
17 I can't tell what you are asking. How many times
18 does he have to say he --

19 MS. SHOFNER: If he doesn't know --
20 okay.

21 THE WITNESS: Okay.

22 MR. SHOFNER: You don't understand the
23 question -- is that what you are saying?

24 MR. HENDERSON: He's been asked the
25 same thing multiple times now.

1 MS. SHOFNER: Because I'm asking him to
2 get clarification. I don't think he's ever
3 answered the question, but I'm happy to ask it
4 again if you're not clear about what I'm asking.

5 MR. HENDERSON: I just don't know how
6 many times you got to repeat the same ground.

7 MS. SHOFNER: I'm -- I'm --

8 MR. HENDERSON: I'm trying to give you
9 room, I just -- literally, I think he's explained
10 this several times now.

11 MS. SHOFNER: I don't think he's
12 explained anything, but I'm happy to try to ask him
13 again if he can figure this out.

14 BY MS. SHOFNER:

15 Q. I'm trying to figure out when the new
16 locker room -- when you were able to go to the new
17 locker room.

18 In what state was the construction of
19 the poly two area -- what state was it in? Was it
20 brand new? Was it just started -- the building
21 starting to being built? Was it toward the end of
22 construction? Was the poly two continuous line --
23 was it operational by the time you were -- when you
24 had to go to the restrooms and use the new locker
25 rooms?

1 MR. HENDERSON: Counselor, I'm sorry.
2 You asked him several questions. Is your question
3 whether or not the line was operational when he
4 went to use the bathroom in poly two -- 'cause I
5 can follow that -- and I don't have an objection to
6 that. Is that your question to him?

7 BY MS. SHOFNER:

8 Q. When was the bathroom operational and
9 locker room operational during the time of the
10 construction of the poly two building?

11 MR. HENDERSON: Objection to form to
12 that question.

13 THE WITNESS: Oh, you can use the
14 restroom before the line started because they
15 completely finished the bathroom -- that part first
16 -- the bathroom and that control room with all of
17 those buttons was -- the control room where the --
18 the breakers -- I guess, it was breakers in there.

19 BY MS. SHOFNER:

20 Q. Okay. What -- where was the bathroom?
21 What level?

22 A. The second -- second level.

23 Q. Well, where was the locker room?

24 A. Second level, too. And same with the
25 restroom.

1 Q. Okay. When you would -- how often did
2 you have to go over to the continuous line to work
3 there?

4 MR. HENDERSON: Object to form.

5 THE WITNESS: Yeah, when it first
6 started. When it first started. Okay. I know
7 when it was first started up, I started working on
8 it and -- oh me. It was a whole shift. I mean, it
9 was -- it was -- it was like a about a few weeks.

10 BY MS. SHOFNER:

11 Q. Okay.

12 A. A couple -- about -- it was like about
13 two or three weeks.

14 Q. Did you only work at the continuous
15 line after it was first started for this two or
16 three-week period, or did you go over there
17 after -- at other times?

18 MR. HENDERSON: Object to form.

19 THE WITNESS: After two or three weeks,
20 then I went back to poly one -- poly number one.

21 BY MS. SHOFNER:

22 Q. Okay. All right. So the majority of
23 your time at Hoechst Celanese was in the poly --
24 on the poly one area?

25 A. Oh yeah, yeah.

1 Q. Okay. The warehouse -- was that in the
2 same area -- was that in the poly building or was
3 that in a different building when you would go to
4 work at the warehouse?

5 A. Oh, it was -- I was in poly building
6 one.

7 Q. Okay.

8 A. It was when I was on the first shift.

9 Q. So they had a warehouse at the poly
10 building number one?

11 A. It was right off from it.

12 Q. Okay.

13 A. It was right -- it was right built next
14 it to.

15 Q. Okay.

16 A. It was like across the big road --
17 right across the from the big road there.

18 Q. So the warehouse was in a separate
19 building than poly one?

20 A. Oh, yes. Yes, it was.

21 Q. Okay. That's what I was asking.

22 A. Yeah. Okay.

23 Q. To do your job in the poly building,
24 did you receive training from Hoechst or did they
25 just turn you loose and say here's the machine?

1 A. Oh yeah, yeah, I had training, yeah.

2 Q. All right. Do you recall how long that
3 training took?

4 A. Oh, I really know. I really don't. I
5 really don't. It wasn't hard to learn. It wasn't
6 hard to learn.

7 Q. Was it on-the-job training or classroom
8 or both?

9 A. No, no classroom.

10 Q. Do you recall who you learned from --
11 who gave you the training?

12 A. Oh, man.

13 Q. Would it be your supervisor, Moe --
14 Mr. Moe?

15 A. It was the -- it was the coworkers I
16 worked with, you see.

17 Q. Did you have to wear any safety
18 equipment?

19 A. Oh, yes, I did.

20 Q. What kind of safety equipment?

21 A. Okay. I had to wear -- I had to wear
22 leather gloves and -- and a hard hat. I remember I
23 had to wear a hard hat.

24 Q. Did you have to wear any ear plugs?

25 A. Oh, yeah. Yeah.

1 Q. How about safety goggles?

2 A. Oh wow. I can't -- I can't remember
3 that part now. I knowed I wore the hard hat.

4 Q. Did Hoechst provide you with the ear
5 plugs and hard hat?

6 A. Oh yeah, oh yeah. That's true.

7 Q. And the leather gloves?

8 A. That's right. Yeah, yeah.

9 Q. And did --

10 A. And boots, too.

11 Q. Steel-toed boots?

12 A. Yeah, I had high boots because there
13 was so much water; it was wet.

14 Q. So it wasn't necessarily steel-toed,
15 but they had to be a certain height?

16 A. I believe it was steel-toed. I believe
17 they was now.

18 Q. Okay. All right. And you said the
19 area was wet where you were working?

20 A. Oh, yes. Yes, because of --

21 Q. Because of the cool-down -- the water
22 that was needed to cool it down?

23 A. Well, they had all those drums -- big
24 drums had water hooked to it and it had a little
25 spout out from it, and it was all the way around

1 the drums.

2 Q. Okay.

3 A. It was all the way around.

4 Q. And was this part of the cool-down
5 process of trying to cool down the poly material?

6 A. Yes, it got cool -- the drum -- kept
7 the drum cool.

8 Q. Okay. Was operating the machines --
9 were there any hazards associated with the actual
10 operation of any of the machines that made the poly
11 material?

12 A. Oh, I'm not sure about that question.

13 Q. I mean, like, could you get your hands
14 caught or fingers mashed or was there any issues
15 with maybe getting hit with steam or any hot water
16 that could cause problems or injuries?

17 MR. HENDERSON: Form.

18 THE WITNESS: Yeah, there was injuries
19 there. You had to be careful. When I was working
20 there, there was one guy that got -- okay.

21 When that -- when that ribbon came off
22 the end of the trough and it before it went into
23 the slicer-dicer, it had to go under -- under a
24 roller --

25

1 BY MS. SHOFNER:

2 Q. Uh-huh.

3 A. -- you see, like on the door -- the
4 door was open right here (Indicating) and there was
5 a roller right there. And there was one guy
6 working there. He was -- (Someone sneezed.)

7 MR. HENDERSON: Bless you.

8 THE WITNESS: -- and he got his hand
9 caught up under -- up under that roller.

10 BY MS. SHOFNER:

11 Q. Okay.

12 A. And I had to call maintenance, 'cause I
13 couldn't get it out. Then I had to call
14 maintenance to come and take the -- take them
15 loose.

16 And after that they said -- after that
17 because that had happened, they was going to get a
18 roller there that would just pop off.

19 Q. Did they do that?

20 A. No, I never did see them get around to
21 it while I was there.

22 Q. These -- the hazards that were
23 associated with operating the machines -- you were
24 told about these hazards during your training; is
25 that correct?

1 A. No, I just saw them.

2 Q. Were they obvious that you don't want
3 to put your hand in the middle of the roller
4 because it could get smashed?

5 MR. HENDERSON: Object to form.

6 THE WITNESS: Well, I thought it was,
7 but you know, so...

8 MS. SHOFNER: Okay.

9 A. It was -- but the -- the person that
10 got it caught just didn't realize it, you see. I
11 always kept my hands out of it -- out of the way.
12 And most of the other workers did too, but...

13 BY MS. SHOFNER:

14 Q. Other than this accident that you
15 recall happening with the roller and your coworker,
16 were there other accidents that you can remember
17 happening?

18 A. Oh, yes. Yes.

19 Q. Okay.

20 A. There was one guy that was there got
21 burnt -- the whole chest. The whole chest. It was
22 caused when one guy was rolling the hot wax -- the
23 hot -- when you roll it off -- when it starts --
24 open it up on the tumbler's moving -- when you open
25 it up, some will fall out and you take it and just

1 roll it up with your hands to get it started and
2 then break it off. And you are supposed to lay it
3 down.

4 And one guy was -- when he rolled it
5 off, he got it and just slung it and there was
6 somebody behind him. And that hot -- the hot poly
7 hit him in the chest and just burnt the chest up --
8 burned the chest -- a big red spot on his chest.
9 They had to take him to the -- they had to take him
10 to the hospital.

11 Q. Okay.

12 A. Yeah.

13 Q. Were there safety procedures that
14 Hoechst Celanese required you to follow during
15 while you were working?

16 A. Okay. When you roll the poly off, you
17 are supposed to take it and just lay it down.

18 Q. Right.

19 A. That was the procedure -- lay it down.

20 Q. Right.

21 A. You wasn't supposed to throw it, you
22 see.

23 Q. Right. Right. So obviously there was
24 policies and protocols in the place in how to
25 handle the materials and operate the machines

1 safely, correct?

2 MR. HENDERSON: Object to form.

3 THE WITNESS: Oh, yeah. Yeah.

4 BY MS. SHOFNER:

5 Q. Okay. And that -- and you were -- you
6 knew about these policies and procedures and how to
7 operate and handle the material safely, correct?

8 A. Oh yeah.

9 Q. How were these safety procedures
10 communicated to you?

11 A. Oh, when it first started off, I
12 learned you're supposed to roll it off and lay it
13 down, you know?

14 Q. Because somebody taught you?

15 A. It was like a no-brainer. I mean, you
16 had to take it off and lay it down.

17 Q. Okay.

18 A. I knowed not to sling it, you know. I
19 mean, that was just common sense.

20 Q. And not just the throwing the poly, but
21 any other kind of safety precautions or procedures
22 that you were supposed to do, including wearing ear
23 protection and wearing a hard hat, how to handle
24 the product without hurting yourself or causing
25 injury -- these all things were things that you

1 were either taught or told by Hoechst how to do
2 properly, correct?

3 A. The only thing I was told when you just
4 rolled -- rolled it when it first starts off to lay
5 it down --

6 Q. Okay.

7 A. -- you see --

8 Q. All right.

9 A. -- don't just sling it.

10 Q. Okay. If you were caught not wearing
11 safety equipment, could you get in trouble for
12 that?

13 A. Oh yeah, you had to wear a hard hat
14 there.

15 Q. If you were caught doing something that
16 was dangerous, could you get in trouble for that?

17 MR. HENDERSON: Form.

18 BY MS. SHOFNER:

19 Q. I'm assuming the guy that through the
20 poly --

21 A. Oh, yeah, yeah.

22 Q. -- he got in trouble for that, right?

23 A. Oh, yeah. Yeah.

24 BY MS. SHOFNER:

25 Q. Okay. So your supervisor was there to

1 make sure that -- one of his jobs was to make sure
2 that you all were operating and working in a safety
3 environment, correct?

4 A. Well, he came down ever so often.

5 Q. Okay.

6 A. He'd come down and check the floor.

7 Q. If you saw anything that you felt was
8 unsafe, could you report that to somebody?

9 A. That never was an issue. I'm sorry,
10 but it never was.

11 Q. Okay. So you never saw anything that
12 you felt you needed to report that was a safety
13 issue?

14 A. No, at the time, I didn't know. I
15 didn't it was. I just didn't know.

16 Q. And just so I understand, the only --
17 the only exposure to asbestos that you believe you
18 had while you were at Hoechst was when Daniels was
19 constructing the continuous line -- poly line,
20 correct?

21 MR. MAJOR: Object to the form.

22 A. Correct. And then after that too
23 because see, after that, there was dust left there.
24 I had to clean up. I had to sweep all the time,
25 you know?

1 Q. Okay. Well, was this right after the
2 construction was completed?

3 A. Yeah, it was all day long I kept -- I
4 kept -- because there was dust accumulating back
5 there. I remember there was dust back there on the
6 end, and --

7 Q. And they had you all clean up this
8 dust?

9 A. Well, it was just part of my job.

10 Q. Okay.

11 A. Yeah, because to keep the area clean
12 was part of my job. To keep it swept -- swept up.

13 Q. How often did you have to dust the poly
14 two building area or clean up?

15 A. Well, when I wasn't on break, I just --
16 I just -- didn't have nothing to do, always keeping
17 the floor swept -- swept up.

18 Q. Are you just talking about just general
19 cleaning after every shift that you would have to,
20 whether you were --

21 A. No, no, no. I always kept it clean
22 because -- yeah, I kept it clean, you know.

23 Q. Okay. And would you have to keep this
24 clean after every -- after your shift every, --
25 every time that -- every day? Were you responsible

1 for cleaning and sweeping after every shift?

2 A. Yeah, I knew to keep it clean, yeah. I
3 just knew to keep it clean.

4 Q. Okay. And my question is: Did you
5 sweep up after every shift?

6 A. It was all during the day. At the end
7 of the shift it was already clean. I made sure it
8 was already clean.

9 Q. Okay. How often did you sweep up
10 during a shift?

11 A. Oh man. Just every time I got a chance
12 all during the day --

13 Q. Okay.

14 A. -- just, you know?

15 Q. And the others were responsible for
16 also sweeping up during their shift -- the six crew
17 members?

18 A. Okay. When I was in poly one, there
19 was just one machine running at that time -- back
20 at that time --

21 Q. Okay.

22 A. -- when I was there. And then so like
23 I said --

24 Q. So who was responsible for cleaning up
25 after poly one or during the shift? Was it

1 everybody, or just one person assigned to it?

2 A. Oh, no. No. It was everybody because
3 there was ribbon got on the floor, sometime the
4 dicer wouldn't work and have to call maintenance to
5 work on it. And when it came off, we'd have to do
6 something with it. And you just stand there and
7 just roll it up -- rolled it up in big rolls -- in
8 big rolls.

9 Q. Okay.

10 A. And that -- oh, it had a -- yeah. Let
11 me see. I believe it had a little color on the end
12 of it to start another row. Yeah. We just kept it
13 rolled up, rolled up, and in rolls.

14 Q. Was it ever your responsibility to go
15 sweep up after the construction crew when they were
16 in building poly two?

17 A. If I understand your question right, I
18 don't -- no, no.

19 Q. And the only time that you would go and
20 sweep up in poly two was when you were working on
21 the continuous line in poly two, correct?

22 A. No, no, I didn't -- I didn't go from
23 one side to the other at the same time. When I
24 worked in poly one, I worked in poly one.

25 Q. Right.

1 A. When I worked in poly two, I worked in
2 poly two.

3 Q. And that was my question. Is that the
4 only time that you would sweep up in poly two is
5 when you were working in poly two during your
6 shift?

7 A. Oh yeah, yeah. That's fine.

8 Q. Okay. Do you know where that dust came
9 from that you were sweeping up during your shift?

10 A. No, it was -- the dust was over there
11 in poly two; that's where the dust was. And poly
12 one -- it stayed wet over there. And oh, poly
13 one -- no poly one stayed wet and it was
14 operates -- it was running -- and all of the stuff
15 that was on the floor was pieces of -- pieces of
16 that ribbon -- pieces of that ribbon on the floor.

17 Q. Okay. The ribbon was on the floor in
18 poly one or poly two?

19 A. Poly one.

20 Q. Okay.

21 A. Because sometimes when you rolled it up
22 it would fall in the floor. Had to get it up --
23 keep it picked up and throwed in the Dumpster.

24 Q. Okay.

25 A. And -- yeah, yeah.

1 Q. And so that debris was caused by the
2 slicer and dicer cutting the ribbon?

3 A. No, it was -- okay. Sometime if the
4 tumbler -- like if a big wheel start rolling, you
5 had to push it the tumbler out of the way. They
6 were on tracks. We could push them one to the
7 other, you see?

8 Each machine had a dicer -- I mean, had
9 a big -- big drum --

10 Q. And I'm just trying to ask where the
11 dust came from that you would sweep up during your
12 shift. And you are saying that there wasn't any
13 dust in poly one except for this -- during the
14 slicer where the ribbon parts would fall down; is
15 that right?

16 MR. HENDERSON: Object to the form.
17 Mischaracterizes his testimony.

18 MS. SHOFNER: And I'm just trying to
19 figure it out.

20 MR. HENDERSON: And I'm just trying to
21 object to your question because it's objectionable.

22 THE WITNESS: It's -- there wasn't
23 nothing to sweep -- nothing to sweep.

24 BY MS. SHOFNER:

25 Q. Okay. And then in poly two, do you

1 know where the dust came from when you were in poly
2 two that you would have to sweep up?

3 A. Oh, see -- yeah, some of it came from
4 when they was putting the lines in -- the
5 insulation on the steam pipes and I believe some of
6 it was coming from out there on the back -- back of
7 the -- I believe it was coming from the back of the
8 -- where it went in the slicer-dicer.

9 Q. But I think you just told me it was
10 never your job to clean up after the construction
11 crew when they were building poly two or doing any
12 work in poly two? That you only swept up when you
13 were on shift in poly two -- when you were
14 operating the poly two continuous line; is that
15 right?

16 A. Yeah, when I was running the line, I
17 kept the floor swept.

18 Q. Right.

19 A. Yeah, I kept the floor swept.

20 Q. Now, in the continuous line -- when
21 that was happening, was that -- did that -- did
22 they use the water to help cool down and the drums
23 to cool the poly ribbon down as well?

24 A. Oh yeah, yeah.

25 Q. So when the --

1 A. It had a smaller drum. It had a
2 smaller drum over there.

3 Q. So it wasn't as wet over in poly two?

4 A. No, it really wasn't. It was just that
5 one little area right there.

6 Q. Okay.

7 A. It was just that one area. And it
8 was -- and the -- it was -- that ribbon didn't go
9 through a window. It went under the door back
10 there. It just went right to the dicer back in the
11 back.

12 MS. SHOFNER: Okay. I think those are
13 all of the questions I have for you, sir. Thank
14 you.

15 THE WITNESS: Okay. Thank you.

16 MR. HENDERSON: Do you have a sense of
17 how much you got -- how long you might need -- I'm
18 sorry. Let's go off the record first.

19 THE VIDEOGRAPHER: The time is
20 7:09 p.m. We are going off the video record.

21 (A recess transpired.)

22 THE VIDEOGRAPHER: The time is
23 7:29 p.m. We are back on the video record.

24 EXAMINATION

25 BY MR. MAJOR:

1 Q. Mr. Crawford, my name is Denny Major.
2 I am from up the road in Greenville, and I've got
3 just a few questions. Luckily, Ms. Shofner, here
4 did most of my heavy lifting for me, but I've got a
5 few things.

6 The first thing that I want to ask
7 about -- and I'm going to go back to Hoechst
8 Ceeleanese, Spartanburg. And the first thing I want
9 to ask about is the construction of the second line
10 on poly two?

11 A. Uh-huh.

12 Q. I think you mentioned that the
13 construction on the second line on poly F.

14 Two began shortly after you left
15 Hoechst Ceeleanese; is that correct? I mean,
16 shortly before you left Hoechst Ceeleanese?

17 A. Yeah, I think so.

18 Q. Do you know how long before you left
19 the construction of that second line in poly two
20 started?

21 A. I'd say roughly about a month.

22 Q. Okay. All right. So that would have
23 been after your two-to-three week stint that you
24 worked in poly two; is that correct?

25 A. Yeah, probably about around that, yeah.

1 Q. Okay. Let me ask it this way: You
2 never worked in poly two during the time of the
3 construction of that second line, did you?

4 A. Oh yes, because -- yeah, because it was
5 -- yeah, yeah. Right when it started, I was there
6 right when it started.

7 Q. Okay. You left about the time it
8 started; is that right? You left to go back to
9 poly one about the time the construction of the
10 second line started?

11 A. Yeah, I worked there a while before it
12 -- yeah, I worked there for a while before -- when
13 -- after it started.

14 Q. Okay. And you worked in poly two for
15 only two to three weeks total, correct?

16 A. No, I worked there for -- in poly
17 two -- it was -- it was at least -- I believe it
18 was at least two years before -- well, first when I
19 started there, it was right after -- right after I
20 moved there -- they -- started working there, they
21 started building the building first -- the whole
22 building.

23 First, they -- they built the whole --
24 put the beam work in and then they come back and
25 put the floor in and then the sides in. And then

1 the -- and then the locker rooms and the -- the
2 restrooms over there on the end. And let me see --
3 and then before -- when they built line one, I had
4 to move over there -- I just filled in.

5 I just filled in until they got
6 somebody to run it. Herman Humphreys was the one
7 that took over after I left -- let me see. 'Cause,
8 yeah, it was hard after that because -- because I
9 was working back there on two, and I saw
10 Herman Humphreys working over there.

11 Yeah, it was -- but I was already
12 working over there in poly two for a while. And
13 then -- yeah, I was -- I started working there and
14 -- after they started building it. It was like --
15 seems like it was about a week.

16 Q. Okay. Let me ask you this.

17 A. Okay.

18 Q. How far was the locker room in poly
19 two? How far was that from the second line in poly
20 two? Do you remember?

21 A. Oh. You said how far was the second
22 line in poly two?

23 Q. Yeah. How far was that from the new
24 locker room that was in poly two?

25 A. Yeah, yeah. Okay. Man, it's hard to

1 put it in distance, but I remember it was -- it was
2 about as far from here to that second door
3 (Indicating).

4 Q. Okay.

5 A. Yeah -- well, that's a mirror -- wait a
6 minute. Okay. About there to -- wait a minute.
7 Wait a minute. That's a mirror there. That's a
8 mirror. Oh my goodness, oh my goodness. I thought
9 it was another door. It looks just like another
10 door. Oh my goodness.

11 MR. HENDERSON: It's reflecting.

12 THE WITNESS: They do that in grocery
13 stores a lot to make it look like they got more
14 produce. Okay.

15 BY MR. MAJOR:

16 Q. Is it that about 20 feet or so?
17 I'm...

18 A. Okay. Okay. One step is a yard, so
19 roughly -- a good ten yards.

20 Q. Okay.

21 A. About ten yards.

22 Q. Okay. Was the restroom by the locker
23 room -- the new restroom?

24 A. Oh yes. When you walk in -- let me
25 see.

1 Q. Same area, right?

2 A. Oh yeah, same area.

3 Q. Okay. Good enough. I'm going to
4 switch gears on you real quick and ask you about --
5 you were never an insulator as I understand it? We
6 haven't talked about that?

7 A. Oh, no. No. I worked for Hoechst in
8 the '70s.

9 Q. Okay. And you would agree with me that
10 there are different types of insulation -- there's
11 fiberglass insulation, rubber insulation, different
12 kinds of insulation -- or do you know?

13 A. I really don't know anything about the
14 insulation. I don't know.

15 Q. All right. And so you are not able to
16 tell whether or not insulation contains asbestos,
17 are you?

18 A. At the time, I didn't know it was a
19 problem, see, so I didn't know 'cause I just didn't
20 know it was a problem.

21 Q. Okay. And at the time you weren't able
22 to tell whether it was asbestos or nonasbestos
23 containing insulation, were you?

24 A. I know it's insulation.

25 Q. Okay. But you don't know whether it

1 had asbestos in it, do you?

2 A. Tell you the truth, I didn't know what
3 it was.

4 Q. Okay.

5 A. I know it was insulation.

6 Q. Okay. Do you remember the names -- did
7 you ever know any of the Daniel employees that you
8 may have seen at the Hoechst facilities?

9 A. There was one of them I saw in the
10 locker room a lot; I know him by face. I know him
11 when he walked out -- you know, I had -- I had
12 conversation with him in the -- in the locker room.

13 Q. Do you --

14 A. And I had conversation with him when I
15 was going to the -- when I was going on -- after
16 the shift going towards the -- going towards my car
17 in the parking lot.

18 Q. Do you know his name or --

19 A. But I just didn't know his name.

20 Q. Okay. Do you know the names of any
21 Daniel employees at the facility?

22 A. Oh, I didn't know any of their names.

23 Q. Do you remember what color hard hats
24 they wore?

25 A. White hard hats --

1 Q. Okay. Did they -- go ahead. I'm
2 sorry.

3 A. I was going to say the Hoechst
4 employees wore yellow hats -- yellow hard hats.

5 Q. Okay. Did Hoechst have their own
6 maintenance workers?

7 A. What?

8 Q. Did Hoechst employ maintenance workers?

9 A. I didn't see any, so...

10 Q. Okay. A minute ago, when I asked you
11 about whether or not you know if any of the
12 insulation that you encountered contained asbestos,
13 you said that you didn't know what it was --

14 A. Uh-huh.

15 Q. -- and you used past tense. Do you
16 know what it is now for any reason?

17 MR. HENDERSON: Object to form.

18 BY MR. MAJOR:

19 Q. Yeah, let me re-ask that. As we sit
20 here today, do you know whether or not any of the
21 insulation that you encountered at Hoechst
22 Celeanese contained asbestos?

23 A. Yeah, I'm sure it did because that's
24 what the -- the -- had the -- that's what they made
25 it out of because it was a good insulation because,

1 you know...

2 Q. Did anybody ever tell you that it
3 contained asbestos?

4 A. Nobody ever told me anything about it.
5 I didn't -- I wouldn't even -- know enough to be
6 concerned at that time.

7 Q. And why do you think now that the
8 insulation back then contained asbestos? Have you
9 done research or something?

10 A. Oh yeah, yeah, yeah.

11 Q. Okay.

12 A. I understand that's what it was made
13 out of.

14 Q. But you don't actually know, do you?

15 MR. HENDERSON: Object to form.

16 THE WITNESS: Huh?

17 MR. HENDERSON: No, I'm objecting to
18 him. I'm objecting to his question, but you can
19 answer it if you can.

20 THE WITNESS: I'm certain they told me
21 that that's what it's made out of.

22 BY MR. MAJOR:

23 Q. Do you know who told you that?

24 A. I read about it. I read about it.

25 Q. Do you remember where you read it?

1 A. It's in a medical book. I got it at
2 home. It's a medical book. It's a medical book.

3 Q. Okay. I'm going to ask you to keep
4 that and provide it to your counsel. Do you still
5 have this book?

6 A. Yeah, I still got it. I sure do.

7 Q. Do you know the name of it?

8 A. No, I really don't. I really don't.

9 Q. Is it a generic book or is it something
10 specific to Hoechst Celanese?

11 A. It's -- it's a about -- it's a health
12 book about -- it's -- it's written by doctors.

13 Q. Okay.

14 A. It was written by doctors.

15 Q. So it doesn't say anything about what
16 the insulation at Hoechst Celanese contained, does
17 it?

18 MR. HENDERSON: Object to form.

19 THE WITNESS: Oh no, it doesn't say
20 anything about -- it's not written about any
21 particular plant, but it was -- it said back up to
22 that time period -- up in the '70s, they made it --
23 asbestos -- let me see.

24 It was made out some kind of rock and
25 it made strands -- best I can remember -- and they

1 made fiber strands out of it because it was a good
2 insulation, and they used it widely for insulation.
3 So I don't know why it would be something
4 different, so...

5 BY MR. MAJOR:

6 Q. And is that the only reason that you
7 think that the insulation at Hoechst Celanese
8 contained asbestos is this book?

9 A. Let me see. Yeah, I got two medical
10 books. I got another one -- it has a whole --
11 about all kinds of diseases.

12 Q. Okay. Other than these medical books,
13 is there any other basis that you have for
14 believing that insulation at Hoechst Celanese in
15 Spartanburg may have contained asbestos?

16 MR. HENDERSON: Object to form. I'm
17 objecting to his question.

18 THE WITNESS: Okay.

19 MR. HENDERSON: You can answer it if
20 you can.

21 THE WITNESS: No, I can't. No.

22 BY MR. MAJOR:

23 Q. Okay. Where did you get these two
24 books? Do you remember who gave them to you?

25 A. Let me see. Up here at the Goodwill.

1 Q. Okay.

2 A. Goodwill. You can buy them real cheap.

3 Q. Okay. Did you buy both of them at the
4 Goodwill?

5 A. I bought one of them at Goodwill and
6 one of them came -- and one of them came through
7 the mail. One came through the mail.

8 Q. Okay. Do you remember who sent it to
9 you?

10 A. It was some kind of law firm that my
11 daughter went online and got in contact with.
12 Yeah, I had it for a good while.

13 Q. Was it -- I assume it was after you
14 were diagnosed with Mesothelioma.

15 A. Yeah, yeah, yeah, 'cause I was trying
16 to find out where it came from.

17 Q. And you still have both of these books
18 at home?

19 A. Oh yeah, I do. I do.

20 Q. I'm going to ask you that hold on to
21 them. Make sure you don't throw them away or
22 anything.

23 A. Okay. I won't.

24 Q. Did you do anything to prepare for your
25 deposition today?

1 A. No, no.

2 Q. Did you meet with your attorney at all
3 in preparation for your deposition?

4 A. No, what he told me --

5 Q. I don't want to know what he told you.
6 But I mean, did you meet with him in preparation
7 for the deposition?

8 A. No, no, not for this meeting, 'cause --

9 Q. Did you talk on the phone with him in
10 preparation for the deposition?

11 A. No, just to find out was that a meeting
12 was coming up, you know.

13 Q. Okay.

14 A. Okay.

15 MR. MAJOR: All right. And I'm going
16 to look at my notes, but I think that's all the
17 questions I have for you now, Mr. Crawford.

18 THE WITNESS: Okay.

19 MR. MAJOR: I appreciate it.

20 THE WITNESS: Okay. Thank you.

21 MR. HENDERSON: Counselor, I just want
22 to make sure -- I think the way you were phrasing
23 your question may be confusing him and I don't want
24 to mislead you about the fact that he and I talked
25 before the deposition.. You see what I'm saying.

1 MR. MAJOR: Yeah, okay. I understand.

2 MR. HENDERSON: Okay. I just want to
3 make sure that you were clear.

4 MR. MAJOR: Yeah. That's fine. Thank
5 you.

6 MR. HENDERSON: Sure.

7 EXAMINATION

8 BY MR. STARR:

9 Q. Mr. Crawford, I'm going to go next.

10 A. Okay.

11 Q. If I do this right, this is going to
12 take about three or four minutes, okay?

13 A. Okay.

14 Q. Sir, you spoke with the Daniel attorney
15 before speaking with me. Do you have any personal
16 knowledge or information about who the insurance
17 carrier for Daniel was during the time you worked
18 for Ceeleanese?

19 A. No, I really didn't.

20 Q. Okay. And sir, to your knowledge did
21 you ever communicate with anyone from Daniel's
22 insurance carrier during that time when you worked
23 at Ceeleanese '70 to '74?

24 A. No.

25 Q. Okay. Sir, to your knowledge, when you

1 worked at Celeanese from '70 to '74, do you recall
2 ever seeing, meeting with, talking to anyone from
3 United States Fidelity and Guaranteed Company?

4 A. No. No, sir.

5 Q. And sir, to your knowledge, did you
6 ever see or receive any information about any
7 activity that may or may not have been performed by
8 USF&G at Celeanese from '70 to '74?

9 A. No.

10 Q. All right. Let me shift gears to
11 something else. And this is for all the places
12 that you worked that we've talked about during
13 today?

14 A. Uh-huh. Uh-huh.

15 Q. Was it ever your job to work or
16 maintain any water cooling equipment?

17 A. Water cooling?

18 Q. Yes, sir. Was it ever your job to
19 maintain, repair, or service any water cooling
20 equipment?

21 A. Oh, no. No.

22 Q. Okay. And sir, was it ever your job to
23 ever service, repair, or maintain any water
24 recycling equipment?

25 A. Oh no, not the equipment, no.

1 Q. Okay. And sir, was it ever your job to
2 ever work on any HVAC equipment during your
3 employment at any of the places we've talked about
4 today?

5 A. I'm sorry. I don't know what that is.

6 Q. I'm sorry. When I say HVAC, I mean,
7 like heating and cooling -- like, you know, air
8 conditioners, something like that.

9 Did you ever have responsibility for
10 servicing, maintaining, or repairing those kinds of
11 pieces of equipment?

12 A. No.

13 Q. Okay. And to your knowledge, sir, were
14 you ever around anybody else that might have been
15 servicing any type of water cooling equipment?

16 A. No, not water cooling.

17 Q. Okay. And you weren't around anybody
18 else servicing any water recycling equipment?

19 A. Oh, when I went worked -- when I went
20 down to Terry Construction Company, I helped them
21 change the filter in -- which was -- it was a lot
22 of sand. So many layers of sand and rocks.

23 Q. Sure. And that's for water filtration?

24 A. Yeah, yeah, that's right.

25 Q. And that's what they were doing at that

1 plant -- they were filtering water?

2 A. Yes, that's right. They was -- yeah,
3 that's right.

4 Q. And that was going in to like a
5 municipal water supply?

6 A. Yeah. And then I helped change -- take
7 the oil out put new in.

8 Q. Sure. Okay. But other than that, any
9 work in your entire career on water recycling or
10 water purifying equipment, or was that it?

11 A. No, nowhere else.

12 MR. STARR: Okay. Sir, I think I got
13 through my three or four minutes as forecasted.
14 Thank you so much.

15 THE WITNESS: Thank you.

16 MR. HENDERSON: Anybody else?

17 MS. RIES: I've got some questions on
18 the phone.

19 MR. HENDERSON: Okay. Fire away.

20 THE VIDEOGRAPHER: Okay. Wait just a
21 moment. Let me put a mic on that, if you don't
22 mind.

23 MR. HENDERSON: Okay.

24 MR. STARR: Would you like for me to
25 move this over?

1 THE VIDEOGRAPHER: Yes, if you could
2 just sit it right next the phone.

3 MR. STARR: Is it okay to walk in your
4 shot?

5 THE VIDEOGRAPHER: Absolutely. Go
6 ahead.

7 THE WITNESS: Oh, I can hear.

8 MR. STARR: Is that cranked up all the
9 way to the bone?

10 COURT REPORTER: Yes.

11 MR. STARR: Do you want that to the
12 side or standing up?

13 THE VIDEOGRAPHER: Standing up is fine.
14 Sir, you don't need to get any closer to that.

15 MS. RIES: Mr. Crawford, can you hear
16 me okay now?

17 THE WITNESS: Oh, I can hardly hear you
18 right now.

19 MS. RIES: I'm sorry. You said you can
20 hear me now?

21 THE WITNESS: I can right now.

22 MR. HENDERSON: Okay. I'm going to
23 have to move this because you see his shadow when
24 he leans over the phone. Mr. Crawford, try not to
25 lean over the phone --

1 THE VIDEOGRAPHER: Please do.

2 BY MS. RIES:

3 Q. Mr. Crawford, my name is Addie Ries,
4 and if you bear with me -- hopefully, we'll get
5 through this pretty quickly.

6 THE WITNESS: Okay.

7 MR. HENDERSON: Hey, Mr. Crawford --

8 THE VIDEOGRAPHER: Actually, maybe we
9 could just go off the record for just a second and
10 try to organize this.

11 MS. RIES: Okay.

12 MR. HENDERSON: Yeah, that sounds good.

13 THE VIDEOGRAPHER: The time is
14 7:51 p.m. We are going off of the record.

15 (A recess transpired.)

16 THE VIDEOGRAPHER: The time is
17 7:53 p.m. We are back on the video record.

18 EXAMINATION

19 BY MS. RIES:

20 Q. Hi Mr. Crawford. My name is
21 Addie Ries, and I'm just going to try to work
22 quickly through my questions if you'll bear with
23 me. And definitely let me know if you can't hear
24 or don't understand any questions that I ask; is
25 that fair?

1 A. Yes, okay.

2 Q. Okay. We have talked today at length
3 about the insulation at Hoechst that you saw there,
4 so I don't want to talk about that right now.

5 I'm want to talk about other jobs other
6 than at Hoechst. So my question is: For your
7 other jobs, did you ever see insulated pipes at the
8 other manufacturing facilities -- the other
9 manufacturing plants where you worked?

10 A. Oh, yes. Yes.

11 Q. Okay. Can you tell me which plants had
12 those insulated steam pipes?

13 A. It was -- wait a minute. It was --
14 wait a minute. No, no, I can't.

15 Q. Sir, let me ask you this: Would it
16 make it easier if I ask you -- do you recall
17 working at any manufacturing plants which did not
18 have insulated steam pipes?

19 A. Well, I know -- I remember CNA had
20 insulated pipes because I walked over the top of
21 them when I was cleaning -- when I was doing -- the
22 4th of July, when the plant was down, and I was
23 doing cleaning. I was doing painting to --
24 painting and cleaning. I was cleaning overhead,
25 and I know they had insulated pipes 'cause -- I

1 don't know where they went to. I don't know where
2 they went to.

3 Q. Okay. So when you were -- when
4 described at CNA that you were walking on top of
5 insulated pipes to clean and paint?

6 A. Yeah, the cleaning and painting.

7 Q. What were you cleaning?

8 A. Oh, okay. I was cleaning the -- the
9 lights up above -- the whole light fixture. I had
10 to clean them off and clean them. Yep. The
11 air-conditioning -- the whole top of it -- the
12 whole thing. Yeah. Yeah.

13 Q. Okay. And how long did you do this
14 cleaning work at CNA?

15 A. It was all week. It was around -- when
16 they had the plant closed down on the 4th of July.

17 Q. Okay. Was it just for one week or were
18 there other repetitions of that one week?

19 A. Yeah, yeah, it was -- I cleaned and
20 painted all week. Yeah, for a whole week long.

21 Q. Okay. Just one week or more than one
22 week?

23 A. It was one week.

24 Q. Okay. So when you were cleaning the
25 lights above the insulated steam pipes in the

1 air-conditioning above the insulated steam pipes,
2 did you --

3 A. Uh-huh.

4 Q. -- did you get dust from the insulated
5 steam pipe on your clothing?

6 A. Oh, yeah. I got covered up. I got it
7 all over me. Yeah. Yes, I did.

8 Q. Did you get the dust -- did you get the
9 dust from the insulated steam pipes in your hair?

10 A. Well, it's got dust over -- I blowed
11 the whole top down -- everything on top. Yeah,
12 everything.

13 Q. Okay. Did you breathe the dust from
14 the insulated steam pipes?

15 A. Yeah, I breathed the air, but I didn't
16 know it was --

17 Q. Okay. So you --

18 A. I didn't know it was the insulation --

19 Q. You said also you were painting --

20 A. Yes?

21 Q. I understood. You said you were
22 painting as well at CNA and were around the
23 insulated steam pipes then?

24 What were you painting?

25 A. Oh, I painted a whole room and the

1 front of the door -- the whole room.

2 Q. Okay.

3 A. It was the whole --

4 Q. Did you ever have to clean the pipe?

5 A. Pipes? Well, yeah. Okay. Okay. I
6 painted the -- I painted pipes at Hoechst now, I
7 did. I did. I painted pipes there at Hoechst and
8 I painted pipes --

9 Q. Okay.

10 A. -- and the pumps. But I didn't know
11 what was in it. I just knowed it had to be painted
12 and I painted it.

13 Q. Okay. When you painted the pipes, were
14 those insulated steam pipes?

15 A. It was insulated, but I don't know what
16 was in it. It was some kind of chemical --
17 chemical in it -- run through it.

18 Q. Okay. You're saying you don't know
19 what ran through the pipe, right?

20 A. That's right. I know it was some kind
21 of chemical, yeah.

22 Q. Okay. So it was an insulated pipe but
23 you don't know what ran through the pipe?

24 A. That's right. I really don't know.

25 Q. Is that correct?

1 A. Correct.

2 Q. Okay. When you painted the pipe -- the
3 insulated pipe at Hoechst -- did you have to sand
4 or shift the insulation at all?

5 MS. SHOFNER: Object to the form.

6 THE WITNESS: Oh, I don't understand.

7 BY MS. RIES:

8 Q. When you painted the pipe -- when you
9 painted the insulated pipes, did you have to sand
10 or chip the insulation surrounding the pipes in
11 order to paint them?

12 A. Oh, I just painted over -- over the top
13 of everything because -- I just painted because it
14 was old.

15 Q. Did you get dust -- okay. When you
16 were painting the insulated pipes, did you get dust
17 on you from the insulated pipes?

18 MS. SHOFNER: Object to the form.

19 THE WITNESS: Wow. Well, I'm not sure.
20 I'm not sure how to answer that.

21 BY MS. RIES:

22 Q. Okay. That's fair enough. That's fair
23 enough. Okay. So we've talked about CNA and
24 Hoechst now. Any other manufacturing plants where
25 you were around insulated steam pipes or insulated

1 pipes of any kind?

2 A. Oh yes, I had -- okay. I was. Over
3 there on the cook stand, they had.

4 Q. On the?

5 A. On the cook stand. On the cook stand.
6 Up underneath it had hot water pipes that run
7 through the kettle and that's how it was -- the
8 kettle was heated. And also it run through the --
9 where it runs -- where the sauce was cooked --
10 where the sauce was cooked. It run through the
11 pipes and that cooked the sauce. Yeah.

12 Q. Okay. Was that when you were at Wise
13 or at Stouffer's?

14 A. Yeah, that was at Stouffer's. That was
15 the Stouffer's. And --

16 Q. Stouffer's. Okay.

17 A. I saw the pipes. It -- they would kept
18 -- they would kept the gas -- the steam would build
19 up and spew out. It would spew out.

20 Q. Okay. Those insulated pipes at
21 Stouffer's -- were those overhead?

22 A. They was -- they was up under the cook
23 stand, but the cook stand was up on a platform. It
24 was on a platform, and the steam pipe was --

25 Q. Okay.

1 A. -- under the bottom under your feet --
2 on top of the floor.

3 Q. Okay. Okay. Do you believe you were
4 ever exposed to dust from those insulated steam
5 pipes?

6 A. Well --

7 Q. If you can't answer, that's fine.

8 A. Okay. All right.

9 Q. Okay. Is that -- I take it you don't
10 know the answer? Was that a yes?

11 MR. HENDERSON: He's thinking.

12 MS. RIES: I'm sorry.

13 MR. HENDERSON: I'm sorry. Just
14 letting her know. He's thinking.

15 MS. RIES: Thank you.

16 MR. HENDERSON: No problem.

17 THE WITNESS: Yes, I believe I was
18 because when they built line ten -- a new line, I
19 started working over there. I was the first one
20 working on it. I was a cook over there on it --
21 line ten.

22 BY MS. RIES:

23 Q. Okay. Were you there when they built
24 the new line?

25 A. Yeah, I was.

1 Q. Okay. Were you present when they were
2 installing the insulated steam pipes at Stouffer's
3 that we were just talking about?

4 A. Yeah. Yeah, okay. I was over on --
5 let me see.

6 Q. Okay. The --

7 A. I was over on the line right next to it
8 -- on the cook stand right next to it when they was
9 building that line.

10 Q. Okay. So you -- is that -- is that an
11 answer yes to my question of whether you were
12 exposed to the insulation that -- when those steam
13 pipes were installed at Stouffer's?

14 A. Yes, I think so. I'm sure. I think so
15 because --

16 Q. Okay.

17 A. -- because they were -- yeah.

18 Q. Okay. Were you ever present -- other
19 than what we just talked about -- were you ever
20 present at any other manufacturing plant when
21 insulated pipes were being -- or insulation on
22 pipes was being repaired or installed?

23 MR. HENDERSON: Object to form.

24 THE WITNESS: Huh?

25 MR. HENDERSON: Just objecting to her

1 question, that's all. Are you okay?

2 THE WITNESS: Yeah, I'm okay.

3 MR. HENDERSON: All right. Do you
4 understand her question?

5 THE WITNESS: It -- yes, I think so. I
6 think so.

7 MR. HENDERSON: Okay.

8 THE WITNESS: Oh, that's a -- Hoechst.
9 I was exposed to it at Hoechst.

10 BY MS. RIES:

11 Q. What happened at Hoechst?

12 A. When I was -- when putting a line in,
13 it was -- they had asbestos. Well, I'm not sure it
14 was asbestos -- okay.

15 It was -- they put -- they put
16 insulation -- they were putting insulation in.
17 They were making some dust when they was -- a good
18 bit of dust when they was -- when they were
19 building that line. And then -- yes.

20 Q. Was that while you were working on the
21 second floor of the poly building?

22 A. Oh yeah, yeah.

23 MR. MAJOR: Object to form.

24 THE WITNESS: Yeah, second floor.

25 BY MS. RIES:

1 Q. Okay. Any other times that you have
2 been present where insulation was either installed
3 or repaired on pipes?

4 A. I just -- right now -- I just can't
5 think of any more right now -- right now. I just
6 can't think of any more.

7 Q. Okay. Okay. Were any of the
8 manufacturing plants where you worked located near
9 train tracks?

10 A. Oh, you said train track?

11 Q. Yes. Were any of the manufacturing
12 plants where you worked located near train tracks?

13 A. Okay. Oh, no not real close.

14 Q. Okay. Other than Hoechst, which we
15 talked about, were you ever present when
16 construction was performed at any of the other
17 manufacturing plants where you worked?

18 A. I just say Hoechst and Timken is --
19 that's all I can think of right now.

20 Q. And what did they do -- what did they
21 do at Timken when you were present?

22 A. Oh, that's when they built -- put new
23 lines in over there -- over there on -- you know,
24 they put line -- eight, nine, and ten.

25 Q. Okay.

1 A. And when they was building line ten, I
2 was working on line eight. I was on the line right
3 close to it.

4 THE VIDEOGRAPHER: Five minutes left on
5 this tape.

6 MS. RIES: Okay.

7 BY MS. RIES:

8 Q. And how long -- how long did that
9 construction last?

10 A. Oh man, that's hard to put a time
11 frames on it. It was like -- it was for months and
12 months from the start to the finish.

13 Q. Okay.

14 A. It was -- maybe it was months.

15 Q. Did you -- were you exposed to dust
16 from that construction?

17 MR. MAJOR: Object to the form.

18 THE WITNESS: Yeah, I feel like I was.

19 BY MS. RIES:

20 Q. And did that construction involve
21 insulation?

22 A. Oh, yes, it did. Yes, it did.

23 Q. And what was the insulation being used
24 for?

25 A. To cool those steam pipes that went

1 down to -- down to the cook. And they went down to
2 the -- the kettles that cooked the food. And also,
3 it was for milk. It was over --

4 Q. Did you say for milk?

5 A. Yes. They had to pump --

6 Q. Okay.

7 A. -- from back to the milk room all the
8 way across to line ten. They had to pump milk to
9 help make the ingredients. And then --

10 Q. Okay. Was that milk hot or cold?

11 A. Yeah, it was -- it was cold. It was
12 cold.

13 Q. Okay. Okay. But there were some steam
14 pipes that they were covering at Timken as part of
15 that construction?

16 MR. MAJOR: Object to form.

17 MS. RIES:

18 Q. With insulation, they were covering
19 steam pipes with insulation at Timken when you were
20 present?

21 MR. MAJOR: Object to the form.

22 THE WITNESS: At Timken?

23 BY MS. RIES:

24 Q. Yes.

25 A. Oh, at Timken. Wait a minute. Wait a

1 minute. Yes, I can -- I don't remember any steam
2 pipes being covered when I was working there.

3 BY MS. RIES:

4 Q. Okay. I was talking about the
5 construction that you said lasted a month.

6 A. Okay.

7 Q. During that construction was insulation
8 being installed on steam pipes or only on the milk
9 pipes?

10 A. Oh, okay. That was at Stouffer's,
11 right?

12 Q. Okay.

13 A. It was both.

14 Q. Was the --

15 A. -- it was both.

16 Q. -- insulation being -- okay. Great.

17 MS. RIES: This is probably a good time
18 to stop and switch tape.

19 THE VIDEOGRAPHER: Okay. Here ends
20 Media Unit Number 4 in today's deposition of
21 Mr. Crawford. The time is 8:15. We are going off
22 of the video record.

23 (A recess transpired.)

24 THE VIDEOGRAPHER: Here begins
25 Media Unit Number 5 in today's videotaped

1 deposition of Mr. Crawford. The time is 8:18 p.m.

2 We are back on the record.

3 MR. HENDERSON: Counselor, based on how

4 Mr. Crawford --

5 BY MS. RIES:

6 Q. Mr. Crawford --

7 MR. HENDERSON: Based on what I'm

8 seeing from Mr. Crawford, I'm going to give you

9 another 15 minutes. If we can't wrap it up, we may

10 have to look at coming back tomorrow, okay?

11 MS. RIES: Okay.

12 BY MS. RIES:

13 Q. Mr. Crawford, you testified earlier

14 about working at Terry Construction in Florida. Do

15 you recall that testimony, sir?

16 A. No, no, no. The Terry Construction was

17 in Gaffney on Fuller Plant Road.

18 Q. Gaffney. I'm sorry. Okay. What was

19 your -- what was the construction project?

20 A. It was to change the filter -- to

21 change the filters.

22 Q. Okay.

23 A. And the filters were great big -- a lot

24 of --

25 Q. Okay. Okay. We can move from that. I

1 think I got two parts crossed in my notes.

2 A. Okay.

3 Q. Okay. Mr. Crawford, did you ever live
4 or work in a shipyard or around a shipyard at any
5 time when you've been living in South Carolina or
6 when you were in the California with the Navy?

7 A. Oh, no. No, no.

8 Q. Have you filed any claims against
9 entities that are now bankrupt? Sometimes they are
10 called bankruptcy trust claims. Do you know if
11 you've filed any of those type of claims?

12 A. Well, actually, I really don't.

13 Q. Okay. Okay. I want to talk a little
14 bit about your brother-in-law, now -- Eddie Gene.

15 A. Yes.

16 Q. And specifically -- I guess this
17 morning when your counsel was asking you about you
18 going over to Eddie Gene's shop -- his garage --
19 when you lived next door -- when you were living
20 with your parents.

21 You gave the date of 1960 to 1970 when
22 you would have walked over there and visited him on
23 those Saturdays, but based on your testimony since
24 that time it sounds like that you recall that Eddie
25 Gene did not move into the house and build the

1 garage until 1966. So is it fair to just assume
2 that we are talking about a period of a time from
3 1966 to 1970?

4 MR. HENDERSON: Object to form.
5 Mischaracterizes his prior testimony.

6 BY MS. RIES:

7 Q. Well, let me ask it a different way.
8 Mr. Crawford, so are we now talking about 1966 to
9 1970 as the period of time in which you lived next
10 door to Eddie Gene while he had his garage at the
11 house on Dill Street?

12 MR. HENDERSON: Object to the form.

13 BY MS. RIES:

14 Q. Mr. Crawford, I'm not meaning this to
15 be a trick question. I'm just trying to confirm
16 obviously you weren't visiting Eddie Gene at his
17 garage until the garage was built, correct?

18 A. Yes, after it was built.

19 Q. Okay. And to the best of your
20 knowledge, Eddie Gene and Faye acquired the
21 property and built the garage in 1966; is that
22 correct?

23 MR. HENDERSON: Object to the form.
24 Mischaracterizes his prior testimony.

25

1 BY MS. RIES:

2 Q. Mr. Crawford?

3 A. Yes.

4 MR. HENDERSON: He's thinking.

5 THE WITNESS: I'm thinking.

6 BY MS. RIES:

7 Q. Okay. I'm sorry.

8 MR. HENDERSON: I just want to confirm,
9 Counselor, you're asking him a question that you're
10 acknowledging he's already answered? Am I
11 understanding you correctly?

12 MS. RIES: I just want to make sure
13 that what I understand is correct. So I thought
14 that was established, but I just want to confirm
15 that we are all on the same page with that.

16 MR. HENDERSON: If it's established at
17 this point, I don't know why we are going over the
18 same questions again.

19 BY MS. RIES:

20 Q. Sir, am I correct that to the best of
21 your knowledge Eddie Gene and Faye bought the
22 property and built the garage in 1966?

23 MR. HENDERSON: Object to the form.

24 BY MS. RIES:

25 Q. Okay. Sir, can you answer my question.

1 MR. HENDERSON: He's trying to.

2 MS. RIES: Okay. Thank you.

3 THE WITNESS: Okay. What I do know,
4 that garage there was there for years. And I --
5 I'm not sure how to put it down in an exact year,
6 but it was up to 1970. It was -- okay.

7 BY MS. RIES:

8 Q. Okay. Okay. That's fair enough.

9 A. It was a lot of years.

10 Q. Okay. So during the time that you
11 testified that you were living with your parents
12 and you would walk over to Eddie Gene's garage --

13 A. Uh-huh.

14 Q. -- on Saturdays -- how many Saturdays
15 per month would you visit Eddie Gene at his garage?

16 A. About -- well, sometimes three out of
17 four, sometimes four times. Oh, it was mostly in
18 the summertime --

19 Q. Okay.

20 A. It was mostly in the summer. It was
21 about the whole month during the summertime -- and
22 spring and summer.

23 Q. Okay. Okay. And when you would go,
24 how long would you stay?

25 A. Oh I'm sorry. I didn't hear that.

1 Q. When you visited Eddie Gene at his
2 garage when you were living next door, how long
3 would you stay when you visited him at his garage?

4 A. It was different times. It was
5 different days. It was different times. It was
6 like a few hours, like hours -- it just changes
7 ever -- I couldn't say exactly. Every day and
8 every week was different.

9 Q. Okay. Okay. Would it be correct to
10 think that sometimes you would stay a few minutes
11 and sometimes you would stay a few hours?

12 A. Oh, I always stayed a few hours.

13 Q. Okay. Did you have a place where you
14 sat and talked to him or were you kind of standing
15 up the whole time?

16 A. Most of the time it was over there next
17 to his workbench where he had --

18 Q. Okay.

19 A. -- he had a bench built where he had
20 the tools hung up and he had little seats over
21 there next to --

22 Q. Okay.

23 A. -- the right on the back end of it.

24 Q. Okay. And am I correct in
25 understanding that you yourself don't have any

1 mechanic training? You were just there watching
2 Eddie Gene, correct?

3 A. Oh, okay.

4 MR. HENDERSON: Object to form and
5 mischaracterizes his prior testimony. Sorry about
6 that, Mr. Crawford. You can go ahead and answer.

7 BY MS. RIES:

8 Q. Mr. Crawford, you yourself don't have
9 any mechanic training, correct?

10 MR. HENDERSON: Object to the form.

11 THE WITNESS: Oh, okay. I have changed
12 starters, changed a alternators, and I have changed
13 spark plugs, and I changed points. And I have
14 changed the wheels -- the wheel bearings, and --
15 yeah, on my own.

16 BY MS. RIES:

17 Q. Okay.

18 A. I mean...

19 Q. Was this work that you did at
20 Eddie Gene's garage or somewhere else?

21 A. It was mostly in my yard. Clear
22 weather, I could just jack it up and get under it
23 under -- under the car. And oh, on top of my yard
24 there was a high point and low point to where I
25 could get under it -- yeah, that's right -- to do

1 what I needed to do. There was a lot I need to do.

2 Q. Okay.

3 A. I couldn't take a motor apart, but
4 there was a lot I could do --

5 Q. Okay.

6 A. -- there was a lot I could do.

7 Q. And were these repairs that you made to
8 your personal vehicles?

9 A. Oh yes, yes, that's true. That's true.

10 Q. Okay. And what types of vehicles did
11 you own that you made repairs to?

12 A. A Ford, Chevrolet, and a -- and a --
13 and yeah, a Dodge too. A Dodge. It was a --

14 Q. Okay.

15 A. -- yeah.

16 Q. The Ford that you mentioned -- what
17 make was that, or model?

18 MR. HENDERSON: Counselor, let me ask
19 you this: After he goes through the make and
20 models, do you have a sense of how much more you're
21 going to have?

22 MS. RIES: Ten minutes. I would hope.

23 MR. HENDERSON: I'm going to -- if you
24 can't tell me how much more you got, I'm on the
25 verge of calling this for tonight and we'll come

1 back tomorrow. At some point I've got to cut it
2 off, and it doesn't seem like we're making much
3 progress beyond what he's already talked about.
4 That's my concern.

5 MS. RIES: Well, this -- what I've just
6 heard is new, so I'm not really sure why -- my
7 original estimate was 30 minutes, so I'm trying my
8 best.

9 MR. HENDERSON: I understand. I don't
10 hear what you're hearing that's new beyond what he
11 talked about earlier.

12 MS. RIES: Okay. Well --

13 MR. HENDERSON: I'm willing for him to
14 go another five tonight. If not, we'll just have
15 to come back and finish this tomorrow. The best I
16 can do is to try to get a sense of what you've got.
17 Like once he goes through the makes and models of
18 the cars, have you got much more than that that you
19 want to ask him about, I think we've got to call it
20 for tonight.

21 Mr. Crawford, unless you tell me I'm
22 wrong, I feel like your voice is starting to
23 change. You look like you're getting tired.

24 THE WITNESS: Well, I had so many -- so
25 many different models. So many.

1 MR. HENDERSON: Yeah. You tell me. Do
2 you want to try to finish or do you want to call it
3 for tonight. I just feel like I'm starting to hear
4 fatigue in your voice. It's making me a little
5 worried about you.

6 THE WITNESS: Okay. Whatever you
7 think.

8 MR. HENDERSON: No, no, it's -- I got
9 to go by how you feel, all right?. Let's go off the
10 record for a minute.

11 MS. RIES: Sure.

12 THE VIDEOGRAPHER: The time is
13 8:32 p.m. We're going off the video record.

14 (A recess transpired.)

15 THE VIDEOGRAPHER: This will conclude
16 today's -- this will conclude today's portion of
17 the video tape deposition of Mr. Crawford taken on
18 February 6th, 2018, consisting of 5 Media Units.
19 The time is 8:35 p.m. We are going off the video
20 record.

21 (The deposition was concluded at 8:35
22 p.m.)

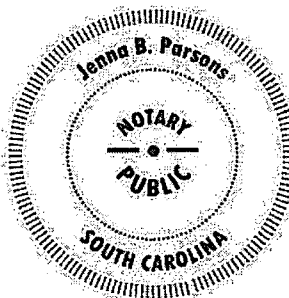
23 (Signature Waived)
24
25

CERTIFICATE OF REPORTER

I, Jenna B. Parsons, Court Reporter and
Notary Public for the State of South Carolina at
Large, do hereby certify that the foregoing
transcript is a true, accurate, and complete
record.

I further certify that I am neither
related to nor counsel for any party to the cause
pending or interested in the events thereof.

Witness my hand, I have hereunto
affixed my official seal this 12th day of February,
2018 at Greenville, Greenville County, South
Carolina.



Jenna Parsons

Jenna B. Parsons, Court Reporter
My Commission expires
September 29, 2026

1 STATE OF SOUTH CAROLINA IN THE COURT OF COMMON PLEAS
2 COUNTY OF RICHLAND FOR THE FIFTH JUDICIAL CIRCUIT

3
4 DWAIN T. WATERS and
JANICE K. WATERS, CASE NO. 2017-CP-40-05462
5 Plaintiffs, In Re: Asbestos Personal
6 V.

7
8 AGCO CORPORATION, et al., Injury Litigation
9 Coordinated Docket
10 Defendants.

11
12
13
14 Continued Videotaped De Benne Esse Deposition
15 of DWAIN T. WATERS, Plaintiff, called for Oral
16 Examination in the above-captioned matter, before
17 Mark L. Dennis, Court Reporter, taken at the
18 Anderson Hilton Garden Inn, Anderson, South
19 Carolina, on October 16, 2017, commencing at
20 1:04 in the afternoon.

21
22 Volume III

23
24 Job No. NJ2732085

25 Priority-One Court Reporting

A P P E A R A N C E S:

DEAN, OMAR, BRANHAM, LLP
 302 N. Market Street, Suite 300
 Dallas, Texas 75202
 BY: JONATHAN M. HOLDER, ESQ.
 Attorneys for Plaintiffs
 NELSON MULLINS RILEY & SCARBOROUGH, LLP
 Meridian
 1320 Main Street, 17th floor
 Columbia, South Carolina 29201
 BY: DAVID G. TRAYLOR, JR., ESQ.
 Attorneys for Defendants - Brenntag
 Specialties, Inc., Brenntag North
 America, Whittaker Clark & Daniels,
 Pfizer, Inc.
 NELSON MULLINS RILEY & SCARBOROUGH, LLP
 Meridian
 1320 Main Street, 17th floor
 Columbia, South Carolina 29201
 BY: DELL P. CHAPPELL, ESQ.
 Attorneys for Defendant - DuPont

LEATH, BOUCH & SEEKINGS, LLP
 92 Broad Street
 Charleston, South Carolina 29402-2201
 BY: YANCEY A. MCLEOD, III, ESQ.
 Attorneys for Defendants - Abex, McWane,
 Fisher Controls

PIERCE, HERNS, SLOAN & WILSON, LLC
 321 E. Bay Street
 Charleston, South Carolina 29401
 BY: WILLIAM P. EARLY, ESQ.
 Attorneys for Defendant - Riley

TURNER, PADGET, GRAHAM & LANEY, P.A.
 1901 Main Street, Suite 1700
 PO Box 1473,
 Columbia, South Carolina 29201
 BY: THOMAS M. KENNADAY, ESQ.
 Attorneys for Defendants - Viking Pump,
 Milliken Company

1 NELSON MULLINS RILEY & SCARBOROUGH, LLP
Meridian

2 1320 Main Street, 17th floor
Columbia, South Carolina 29201

3 BY: NICHOLAS A. CHARLES, ESQ.
Attorneys for Defendants - Aurora Pumps
4 Company, Weir Valves & Controls
5 TADDEOSTURM, PLC

3 West Cary Street
6 Richmond, Virginia 23220

BY: MATTHEW D. JOSS, ESQ.
7 Attorneys for Defendant - General
Electric Co.

8
9 ROE, CASSIDY, COATES & PRICE, PA
1052 N. Church Street

10 Greenville, South Carolina 29603
BY: WILLIAM A. COATES, ESQ.

11 Attorneys for Defendants - Genuine Parts,
NAPA

12
13 NELSON MULLINS RILEY & SCARBOROUGH, LLP
Meridian

14 1320 Main Street, 17th floor
Columbia, South Carolina 29201

15 BY: JAMES B. GLENN, ESQ.
Attorneys for Defendants - Air & Liquid
16 Systems, Goulds Pumps, New Holland North
America, Inc.

17
18 SMITH, MOORE, LEATHERWOOD, LLP
2 W. Washington Street, Suite 1100
19 Greenville, South Carolina 29601

BY: STEPHANIE G. FLYNN, ESQ.
20 Attorneys for Defendant - United Conveyor
Corporation

1 GALLIVAN WHITE & BOYD, PA
2 55 Beattie Pl #1200
3 Greenville, South Carolina 29601
4 BY: DAVID RHENEY, ESQ.
5 Attorneys for Defendants - Flowserve
6 and Covil

7 WEINBERG, WHEELER, HUDGINS, GUNN
8 & DIAL
9 3344 Peachtree Road NE, Suite 2400
10 Atlanta, Georgia 30326
11 BY: SHUBHRA MASHELKAR, ESQ.
12 Attorneys for Defendant - CNH America

13 HAYNSWORTH SINKLER BOYD, PA
14 1 North Main Street, 2nd floor
15 Greenville, South Carolina 29601-2772
16 BY: MOFFATT McDONALD, ESQ.
17 Attorneys for Defendants - Cyprus Amax
18 Minerals Company, Union Carbide Corp.,
19 Certainteed Corporation, Dana Companies,
20 LLC, FMC Corporation, The Gorman Rupp
21 Company, Daniel International Corp.,
22 Fluor Daniel Services Corp., Fluor
23 Enterprises, Inc., Fluor Constructors
24 International, Inc.

25 RICHARDSON PLOWDEN, ESQS.
1900 Barnwell Street
Columbia, South Carolina 29201
BY: JOSEPH THOENSEN, ESQ.
Attorney for Defendant - Cleaver-Brooks

HAWKINS, PARNELL, THACKSTON & YOUNG, LLP
303 Peachtree Street NE, Suite 4000
Atlanta, Georgia 30308-3243
BY: WILLIAM T. WOOD, III, ESQ.
Attorneys for Defendants - Eaton Corp.,
CNA Holdings, LLC; Federal Mogul Asbestos
Personal Injury Trust as Successor to
Felt Products Manufacturing Company
WOMBLE, CARLYLE, SANDRIDGE & RICE, LLP
550 South Main Street, Suite 400
Greenville, South Carolina 29601
BY: MICHAEL BOGLE, ESQ.
Attorneys for Defendant - SPX Corp.

1 McANGUS, GOUDELOCK & COURIE
1320 Main Street
2 Meridian 10th floor
Columbia, South Carolina 29201
3 BY: ANNA BARBER MARSH, ESQ.
Attorney for Defendants - Dolgen Corp.,
4 LLC; Dollar General
5 NELSON MULLINS RILEY & SCARBOROUGH, LLP
Atlantic Station
6 201 17th Street NW, Suite 1700
Atlanta, Georgia 30363
7 BY: GREGORY M. O'NEIL, ESQ.
Attorneys for Defendants - Honeywell
8 International, Inc.; Deere & Company
9 K & L GATES
Hearst Tower
10 214 North Tryon Street, 47th floor
Charlotte, North Carolina 28202
11 BY: REBECCA L. GAUTHIER, ESQ.
Attorneys for Defendant - Crane Co.
12
13 EVERT WEATHERSBY HOUFF, ESQS.
3455 Peachtree Road NE, Suite 1550
14 Atlanta, Georgia 30326
BY: ANDREW S. ROGERS, ESQ.
15 Attorneys for Defendants - CBS Corp.,
Foster Wheeler Energy Corp., Trane US,
16 Inc., Ingersoll-Rand Co., Spirax Sarco,
Inc.

17 APPEARANCES BY TELEPHONE:

18
19 GALLIVAN WHITE & BOYD, PA
55 Beattie Pl #1200
20 Greenville, South Carolina 29601
BY: DAVID RHENEY, ESQ.
21 Attorneys for Defendant - and Covil
22 FORMAN WATKINS & KRUTZ, LLP
210 East Capitol Street, Suite 2200
23 Jackson, Mississippi 39201-2375
BY: MARY CLIFT ABDALLA, ESQ.
24 Attorneys for Defendant - International
Paper Company
25

1 GREENBERG TRAUIG, LLP
2 3333 Piedmont Road NE, Suite 2500
3 Atlanta, Georgia 30305
4 BY: TARYN HARPER, ESQ.
5 Attorneys for Defendant - Valeant
6 Pharmaceuticals

7 NELSON MULLINS RILEY & SCARBOROUGH, LLP
8 Meridian, 17th floor
9 1320 Main Street
10 Columbia, South Carolina 29201
11 BY: ROBERT MERIWETHER, ESQ.
12 Attorneys for Defendants - Carrier
13 Corporation, Grinnell LLC, ITT Corp.,
14 Kubota Tractor, McNeil (Ohio) Corporation
15 PIERCE, HERNS, SLOAN & WILSON, LLP
16 321 East Bay Street
17 Charleston, South Carolina 29401
18 BY: M. TODD RAINSFORD, ESQ.
19 Attorneys for Defendants - BorgWarner
20 Morse TEC, LLC, Johnson & Johnson,
21 Johnson & Johnson Company, Inc.
22 DLA PIPER, LLP (US)
23 Marbury Building, 6225 Smith Avenue
24 Baltimore, Maryland 21209-3600
25 BY: WILLIAM KINIRY, III, ESQ.
Attorneys for Defendants - BASF Catalysts, LLC,
successor in interest to Englehard, Pita Realty
& Eastern Magnesia Talc; BASF Corporation;
Eastern Magnesia Talc Company

THE VAN WINKLE LAW
11North Market Street
Asheville, North Carolina 28801
BY: STEPHEN B. WILLIAMSON, ESQ.
Attorneys for Defendants - McNeil & NRM,
Honeywell International
GORDON & REES SCULLY & MANSUKHANI
One North Franklin, Suite 800
Chicago, IL 60606
BY: STEPHANIE F. JONES, ESQ.
Attorneys for Defendant - Hennessy
Industries LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Americas,
LLC.

BARNWELL, WHALEY, PATTERSON & HELMS, LLC
288 Meeting Street
Charleston, SC 29401
BY: DAVID S. COX, ESQ.
Attorneys for Defendants - Bridgestone
Inc. and Bridgestone Americas Tire Operations,

SOWELL GRAY ROBINSON STEPP & LAFFITTE, LLC
1310 Gadsden Street
Columbia, SC 29201
BY: MONTEITH P. TODD, ESQ.
Attorneys for Defendant - AGCO

NEXSEN PRUET
55 E. Camperdown Way, Suite 400
Greenville, SC 29601
BY: MICHAEL J. JORDAN, ESQ.
Attorneys for Defendant - Idelle Labs

Electric

RICHARDSON PLOWDEN, ESQS.
1900 Barnwell Street
Columbia, South Carolina 29201
BY: STEVEN J. PUGH, ESQ.
Attorney for Defendant - South Carolina

and Gas Company
SMITH, ANDERSON, BLOUNT, DORSETT, MITCHELL
& JERNIGAN, LLP
150 Fayetteville Street, Suite 2300
Raleigh, NC 276001
BY: C. ERNEST SIMONS, JR., ESQ.
Attorney for Defendant - Ford Motor Company

Company

HAWKINS, PARNELL, THACKSTON & YOUNG, LLP
303 Peachtree Street, NE
Atlanta, GA 30308-3243
BY: PETER YORK, ESQ.
Attorney for Defendant - Colgate-Palmolive

Also Present:
Cliff Williams, Videographer
Brady A. Yntema, Esq.
Mrs. Janice Waters

I N D E X

EXAMINATION	PAGE
By Mr. Holder:	310

1 THE VIDEOGRAPHER: This is the
2 continuation of the deposition of Dwaine
3 Waters. Today's date is October 16, 2017, we
4 are in Anderson, South Carolina. You may
5 proceed.

6 DWAIN WATERS, recalled as a witness and
7 having been previously sworn, testifies as follows:

8 BY MR. HOLDER

9 Q Good afternoon, again, Mr. Waters. This is,
10 for those listening, this is your attorney, again,
11 Mr. Holder. We are going to pick up again this afternoon
12 with your testimony. Up to this point we've been discussing
13 -- but before I get into that I first want to remind you,
14 since it's a new day, you're still under the oath that you
15 took on the first day. Do you understand that?

16 A Yes, I do.

17 MR. HOLDER: Okay. Thank you very much.

18 DEFENSE COUNSEL: Same stipulations, a
19 continuation.

20 MR. HOLDER: Right. And just for the
21 record it's the same stipulations that have
22 been agreed to on volumes one and volume two
23 of the deposition. Thank you.

24 THE WITNESS: I'm going to move so I can
25 hear.

1 MR. HOLDER: If -- make sure --

2 Mr. Water's going to move a little closer
3 because he forgot his hearing aid today.

4 BY MR. HOLDER

5 Q Back to what I was saying, up to this point we
6 have been discussing your personal and family life growing up
7 and the work that you have done in your personal life at home
8 and at family members' homes, but today we're going to focus
9 more on your professional work life. Okay? And we'll go
10 through your work history, is that okay?

11 A That's fine.

12 Q All right. Just always be sure to speak up
13 and that your answers are verbal and that will always help
14 out the court reporter, okay?

15 A Yes.

16 Q Thank you. Did you -- let's just start with
17 your first jobs that you remember, I guess, would that have
18 been -- did you begin working in school?

19 A Yes.

20 Q And where did you attend high school?

21 A Where did I attend?

22 Q Yes.

23 A Belton-Honea Path High School.

24 Q And do you know around what years you attended
25 Belton-Honea Path High School?

1 A Well, I went there the ninth and the tenth,
2 two years.

3 Q Do you know around what age you were at that
4 time?

5 A Sixteen, I think.

6 Q And, based on your birth date of 1954, that
7 you have testified to previously in this deposition, would it
8 be your estimation that was sometime approximately in the
9 year 1970?

10 A Yes.

11 Q Okay. When attending BHP High School, would
12 you ever work outside of your school hours, for pay I mean?

13 A Yes.

14 Q I know that parents oftentimes have their
15 kids work around the house and in the yard. So, I mean an
16 actual job that you were an employee for. What was the first
17 one that you remember?

18 A Well, very first one was Shawnee's.

19 Q Do you remember around how old you were when
20 you worked at Shawnee's?

21 A I'm thinking I was around 15, 16.

22 Q Okay. And what was your job at Shawnee's?

23 A I cooked.

24 Q Now, do you have any reason to suspect you may
25 have been exposed to asbestos in your work at Shawnee's?

1 A No, none that I know of.

2 Q And just for people that may not be familiar,
3 Shawnee's is a restaurant, correct?

4 A Yes.

5 Q What was your next job after or let me ask
6 this: Why did you leave the job cooking at Shawnee's?

7 A My second job?

8 Q Why did you leave the job at Shawnee's?

9 A Hours.

10 Q Okay.

11 A They were tough hours, weekends --

12 Q Okay.

13 A -- about half the night working.

14 Q Okay.

15 A Even though Shawnee's closed I think around
16 eleven o'clock, by then we would stay and cleanup and it take
17 2:30 in the morning to get cleaned up.

18 Q Sure. So what was the next job that you
19 remember working after Shawnee's?

20 A I quit there and went to work with Kmart.

21 Q Well, what did you do for Kmart?

22 A Well, I started out as part-time stocking toys
23 at Christmas.

24 Q And did any of -- or how long did you stay at
25 Kmart?

1 A Oh, it wasn't very long at all.

2 Q I'm sorry, go ahead -- I didn't mean to cut
3 you off. Did you finish your answer?

4 A It wasn't very long at all. I didn't really
5 like working --

6 Q Sure.

7 A -- Kmart.

8 Q What did -- where was the Kmart located that
9 you worked for?

10 A It was located here on Main Street.

11 Q And when you say here, do you mean Anderson,
12 South Carolina?

13 A Here in Anderson, yeah.

14 Q And do you have any reason to suspect that you
15 were exposed to asbestos while working for Kmart?

16 A No, sir.

17 Q When did you leave Kmart?

18 A Must have been in the summer of '01 or '02.

19 Q When you left working at Kmart?

20 A When I left, yes. I quit.

21 Q In the summer of 2001, is that what you said?

22 A No.

23 Q What did you say?

24 A I said that I quit Kmart in -- excuse me, I'm
25 losing my train of thought. I quit Kmart in the summer of

1 '71 or '72. I may have said that, I'm sorry.

2 Q You may have said that and I thought I heard
3 '01 or '02 and I probably pulled you off of your train of
4 thought but anyway, okay.

5 A My train of thought is not really --

6 Q I hear you.

7 A -- here today.

8 Q We completely understand. If ever our
9 questions and when I say "our questions" I mean my questions,
10 get long winded and you can't even follow what the question
11 was, please just tell me I can't follow the train of thought
12 and I will breakdown the question, okay?

13 A Thank you.

14 Q Thank you. Now, when you left Kmart, what was
15 your next job for employment?

16 A I went to work with Covil Insulation Company.

17 Q Okay. And what year do you believe that was
18 in?

19 A I believe that was in '72.

20 Q Okay.

21 A I'm not mistaken.

22 Q Now, how did you hear of or did you hear of a
23 opening at Covil?

24 A Did I give an opening?

25 Q Did you hear about an opening --

1 A Oh, yes.

2 Q -- for a job at Covil?

3 A Yes, I did.

4 Q How did you hear about the opening for a job
5 in Covil?

6 A Through my step-daddy.

7 Q And at this time did he still work at Covil
8 Insulation?

9 A Yes, he worked there.

10 Q And at this time did you still live in the
11 family home with Mr. Waters?

12 A Yes, I did.

13 Q Do you remember around what time of year it
14 was when you got hired on, by chance, at Covil?

15 A It was -- it was in the summer months. I
16 don't remember what month.

17 Q All right. Now, with Covil, did you have to
18 start out training or being trained, if you didn't have
19 previous experience in the insulation business?

20 A Yes, they would train a person --

21 Q Okay.

22 A -- for -- to be an insulator.

23 Q Okay. What -- let me just ask, I will try to
24 break it down. What did you start out at as Covil, your job
25 title?

1 A As a helper, an apprentice like.

2 Q And what were your job responsibilities as a
3 helper or an apprentice?

4 A Mine was to keep the insulation up to the --
5 to the mechanics. That's what you call the top. Keep the
6 materials and wire and things like that, make up the mud in a
7 wheelbarrow and all, put it in buckets and take it to them
8 and clean up. Excuse me.

9 Q Now, did you say unload?

10 A Sir?

11 Q Did you say unload?

12 A Unload?

13 Q Unload the shipments of insulation?

14 A Yes, we would do that, take it off the trucks
15 and all.

16 Q Would that include unboxing it or taking the
17 insulation out of the boxes?

18 A Yes.

19 DEFENSE COUNSEL: Object to the form.

20 THE WITNESS: We would normally take it
21 out of the box as we got to use it, we needed
22 to use it.

23 BY MR. HOLDER

24 Q Sure. Did -- was it normal course for Covil
25 to set up its own little tool shack or tool shed or stock shed

1 on a premise where they would keep stock insulation?

2 A Yes, we would have, a lot of times, a plant
3 that was like Owens-Corning we had a gang box and it was in a
4 specified area for -- for the construction work and that's
5 where we were. A lot of jobs, a lot of times, would have a
6 little building that we would put tools and supervisor and
7 all work from there, so it varied.

8 Q Sure. So when you say "gang box," is that the
9 shed where y'all kept or the unit or whatever where y'all
10 kept the tools or supplies?

11 A It was mainly where all the insulators would
12 come in in the mornings and it was just a big metal box and
13 the supervisor always had the key to it to unlock it --

14 Q Sure.

15 A -- and all the insulators kept their tools, so
16 they wouldn't get stolen.

17 Q Did you-all have a meeting there before you
18 would head out on your job?

19 A That's where we would have the meetings and
20 all, yeah.

21 Q Would that be called a gang box meeting?

22 A I guess you could call it that.

23 Q Okay. In any of those meetings do you
24 remember discussing the hazards of asbestos?

25 DEFENSE COUNSEL: Object to the form.

1 THE WITNESS: No.

2 BY MR. HOLDER

3 Q Okay. Did -- let me get back into your job
4 roles. Do you know how long, around how long you were an
5 apprentice?

6 A For about six months.

7 Q Now, when you're training, do you, as an
8 apprentice, are you already on the job sites or is this prior
9 to going out into the field?

10 A No, you train on the job site.

11 Q From your first day at Covil were you out in
12 the field on work sites?

13 A Yes, sir.

14 Q What was the position? What was your job
15 title after helper or apprentice?

16 A Oh, after the apprentice?

17 Q After helper or apprentice, yes.

18 A It went by -- doggone been so long I may have
19 it backwards, but it was like first class, second class,
20 third class mechanic. I'm thinking the third class mechanic
21 was the top mechanic.

22 Q Okay. But it could be reversed?

23 A It could be reversed because it's been --

24 Q It could have gone third, second, first class?

25 A Right. Which to me that would sound more

1 logical.

2 Q Right.

3 A But for some reason or another doesn't seem
4 right.

5 Q If in your employment records it said that you
6 were a third class mechanic before you were a first class
7 mechanic, would that mean that the first class mechanic would
8 be the higher more skilled position because you wouldn't
9 digress, down, would you?

10 A Right.

11 Q How long do you believe --

12 MR. HOLDER: Or strike that.

13 BY MR. HOLDER

14 Q What would differ about your job role or job
15 duties when you were working as a -- in this first class of
16 mechanic?

17 A Talking about the top or the bottom?

18 Q When -- the first one after you graduated from
19 helper?

20 A Okay. First class you still perform the
21 helper's job, still done that.

22 Q Okay.

23 A But during that time they would allow you to
24 go in, one of the mechanics teach you how to put on Kaylo or
25 how to smooth mud, things like that. It's just kind of an

1 on-hands teaching process that they had and that was the
2 difference.

3 Q Was it less grunt work and more teaching and
4 learning?

5 A Sir?

6 Q Was it less grunt work than the apprentice job
7 and more instruction?

8 A At that time it was about 50-50.

9 Q Okay. Now, do you know how long it was until
10 you graduated to the next class of mechanic?

11 A Yeah.

12 Q How long?

13 A It was about -- well, I don't think -- it was
14 about four months, maybe, because Russell Johnson come on the
15 job and gave me my next raise.

16 Q Sure. Let me ask you this: Who's Russell
17 Johnson?

18 A Russell Johnson?

19 Q Yes.

20 A He -- Russell back then was a Road
21 Superintendent for Covil Corporation and he worked out of
22 Greenville office.

23 Q And he worked out of where?

24 A He worked out of the Greenville office.

25 Q Okay.

1 A And he would come check on jobs, make sure
2 they're doing okay and all.

3 Q And his title was Road Superintendent?

4 A Road Superintendent. He placed people on the
5 jobs out in the field, you know.

6 Q Would the Superintendents of each work site
7 answer to him?

8 A Well, we didn't have a Superintendent --

9 Q Okay.

10 A -- on our job.

11 Q Who was the highest man from Covil on each job
12 site?

13 A The highest man on a job like that would be
14 like a third class mechanic that Russell chose to do the job.

15 Q And would he be a supervisor on that site?

16 A He would be the supervisor on that job, yes.

17 Q Now, would Russell Johnson move up higher in
18 the company?

19 A Did Johnson?

20 Q Did Russell Johnson that you just mentioned --

21 A Yes.

22 Q -- had he gone up higher in the company of
23 Covil than Road Superintendent?

24 A Yes, he went from Road Superintendent to
25 Vice President to President when Mr. Covil retired.

1 Q Okay. And were you still there when he was in
2 the higher positions?

3 A Did I still --

4 Q Were you still at Covil --

5 A Yes.

6 Q -- when he was in the higher positions?

7 A Yes, always.

8 Q Thank you. Now, for this second mechanic,
9 second class, let me first ask you: When you described the
10 job title as a mechanic, is that a term for an insulator?

11 A That's a term for insulators, yes. That's the
12 method in which they go through in stages to be an insulator.

13 Q Sure. So it does not indicate that you were
14 doing any automotive work at Covil?

15 A No. No. It's completely different.

16 Q Okay. I just wanted to clarify for anybody
17 that's looking at this later. How long do you think you were
18 a second class mechanic for Covil before you got your --

19 A About a year, year and a half maybe. Took a
20 little longer than last one.

21 Q And so for your last job title it was either
22 first class or third class, whichever, the top?

23 A Mechanic, yeah.

24 Q And was that -- that top class of mechanic, was
25 that the position you held until you -- the time you left

1 Covil?

2 A Yes.

3 Q As a -- let me ask you about as a second class
4 mechanic, that one in the middle, how would your job roles
5 differ from that of a first class mechanic or the
6 intermediate or the one that you came from?

7 A Well, we did -- by that time you learned a
8 good bit about the installing the insulation, so a lot of
9 times you would -- they would give you work to do that was
10 always in a hard spot or place like that.

11 Q Sure.

12 A As -- I think it's just part of the way
13 they're doing and you were allowed to do, insulate things
14 like that.

15 Q All right. And then for the top class
16 mechanic, what were the job roles that or the job duties that
17 you had when you were at that top class mechanic?

18 A Well, it was to insulate the pipes and
19 boilers, tanks, whatever the job may be.

20 Q Sure.

21 A And it was always to look out for the helper.
22 You always had a helper or maybe two and try to keep it going
23 smooth, the job, keep the materials there. The
24 responsibility to reorder if you need it, things like that.

25 Q Okay. I want to go through -- we'll try to go

1 through each work site where you were with Covil and ask you
2 a couple of questions about each one of those, okay?

3 A Okay.

4 Q All right. The first one I wanted to ask you
5 about -- let me just ask you: What is the first work site
6 you remember going to when you first started out as a helper
7 or an apprentice?

8 A That was Owens-Corning.

9 Q And where is the Owens-Corning plant located?

10 A It's out off Starr Iva Highway.

11 Q Okay. Say that again?

12 A Starr Iva Highway.

13 Q Okay. And can you spell that for us?

14 A Starr --

15 Q I know --

16 A S-T-A-R-R Iva; I-V-A.

17 Q I-V-A. Now, before we -- one last thing I
18 want to ask you that will, I guess, apply to all of the work
19 sites is the classifications of what type of jobs y'all were
20 doing with Covil at that site? What were the different types
21 of project that y'all would go out to a work site and do?

22 A Are you referring to any specific plant or?

23 Q Let's just use, as an example, the first one,
24 Owens-Corning plant, was this for -- well, let me ask you:
25 Do you know what a shutdown is?

1 A Oh, yes.

2 Q Explain to the jury what a shutdown is.

3 A Shutdown is when a piece of machinery is
4 shut down for repairs or replacement.

5 Q Sure and --

6 A That's what I was -- we were doing at
7 Owens-Corning when I first went there. They had 27 furnaces
8 in a furnace hall and we were rebuilding one, but we
9 constantly rebuilt those things back then.

10 Q Now, when you would have a shutdown, would it
11 be an entire plant would shut down or would just certain
12 portions of it shut down to work on that equipment?

13 A Just that particular area. It was where the
14 machine was.

15 Q Okay. Now, were there -- were there some
16 plants where you as Covil were just on call? Like you might
17 go there more than once?

18 A They had maintenance contracts for that.

19 Q Okay. And would Covil ever hold a maintenance
20 contract with any of the plants that you worked in?

21 A Yes, sir.

22 Q Would, for instance, Owens-Corning plant have
23 a maintenance contract?

24 A No, sir.

25 Q And what would a maintenance contract with a

1 certain plant entail for you as the worker?

2 A Well, it would, you'd be there every day.
3 It's like a -- it would be like just working for a particular
4 company and going to the same place every day, but the
5 maintenance they required us to be on the job. Anything that
6 was torn off by their people to replace, we would replace,
7 and then they would have maybe an extruder or whatever go
8 bad, shut it down. We would be there to insulate that.

9 Q Now, for these places that would have y'all
10 come in and do work, did they have guys that could do the
11 same work as y'all or did y'all do work that nobody else
12 there could do?

13 A Well, they didn't have -- they didn't have
14 trained insulators.

15 Q Okay. Now, could you, for a place or a plant
16 where there was -- the relationship was a maintenance
17 contract that you just described, could you also have
18 shutdowns at that location?

19 A Yeah -- yes.

20 Q Okay. But certain places where you would work
21 a shutdown wouldn't be a maintenance contract, is that fair
22 to say?

23 A Yes, true, that's the way it worked.

24 Q Now, how about new construction, would you-all
25 ever work new construction?

1 A Oh, yes.

2 Q Now, is new construction something that you
3 would have also worked on as part of a maintenance contract
4 at a place or would it just be an individual contract to
5 build this?

6 A It would just be a contract for that
7 particular job, for that particular plant --

8 Q Sure.

9 A -- or building.

10 Q Okay. So, just to summarize, I've got three
11 different kinds of projects. Where you have a maintenance
12 contract is the first kind where you would have that kind of
13 as a home plant and go there every day for work and do
14 whatever jobs they may have at that plant, is that correct?

15 A Correct.

16 Q And then there's a second type of project that
17 would just be a shutdown, where it could happen at a place
18 where you have a maintenance contract, but you could also
19 just be hired to come in and work on that one piece of
20 equipment for that shutdown, is that correct?

21 A Yes.

22 Q Okay. And the third kind of project you might
23 work at a plant is a new construction project, which would be
24 a project that is for that specific either new premise or new
25 addition to a plant, is that correct?

1 A True.

2 Q Okay. Can you think of any other types of
3 work projects that wouldn't fall under one of those three
4 categories?

5 A No, I think that that would pretty well cover
6 it.

7 Q Okay. So, as we go through some of the work
8 sites I may ask you was this a shutdown or a new construction
9 and then if it was a shutdown, I may ask if there was a
10 maintenance contract, but we're trying to figure out which
11 one of these types of projects each one of your jobs was,
12 okay?

13 A Okay.

14 Q All right. So let's start out back with the
15 Owens-Corning plant that you remembered as being the first,
16 the first plant where you worked. Just to say again: Was
17 there a maintenance contract between Covil and Owens-Corning
18 plant to your knowledge?

19 A No.

20 Q Was the project that you were working on that
21 first trip to Owens-Corning plant, was that a shutdown or was
22 that new construction?

23 A That would have been -- that would have been a
24 shutdown, a rebuild, so a shutdown.

25 Q Okay. And the shutdown was to what piece of

1 equipment?

2 A Shutdown was to what?

3 Q Was to what equipment was shut down for that
4 job?

5 A It was one of the furnaces.

6 Q Okay. And what kind of furnaces were those?

7 A Those were fiberglass furnaces that made the
8 fiberglass strands for the cloth and different things like
9 that.

10 Q What all responsibilities did you have as part
11 of that shutdown or part of that maintenance --

12 A Well --

13 Q -- as a helper, sorry.

14 A As a helper it was to keep the materials to
15 the mechanics, make the finish mud or insulation mud and had
16 two different types of mud we put on. One was a mud that had
17 insulation in it to help fill cracks, the other one was a
18 finished mud to go over it and make it look good.

19 Q Okay. And on this first shutdown of the
20 furnaces that you described at Owens-Corning, was there also
21 other crafts working in the area?

22 A Oh, yes.

23 Q Okay. Were there also pipe fitters working
24 nearby?

25 A Yes.

1 Q Around how far away would pipe fitters be
2 working?

3 A Three or four feet.

4 Q What kind of -- what kind of work would they
5 be doing on the furnace, do you happen to recall?

6 A Well, they were mainly bolting the headers and
7 things on the furnace.

8 Q What is a header?

9 A Well, it's just like an exhaust manifold has
10 three or four pipe coming together to one.

11 Q Okay. Do you know if they would be having to
12 replace a gasket in between there?

13 DEFENSE COUNSEL: Object to form.

14 THE WITNESS: Yeah, they sure did.

15 BY MR. HOLDER

16 Q Okay. Would they have been removing old
17 gasket material to put the new gasket on?

18 DEFENSE COUNSEL: Object to the form.

19 THE WITNESS: Yes. Oh, yes.

20 BY MR. HOLDER

21 Q Okay. What kind of -- what kind of tools
22 would the pipe fitters use or whoever was doing the work would
23 use when they would remove this gasket material from the
24 facing?

25 DEFENSE COUNSEL: Object to the form.

1 BY MR. HOLDER

2 Q Excuse me, where would they remove the old
3 gasket from?

4 A Well, those things were big, they would bring
5 them and set them out of the work area.

6 Q Okay.

7 A And then put them on a dolly, take them to a
8 pipe shop --

9 Q Okay.

10 A -- and rework them there.

11 Q So for the headers --

12 A Yes.

13 Q -- the ones where multiple pipes came
14 together, those would be taken away from where yo-all were
15 working --

16 A Yes.

17 Q -- for them to be cleaned?

18 A And then brought back.

19 Q Would the pipe fitters ever work on any regular
20 connections that were not where multiple pipes came together?

21 A Oh, yes, on different jobs.

22 Q Right. I should have specified that. Let's
23 keep job by job separate. So let me ask you this: Do you
24 remember pipe fitters working any, on any single pipe
25 connections in the work related to the furnaces at.

1 Owens-Corning when you were a helper?

2 DEFENSE COUNSEL: Object to the form.

3 THE WITNESS: No, not really.

4 BY MR. HOLDER

5 Q Okay. Were there any valve technicians in
6 the -- in the area where you were working at the
7 Owens-Corning plant, that you recall?

8 A Oh, yes.

9 Q Okay. Would they also be close by?

10 A Yes.

11 Q Okay. About how close would they be?

12 A They would be right -- all crafts worked
13 together because a lot of times in a situation you just get
14 crammed right up to one another, y'all stop and let these
15 guys do what they have to do, so us and pipe fitters, we worked
16 pretty good together, hand in hand, we were probably a lot of
17 times one piece of insulation apart from one another which
18 y'all, everybody knows the commercial insulation comes in
19 three foot pieces.

20 Q Sure. And you were about that from each
21 other?

22 A Yes, we would hold off that to allow them
23 to --

24 Q Okay. Were -- do you remember what any of the
25 valve techs would have been working on with the furnace, with

1 any of the furnace work?

2 A I can't remember them working on the furnaces.
3 I really can't.

4 Q What about -- let me ask you this: Was there
5 a boiler at the Owens-Corning plant that you remember?

6 A Yes.

7 Q Okay. Was the boiler close to -- close to
8 where the furnaces were?

9 A It was in another building.

10 Q Okay. Did you ever have occasion, while at a
11 job at Owens-Corning, to work on or around the boiler at
12 Owens-Corning plant?

13 A Yes. Yes, we done -- we done a lot of
14 different types of jobs at Owens-Corning on and off while I
15 was with Covil.

16 Q Okay. So is Owens-Corning a plant that you
17 would come back to intermittently throughout your time with
18 Covil?

19 A Um-hum.

20 Q Okay. And make sure to verbalize your
21 answers.

22 A Sir?

23 Q Make sure to say your answer instead of saying
24 um-hum, uh-huh.

25 A Yes.

1 Q Now, you mentioned that one of the jobs when
2 you would -- when you came back to Owens-Corning plant was on
3 or around the boiler, is that correct?

4 A It may not have been the second time, but I
5 have worked around it.

6 Q Okay. And that's what I'm saying, at one of
7 the times -- one of your work experiences at Owens-Corning
8 plant you were on or around the boiler, is that correct?

9 A That is true.

10 Q Do you happen to remember what, where in the
11 hierarchy of mechanics you were at that point or if you were
12 still an apprentice or --

13 A Nah, at that point I was -- I was probably
14 second class.

15 Q Okay. And do you remember what, do you
16 remember what job y'all were doing at the -- on the
17 furnace -- I mean, furnace -- on the boiler?

18 A Yes, we were insulating the boiler and pipes
19 and valves going to them.

20 Q Okay. Around how large was this boiler?

21 A Huge. I don't think we ever worked on
22 anything small. It would be -- I don't know how many tubes
23 is in that boiler. It was just huge. It was about almost as
24 big around as the back of a tanker truck, 18 wheeler.

25 Q Wow. Okay. Now, do you happen to remember

1 the manufacturer of that boiler at Owens-Corning that you
2 worked on?

3 A I do, but it's not coming to me right now.

4 Q Okay.

5 A I do remember that.

6 Q If it pops in your head as we go throughout
7 the day, just say "hold on, Jonathan, I remember that's the
8 manufacturer's name" and you can give it to me, okay?

9 A Okay. It's a company that everybody knows.

10 Q That's okay. We can keep moving and if it
11 comes to you, let us know.

12 A For some reason I'm thinking Fisher.

13 Q Okay. You think --

14 A For some reason --

15 Q Okay.

16 A Might be wrong.

17 Q Okay. Now, do you remember how long the job
18 was when you worked on the boiler at Owens-Corning plant?

19 A Yeah, we worked on it for about four or five
20 days.

21 Q And I didn't ask you that for the first visit
22 to the Owens-Corning plant, but how long was the job with the
23 furnaces, that first job as a helper at Owens-Corning? How
24 long was the first job that you had at Owens-Corning?

25 A Oh, it was about a week.

1 Q Okay. Now, when you were working on the
2 boiler at Owens-Corning were there other crafts in the area
3 also working on the boiler?

4 A Oh, yes.

5 Q Okay. And would that include pipe fitters?

6 A Yes, sure.

7 Q Okay. Would that include valve technicians?

8 A Yeah.

9 Q Okay. What about boilermakers?

10 A Oh, yes.

11 Q Okay. And what was the project being done, if
12 you know, to the boiler other than insulating it, I guess,
13 which would be your job? What was being done to the boiler?
14 What was the project?

15 A It was just going through a -- I guess you
16 would say a rebuild because a lot of tubes and things had to
17 be replaced.

18 Q Okay. Would that be a regular maintenance
19 shutdown?

20 A I would think so.

21 Q Okay. Now --

22 A Most of the time they wouldn't shut a boiler
23 down though unless it sprung a leak somewhere.

24 Q Could you perform work on a boiler while it
25 was still running?

1 A Yes.

2 Q Okay. And was that how it occurred most of
3 the time?

4 A Is that what?

5 Q Is that how it happened most of the time when
6 you were doing work on a boiler, was it still in operation?

7 A Yeah, it really didn't matter with us if it
8 was running or not, but, yes, it would a lot of times, it
9 would be.

10 Q Sure. Now, you've described multiple
11 maintenance jobs that you've performed while with Covil at
12 the Owens-Corning plant, were these all individual shutdown
13 maintenance jobs or was this under a longer contract
14 relationship?

15 DEFENSE COUNSEL: Object to the form.

16 THE WITNESS: With Owens-Corning it was
17 all individual bid jobs. They would bid them
18 out and Covil got all of them mainly and
19 that's the way that went.

20 BY MR. HOLDER

21 Q Okay.

22 A And that's how we got them.

23 Q Okay. All right. What was the next plant you
24 remember going to after, after Owens-Corning, I guess after
25 you left the first time, if you recall?

1 A Well, left Owens-Corning and --

2 MR. HOLDER: Actually, hold on one
3 second. I forgot to ask you a few questions
4 about Owens-Corning. I apologize.

5 BY MR. HOLDER

6 Q At Owens-Corning I know that we talked about
7 the actual crafts, but let me clarify on the actual products
8 that you may or may not have been around. During your time
9 working any of these projects with Covil out at the
10 Owens-Corning plant, did you work in the vicinity of pumps?

11 DEFENSE COUNSEL: Object to the form.

12 THE WITNESS: Yes, sure did.

13 BY MR. HOLDER

14 Q What was being done to those pumps when you
15 were in the vicinity?

16 DEFENSE COUNSEL: Object to the form.

17 THE WITNESS: Well, a lot of times they
18 would take them apart to replace impellers and
19 things like that on them.

20 BY MR. HOLDER

21 Q Okay.

22 A Occasionally one may have a bad motor and they
23 would do that.

24 Q Do you recall them every having to remove any
25 packing from a pump?

1 A Oh, yes.

2 DEFENSE COUNSEL: Object to the form.

3 THE WITNESS: They would have to.

4 BY MR. HOLDER

5 Q Okay. And how would that be done?

6 DEFENSE COUNSEL: Objection.

7 THE WITNESS: Well, just unbolt it and
8 take it apart and take the packing and all
9 out. You have to take it completely apart
10 really to get the impeller out.

11 BY MR. HOLDER

12 Q Okay. And would they -- would the people that
13 you witnessed pulling the packing out of the pumps use any
14 certain kind of tool?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: Certain kind of tools?

17 MR. HOLDER: Yes, to pull the packing out
18 for that specific job.

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: Yes, it was -- I don't know
21 what it was. I don't know what they call the
22 thing.

23 BY MR. HOLDER

24 Q Okay. And when they would be pulling packing
25 out of the pumps, like, how close would you be to this?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: We were always real close,
3 like three or four feet.

4 BY MR. HOLDER

5 Q And when they pulled the packing out of these
6 pumps, would that create any dust?

7 DEFENSE COUNSEL: Objection to form.

8 THE WITNESS: Yes.

9 BY MR. HOLDER

10 Q Do you believe you breathed that dust?

11 DEFENSE COUNSEL: Objection, form.

12 THE WITNESS: Yes, very possible.

13 BY MR. HOLDER

14 Q Okay. And did this happen a single time or
15 was this a repeated occurrence that you remember when working
16 at the Owens-Corning plant?

17 DEFENSE COUNSEL: Objection.

18 THE WITNESS: No, it was repetitive. Not
19 just there, but in other plants I've worked
20 too.

21 MR. HOLDER: Sure. Same question.

22 BY MR. HOLDER

23 Q Do you recall ever, when they were working on
24 the pumps that you recall, them ever replacing the gaskets in
25 the pumps?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: Yes, I've seen them replace
3 them lots.

4 BY MR. HOLDER

5 Q Okay. Let me ask specifically about internal
6 gaskets. Do you recall ever seeing anyone working on
7 internal or replacing internal gaskets in pumps at the
8 Owens-Corning plant?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: Yes.

11 BY MR. HOLDER

12 Q Okay. And around how far away were you when
13 you were witnessing this and I apologize to being repetitive,
14 but I have to keep asking this, but how close were you when
15 you saw people working on pumps and replacing gaskets while
16 at Owens-Corning plant?

17 DEFENSE COUNSEL: Objection.

18 THE WITNESS: We were almost in one
19 another's way. You know we were two, three,
20 four -- just.

21 BY MR. HOLDER

22 Q Sure.

23 A Just back off a little and do their thing, you
24 know.

25 Q Sure. And when they were changing, when you

1 witnessed people changing the gaskets on the internal gaskets
2 on pumps at the Owens-Corning plant, did they have to remove
3 old gasket material?

4 A Sure.

5 DEFENSE COUNSEL: Objection.

6 BY MR. HOLDER

7 Q Okay. And did the removal of that old gasket
8 material create dust?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: Yes.

11 BY MR. HOLDER

12 Q Okay. And do you know what they would use to
13 remove the old gasket material at the plant, at the
14 Owens-Corning plant, when you witnessed on the pumps?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: Just a lot of times I've
17 seen them use screwdrivers. I've seen them
18 grab it with a pair of pliers or channel
19 locks, just however they can get it out.

20 BY MR. HOLDER

21 Q Sure. And would this process create debris
22 and dust?

23 DEFENSE COUNSEL: Objection.

24 THE WITNESS: Yeah.

25 BY MR. HOLDER

1 Q Okay. And do you think that you breathed that
2 dust?

3 A Oh, yes, all of us did.

4 DEFENSE COUNSEL: Objection.

5 BY MR. HOLDER

6 Q Okay. And do you think that this happened a
7 single time or did this happen repeatedly?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: It happened quite often.

10 We didn't think anything about it.

11 MR. HOLDER: Sure.

12 BY MR. HOLDER

13 Q Did you similarly -- were you similarly in the
14 vicinity of other crafts working on valves at Owens-Corning
15 plant?

16 DEFENSE COUNSEL: Object to the form.

17 Same objection.

18 THE WITNESS: Yes, from time to time.

19 BY MR. HOLDER

20 Q Okay. And when you saw them doing this, kind
21 of the same questions as for the pumps, did you witness the
22 replacement of any internal gaskets on any valves at
23 Owens-Corning plant?

24 DEFENSE COUNSEL: Object to the form.

25 THE WITNESS: Yes, I do.

1 BY MR. HOLDER

2 Q Okay. And would that require the removal of
3 old gasket material?

4 DEFENSE COUNSEL: Object to the form.

5 THE WITNESS: Oh, yes.

6 BY MR. HOLDER

7 Q Okay.

8 A A lot of times removal of the valve --

9 Q Okay.

10 A To get the --

11 Q And how large were the valves that you
12 remember at the Owens-Corning plant?

13 A Oh, my goodness, all sizes really.

14 Q What was the biggest one you remember?

15 A They're probably about three feet, two and a
16 half foot pipe.

17 Q And would the valve connect with a flange to
18 the pipe?

19 A Yes, it bolted in.

20 Q Okay. And so would they require a gasket on
21 the -- on the flange?

22 A Oh, yes.

23 Q From the valve to the pipe?

24 A Yes.

25 DEFENSE COUNSEL: Object to the form.

1 BY MR. HOLDER

2 Q Okay. And when you were there at
3 Owens-Corning, did you witness anyone removing old gasket
4 material from the flanges of the valves?

5 DEFENSE COUNSEL: Objection.

6 THE WITNESS: Yes.

7 BY MR. HOLDER

8 Q Okay. And did this practice release debris
9 and dust?

10 DEFENSE COUNSEL: Objection.

11 THE WITNESS: Yes. Anything -- yes.

12 BY MR. HOLDER

13 Q Okay. And were you or did you breathe that
14 dust?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: Yes.

17 BY MR. HOLDER

18 Q Now, also, did the valves, like the pumps,
19 contain packing?

20 DEFENSE COUNSEL: Objection.

21 THE WITNESS: Yes, some did, some would.

22 BY MR. HOLDER

23 Q Okay. Did you ever see the packing from the
24 valves being removed when you were working at Owens-Corning?

25 DEFENSE COUNSEL: Object to the form.

1 THE WITNESS: Yes.

2 BY MR. HOLDER

3 Q Okay. And do you remember this process
4 creating visible debris and dust?

5 DEFENSE COUNSEL: Objection to form.

6 THE WITNESS: Well, yes, but it wasn't
7 just full -- all full debris and dust in the
8 air, but it would give off.

9 MR. HOLDER: Sure.

10 THE WITNESS: It would give off, excuse
11 me, particles.

12 BY MR. HOLDER

13 Q Sure. Do you believe that you would breathe
14 some of those particles it would give off?

15 DEFENSE COUNSEL: Objection to form.

16 THE WITNESS: Yes.

17 BY MR. HOLDER

18 Q Okay. Is that something that happened just
19 once or did, did it, was it repeated occurrence on the
20 removal of gaskets from the flanges of valves?

21 DEFENSE COUNSEL: Objection.

22 THE WITNESS: The way we worked with
23 other trades and things in trying to get
24 machinery going, it happened very often.

25 BY MR. HOLDER

1 Q Okay. Did pumps also have flange gaskets?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: Pardon?

4 BY MR. HOLDER

5 Q Did pumps also have flange gaskets?

6 A Pumps --

7 DEFENSE COUNSEL: Objection.

8 THE WITNESS: Yes.

9 BY MR. HOLDER

10 Q And did you also ever witness any workers
11 removing the old gasket material from the flanges where the
12 pumps connect?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: Yes.

15 BY MR. HOLDER

16 Q And, similarly to the flanges I just asked you
17 about, for the valve, did the removal of the old gasket
18 material from the flange facings on the pumps create visible
19 debris or dust?

20 A Yes.

21 DEFENSE COUNSEL: Objection.

22 BY MR. HOLDER

23 Q And would you breathe that dust?

24 DEFENSE COUNSEL: Objection.

25 THE WITNESS: Yes.

1 MR. HOLDER: Okay. Thank you. You okay?
2 You need a drink of water?

3 THE WITNESS: Thank you, no.

4 BY MR. HOLDER

5 Q When you left the Owens-Corning plant the
6 first time and went on to the next work site, where was that?

7 A I'm thinking that it was a Firestone plant in,
8 Murfreesboro, Tennessee.

9 Q Okay.

10 A It was a new job. They were building the
11 plant.

12 Q Do you know what stage of construction or what
13 phase it was in?

14 A Yes, the building was up. They were setting
15 equipment, still running pipe, all those sort of things just,
16 you know.

17 Q Sure.

18 A Still have -- we have all the trades there,
19 you know.

20 Q Okay. So was your work inside or was it
21 outdoor, in open air?

22 A It was both. Coldest winter I've ever spent.

23 Q So that helps a little bit, so your job at
24 Firestone plant in Murfreesboro, Tennessee, was in the
25 winter, do you believe that? Is that true?

1 A Um-hum. Yes.

2 Q Okay. All right. Now, what was your job role
3 at this job at the Firestone plant, were you still a helper?

4 A I was a helper.

5 Q And did --

6 A Well, I was second class mechanic. Might as
7 well say helper.

8 Q Okay. Well, I don't want to get out of order,
9 but the first job I had you on was Owens-Corning right when
10 you got hired, correct?

11 A Yes.

12 Q All right. And then that was as a helper or
13 an apprentice, right?

14 A Right.

15 Q And then I had that, that first project on the
16 furnaces took about a week?

17 A Right.

18 Q And then the next job you went to was
19 Murfreesboro, Tennessee?

20 A Yes.

21 Q So were you already a second class mechanic by
22 the second week on the job?

23 A No.

24 Q Okay. So would you --

25 A I would have been an apprentice.

1 Q Okay. That helps.

2 A I was trying to remember during that stay I
3 did, because we were there for -- I was there for about
4 ten -- I think ten months, may have been eleven.

5 Q Ten months at the Firestone plant in
6 Murfreesboro, Tennessee?

7 A Yes.

8 Q Okay. And so would that have been the rest of
9 the year of 1972?

10 A Yes.

11 Q Okay. Now, what were you doing, what were
12 your job roles when you started at the Firestone plant as a
13 helper? What were you doing?

14 A I was carrying insulation up on the roof.

15 Q Why were you up on the roof?

16 A Sir?

17 Q Why were you up on the roof?

18 A Because we had steam pipes up there that had
19 to insulate.

20 Q And you were carrying insulation up to the
21 roof, is that what you said?

22 A Yes, just manual labor.

23 Q And how long did you -- did you also -- were
24 you also mixing the mud at this one?

25 A Oh, yes, it was all the duties of a helper I

1 done there too, you know.

2 Q How would you get up to the roof?

3 A Stairs.

4 Q So there were stairs on the inside of the
5 building that you would walk up to the roof?

6 A Yes.

7 Q Okay?

8 A Yes.

9 Q Now, how long was it do you believe you stayed
10 a helper at -- while you were at the Firestone plant?

11 A Didn't seem like it was very long and I went
12 to second class.

13 Q Okay.

14 A Because I went from that to putting the
15 material on.

16 Q Okay. So did you ever spend any time at that
17 lowest class mechanic after you were a helper?

18 A Um-hum.

19 Q Okay. So was that before you were a second
20 class?

21 A You talking about helper?

22 Q Helper and then third class or first class,
23 whichever one is the top or bottom, is the bottom and then
24 second class mechanic, correct?

25 A Um-hum.

1 Q So I was just asking --

2 A I was the bottom of that from there.

3 Q So when you were working at the Firestone
4 plant, you were a helper as well as the lowest class mechanic?

5 A Yeah.

6 Q Did you learn how to --

7 A I would say the second. I guess it would have
8 been called first.

9 Q Okay. And was that where you did a lot of
10 your learning of the insulation work?

11 A Yes, I learned insulation. It's not one of
12 those things that you learn overnight. You learn how to do
13 it very quickly, but you have to also know what you can
14 insulate, what you can't, how thick it needs to be according
15 to temperature inside, outside, whatever.

16 Q Right. For a new construction job like the
17 Firestone plant, would there -- I know you said they were
18 setting the equipment, but during new construction generally,
19 is there any replacement work already going on of internal
20 components of any of the equipment?

21 DEFENSE COUNSEL: Objection to form.

22 THE WITNESS: Well, it's -- always a
23 piece equipment that gives problems, that has
24 to be done. There's always somebody
25 putting -- running pipe in a different way

1 than it should be and has to be torn out and
2 redone.

3 BY MR. HOLDER

4 Q Okay.

5 A That's just common with new construction.

6 Q Okay. But, as far as a regular practice of
7 changing out gaskets or packing from pumps and valves, did
8 that occur often at a new construction like this?

9 DEFENSE COUNSEL: Object to the form.

10 THE WITNESS: Well, it was more. You had
11 the gaskets installing.

12 BY MR. HOLDER

13 Q Installing more than removing?

14 A Um-hum.

15 Q Okay. So would you have been around all the
16 crafts that you mentioned so far today at the Firestone
17 plant?

18 DEFENSE COUNSEL: Objection to form.

19 BY MR. HOLDER

20 Q So I'll break it up. Were you around
21 pipe fitters at the Firestone plant?

22 A Yes, sir.

23 Q Were you around valve techs at the Firestone
24 plant?

25 A Yes, sir.

1 DEFENSE COUNSEL: Objection, form.

2 BY MR. HOLDER

3 Q Were you around boilermakers at the Firestone
4 plant?

5 A I don't think so. I don't think I worked that
6 area.

7 Q Good thing we broke it up. Were you in the
8 vicinity of boilers at the Firestone plant?

9 A I just don't remember.

10 Q Okay, that's fine. Now, at the Firestone
11 plant, this new construction, were you around any pumps?

12 DEFENSE COUNSEL: Objection.

13 THE WITNESS: Yes.

14 BY MR. HOLDER

15 Q Did you see any pumps that were having to be
16 torn down instead of installed?

17 DEFENSE COUNSEL: Objection.

18 THE WITNESS: Not that I can remember.

19 BY MR. HOLDER

20 Q Okay. Same question for valves. Did you see
21 any valves while you were working at the Firestone plant?

22 A Repeat that, please.

23 Q I'm sorry. Bad question. Did you work around
24 or in the vicinity of any valves while you were at the
25 Firestone tire plant?

1 A Oh, yes.

2 DEFENSE COUNSEL: Objection to form.

3 THE WITNESS: I insulated them.

4 BY MR. HOLDER

5 Q Now, would these valves have had any packing
6 or gasket removal at this time at the Firestone plant when
7 you were around?

8 A No.

9 DEFENSE COUNSEL: Object to the form.

10 MR. HOLDER: Okay.

11 BY MR. HOLDER

12 Q Any packing removal that you remember at all
13 at the Firestone plant?

14 DEFENSE COUNSEL: Objection to form.

15 THE WITNESS: Not that I can recall.

16 BY MR. HOLDER

17 Q Okay, that's fine.

18 A We would work seven days and go home for six
19 and --

20 Q Okay.

21 A -- so that's the way we worked, so that may
22 give you an answer.

23 Q Sure. Well, never mind. That's -- that is
24 helpful. So for the whole ten-month period would you say
25 that you only worked every other week?

1 A Um-hum, that's the way we worked. We had two
2 crews that would rotate.

3 MR. HOLDER: How you feeling or you need
4 a break or are you doing okay?

5 THE WITNESS: Whatever you want to do.

6 MR. HOLDER: Okay. Let's go over one
7 more premises.

8 BY MR. HOLDER

9 Q After the Firestone plant was completed do you
10 know -- well, before we leave the Firestone plant, did you
11 ever see any of the supervisors or managers or people from
12 Firestone around the plant?

13 A Yes, there were Firestone people there.

14 Q Okay. Did any of them ever stop you to warn
15 you of any of the dangers or hazards of asbestos by chance?

16 DEFENSE COUNSEL: Object to the form.

17 THE WITNESS: No.

18 BY MR. HOLDER

19 Q Did you see any warnings posted anywhere at
20 the Firestone plant regarding the hazards of asbestos when
21 you were there?

22 DEFENSE COUNSEL: Object to the form.

23 THE WITNESS: No.

24 BY MR. HOLDER

25 Q Now, after leaving the Firestone plant, after

1 that ten months, where's the next work site you remember
2 working for Covil?

3 A Left there and went back to Owens-Corning
4 Fiberglas.

5 Q Okay.

6 A To do pipe, insulate. I think it's some kind
7 of chemical pipe that we insulate. I'm not sure. Hard to
8 remember all that.

9 Q Sure. And how long was that job, that second
10 stint at Owens-Corning?

11 A Oh, it lasts for about a week and a half.

12 Q All right. And after you left Owens-Corning
13 that second time, let me ask you this: I know I asked you
14 questions before about Owens-Corning and I asked them
15 generally about your work at Owens-Corning, during all of
16 your visits there, so during this second visit when you were
17 insulating pipe, would your answers be the same as to being
18 around crafts and different kinds of products while at
19 Owens-Corning?

20 DEFENSE COUNSEL: Object to the form.

21 MR. HOLDER: Okay. Sounds like they want
22 us to go through it.

23 THE WITNESS: Same.

24 BY MR. HOLDER

25 Q All right. So at this one week job at

1 Owens-Corning, what building were you in, do you remember?

2 A It was outside doing the pipe.

3 Q Okay.

4 A It was going from factory D back up to the
5 furnace hall.

6 Q Now, were there any pipe fitters in the
7 vicinity while you were doing this insulating of pipe?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: No, the pipe fitters -- the
10 job was completed. It was ready for us. We
11 just --

12 BY MR. HOLDER

13 Q Okay. So were you around any valve
14 technicians while doing this one-week job?

15 A Not on that particular job.

16 Q How about boilermakers?

17 A Pardon?

18 Q How about boilermakers?

19 A No, I don't --

20 Q Okay. During the second one-week job were you
21 in the vicinity of any pumps being worked on?

22 DEFENSE COUNSEL: Objection.

23 THE WITNESS: None that I remember.

24 BY MR. HOLDER

25 Q Okay. Were you in the vicinity of any valves

1 being worked on during the second [sic] trip?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: No.

4 BY MR. HOLDER

5 Q Were you in the vicinity of any boilers being
6 worked on during this third trip?

7 A No.

8 Q After this second stint at OCF, which was the
9 one-week pipe insulation project, where did you go next?

10 A Oh, my goodness, I can't remember the name of
11 the mill I went to, but it was in -- it was in Alabama.

12 Q Okay. And what kind of mill was it, do you
13 happen to remember?

14 A It was a cotton mill, I think, some type of
15 clothing material plant.

16 Q Okay. Like textile? Like textile? Like a
17 textile mill?

18 A Um-hum.

19 Q Okay. How long was that project at the cotton
20 or textile mill, in Birmingham?

21 A That was probably about -- I think it was two
22 weeks. It may have been a little bit less. I'm not sure.

23 Q So approximately two weeks. Do you remember
24 what the project, what y'all were doing? What was the
25 project?

1 A We were sent there to work on the big air
2 washers you see. We were there to insulate all the piping
3 and all coming from and going to that.

4 Q Now, was this a new construction job?

5 A Yes, it was an old plant.

6 Q Okay. So would you have been around any work
7 being done on old equipment?

8 A On what?

9 Q Older equipment. Since it was new
10 construction were you only around new equipment or were you
11 also around old?

12 A Yes.

13 Q Okay. Which one was it, old equipment or --

14 A That was new equipment.

15 Q Okay.

16 A That was something that they added into --

17 Q Okay.

18 A -- the plant.

19 Q How many buildings was this textile plant?

20 A I would say about three.

21 Q How many buildings did you work in?

22 A One.

23 Q Okay. And was the new construction you were
24 working in, was that the building, the construction of that
25 building or was that building already constructed?

1 A The building was already constructed.

2 Q Okay. And so you were working new
3 construction on an addition to one of the buildings at this
4 textile plant?

5 A Yes.

6 Q Okay. And were you inside or outside during
7 the construction?

8 A Outside. Well, and in --

9 Q Okay.

10 A Mainly outside.

11 Q And what did your specific job roles entail on
12 this?

13 A Pardon?

14 Q What did your specific job roles entail on
15 this project at the textile mill for two weeks?

16 A It was four of us went, so we all just worked
17 together insulating, carrying material and all, whatever we
18 needed to do. I done whatever I had to do to try to get the
19 job finished.

20 Q Sure. Did you say four men went?

21 A Four.

22 Q So does that mean, from Covil?

23 A From Covil Corporation, yes, sir.

24 Q Okay. And that means you and three others?

25 A Yes.

1 Q Okay. Now, if there were only four of you-
2 all, was there other crafts also in the vicinity working
3 around y'all at this textile mill in Birmingham, Alabama?

4 DEFENSE COUNSEL: Objection.

5 THE WITNESS: Not that I can remember.

6 BY MR. HOLDER

7 Q Okay. Did you have to work on any -- any
8 pumps at this, at this job when you were doing the piping?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: Did I have to work? Yes,
11 we insulated them.

12 BY MR. HOLDER

13 Q Okay. How about valves? You insulate any
14 valves?

15 DEFENSE COUNSEL: Object to the form.

16 THE WITNESS: Same.

17 BY MR. HOLDER

18 Q How about boilers, did you-all have to --

19 A We didn't work on any boilers there.

20 Q Okay. Did you ever see any work being done
21 replacing packing?

22 A Excuse me?

23 Q Did you ever see any work done at that textile
24 plant replacing packing or gaskets?

25 A No, sir.

1 DEFENSE COUNSEL: Objection.

2 MR. HOLDER: Why don't we take a five-
3 minute break. Okay, off the record.

4 (Whereupon, discussion was held off the record
5 and a recess was taken at 2:26 until 2:40.)

6 THE VIDEOGRAPHER: Going back on the
7 record at camera time 14:40.

8 BY MR. HOLDER

9 Q Good afternoon, again. Mr. Waters, Jonathan
10 Holder, again, your attorney. During the break did you get a
11 little short of breath?

12 DEFENSE COUNSEL: Object to the form.

13 THE WITNESS: Yes, I did.

14 BY MR. HOLDER

15 Q And did you put on the oxygen to help you with
16 your breathing?

17 A Yes, help relax.

18 Q Sure. And I just wanted to let the jury know
19 because in the video when we went on break, you didn't have
20 anything on and when you started back, you did and that's the
21 only reason.

22 A Well, I try not to use it if I don't have to, but it
23 was a have to.

24 DEFENSE COUNSEL: Objection.

25 BY MR. HOLDER

1 Q Let's go back to -- I believe we ended with
2 the cotton mill or textile mill in Birmingham, Alabama.

3 A Yes.

4 Q Is that correct? All right. Where did you --
5 where's the next work site you remember going after the --
6 after that textile mill in Birmingham, Alabama?

7 A We went to -- back to Owens-Corning.

8 Q Okay. Now, on this trip to Owens-Corning, I
9 believe this was your third, is that correct?

10 A Yes.

11 Q Now, for this trip to Owens-Corning do you
12 know approximately how long of a stay it was or how long the
13 project --

14 A Yes.

15 Q -- was there?

16 A Owens-Corning had built a new building on the
17 far corner of their facility. It was a warehouse and a
18 loading area and then it also wove fiberglass into cloth.

19 Q Okay.

20 A And they had built that and we went there to
21 do all the insulation on that building, ductwork, water, all
22 of it.

23 Q Okay. So was this a completely new building?

24 A Yes.

25 Q Was it attached to any of the old buildings?

1 A No, it was detached. It was to itself. Only
2 thing it was sidewalks go down to it.

3 Q Sure. Do you know approximately how long you
4 were there for this job?

5 A Yeah. We were there for a good while. I
6 would say probably six months or so.

7 Q Okay. And what all did you do? What was your
8 responsibility at this new construction at Owens-Corning when
9 you were there for the third time?

10 A Well, when I got back to Owens-Corning I --
11 they put me insulating pipe and first was a waterline I
12 think I done and there I don't remember all what we did, but
13 we -- I worked on all of it.

14 Q Was it similar to the other new construction
15 jobs that you told us about in that there wasn't removal of
16 old equipment, it was all --

17 A It was all new.

18 Q -- new installation?

19 A It was all new.

20 Q Okay. Would you have been around other crafts
21 during this six month --

22 A Oh, yeah, we were.

23 Q Let me finish the question, I'm so sorry. At
24 this six-month stint, your third time at OCF, would you be
25 around other crafts?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: Yes.

3 BY MR. HOLDER

4 Q Okay. Would you have, specifically on this
5 third job, been around pipe fitters?

6 DEFENSE COUNSEL: Objection.

7 THE WITNESS: Yes.

8 BY MR. HOLDER

9 Q Would you have been in the vicinity of valve
10 techs?

11 DEFENSE COUNSEL: Objection.

12 THE WITNESS: Yes.

13 BY MR. HOLDER

14 Q Would you be in the vicinity of boilermakers?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: No.

17 BY MR. HOLDER

18 Q Okay. And for this -- these questions I'm
19 just talking about during that third trip to Owens-Corning,
20 during the new construction job. Okay. Did you have to
21 insulate any boilers during this third trip to OCF?

22 A No.

23 Q Okay. Were you insulating any pumps at this
24 third trip to OCF?

25 DEFENSE COUNSEL: Objection.

1 THE WITNESS: Yes.

2 BY MR. HOLDER

3 Q Did you insulate any valves on this third trip
4 to OCF?

5 DEFENSE COUNSEL: Object to the form.

6 THE WITNESS: Yes.

7 BY MR. HOLDER

8 Q I haven't asked you about this product, but
9 did Owens-Corning plant have any turbines?

10 DEFENSE COUNSEL: Object to the form.

11 THE WITNESS: You mean turbines?

12 MR. HOLDER: Yes.

13 THE WITNESS: No.

14 BY MR. HOLDER

15 Q What are turbines used for in your experience?

16 DEFENSE COUNSEL: Object to the form.

17 THE WITNESS: Usually in nuclear power.

18 BY MR. HOLDER

19 Q Okay. And what is a turbine?

20 DEFENSE COUNSEL: Object to the form.

21 THE WITNESS: Well, if you've ever seen a
22 jet engine, it's fairly similar --

23 MR. HOLDER: Okay.

24 THE WITNESS: -- like with the power --

25 MR. HOLDER: Okay.

1 THE WITNESS: Very loud, very noisy and
2 very powerful.

3 BY MR. HOLDER

4 Q What is it, its purpose?

5 DEFENSE COUNSEL: Object to the form.

6 THE WITNESS: It's to help generate
7 power.

8 MR. HOLDER: Repeat that. Repeat your
9 answer.

10 THE WITNESS: To help generate power.

11 BY MR. HOLDER

12 Q After this six-month stint at OCF, this third
13 stint at OCF when you were there six months, where's the next
14 work site you remember going or working at?

15 A I went, I think, to Clemson University.

16 Q Now, was this the only time that you had
17 worked at Clemson University or just the first time?

18 A No, it was the only. Yes, it was probably the
19 first.

20 Q What kind of work was this project at Clemson
21 University? When I say what kind, I mean shutdown, new
22 construction, the categories we talked about earlier?

23 A Yeah, this was a -- it was a maintenance job.
24 Covil was awarded maintenance on that, most plants and
25 places.

1 Q Most plants?

2 A Most plants and different things. They bid
3 the jobs out. Lowest bidder gets it, Covil got Clemson
4 University.

5 Q Okay.

6 A And so we -- I was there and that work was a
7 rebuild, you may say a shutdown, like on some steam, steam
8 system.

9 Q When you talk about the bids and that Covil
10 won the bid, would this be what we had talked about as a
11 maintenance contract?

12 A Yes, that's what it is.

13 Q Okay. Would you actually, I think you --

14 MR. HOLDER: Strike that.

15 BY MR. HOLDER

16 Q You described maintenance contract as, correct
17 me if I'm wrong, but the type job where you would go to the
18 work site every day?

19 A Yes.

20 Q Okay.

21 A But we would bring in extra help if needed or
22 if a man was out, we would bring -- we would do that. That
23 was just typical of it.

24 Q Okay. And would that maintenance contract
25 include any type of insulation that's needed?

1 DEFENSE COUNSEL: Objection to form.

2 THE WITNESS: Yes.

3 BY MR. HOLDER

4 Q And when I say insulation, let me correct that
5 question. Does that mean any type of insulating, like the
6 work, is that what it refers to in the contract?

7 DEFENSE COUNSEL: Objection.

8 THE WITNESS: Yes, that's what it was all
9 for.

10 BY MR. HOLDER

11 Q And how long for this first stay at Clemson,
12 did you go there every day for work?

13 A I think it was maybe a week there with Tony.

14 Q Who's Tony?

15 A Tony was the man that run -- he was over the
16 maintenance there at Clemson for Covil. Tony Teems.

17 Q Would he have been the top class mechanic that
18 was a supervisor?

19 A Yeah. Yes.

20 Q Is Tommy Teems still alive?

21 A No, I'm afraid not.

22 Q Tony Teems. Excuse me, I think I said Tommy.

23 A One of the nicest fellows though you'll ever
24 want to meet.

25 Q Now, at Clemson University, during this first,

1 this first trip there, what building did you work in?

2 A Gosh, it's over there close to the baseball
3 field. I can't think of the name.

4 Q Do you know what the product was that you were
5 working on?

6 A Working on steam.

7 Q And when you say "steam," is that a whole
8 steam system or steam pipes or what?

9 A Yeah, it was steam pipes that had to be
10 replaced.

11 Q Okay.

12 A So we were doing the replacement I guess you
13 might say.

14 Q Okay. I believe you said it already, did you
15 say this first job was approximately six months?

16 DEFENSE COUNSEL: Object to the form.

17 BY MR. HOLDER

18 Q Or one week, excuse me?

19 A Yeah.

20 Q I apologize. I think six months was the last
21 one. One week. During this one week when you were replacing
22 pipe and insulating it?

23 A Yeah, I done the steam stations, that's what
24 Tony wanted me to do because they were out of --

25 Q Was there also pipe fitters working in the

1 steam stations?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: I didn't see any other
4 maintenance or craft in that area at the time
5 I was there.

6 BY MR. HOLDER

7 Q Okay. And how big was that building you were
8 working in on that first trip to Clemson?

9 A It was pretty good size building. Hard to
10 say, gosh.

11 Q Like in terms of a football field, was it
12 bigger than a football field?

13 A I can think of a building in square feet and
14 it's kind of --

15 Q Sure.

16 A But, anyway, it would be, I think, about, if
17 you go in football, fifty yards --

18 Q Okay. I gotcha.

19 A -- wide. Probably close to that in length --

20 Q Sure. And --

21 A -- tall.

22 Q Go ahead, I'm sorry, I didn't mean to
23 interrupt you.

24 A I was just guessing, maybe ninety thousand
25 square feet or so. I don't know.

1 Q Okay. Go ahead. Do you know if this building
2 had a name like --

3 A Yeah, it did, that's what I was trying to
4 remember a while ago.

5 Q Okay.

6 A It's the one with the clock on it. What's it
7 called everybody?

8 Q Tillman?

9 A Tillman, Tillman Hall.

10 Q Okay. And did you have to insulate any of the
11 pumps during that job?

12 DEFENSE COUNSEL: Objection.

13 MR. HOLDER: Let me ask you this:

14 BY MR. HOLDER

15 Q Were there any pumps in that steam station?

16 DEFENSE COUNSEL: Objection.

17 THE WITNESS: Yes.

18 BY MR. HOLDER

19 Q Did you have to insulate any of those pumps?

20 DEFENSE COUNSEL: Objection.

21 THE WITNESS: Yes.

22 BY MR. HOLDER

23 Q Did you know if there were any valves in that
24 steam station?

25 DEFENSE COUNSEL: Objection.

1 THE WITNESS: Yes.

2 BY MR. HOLDER

3 Q Did you have to insulate any of those?

4 A Yes, I did.

5 Q How about steam traps, were there any steam
6 traps in that building?

7 A Yes, sure was.

8 Q Did you have to insulate any of the steam
9 traps?

10 A Sir?

11 Q Did you have to insulate any of the steam
12 traps?

13 A Yes, I've insulated them before.

14 Q Okay. Do you think you had to insulate them
15 at that trip to Tillman?

16 A Yeah. Yeah. Trying to remember the name of
17 them something --

18 Q It's okay.

19 A Hofsko (phonetic) something --

20 Q Okay.

21 A They were kind of weird looking steam traps.

22 Q Okay.

23 A They -- that's what made me kind of take a
24 look at them.

25 Q Where does the insulation go on them? Where

1 does the insulation go on them?

2 A The insulation around to keep from getting
3 burned.

4 Q Okay.

5 A That's it, it was more of a safety than
6 anything --

7 Q Sure.

8 A -- on that.

9 Q Sure. Did you have to remove insulation from
10 any of these pieces, any of this equipment that you have
11 described putting insulation on? Did you ever have to -- did
12 you have to remove any insulation off of it?

13 A (No response)

14 Q Okay. Would -- you have to say it out loud.

15 A No.

16 Q Okay. For any of the pumps or valves or steam
17 traps that you insulated there at that first Clemson job, for
18 any of them did you see any warnings on them regarding
19 asbestos?

20 DEFENSE COUNSEL: Object to the form.

21 THE WITNESS: Oh, no.

22 BY MR. HOLDER

23 Q I know -- I believe you said there were no
24 other crafts working in the building with you?

25 A No. They had completed --

1 Q Okay.

2 A -- there what they had to do.

3 Q Okay. Was the --

4 A By the time I got there anyway.

5 Q Was the insulation that you were putting on
6 this equipment being mixed there in the building or was it --

7 A Repeat that again.

8 Q What kind of insulation did you use for this
9 insulating at Clemson, was it mud, block?

10 A It was Kaylo.

11 Q Okay.

12 A And brown mud.

13 Q And explain what Kaylo is for the jury. Is
14 that a mud or a block? What is that?

15 A No, it's a -- it's a hard block, chalky
16 looking.

17 Q Okay. And what shape is it?

18 A Comes in different sizes for different size
19 pipes. It comes in a block for tanks and things like that.

20 Q When you say for pipe, does it come so that it
21 fits around the pipe?

22 A Yes.

23 Q Okay.

24 A It comes in halves.

25 Q Kind of like in a half moon?

1 A And you put two halves together, stagger them
2 and wire them.

3 Q Okay.

4 A And that's what --

5 Q What kind of -- I'm sorry, go ahead.

6 A I'm sorry.

7 Q Oh, no, I was going to ask which kinds do you
8 remember insulating. Let's start with the pumps, was that a
9 block insulation or was that the mud insulation you talked
10 about?

11 DEFENSE COUNSEL: Objection.

12 THE WITNESS: The pumps that I would
13 always use the size of the flange. I would
14 use that. Get that size pipe covering.

15 BY MR. HOLDER

16 Q Okay.

17 A And go over the flange.

18 Q Sure.

19 A And then I would cut it to a V and make the
20 top of where the top of the flange is.

21 Q Sure. What about for valves?

22 A Pardon?

23 Q What about for valves that you had to
24 insulate?

25 DEFENSE COUNSEL: Objection.

1 THE WITNESS: The same way. Of course
2 you do mud it and all after you complete it,
3 the insulation.

4 BY MR. HOLDER

5 Q Where was that mud being mixed during this
6 job?

7 A It was usually mixed outside in a wheelbarrow.

8 Q Okay. After that one week job at Tillman
9 where did -- where was the next work site you remember going
10 with Covil?

11 A Where did I go next?

12 Q Yes.

13 A I think that I went for a day, could have been
14 two days, at one of these mills here in Anderson. The one
15 that's -- I can't think of the name of the doggone thing.

16 Q The Abney Mill?

17 A No, it wasn't Abney. It wasn't J. P. It
18 wasn't the -- nope.

19 Q That's okay. How long did you say you were
20 there?

21 A A couple of days. It was to insulate some
22 water pipe.

23 Q Do you know what you think this mill did, like
24 what did they make?

25 A It was a cotton mill. It was a fabric type.

1 Q What kind of job would only take a day or two?

2 A Sir?

3 Q What kind of a job would only take a day or
4 two?

5 DEFENSE COUNSEL: Objection.

6 THE WITNESS: Well, it was a replacement
7 of that pipe. The old mill was ancient.

8 BY MR. HOLDER

9 Q And so the new --

10 A That's what it -- you know, we got the
11 contract on it or they called Covil or whatever.

12 Q Sure.

13 A That's how long it took.

14 Q Okay.

15 A You can run a hundred feet of pipe in a day.

16 Q Okay. And is that the pipes already laid and
17 you're insulating it or is that laying the pipe and then
18 insulating it?

19 A No, it's just insulating the pipe.

20 Q Okay. So when you got there, the pipe has
21 already been installed?

22 A It's already been installed completely.

23 Q So for this job was there any other crafts
24 around?

25 A Sir?

1 Q When -- for this job at the mill in Anderson,
2 the textile mill that we can't really remember what the name was,
3 you said the pipe was already installed. Were there other
4 crafts around when you were working there for that one or two
5 days, do you remember?

6 A No. Just mill workers pass by whatever.

7 Q That's fine. What was -- after you left that
8 little cotton or textile mill, what was the next work site
9 you remember going to?

10 A The next one would have been, I think,
11 B-A-L --

12 MR. HOLDER: I'll do it. That's the
13 Badische? D-O-W separate word
14 B-A-D-I-S-C-H-E.

15 THE WITNESS: Yes, BASF is what we always
16 called it.

17 BY MR. HOLDER

18 Q Okay. So BASF plant. And that was the place
19 you remember going to after that one- or two-day job in, at
20 the cotton or textile mill in Anderson, correct? Is that
21 correct?

22 A Yes.

23 Q Okay. Now, do you know around what year it
24 would have been that you would have first -- that first time
25 you went to the BASF plant?

1 A Gosh, not really, but I'm thinking it would
2 have been in probably '74 was the very first time I went down
3 there.

4 Q Okay. Is this a plant that you had returned
5 to or that you had just had one single job at?

6 A Covil had a maintenance contract. Dow
7 Badische they were -- they had -- were on the job when the
8 plant was being built, so they got the contract --

9 Q When did --

10 A -- to stay on there.

11 Q Okay. Did you -- were you in the first group
12 of Covil to go to work at BASF or was Covil already working
13 there?

14 A They were already working there. They had
15 their maintenance crew and all there.

16 Q Who's they?

17 A Covil.

18 Q So how long were you at BASF the first time
19 you went?

20 A I think I was there for maybe a week.

21 Q Okay.

22 A I helped out on one of their shutdowns. As a
23 matter of fact, they had about three going on at the same
24 time.

25 Q Okay. Would that be multiple shutdowns within

1 the same building?

2 A No.

3 Q Okay. Well, let me ask this: Where's the OCF
4 plant located, not OCF plant, BASF plant, where is that
5 located?

6 A It's off of Masters Boulevard.

7 Q And what city and state?

8 A Anderson, South Carolina.

9 Q And had -- was it already in operation when
10 you went there?

11 A Yes, it was.

12 Q Or was it still in construction? Okay. Now,
13 what, on this first week shutdown that you worked in 1974 you
14 said, what was -- what was the job being done? What were you-
15 all working on?

16 A I was working on steam pipe that went from,
17 that went from the building where the boiler and all the way
18 back up to the plant is what I done, that and the return on
19 it.

20 Q Okay. And were you applying the insulation or
21 what were you --

22 A Applying.

23 Q Was there any insulation that had to be
24 removed?

25 A No.

1 Q Was this all new?

2 A It was replace.

3 Q Replace, okay. So had the old insulation
4 already been removed and discarded?

5 A Yes.

6 Q Okay. During this first job at BASF, were you
7 around other crafts?

8 A Yes.

9 Q Okay. Were you around pipe fitters --

10 A Oh, yes.

11 Q -- at this first job at BASF?

12 DEFENSE COUNSEL: Objection.

13 BY MR. HOLDER.

14 Q Okay. And what were the pipe fitters doing?

15 A Pardon?

16 Q What were the pipe fitters doing at this first
17 trip at BASF?

18 DEFENSE COUNSEL: Object to the form.

19 THE WITNESS: At that particular time
20 they were working on the valves.

21 BY MR. HOLDER

22 Q What were they doing on the valves?

23 A Setting them in place, torquing the bolts,
24 getting them ready, together.

25 Q Were they installing the flange gaskets?

1 A Yeah, they were.

2 DEFENSE COUNSEL: Objection.

3 BY MR. HOLDER

4 Q Were there any flange gaskets removed that you
5 can remember?

6 A No.

7 Q Was there any -- did you have to work around
8 any valve techs during that first job at BASF?

9 DEFENSE COUNSEL: Objection to the form.

10 THE WITNESS: Yeah, I did.

11 BY MR. HOLDER

12 Q Okay. And what were the valve techs doing?

13 DEFENSE COUNSEL: The same objection.

14 THE WITNESS: They were just installing,
15 setting everything up --

16 MR. HOLDER: Okay.

17 THE WITNESS: -- just doing what it's
18 supposed to do.

19 MR. HOLDER: Sure.

20 BY MR. HOLDER

21 Q Did you have occasion while you were -- before
22 I go into specific products I forgot to ask you about
23 boilermakers. Did you have to work in proximity to
24 boilermakers that first trip to BASF?

25 DEFENSE COUNSEL: Objection.

1 THE WITNESS: I worked in the room where
2 it was, but I don't recall any boilermakers in
3 there.

4 BY MR. HOLDER

5 Q Okay. And when you say "where it was," do you
6 mean the boiler?

7 A Um-hum. Yes.

8 Q Sure. Did you have to insulate any part of
9 the boiler during that trip to BASF?

10 A No, no more than just insulating the pipe --

11 Q Okay.

12 A -- tie it in.

13 Q Where would this pipe tie into the boiler, do
14 you recall, or would it tie directly into the boiler?

15 A Yeah, it tied directly into the end.

16 Q Do you remember about how large that boiler
17 was?

18 A Sir?

19 Q Do you remember about how large that boiler
20 was that you worked around that first trip to BASF?

21 A Well, to me boiler was a boiler and I had my
22 job to do and I just -- I can't recall. It's just --

23 Q Sure. No problem. Did you have to insulate
24 any pumps during this first trip to BASF?

25 DEFENSE COUNSEL: Objection.

1 THE WITNESS: Yeah, outside.

2 BY MR. HOLDER

3 Q Okay. Did you have to insulate any valves on
4 this first trip to BASF?

5 DEFENSE COUNSEL: Objection.

6 THE WITNESS: Yes, sir.

7 MR. HOLDER: Say that again.

8 THE WITNESS: Yes, sir.

9 BY MR. HOLDER

10 Q Okay. For the insulation that you applied on
11 the line, the pumps and the valves, do you remember if you
12 used a mud or a solid-type form insulation?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: Oh, yes. To finish you
15 always had your insulation mud to help if it's
16 bad, you had your brown mud as a finish.

17 BY MR. HOLDER

18 Q And would you layer that on top of the block
19 or half moon?

20 A Pipe cover, yes. For valves, yes.

21 DEFENSE COUNSEL: Objection, the same
22 objection.

23 THE WITNESS: And a lot of times we would
24 metal -- put metal over them.

25

1 BY MR. HOLDER

2 Q Okay.

3 A Aluminum.

4 Q Do you remember on this first trip to BASF
5 seeing any signs anywhere that warned about the hazards of
6 asbestos?

7 DEFENSE COUNSEL: Objection.

8 THE WITNESS: No, nothing.

9 BY MR. HOLDER

10 Q Did any -- anybody that worked for BASF ever
11 tell you, on that first trip to BASF, ever warn you
12 specifically --

13 A Well --

14 Q -- let me finish the question. Ever warn you
15 specifically in person about the dangers of asbestos?

16 DEFENSE COUNSEL: Objection.

17 THE WITNESS: Oh, no.

18 BY MR. HOLDER

19 Q Okay. After, after that first one-week trip
20 to BASF, what was the next work site you remember going to
21 for Covil? Sorry.

22 A I went to a -- I can't find the name of the
23 mill, they just tore it down, it was in Clemson. It had a
24 lot of light frontage on it. Anyway, Covil sent me there for
25 a day just to do some repair work.

1 Q And what -- any idea what this mill did? What
2 kind of mill it was?

3 A I'm thinking it was a textile mill.

4 Q And this textile mill in Anderson did you say?

5 A Sir?

6 Q -- or in Clemson did you say?

7 A Clemson, yes. I used to remember names of
8 these things, but it's --

9 Q Sure.

10 A I haven't thought about this stuff in years.

11 Q Sure. And for this one, for this one that
12 we're specifically talking about, the textile mill, you
13 recall only being there for a single day in your career?

14 A A single day.

15 Q Okay.

16 A As a matter of fact, it didn't take a full day
17 to do it.

18 Q Okay.

19 A They had some beautiful trees and when I got
20 through, I had a late lunch and went to sleep under that tree.

21 Q And you remember? And you remember that from
22 just a single day?

23 A Yeah, I remember the tree and that was a rare
24 thing.

25 Q After that one day textile mill work, do you

1 remember the next work site that you went to after that?

2 A Yes, sir. I went back to Clemson University
3 and worked for Tony.

4 Q Okay. How long were you at Clemson for the
5 second trip?

6 A I was there for -- well, I was there, I'm
7 thinking, about maybe a month.

8 Q Okay. What was the work project that you were
9 doing during the second trip to Clemson?

10 A Would you repeat that?

11 Q What was the project that you were working on
12 during the second trip to Clemson?

13 A Oh, gosh dog, Tony had me going everywhere. I
14 worked down in the manholes and I worked at the -- over here
15 close to where that dairy is. All just odd and end things --

16 Q Sure.

17 A You know.

18 Q And this was over for about a month period?

19 A Yeah.

20 Q Okay. Now, let me unpack some of that. What
21 kind of work would you do in the manholes?

22 A What would I do where?

23 Q In the manholes. You described working in the
24 manholes?

25 A It's just -- Clemson's like a city itself

1 underneath --

2 Q Right.

3 A And all those pipe chases --

4 Q I got you.

5 A That's what I was referring to is a pipe
6 chase.

7 Q Okay.

8 A They go from building to building and all that
9 kind of thing.

10 MR. HOLDER: Can you do me a favor, if we
11 could, could we try to face a little more
12 towards the camera. The cameraman is having a
13 little bit of a tough time --

14 THE WITNESS: I'm sorry.

15 MR. HOLDER: -- keeping us on the video.

16 THE WITNESS: Okay.

17 MR. HOLDER: It's just to help the jury
18 when they are -- if we have to use the video
19 when we come to trial. So I appreciate that.

20 BY MR. HOLDER

21 Q Well, let me first ask you specifically about
22 the manhole work, would you be doing insulation work in the
23 manholes?

24 A Sure.

25 Q Okay.

1 A Pipe chases, you know, insulating pipe there
2 too.

3 Q Sure. Right. Would there be other crafts
4 working side by side you in the pipe chases?

5 A There wasn't.

6 Q There was not. Okay. What about -- do you
7 recall insulating any valves in the pipe chases?

8 DEFENSE COUNSEL: Object to the form.

9 THE WITNESS: Oh, yes.

10 BY MR. HOLDER

11 Q Okay. Do you recall insulating any pumps in
12 the pipe chases?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: Yes.

15 BY MR. HOLDER

16 Q Do you recall about how long of that one month
17 you would have spent in the manholes, in the pipe chases?

18 A Well, I was there the whole month.

19 Q Okay.

20 A Like I said, I was doing all kinds of little
21 odds and ends.

22 Q Right.

23 A Things that needed -- he wanted me to do.

24 Q Okay. Well, help me understand this, is the
25 manholes or pipe chases like one of the places you went or

1 did you go back there from time to time to do work?

2 A No, that was one of the places I went.

3 Q So for that work that you did in the manholes,
4 how long did that take? Was that a day job or two-day job?

5 A No, it was probably about a week.

6 Q Okay. Then you did work over near the Clemson
7 dairy, is that correct?

8 A Um-hum.

9 Q All right. What work would you have done over
10 at the dairy?

11 A I cannot remember.

12 Q Okay. Do you think it was the insulating?

13 A I cannot remember to save my life. All I
14 remember is they gave me some ice cream and it was good.

15 Q Do they still have a functioning dairy over at
16 Clemson?

17 A I really don't know, more than likely. It was
18 insulating pipe, to that I'm sure, but I just -- it kind of
19 went over my head right now.

20 Q One of those places that sticks out I'm sure
21 because it's not like your normal work site?

22 A I can remember the places and not what I done.
23 Then sometimes I remember what I done and not the places.

24 Q Sure.

25 A We talking, what, 30 years ago --

1 Q Sure. Sure.

2 A Or so.

3 Q All right. Do you know about how, if the
4 manhole, if you were there for a week of -- of the about a
5 month at Clemson for that second trip there, about how long
6 do you think you would have been working over at the dairy?

7 A Probably a couple of days on that I'm
8 thinking.

9 Q Okay. Do you remember any of the other places
10 you would have worked besides in the pipe chases and in the
11 dairy during that second trip to Clemson?

12 A No. Tony, he had me on steam stations. He
13 loved for me to do them things.

14 Q Okay. Are steam stations what you were
15 working on on the last trip to Clemson?

16 A Um-hum.

17 Q Okay.

18 A A lot of them were about 2-foot, 3-foot off
19 the ground. Different things hit -- hit them, knocked the
20 insulation loose or whatever and we -- I just -- he would get
21 me to go in there and tear off what was, you know, the bad
22 looking stuff and replace.

23 Q Sure.

24 A To make it look good, again.

25 Q Sure. Did that --

1 A Clemson is very particular about their
2 neatness.

3 Q Sure. Did that ever occur to -- when I say
4 "that," I mean the insulation falling off and you having to go
5 and tear it off and re-insulate?

6 A Hm-hmm.

7 Q What you just described, do you recall that
8 ever occurring to insulation on pumps?

9 DEFENSE COUNSEL: Objection.

10 MR. HOLDER: At Clemson during this
11 second trip?

12 DEFENSE COUNSEL: Objection.

13 THE WITNESS: Yeah, yeah. It happened
14 with pumps too.

15 BY MR. HOLDER

16 Q How about with valves?

17 DEFENSE COUNSEL: Same objection.

18 THE WITNESS: Yeah. Valves and steam
19 stuff, yeah.

20 BY MR. HOLDER

21 Q Okay. And when you would go there and have to
22 tear off the insulation, whether it be off of a pump or off
23 of a valve to re-insulate it, would tearing it off create
24 dust?

25 DEFENSE COUNSEL: Objection to form.

1 THE WITNESS: Oh, yes.

2 BY MR. HOLDER

3 Q Okay. Do you believe that you would breathe
4 that dust?

5 DEFENSE COUNSEL: Objection.

6 THE WITNESS: Oh, yes.

7 BY MR. HOLDER

8 Q Okay. Generally, and I will just say as to
9 the pumps and the valves in the steam stations at Clemson
10 that you worked on, would they work without insulation?

11 DEFENSE COUNSEL: Objection.

12 THE WITNESS: Yes.

13 BY MR. HOLDER

14 Q Okay. How?

15 A Not -- I mean, you know, they would have to do
16 some regulations --

17 Q All right.

18 A -- and heat and all.

19 Q Would anybody be able to come in and touch it?

20 DEFENSE COUNSEL: Objection.

21 THE WITNESS: Yeah.

22 BY MR. HOLDER

23 Q Would they burn themselves?

24 DEFENSE COUNSEL: Objection.

25 THE WITNESS: Oh, absolutely, if it

1 wasn't insulated.

2 DEFENSE COUNSEL: Objection.

3 BY MR. HOLDER

4 Q Okay. So without insulation would anybody be
5 able to maintain these pieces of equipment?

6 DEFENSE COUNSEL: Objection to form.

7 THE WITNESS: I don't think they could
8 keep it on a steady flow, work.

9 MR. HOLDER: I understand.

10 BY MR. HOLDER

11 Q And, again, when you were being sent in to do
12 this type of work in the steam stations at Clemson, during
13 the second trip, did you see any warnings on any of the pumps
14 or the valves regarding dangers of asbestos?

15 DEFENSE COUNSEL: Object to form.

16 THE WITNESS: None.

17 BY MR. HOLDER

18 Q During the second trip to Clemson, did you
19 ever have to do work on any boilers?

20 A I don't think so.

21 Q Okay. And I know we talked about you
22 insulating pumps and valves, but did you have occasion to be
23 in the vicinity of packing or gasket replacement --

24 DEFENSE COUNSEL: Object to the form.

25 BY MR. HOLDER

1 Q -- during the second trip to Clemson?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: No, not on the second trip.

4 I thought you were talking about in general.

5 BY MR. HOLDER

6 Q Yeah, sorry. That's why I try to be so
7 specific.

8 A No, not then.

9 Q Okay. After you completed this second trip to
10 Clemson, where did you -- what's the next work site you
11 remember going to with Covil?

12 A Well, while I was there they called and sent
13 me to BASF, again. I thought I had found a home at Clemson,
14 but I didn't.

15 Q And after a month at Clemson, which was the
16 second time at Clemson, you were back to BASF?

17 A Yeah.

18 Q And was this your second time at BASF?

19 A Yes.

20 Q Now, on the second trip to BASF, was this,
21 would this have been as part of a shutdown or was this part
22 of a maintenance visit or what kind of trip was it?

23 A Yes and no. They were in need of men. They
24 had to let two go, they needed two men.

25 Q "They" is meaning Covil?

1 A They Covil, yes.

2 Q Okay. And so you --

3 A To go there and work maintenance.

4 Q Were you working as a replacement worker then?

5 A I was taking a former employee's place, yes.

6 Q Remember try to, as much as we can, try to
7 stay facing the camera so the jury can see us, but you're
8 doing great. Now, this second trip to BASF, do you remember
9 how long you were there for?

10 A I was there --

11 MR. HOLDER: Strike that. Let's think
12 about it in these terms: Let me ask this
13 first:

14 BY MR. HOLDER

15 Q Do you remember the project that you were
16 assigned to work on during that second trip to BASF?

17 A Yes. It was on the mezzanine floor and it was
18 steam pipe.

19 Q Okay. The steam pipe work on the mezzanine
20 level, which was the second trip to BASF --

21 A Yes.

22 Q Okay. How long did that project take? Do you
23 know how long you were there for?

24 A Well, I was there for most of the time that I
25 worked with Covil. I would leave and maybe do a little small

1 weekend job because, our, on a holiday -- BASF had holidays
2 for their employees and they would shut -- shut down, you
3 know, so I would -- road superintendent called me, give me a
4 job that would last for that amount of time, but I was there
5 from -- gosh, trying my best to remember. I think '75 until
6 '80, until maybe 1980, early '80.

7 Q Okay. Okay. I'm going to try and keep going
8 through the job sites for how long or for the job, the work
9 you were there for a specific visit to that premises. So
10 between the time you went there and the time you left, let's
11 just talk about for the second visit when you went to BASF.
12 Do you know about how long you would have been there day
13 after day? Would that have become your regular workplace
14 during that second visit for a long period of time?

15 A Probably about a year.

16 Q Okay. And during this year did it all -- did
17 the steam pipe work on the mezzanine level take the entire
18 year or is that just one job you did during that year?

19 A That was just one.

20 Q Okay. Do you remember any of the other
21 projects that you did during that year?

22 A Yes. I done some ductwork that ran through
23 the work areas where the spinning of this nylon, I guess it
24 was, or polyester.

25 Q Okay.

1 A This big old duct, huge duct, worked on that.

2 Q Were most of the jobs new construction or were
3 they maintenance of older work?

4 A Both. They were both there.

5 Q Now, during any of the maintenance work on,
6 that was not new construction at the BASF plant, during this
7 second stay there, would you have been around other crafts
8 that were also doing maintenance work at BASF?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: Sure. Sure.

11 BY MR. HOLDER

12 Q During this year at BASF, during your second
13 stint there, would you have been around pipe fitters?

14 DEFENSE COUNSEL: Objection.

15 THE WITNESS: Yes, we worked closely with
16 pipe fitters and welders.

17 BY MR. HOLDER

18 Q About how close would you have been working to
19 them?

20 DEFENSE COUNSEL: Objection.

21 THE WITNESS: Too close.

22 BY MR. HOLDER

23 Q I'm sure.

24 A About three, four feet, you know, just we were
25 always jammed up.

1 Q Sure. Did you ever work around valve
2 technicians at BASF on any of these maintenance jobs?

3 DEFENSE COUNSEL: Objection.

4 THE WITNESS: Yes, I did.

5 BY MR. HOLDER

6 Q Okay. And would they have been about the same
7 distance away?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: Yes.

10 BY MR. HOLDER

11 Q As the pipe fitters that you just described?

12 A Yes.

13 Q Okay. All right. Now, during any of these
14 maintenance project jobs that you did at BASF during the
15 second stint, would you be working in the vicinity of other
16 workers removing packing from pumps?

17 DEFENSE COUNSEL: Objection.

18 THE WITNESS: Oh, yes. Yes. Daniel had
19 the contract, maintenance contract, on that
20 kind of thing and we worked very close with
21 Daniel.

22 BY MR. HOLDER

23 Q Did Daniel have the maintenance contract for
24 BASF generally during that time?

25 DEFENSE COUNSEL: Object to the form.

1 THE WITNESS: Yes. Yes, it sure did.

2 BY MR. HOLDER

3 Q And what -- if Daniel had the maintenance
4 contract at that time, what was Covil doing?

5 A Covil was doing the insulation work.

6 Q Okay. Was Covil a sub of Daniel?

7 A No.

8 DEFENSE COUNSEL: Object to the form.

9 THE WITNESS: Covil was -- Covil was --
10 was bid out just like Daniel was for the
11 maintenance contracts. Daniel was the lowest
12 bidder there. Covil was, so they got the
13 jobs, you know.

14 BY MR. HOLDER

15 Q Okay.

16 A Also, Daniel was there during all the
17 construction as well just like Covil.

18 Q Okay.

19 A And that may -- had a lot to do with it. I
20 don't know.

21 DEFENSE COUNSEL: Objection to the
22 responsiveness.

23 MR. HOLDER: Sure.

24 BY MR. HOLDER

25 Q Okay. On the valve techs, the other crafts

1 that you were around that you just mentioned --

2 A Um-hum.

3 Q -- for valve techs and pipe fitters?

4 A Um-hum.

5 Q On the maintenance work that you would have
6 been around at your second trip at BASF?

7 A Yes.

8 Q Were you ever in the vicinity of pipe fitters
9 removing packing from pumps?

10 DEFENSE COUNSEL: Objection to form.

11 THE WITNESS: Oh, yes.

12 MR. HOLDER: At BASF. Okay.

13 THE WITNESS: As a matter of fact, it
14 wasn't a common thing, but myself and the
15 other insulators there we worked very close with
16 Daniel. If the guy needed help, we'd helped
17 him with it.

18 MR. HOLDER: Sure.

19 THE WITNESS: On things like that too.

20 MR. HOLDER: Sure.

21 THE WITNESS: We always worked real
22 close --

23 MR. HOLDER: Okay.

24 THE WITNESS: -- together on trying to
25 get things done, like that's what we would do.

1 DEFENSE COUNSEL: Object to the
2 responsiveness.

3 THE WITNESS: We didn't have to. It
4 wasn't a part of our job title or anything,
5 but --

6 BY MR. HOLDER

7 Q Sure.

8 A We just, you know, most trades will back then
9 and I think it's all labor now, most trades back then we
10 would help one another.

11 Q Okay.

12 A Interact like that to get things done.

13 Q Let me ask you this: Were you in a union at
14 this time?

15 A No.

16 Q Were you ever in a union?

17 A Covil, yes.

18 Q Okay. Is that a labor union?

19 A Labor union, yes.

20 Q Okay. And you were while you were at Covil?

21 A Pardon?

22 Q I said you were in a labor union while you
23 were at Covil?

24 A No. Covil had went nonunion --

25 Q Okay.

1 A -- during that.

2 Q That's all I was asking.

3 A You don't do things like I just said if you
4 are union.

5 Q That's why I was asking. Now, did the -- you
6 had stated that you recalled being in the vicinity during the
7 maintenance work while pipe fitters removed packing from
8 pumps?

9 DEFENSE COUNSEL: Objection. Objection
10 to form.

11 THE WITNESS: Yes.

12 MR. HOLDER: Correct.

13 BY MR. HOLDER

14 Q Okay. Now, that removal of packing from these
15 pumps, did that create visible dust?

16 DEFENSE COUNSEL: Object to the form.

17 THE WITNESS: Yeah.

18 BY MR. HOLDER

19 Q And do you believe that you would have
20 breathed that dust?

21 DEFENSE COUNSEL: Objection to form.

22 THE WITNESS: Yeah.

23 BY MR. HOLDER

24 Q Okay. And did that happen just one time or
25 did that happen multiple times?

1 DEFENSE COUNSEL: Objection to form.

2 THE WITNESS: Well, it happened many
3 times.

4 BY MR. HOLDER

5 Q Okay. Now, similarly, did you have occasion
6 to be in the vicinity of pipe fitters removing gaskets from
7 pumps while at BASF during this period?

8 DEFENSE COUNSEL: Objection to form.

9 THE WITNESS: Yes.

10 BY MR. HOLDER

11 Q Okay. And did the removal of the old gasket
12 material from -- let's start with internal gaskets on the
13 pumps, did the removal of that old gasket material create
14 dust?

15 DEFENSE COUNSEL: Objection to form.

16 THE WITNESS: Yeah.

17 BY MR. HOLDER

18 Q Okay. And do you believe that you breathed
19 that dust?

20 A Yeah.

21 DEFENSE COUNSEL: Objection to form.

22 BY MR. HOLDER

23 Q And do you believe that happened one time or
24 do you believe that happened many times?

25 DEFENSE COUNSEL: Objection to form.

1 THE WITNESS: No, it happened multiple
2 times --

3 MR. HOLDER: Okay.

4 THE WITNESS: -- over the years.

5 MR. HOLDER:

6 Q Sure. And specifically at BASF?

7 DEFENSE COUNSEL: Objection to form.

8 THE WITNESS: Yes, I was there the
9 longest during --

10 MR. HOLDER: Sure.

11 BY MR. HOLDER

12 Q I'm sorry if some of these questions sound
13 similar, but we just have to get as much detail as possible.
14 Also at BASF, on any of these maintenance jobs, now not the
15 new construction, but on the maintenance jobs, do you ever
16 recall being in the proximity of a valve tech. who was
17 pulling or removing packing from a valve?

18 DEFENSE COUNSEL: Object to form.

19 THE WITNESS: Yes.

20 BY MR. HOLDER

21 Q Okay. And did the removal of the packing from
22 the valve create visible dust?

23 DEFENSE COUNSEL: Objection.

24 THE WITNESS: Yeah.

25 BY MR. HOLDER

1 Q Okay. And do you believe that you would
2 breathe that dust?

3 DEFENSE COUNSEL: Objection.

4 THE WITNESS: Yes.

5 BY MR. HOLDER

6 Q Okay. And do you believe that happened one
7 time or did that happen multiple times?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: It happened multiple times.

10 BY MR. HOLDER

11 Q Okay. And, also, as to a valve and this is at
12 BASF on these maintenance jobs, would you have been in the
13 vicinity when a valve technician was replacing an internal
14 gasket on a valve?

15 DEFENSE COUNSEL: Objection to form.

16 THE WITNESS: Yes, I have been.

17 BY MR. HOLDER

18 Q Okay. And did they have to remove the old
19 gasket material on these internal gaskets of the valves?

20 A Yes.

21 Q Okay. And did the removal of the old gasket
22 material on the internal gaskets of the valves create visible
23 dust?

24 A Yes.

25 DEFENSE COUNSEL: Objection.

1 BY MR. HOLDER

2 Q And do you believe you breathed that dust?

3 A Yes.

4 DEFENSE COUNSEL: Objection.

5 BY MR. HOLDER

6 Q And did that happen just one time or did that
7 happen many times?

8 A Multiple times.

9 DEFENSE COUNSEL: Objection.

10 BY MR. HOLDER

11 Q Okay. Finally, on the valves at BASF, and
12 just on the maintenance projects. I'm not talking about the
13 new construction on the second stint at BASF, were you in the
14 vicinity when valve technicians would remove or replace
15 flange gaskets?

16 DEFENSE COUNSEL: Objection.

17 THE WITNESS: Replace flange gaskets?

18 Oh, yes. Yes, I was. Common thing.

19 BY MR. HOLDER

20 Q Okay. And would you have been in the
21 proximity to these valve techs when they were removing old
22 flange gasket materials off the flange facing?

23 DEFENSE COUNSEL: Objection.

24 THE WITNESS: Yes.

25 BY MR. HOLDER

1 Q Okay. And would this removal of the flange
2 gasket material from the flange facing create a visible dust?

3 A Yes.

4 DEFENSE COUNSEL: Object to form.

5 BY MR. HOLDER

6 Q Okay. And do you believe that you would
7 breathe that dust?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: Yes.

10 BY MR. HOLDER

11 Q And do you believe that happened just one time
12 or did that happen many times while at BASF?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: Many times.

15 BY MR. HOLDER

16 Q Okay. Did you see any warnings on any of
17 these pumps at BASF that warned against the dangers of
18 asbestos.

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: No, sir.

21 BY MR. HOLDER

22 Q Okay. Did you see any warnings on any of the
23 valves at BASF which warned against the hazards of asbestos?

24 A No, sir.

25 DEFENSE COUNSEL: Objection.

1 BY MR. HOLDER

2 Q Okay. Did you ever speak with any
3 representatives from any pump manufacturers that were on-site
4 at the BASF plant and they warned you about the hazards of
5 asbestos?

6 A No, sir.

7 Q Same question for -- did you ever have
8 occasion to speak to any valve manufacturer representative on
9 premises at BASF and they warn you about the hazards of
10 asbestos?

11 DEFENSE COUNSEL: Objection to form,
12 misstates testimony.

13 THE WITNESS: No, sir.

14 BY MR. HOLDER

15 Q I guess this is a good time to ask anyway, do
16 you recall ever, at BASF, ever any product manufacturers
17 being on-site to oversee any maintenance job of a product?

18 A You talking --

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: -- a part manufacturer or
21 whatever?

22 MR. HOLDER: Right, at BASF.

23 THE WITNESS: No.

24 MR. HOLDER: Not anywhere else.

25 BY MR. HOLDER

1 Q Okay. Now, did any boiler projects that you
2 did during the second stint at BASF?

3 DEFENSE COUNSEL: Objection.

4 THE WITNESS: Yes.

5 BY MR. HOLDER

6 Q All right. What work did you do on the boiler
7 during the second trip at BASF?

8 A Oh, gosh, putting a refractory cement around
9 it.

10 Q Okay. And would that have been around the
11 outside or the inside of the boiler?

12 A That was both, in and out.

13 Q Did -- well, let me ask you this: How long
14 did the job take of refractory bricking the boiler?

15 A Of actual --

16 Q Of refractory bricking, installing the
17 refractory brick of the boiler?

18 A We were done in 24 hours.

19 Q Wow. How big of a boiler was it?

20 A It wasn't that big.

21 Q Okay.

22 A But it was most needed.

23 Q Okay. Was it an older boiler?

24 A Well, for life of boilers, yeah. I'd say
25 probably ten years old.

1 Q Do you happen to remember what kind of boiler
2 it was? Like was it a certain number of tubes or a package
3 boiler or sectional boiler?

4 A Pardon?

5 Q Do you know what type of boiler it was that
6 you worked rebricking?

7 A You want the name?

8 Q No. No. Like what type it is because
9 sometimes you might have hog fuel boiler or a package boiler,
10 trash boiler, a medical incinerator boiler?

11 A No, it was for -- this was for steam for hot
12 water.

13 Q Okay. Was -- did you have to remove
14 refractory brick before installing the new refractory brick?

15 A Yeah, the one that was burned out.

16 Q Okay. And were there other crafts around on
17 this job?

18 A Oh, yes, because it had to be done quick, you
19 know.

20 Q What other crafts do you remember around
21 working on this boiler job?

22 A Pardon?

23 Q What other crafts do you remember being around
24 working at this boiler job at BASF?

25 A Well, there were pipe fitters and welders

1 and --

2 Q Any valve technicians?

3 DEFENSE COUNSEL: Objection.

4 THE WITNESS: That's about all I can
5 remember and us.

6 MR. HOLDER: Okay. All right.

7 BY MR. HOLDER

8 Q Did this removal of the refractory brick, the
9 old refractory brick, did that create visible dust?

10 A Oh, yes.

11 DEFENSE COUNSEL: Objection.

12 BY MR. HOLDER

13 Q Do you think you breathed that dust?

14 A Yeah.

15 Q Were there any warnings anywhere up in that
16 building or anywhere at that facility of BASF warning you
17 against the potential hazards of asbestos?

18 A No.

19 Q Okay. And, similarly for when you were doing
20 the steam pipe work and around the maintenance work around
21 the pipe fitters and valve techs that you described earlier,
22 did you see any warning signs around in the building in those
23 rooms for BASF warning against the hazards of asbestos?

24 DEFENSE COUNSEL: Objection.

25 THE WITNESS: None.

1 BY MR. HOLDER

2 Q Okay. Did anyone from on-site that worked at
3 BASF ever warn you about the hazards, the potential hazards
4 of asbestos?

5 A No, no warning.

6 Q After you left -- actually, hold on. What,
7 during that refractory brick work at the boiler, what were
8 the other crafts doing or, for instance, what were the
9 pipe fitters doing during the boiler job?

10 A They were putting up the pipe, bolting flanges
11 together, putting up new pipe to take place of some of the
12 old.

13 Q Okay. Were some pipe fitters removing flange
14 gaskets?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: Yeah.

17 BY MR. HOLDER

18 Q Okay. Was that work creating visible dust?

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: Oh, yeah.

21 BY MR. HOLDER

22 Q Okay. And do you believe you breathed that
23 dust?

24 DEFENSE COUNSEL: Objection.

25 THE WITNESS: Yeah.

1 BY MR. HOLDER

2 Q Okay. And that happened one time or did that
3 happen many times?

4 A That happened many times.

5 DEFENSE COUNSEL: Objection.

6 BY MR. HOLDER

7 Q Okay. And how about valve technicians, were
8 valve technicians present inside -- not inside, but at that
9 boiler project at BASF?

10 DEFENSE COUNSEL: Objection.

11 THE WITNESS: Yes.

12 BY MR. HOLDER

13 Q Okay. Were the valve techs removing flange
14 gaskets from the valves?

15 DEFENSE COUNSEL: Same objection.

16 THE WITNESS: Well, I'm sure that they
17 were, but I can't say.

18 BY MR. HOLDER

19 Q Specifically.

20 A That I remember seeing that time.

21 Q Okay. Do you remember any valve techs at that
22 specific boiler job at BASF working on any internal
23 gaskets of those valves --

24 DEFENSE COUNSEL: Objection to form --

25 BY MR. HOLDER

1 Q -- at BASF?

2 A I can't recall.

3 MR. HOLDER: Okay. That's fine. How you
4 feeling? You like to take another five-minute
5 break? Seems like a good point.

6 THE WITNESS: Okay.

7 MR. HOLDER: Okay. We can go off the
8 record, please.

9 THE VIDEOGRAPHER: Off the record at
10 15:48.

11 (Whereupon, a recess was taken at 15:48
12 until 16:03.)

13 THE VIDEOGRAPHER: Going back on the
14 record. Camera time is 16:03.

15 BY MR. HOLDER

16 Q All right. Mr. Waters, Jonathan Holder,
17 again, your attorney coming back on to the record this
18 afternoon. When we went off or when we left last, you were
19 telling us about some work projects you had done over at the
20 BASF plant while you were working for Covil, do you remember
21 that?

22 A Yes, sir.

23 Q Okay. And you mentioned that often you would
24 be working around other crafts during your time at BASF, is
25 that correct?

1 A Yes, sir.

2 DEFENSE COUNSEL: Objection.

3 BY MR. HOLDER

4 Q Okay. And I believe you stated, but correct
5 me if I'm wrong, you were around pipe fitters and valve techs
6 and welders during your time at BASF, is that correct?

7 A Yes, sir.

8 DEFENSE COUNSEL: Objection. Objection
9 to form.

10 BY MR. HOLDER

11 Q Now, you also mentioned Daniel, do you recall
12 testifying about Daniel regarding BASF?

13 DEFENSE COUNSEL: Object to the form.

14 THE WITNESS: Yes. Daniel -- Daniel had
15 the maintenance contract on that, that work
16 there, yes.

17 BY MR. HOLDER

18 Q And just so we clarify for the jury that might
19 not be familiar, is Daniel a company or a person?

20 A Daniel is a company.

21 Q Okay.

22 A Daniel Construction.

23 Q Okay. And so when you described working
24 around pipe fitters and valve techs, were these men that were
25 employed by Daniel?

1 DEFENSE COUNSEL: Object to the form.

2 BY MR. HOLDER

3 Q Or Daniel workers, however you want to word
4 it?

5 DEFENSE COUNSEL: Object to the form.

6 THE WITNESS: They were Daniel employees
7 and they were BASF employees as well.

8 BY MR. HOLDER

9 Q Okay. So you worked around both BASF
10 employees and Daniel employees?

11 DEFENSE COUNSEL: Object to form.

12 THE WITNESS: Yes. BASF had a
13 maintenance crew like any other plant.

14 BY MR. HOLDER

15 Q Okay. Could their maintenance crew do the
16 same thing that you-all could do?

17 A Well, probably to a point --

18 Q Okay.

19 A -- but they could go get a -- maintenance
20 maintained, that's all they were trained to do. So maintain
21 the equipment and --

22 Q Sure. Did they have certified insulators on
23 staff there at BASF?

24 A I was the only one.

25 Q Okay. But I mean you weren't employed by

1 BASF?

2 A No.

3 Q Correct?

4 A Right. I was --

5 Q So I am asking if BASF had their own
6 insulators employed that were working with y'all?

7 A No.

8 Q Okay.

9 A No.

10 Q Just making sure. Now, would the -- and I
11 just want to clarify also, before leaving this point, when
12 you said there would be workers that were both Daniel workers
13 and BASF workers working around y'all, I just want to clarify
14 men wouldn't be working at the same time for both BASF and
15 Daniel --

16 A No.

17 Q -- correct?

18 A No.

19 DEFENSE COUNSEL: Object to the form.

20 BY MR. HOLDER

21 Q When you say BASF workers, and Daniel workers
22 you meant separate people, is that correct?

23 A I meant separate companies --

24 Q Okay.

25 A -- but they would -- let me see if I can't

1 simplify this thing. We were -- we were hired maintenance
2 people to be able to do construction, if needed, on anything
3 in the plant. The BASF maintenance person, people, they were
4 hired to know how this valve is -- characteristics from Daniel
5 to let them know about things. It's the reason they would
6 come in and their supervisors have them come in and sometimes
7 they would work with us for a day or so to pick up on what's
8 happening.

9 DEFENSE COUNSEL: Object to the
10 responsiveness.

11 BY MR. HOLDER

12 Q Who are they?

13 A Who are they?

14 Q Yeah, you said, "they would come in?"

15 A The BASF maintenance people --

16 Q Okay.

17 A -- but they mainly just done the maintenance.
18 They would oil up the pumps and do all that kind of thing,
19 you know --

20 Q Okay.

21 A -- go around check belts.

22 Q Would it suffice it to say they did less
23 skilled things than your team did?

24 DEFENSE COUNSEL: Object to the form.

25 BY MR. HOLDER

1 Q Less skilled things like --

2 A Yes. Yes, they kept it going.

3 Q Okay. So that's fine. Let's -- I want to
4 keep moving. At -- did you ever see at BASF, in these jobs
5 where there were other crafts around, did you ever see any
6 supervisors from Daniel on-site?

7 DEFENSE COUNSEL: Object to the form.

8 THE WITNESS: Oh, yes.

9 BY MR. HOLDER

10 Q Okay. Did any of the supervisors from Daniel
11 on-site ever warn you at BASF of the hazards of asbestos?

12 A No.

13 DEFENSE COUNSEL: Object to the form.

14 BY MR. HOLDER

15 Q Okay. Did any of Daniel workers ever warn you
16 about the hazards of asbestos from the work they were doing
17 while you were there?

18 DEFENSE COUNSEL: Object to the form.

19 THE WITNESS: None, no.

20 BY MR. HOLDER

21 Q Did you ever notice if Daniel had a safety man
22 on-site possibly hired by -- possibly employed by another
23 company?

24 A No, they didn't.

25 Q Okay. Do you remember anyone from United

1 Safety, U. S. F. and G.? You ever remember anybody with
2 those initials on-site?

3 DEFENSE COUNSEL: Object to the form.

4 THE WITNESS: Not that I recall.

5 BY MR. HOLDER

6 Q Okay.

7 A They could have been there, but not know it.

8 Q Sure.

9 A I have no idea.

10 Q Did you ever attend any safety meetings led by
11 Daniel workers or Daniel supervisors?

12 A No, to be honest with you.

13 Q Okay.

14 A They would -- they would say, okay, we're
15 going to have a safety meeting and start talking about
16 fishing or everything else for around fifteen minutes or ten
17 or whatever and then we get up and go on.

18 Q That was the Daniel?

19 A That was the safety meeting.

20 Q Okay. And that was the Daniel personnel?

21 DEFENSE COUNSEL: Object to the form.

22 THE WITNESS: Yeah.

23 BY MR. HOLDER

24 Q Do you know who supplied the materials that
25 you worked with there at BASF? Did Daniel supply them or if

1 Covil supplied them?

2 A Covil supplied all the insulation materials.

3 Q Okay. Do you know if they were purchased by
4 Daniel or purchased by BASF?

5 DEFENSE COUNSEL: Object to the form.

6 THE WITNESS: Well, they were purchased
7 by BASF at that time, yeah.

8 BY MR. HOLDER

9 Q Did there come a time at BASF when Daniel took
10 over the insulation contract as well?

11 A Yes.

12 DEFENSE COUNSEL: Object to the form.

13 THE WITNESS: They did.

14 BY MR. HOLDER

15 Q Around when was that?

16 A Pardon?

17 Q Around when in time was that?

18 A Daniel was awarded the contract at BASF in,
19 I'm thinking, it's probably around 1980, '81.

20 Q Was that impetus to you leaving? Is that what
21 caused you to leave BASF and not work there anymore?

22 A Yes.

23 Q Okay. So when Daniel took over the insulation
24 contract at BASF, is when you moved on from BASF?

25 A Yes.

1 Q Okay. Now, do you, during your time working
2 around Daniel workers at BASF, did -- do you ever recall any
3 workers or any company referred to as Fluor, F-L-U-O-R?

4 DEFENSE COUNSEL: Object to form.

5 MR. HOLDER: Connected with Daniel?

6 DEFENSE COUNSEL: Object to the form.

7 THE WITNESS: Not that I know of.

8 BY MR. HOLDER

9 Q Okay. Who had more people on the site at
10 BASF, Covil or Daniel?

11 A Daniel.

12 Q How, like how -- do you know approximately how
13 many people Covil had on-site at BASF?

14 A We had between four and six people there.
15 Just about all that.

16 Q Okay. And how many --

17 A Small amount of people.

18 Q Sure. But how many people -- would you know
19 or would you know approximately did Daniel have at BASF?

20 A Oh, my goodness, they had, I'm thinking about
21 18.

22 Q So between three and four times as many people
23 as Covil had, is that fair to say?

24 DEFENSE COUNSEL: Object to form.

25 THE WITNESS: Yes.

1 BY MR. HOLDER

2 Q And does that include supervisors from Daniel?
3 Is that a yes?

4 A That includes the supervisors, yes.

5 Q I'm going to ask you about some other work
6 sites that may have been shorter in time than the other ones.
7 If you recall working at these premises and we'll discuss
8 them. Do you recall working at any work at Milliken and
9 Company?

10 DEFENSE COUNSEL: Objection.

11 THE WITNESS: Yes.

12 BY MR. HOLDER

13 Q Okay. Do you recall when about you would have
14 done any work at Milliken?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: It would have been sometime
17 before I went to BASF.

18 BY MR. HOLDER

19 Q Okay. How long was this project? Was this a
20 long one or short one?

21 DEFENSE COUNSEL: Objection.

22 THE WITNESS: No, it was a short project.
23 It was probably two or three days.

24 BY MR. HOLDER

25 Q And was this for a shutdown or new

1 construction?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: Well, it looked like it was
4 for, they had -- it was repair actually, but,
5 yeah, I guess repair would be shutdown I
6 reckon, if that's the way you word it.

7 BY MR. HOLDER

8 Q Okay. And just to clarify, this was work
9 while you were employed with Covil, correct?

10 A Yes, Covil.

11 Q And do you remember what class of mechanic you
12 would have been at the time you worked at Milliken?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: I was the third class,
15 first class, whatever.

16 BY MR. HOLDER

17 Q Okay. The top one?

18 A Yes.

19 Q Okay. And do you remember -- first off, was
20 it insulation work that you did at Milliken?

21 DEFENSE COUNSEL: Object to the form.

22 THE WITNESS: Oh, yes.

23 BY MR. HOLDER

24 Q And do you recall -- first, do you recall how
25 many buildings were at the Defluor plant for Milliken?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: At the?

3 MR. HOLDER: Defluor. I thought that's
4 what you called it, the Defluor plant. I'm
5 sorry. The Milliken plant?

6 DEFENSE COUNSEL: Objection.

7 THE WITNESS: No, I can't really recall.

8 BY MR. HOLDER

9 Q Okay. Do you recall what building you were
10 in?

11 DEFENSE COUNSEL: Objection.

12 THE WITNESS: I really can't remember
13 what building I was in there.

14 BY MR. HOLDER

15 Q Okay. Do you remember what you were
16 insulating?

17 DEFENSE COUNSEL: Objection.

18 THE WITNESS: I do remember that.

19 BY MR. HOLDER

20 Q What were you insulating for this company?

21 A Waterline.

22 Q Waterline, okay. Did you also have to
23 insulate any pumps --

24 DEFENSE COUNSEL: Objection.

25 MR. HOLDER: -- at Milliken?

1 THE WITNESS: I don't think so.

2 BY MR. HOLDER

3 Q Okay. Do you think you had to insulate any
4 valves at Milliken?

5 DEFENSE COUNSEL: Objection.

6 THE WITNESS: No, sir. May have, but I
7 can't mentally see it in my mind right now.

8 BY MR. HOLDER

9 Q That's fine. And we're just talking about
10 that couple-day job at Milliken. When you were there for a
11 couple of days doing the waterlines, would you have been
12 around other crafts?

13 DEFENSE COUNSEL: Objection.

14 THE WITNESS: I was around mainly textile
15 workers.

16 MR. HOLDER: So y'all didn't -- y'all
17 didn't rope off the area?

18 DEFENSE COUNSEL: Objection.

19 THE WITNESS: The line, the line was
20 already complete. No, we didn't have to take
21 anything off.

22 BY MR. HOLDER

23 Q Okay. And what I was saying was, did you-all
24 ever rope off the area where you were working to keep other
25 workers away from it? You said you were working near textile

1 workers. I'm assuming those were Milliken employees?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: Right.

4 BY MR. HOLDER

5 Q So, I'm asking were they in close proximity to
6 you, the textile workers, while you were doing this
7 insulating?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: Probably thirty feet
10 because the pipe was in the ceiling.

11 BY MR. HOLDER

12 Q Do you remember whether you used a mud or a --

13 A Yes.

14 Q -- solid insulation?

15 A Yes, we did.

16 DEFENSE COUNSEL: Objection.

17 THE WITNESS: We used mud for els and
18 things to finish and dress them out.

19 BY MR. HOLDER

20 Q Okay. Did you use solid insulation for the
21 waterline?

22 A Fiberglass.

23 DEFENSE COUNSEL: Objection.

24 BY MR. HOLDER

25 Q Okay. Did you have to remove any insulation

1 from that waterline?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: Pardon?

4 BY MR. HOLDER

5 Q Did you have -- at the Milliken plant when you
6 went there for that job to insulate the waterline, did you
7 have to remove any old insulation from the waterline or was
8 it a new line?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: No, it was a new line.

11 BY MR. HOLDER

12 Q Did the mud that you used for insulating
13 equipment, did that -- was that mixed in the room where you
14 were?

15 DEFENSE COUNSEL: Objection.

16 THE WITNESS: No, that was mixed, I'm
17 thinking, in a hallway.

18 BY MR. HOLDER

19 Q Do you recall if you were present when it was
20 being mixed?

21 A Yes, I was.

22 DEFENSE COUNSEL: Objection.

23 BY MR. HOLDER

24 Q Okay. And do you think -- do you think it
25 created visible dust when it was being mixed?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: Oh, yes.

3 BY MR. HOLDER

4 Q Okay. Do you believe that you breathed that
5 dust?

6 A Yes.

7 DEFENSE COUNSEL: Objection.

8 BY MR. HOLDER

9 Q Okay. Did you see any warning signs up at the
10 Milliken plant warning you of the hazards of asbestos?

11 DEFENSE COUNSEL: Objection.

12 THE WITNESS: No, sir.

13 BY MR. HOLDER

14 Q Okay. Did you -- did you -- were you told by
15 any supervisors or managers or employees at Milliken, did
16 anybody give you a warning of -- the people employed by
17 Milliken about the dangers of asbestos?

18 DEFENSE COUNSEL: Objection.

19 THE WITNESS: No, sir.

20 BY MR. HOLDER

21 Q Okay. Did you ever have occasion to work at a
22 DuPont plant?

23 A Yes.

24 Q Okay. Where was the DuPont plant where you
25 worked?

1 A Greenville.

2 Q Do you remember around when that job at the
3 DuPont plant in Greenville would have been?

4 A Yes, it was during -- it was during the BASF
5 era.

6 Q Okay. So was the project at the DuPont plant
7 in Greenville a shorter project --

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: It was a --

10 MR. HOLDER: -- than BASF I should say, I
11 guess.

12 THE WITNESS: Yes, it was a shutdown
13 there.

14 BY MR. HOLDER

15 Q Can you estimate how long you were there for
16 the project at DuPont in Greenville?

17 A I was there for about -- I believe I was there
18 for about maybe three, four days. Could have been a week.
19 I'm not real certain on that.

20 Q And do you recall what you were -- what the
21 job was? What you were doing at the DuPont plant in
22 Greenville?

23 A Well, it was kind of so chaotic there with me.
24 I insulated. I just remember insulating some pipe, Kaylo.

25 Q Sure. What do you mean by chaotic?

1 A Pardon?

2 Q What do you mean by chaotic?

3 A It was very busy, very unorganized and it
4 wasn't kind of job I liked.

5 Q Sure. Was there other crafts present at the
6 DuPont plant?

7 A Yes, that's one of the things. Yes.

8 Q Okay. What other crafts do you remember being
9 present at the DuPont plant during this shutdown?

10 DEFENSE COUNSEL: Objection.

11 THE WITNESS: Electricians, pipe fitters
12 welders, insulators.

13 BY MR. HOLDER

14 Q Any boilermakers?

15 A Pardon?

16 Q Any boilermakers?

17 A None that I remember.

18 Q Any valve technicians?

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: Yes, they were there.

21 BY MR. HOLDER

22 Q Okay. And would you be -- you said you were
23 insulating line during this project at DuPont, were you
24 following like a pipe or a valve team or a group of men that
25 was doing work ahead of you and insulating as you went?

1 DEFENSE COUNSEL: Objection to form.

2 THE WITNESS: I'm thinking the pipes I
3 worked on had already been pressure checked
4 and everything was ready to go.

5 MR. HOLDER: Okay.

6 THE WITNESS: That's what I'm thinking.

7 BY MR. HOLDER

8 Q Okay. And so would you have -- would you
9 still have been in proximity to the other crafts such as
10 pipe fitters and valve techs while you were insulating the
11 line?

12 DEFENSE COUNSEL: Objection.

13 THE WITNESS: Yeah. Off and on. Yes,
14 sure would.

15 BY MR. HOLDER

16 Q Okay. And what would, let's say a pipe fitter
17 be doing during that project while you were trying to
18 insulate your line?

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: Pipe fitter is usually
21 trying to fit in the rest of the pipe or
22 poles. You might say he's trying to measure
23 that out.

24 BY MR. HOLDER

25 Q Would they have been replacing or removing and

1 installing flange gaskets?

2 DEFENSE COUNSEL: Object to the form.

3 BY THE WITNESS

4 Q -- during this outage at the DuPont plant?

5 A Yes, probably be installing.

6 Q Okay.

7 A Best I remember.

8 Q Okay. Would -- this being a shutdown, was it only
9 new valves and new pumps that were being worked on or were
10 they working on old?

11 THE WITNESS: Yes, it was --

12 DEFENSE COUNSEL: Objection.

13 THE WITNESS: Because it was like adding
14 more equipment.

15 MR. HOLDER: Okay.

16 BY MR. HOLDER

17 Q Do you recall any of these crafts changing
18 internal gaskets during this couple-day job at the DuPont
19 plant in Greenville?

20 DEFENSE COUNSEL: Objection to form.

21 THE WITNESS: I'm sure they did, but I
22 don't recall.

23 BY MR. HOLDER

24 Q Okay, that's fine. Did you see any signs up
25 anywhere in the building there at DuPont warning you of the

1 hazards of asbestos?

2 DEFENSE COUNSEL: Objection.

3 THE WITNESS: None.

4 BY MR. HOLDER

5 Q Did you ever -- were you ever told by any
6 employee of DuPont that you should be careful or warned about
7 the dangers of asbestos while you were there at the plant?

8 DEFENSE COUNSEL: Objection.

9 THE WITNESS: No.

10 BY MR. HOLDER

11 Q Did you ever do any work projects while you
12 were with Covil down at the Savannah River site?

13 A Yes.

14 Q Okay. And what kind of plant is that?

15 A That's power.

16 Q Okay. And do you remember about how long you
17 spent on that job at the Savannah River site?

18 A Well, I'm thinking maybe between four days and
19 a week, I guess.

20 Q Okay. Do you recall what you were doing as
21 your job, what your task was down at the Savannah River site?

22 A Gosh, Lord have mercy.

23 Q Well, let me strike that and ask you a couple
24 of other questions first about it. The Savannah River site,
25 did it have more security than other plants than you've been

1 to?

2 A Sure.

3 Q Okay. Did you have to like get a temporary ID
4 made while you were on premises there at the Savannah River
5 site?

6 A Yes.

7 Q Okay. And did they have a big, like almost
8 like a federal, like, almost kind of looks like the border
9 control places at the entrance of the plant. Savannah River
10 plants?

11 DEFENSE COUNSEL: Objection, form.

12 THE WITNESS: Metal detector, yeah.

13 BY MR. HOLDER

14 Q Now so when you --

15 A You had an x-ray machine.

16 Q A what machine?

17 A X-ray machine.

18 Q Okay.

19 A Slid your lunch forward, through.

20 Q So when you were working at this plant, it's kind
21 of those things that stick out in your memory, I know it was
22 a short time, only a week or less, did -- do you recall just
23 for those other details --

24 A I was putting Miro on.

25 Q What?

1 A I think I was putting Miro on.

2 Q What is Miro?

3 A It's a stainless steel type of insulation,
4 breathable.

5 Q Now, is this what goes on like stacks? What
6 they call stacks?

7 A Reactor.

8 Q Okay. Let's actually define some terminology
9 so we can work with it. What is -- do you know what a stack
10 is?

11 A Yeah.

12 Q What is a stack?

13 A Talking about a stack that smoke comes out of.

14 Q I mean a stack that you might insulate?

15 A Oh yeah, yeah, yeah.

16 Q What is that? What is a stack made out of?

17 A Steel mainly or wire, the ones you talking
18 about, yeah, they're steel.

19 Q What is the purpose of them?

20 A To let out the exhausts.

21 Q Okay. Are they on top of something?

22 A Yeah.

23 Q Okay. What are they on top of?

24 A Most of them are on top of a power plant, the
25 reactor.

1 Q Okay. Would this be a turbine generating -- a
2 turbine generator reactor?

3 DEFENSE COUNSEL: Object to the form.

4 MR. HOLDER: I might be calling the
5 terminology --

6 THE WITNESS: Yes, I think so.

7 BY MR. HOLDER

8 Q Okay. Do you know if these stacks were
9 something that were present at Savannah River site?

10 DEFENSE COUNSEL: Object to the form.

11 THE WITNESS: Yes.

12 BY MR. HOLDER

13 Q Okay. Do you believe that in your work you
14 did you insulated these stacks?

15 DEFENSE COUNSEL: Object to the form.

16 THE WITNESS: I can't remember if it's
17 this job or another, but, yes, I did insulate
18 some.

19 BY MR. HOLDER

20 Q Okay. What do you insulate stacks with?

21 DEFENSE COUNSEL: Objection.

22 THE WITNESS: Rockwool, big old batts of
23 it and you wire it to this heavy gauge forming
24 wire put in concrete. You put it over that
25 and then go back over it with metal but, yes,

1 I remember that well now because it's so tall.

2 I think it's about three hundred feet.

3 BY MR. HOLDER

4 Q How would you get up? Y'all have scaffolding?

5 A We had a crane.

6 Q Okay. Would you just be in the bucket?

7 A No, I would sit in a chair, the crane holds
8 the chair out and then we just roll it down the winch.

9 Q Were you harnessed in to the chair?

10 A Pardon?

11 Q Were you harnessed into the chair --

12 A No.

13 Q -- hanging from the crane?

14 A No, I was just sitting there.

15 Q Did you ever have a problem with heights or
16 anything?

17 A No, I never did. Had to stick our feet in
18 that big, old, heavy gauge wire to keep the wind from blowing
19 us out while we done it.

20 Q That was smart.

21 A No big deal.

22 Q Yeah. What about the Miro?

23 A Miro.

24 Q Miro, excuse me.

25 A That was in -- that was at that nuclear plant

1 in -- out from Newberry.

2 Q Okay. We'll get to that in one second then.
3 Did you do any Miro work at the Savannah River site?

4 A No, wire.

5 Q Okay. So that one week at Savannah River
6 site, was that all spent on insulating the stacks?

7 A Yeah.

8 DEFENSE COUNSEL: Objection to form.

9 THE WITNESS: Because when we got done
10 with that, I was glad to get out of the place.

11 BY MR. HOLDER

12 Q Now, did you have to actually do any work on
13 the reactor at Savannah River site?

14 A Not at that -- not at that plant, no.

15 DEFENSE COUNSEL: Object to form.

16 BY MR. HOLDER

17 Q Other than just the stacks?

18 A Yeah.

19 DEFENSE COUNSEL: Object to the form.

20 BY MR. HOLDER

21 Q And during this job at Savannah River site,
22 were you around other crafts?

23 A Sure.

24 Q Okay. Well, let me ask you about where the
25 stacks were, were they located inside of a building?

1 A No.

2 Q Okay. They were outside?

3 A Yes.

4 Q Okay. Would you have been in close proximity
5 to pipe fitters on this job while you were insulating the
6 stacks?

7 A You couldn't have paid them to get where I
8 was.

9 Q Would it be the same for valve techs?

10 A Um-hum.

11 Q Okay. How about for boilermakers?

12 A Same.

13 Q Okay. All right. Do you remember any --
14 working on any pumps during this job at the Savannah River
15 site?

16 A I didn't.

17 DEFENSE COUNSEL: Objection.

18 BY MR. HOLDER

19 Q Okay. How about any valves?

20 A No.

21 Q Okay. Ever remove any packing or gaskets from
22 any kind of equipment?

23 A No.

24 Q Okay. Do you remember seeing any signs
25 anywhere around the Savannah River site posted warning of the

1 hazards of asbestos?

2 A No.

3 Q Okay. Anyone from the Savannah River site
4 ever warn you about any of the dangers of asbestos you might
5 come in contact with?

6 A No.

7 Q Okay. Let's talk about the power plant near
8 Newberry I think is what you said? Okay?

9 A Yes.

10 Q Is that the Summer Nuclear Station, does that
11 sound correct?

12 A That sounds right.

13 Q All right. I believe that is in Jenkinsville,
14 South Carolina, does that sound correct?

15 A Yeah.

16 Q Okay. And Jenkinsville near Fairfield County,
17 is that right?

18 A I think so.

19 Q Okay. Now, how long do you believe that you
20 were at the Summer Nuclear Station for the work that you did?

21 A That job was a -- one of those Badische
22 holidays and they needed me in there, so I went there.

23 Q When you say --

24 A Probably, maybe a week.

25 Q When you say Badische holidays, does that mean

1 during the time that you would have been working at BASF, but
2 you had time off from there?

3 A We would -- when we would observe their days
4 that they gave their employees for holidays, so we would be
5 off as well.

6 Q And then on those holidays you might go to
7 another work site and do another job?

8 A Well, Covil always saw to it that I did.

9 Q Now, at this nuclear station in Jenkinsville,
10 do you happen to know who owned the plant?

11 A No, I sure don't.

12 Q Okay. Was this a new construction or was this
13 more like a shutdown maintenance?

14 A It was new construction.

15 Q And other than being during your time when you
16 were at BASF do you know any more specific than that? Maybe
17 an approximate year it would have been?

18 A Excuse me, repeat that.

19 Q I know you said it was during your BASF years
20 when you went down to this power plant?

21 A Right.

22 Q I'm asking: Is there any way you could
23 estimate the specific year it would have been? It's okay if
24 you can't.

25 A Probably between the '80 --

1 Q Before you left in '80 or after you left in
2 '80?

3 A It would be before.

4 Q Okay.

5 A Thinking it was in '80, it may be '79.

6 Q Okay. But you know it was new construction?

7 A Yes, it was new construction. Yeah, because I
8 bought a truck in '79.

9 Q That was around --

10 A Probably around mid-year '79, I think.

11 Q Okay. And that was around the same time you
12 would have been working down at that station?

13 A Hm-hmm.

14 Q Okay. Do you know how long that project would
15 have taken? How long you would have been there?

16 DEFENSE COUNSEL: Objection to form,
17 asked and answered.

18 MR. HOLDER: I'm sorry if you already
19 said it. How long guys?

20 DEFENSE COUNSEL: He said about a week.

21 BY MR. HOLDER

22 Q You were here for about a week?

23 A Hm-hmm.

24 Q At this one?

25 A Hm-hmm. That is what I --

1 MR. HOLDER: Okay. I'll keep moving.

2 Thank you counsel for General Electric. Makes
3 me think there must be something from General
4 Electric on these premises.

5 DEFENSE COUNSEL: Objection.

6 BY MR. HOLDER

7 Q What type of work did you do while you were at
8 the nuclear station in Jenkinsville, South Carolina?

9 A They gave me a crewman and blueprints on the
10 bottom of the rack and took the Miro and I had guys put it
11 on. I'd have one guy cutting it direct for a fit or remake a
12 piece that had to be because they had changed a lot of the
13 hangers and a lot of the stuff there and they would put on --
14 I had them go back and forth.

15 Q Was this a new reactor?

16 A Yes.

17 Q Was it the first time insulation ever being
18 put on to it?

19 A Yes.

20 Q Okay.

21 A It's removable. This is a removable type. It
22 has like a --

23 Q The Miro?

24 A -- brillo in it or whatever, you know.

25 Q Are you referring to the Miro is a removable?

1 A Yeah, it was a removable type insulation. It
2 had suitcase latches on it.

3 Q Okay. I know what you're talking about. Do
4 you recall who manufactured that reactor at the Summer
5 Nuclear Station? First off let me ask you this: Did it have
6 any loops?

7 A Pardon?

8 Q Did it have any loops?

9 A Any what?

10 Q Loops. A reactor, you know, a reactor, some
11 of them, the different types might be called a certain number
12 of loop reactor?

13 DEFENSE COUNSEL: Object to the form.

14 THE WITNESS: Don't know. It's all --

15 MR. HOLDER: No problem if you don't
16 remember the manufacturer.

17 THE WITNESS: I'm through right now.

18 BY MR. HOLDER

19 Q That's fine. Was the reactor connected to a
20 turbine --

21 DEFENSE COUNSEL: Object to the form.

22 THE WITNESS: No.

23 MR. HOLDER: -- at the Summer Nuclear
24 Station?

25 BY MR. HOLDER

1 Q Sir, did you have to do any work on the
2 turbine?

3 DEFENSE COUNSEL: Object to form.

4 THE WITNESS: No.

5 BY MR. HOLDER

6 Q Okay. Was anyone doing work on the turbine
7 when you were insulating the reactor?

8 DEFENSE COUNSEL: Object to the form.

9 THE WITNESS: I really don't know.

10 BY MR. HOLDER

11 Q Okay.

12 A I don't think so.

13 Q Okay.

14 A Could have been, but --

15 Q Was this -- was this unit online yet? Had it
16 started generating power yet?

17 A They were going to start it up soon as
18 possible when I was there. That was one of the reasons they
19 had me doing what I was doing.

20 Q And was any of the work that you were doing on
21 the reactor disturbing any asbestos, to your knowledge?

22 A None that I know of.

23 Q Okay. Was the insulation that you were using
24 on the reactor at that facility asbestos free, the Miro?

25 A Yes.

1 Q Now, when you were at --

2 A GE.

3 Q Say again?

4 A GE.

5 Q What is that --

6 A The reactor.

7 Q Okay. The reactor at the Summer Nuclear
8 Station was a GE reactor?

9 A I'm thinking it was.

10 Q Okay. Do you happen to know who made the
11 turbine it was connected to?

12 DEFENSE COUNSEL: Object to form.

13 THE WITNESS: No, I don't.

14 BY MR. HOLDER

15 Q Okay. Were there any other -- I'm sorry if I
16 asked it before, I don't think I have. Were there any other
17 crafts around when you were working at the Summer Nuclear
18 Station?

19 DEFENSE COUNSEL: Objection.

20 THE WITNESS: Oh, sure.

21 BY MR. HOLDER

22 Q Okay. Do you know if there was any pumps
23 being worked on nearby you when you were at the --

24 A No.

25 Q -- Summer Nuclear Station?

1 DEFENSE COUNSEL: Objection.

2 THE WITNESS: I'm sure that there was,
3 but, you know, I was busy with a bunch of men
4 and all, I didn't --

5 BY MR. HOLDER

6 Q Do you have a recollection of the valves being
7 worked on nearby where you were doing your job at the Summer
8 Nuclear Station?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: I can't recall.

11 BY MR. HOLDER

12 Q And did you have to do any work insulating any
13 pumps or valves?

14 A No.

15 DEFENSE COUNSEL: Objection.

16 BY MR. HOLDER

17 Q Okay. Do you know any other companies or
18 contractors that were on-site while you were working at the
19 Summer Nuclear station?

20 A I didn't know of any.

21 Q Do you remember any crafts that were working
22 on the turbine at -- that was connected to this reactor when
23 you were working at the Summer Nuclear Station?

24 DEFENSE COUNSEL: Object to form.

25 THE WITNESS: No.

1 BY MR. HOLDER

2 Q Okay. Do you know of any gasket work that was
3 going on nearby while you were doing your Miro insulation
4 installation?

5 A Pardon?

6 Q Do you know of any gasket work that was going
7 on nearby while you were doing this work at Summer Nuclear
8 Station?

9 DEFENSE COUNSEL: Objection.

10 THE WITNESS: No, not that I can recall.

11 DEFENSE COUNSEL: Objection.

12 BY MR. HOLDER

13 Q Okay. Did you see any signs anywhere around
14 Summer Nuclear Station warning you of the hazards of
15 asbestos?

16 DEFENSE COUNSEL: Objection to the form.

17 BY MR. HOLDER

18 Q Did you notice any signs posted anywhere
19 around Summer Nuclear Station --

20 A No.

21 Q -- warning you --

22 A No.

23 Q -- of the hazards of asbestos?

24 A No.

25 DEFENSE COUNSEL: Objection.