

1 A. No.

2 Q. In the 1960s did you find any evidence
3 that J.T. Thorpe & Son did any research regarding
4 the dangers of asbestos?

5 A. No.

10:51

6 Q. Did you find any research or any documents
7 or any evidence that J.T. Thorpe & Son took any
8 affirmative steps to control the level of dust at
9 any of its job sites in the 1960s?

10 A. Mr. Dawson discussed that they would use
11 wetting techniques and also use respirator masks
12 when we were on our projects.

10:51

13 Q. What's the earliest year you've been able
14 to document that J.T. Thorpe & Son did wetting
15 techniques or used respirators or masks?

10:52

16 A. I believe he referred to those back in the
17 '60s and '70s.

18 Q. Are you able to narrow it down other than,
19 say, two decades of work when wetting techniques
20 or respirators were used as a part of J.T. Thorpe
21 & Son's work?

10:52

22 A. No.

23 Q. Do you know whether -- do you know why or
24 how J.T. Thorpe & Son came to first decide to use
25 wetting techniques?

10:52

1 A. Correct.

2 Q. In any of the job files you've produced to
3 us in this case did you see any evidence that
4 there was any suggestion of use of respirators?

5 A. I didn't go through each one in that 10:53
6 detail.

7 Q. Did you see any?

8 A. I didn't see anything that indicated that
9 in that detail.

10 Q. Did you see any evidence in your view of 10:54
11 all the documents you reviewed in your years of
12 being a corporate representative that someone on
13 behalf of J.T. Thorpe warned workers of the
14 dangers of asbestos in the 1960s?

15 A. No. 10:54

16 Q. In the 1970s?

17 A. No.

18 Q. In the 1980s?

19 A. No document specific, no.

20 Q. What about the 1950s? 10:54

21 A. No.

22 Q. Did J.T. Thorpe & Son ever consult with
23 industrial hygienists in the 1950s and 1960s for
24 any purpose?

25 A. No, I -- to be candid with you I didn't 10:54

1 know there were industrial hygienists in the '50s
2 and '60s.

3 Q. You have no documentation that J.T. Thorpe
4 & Son went out to get outside advice on safety
5 from an industrial hygienist in the 1950s or 10:54
6 1960s, correct?

7 A. Correct.

8 Q. Certainly J.T. Thorpe & Son never had as a
9 part of its safety program a process by which its
10 workers should change out of work clothing before 10:55
11 leaving job sites and going home?

12 A. I have not seen any documentation to
13 reflect that question -- an answer to that
14 question.

15 Q. There's been no documentary evidence or 10:55
16 testimony evidence that in the 1950s anybody at
17 J.T. Thorpe & Son would have told workers employed
18 by other contractors to be careful around any
19 dusty conditions?

20 A. Correct. 10:55

21 Q. There's no safety protocol, procedures, or
22 written policies from J.T. Thorpe & Son where they
23 would take steps to reduce the level of dust on a
24 particular job site?

25 A. Nothing that I found. 10:56