

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
26
27
28

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE CITY AND COUNTY OF SAN FRANCISCO

---oOo---

DORA ENOS,

Plaintiff,

vs.

No. 788265

JOHNS-MANVILLE CORPORATION,
et al.,

Defendants.

DEPOSITION OF ROBERT ENOS

Taken before KATHY KUSROW ROTHSTEIN, a Notary Public

In and for the County of Alameda

State of California

CSR No. 3919

April 10, 1985

AIKEN & WELCH, INC.
Certified Shorthand Reporters
1404 Franklin Street
Oakland, California 94612
(415) 451-1580

I N D E X

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
26
27
28

PAGE

EXAMINATION BY MS. MEYER	6
EXAMINATION BY MS. LYONS	32
EXAMINATION BY MS. GAMBINO	32
EXAMINATION BY MS. ADAMS	36

E X H I B I T S

DEFENDANT'S

PAGE

1	Copies of photos	7
---	------------------	---

DEPOSITION OF ROBERT ENOS

1
2
3
4 BE IT REMEMBERED, that pursuant to Notice, and on the
5 10th day of April 1985, commencing at the hour of 9:00 a.m.,
6 in the offices of Aiken & Welch, 1404 Franklin Street, 420A,
7 Oakland, California 94612, before me, KATHY KUSROW ROTHSTEIN,
8 a Notary Public in and for the County of Alameda, State of
9 California, personally appeared ROBERT ENOS, produced as a
10 witness in said action, and being by me first duly sworn, was
11 thereupon examined as a witness in said cause.
12

13 --oOo--
14

15 MARTIN GLICKFELD, Cartwright, Sucherman, Slobodin &
16 Fowler, Inc., 160 Sansome Street, San Francisco, California
17 94101, appeared on behalf of the Plaintiff.
18

19 ELIZABETH MEYER, Berry & Berry, 1221 Broadway, Oakland,
20 California 94612, appeared on behalf of Celotex Corporation.
21

22 CATHERINE A.S. LYONS, Bledsoe, Cathcart, Boyd, Eliot &
23 Curfman, 650 California Street, #2828, San Francisco,
24 California 94108, appeared on behalf of Flexitallic Gasket.
25
26
27
28

1 MARY ELLEN GAMBINO, Hardin, Cook, Loper, Engel &
2 Bergez, One Kaiser Plaza, Oakland, California 94612,
3 appeared on behalf of Western MacArthur.

4 ALAN BALCHER, LaFollette, Johnson, Schroeter & DeHaas,
5 100 Van Ness Avenue, San Francisco, California 94102,
6 appeared on behalf of Flintkote Co.

7
8 PAUL CLARK, McCutchen, Doyle, Brown & Enersen, Three
9 Embarcadero Center, San Francisco, California 94111, appeared
10 on behalf of GAF Corporation.

11
12 JIM S. SIMMONS, Legal Assistant, Fisher & Hurst, Four
13 Embarcadero Center, San Francisco, California 94111, appeared
14 on behalf of Raymark Industries, sued herein as
15 Raybestos-Manhattan, Inc.

16
17 LYNN M. RENNERT, Popelka, Allard, McCowan & Jones, One
18 Almaden Boulevard, San Jose, California 95112, appeared on
19 behalf of Owens-Corning Fiberglas Corporation.

20
21 JOHN MAJESKI, Ropers, Majeski, Kohn, Bentley, Wagner &
22 Kane, 655 Montgomery Street, San Francisco, California 94111
23 appeared on behalf of Fibreboard Corporation.

24
25 LINDA ADAMS, Van De Poel, Strickland and Haapala,
26 2030 Franklin Street, Oakland, California 94612, appeared on
27 behalf of AC&S.

28

1 STEVEN LAVE, Mullally & Cederborg, 436 - 14th Street,
2 Oakland, California 94612, appeared on behalf of Keene
3 Corporation.

4
5 SUSAN PIERCE, Gudmundson, Siggins & Stone, 235
6 Montgomery Street, San Francisco, California 94104, appeared
7 on behalf of Armstrong World Industries.

8
9 GABRIEL A. JACKSON, Winingham, Roberts, Fama, Thompson
10 & Cooper, 425 California Street, San Francisco, California
11 94104, appeared on behalf of Eagle-Picher Industries, Inc.

12
13 ALSO PRESENT: Thomas Enos and Betty Cadwallader.

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 ROBERT ENOS,

2 sworn as a witness by the Notary Public,

3 testified as follows:

4 EXAMINATION BY MS. MEYER

5 MS. MEYER: Q. Would you state your name, please, for
6 the record?

7 A. My name is Robert Enos.

8 Q. And would you spell your last name for the
9 recorder?

10 A. E-n-o-s.

11 MR. GLICKFELD: Before we go on, maybe I should put on
12 the record what I told you about the document production.

13 MS. MEYER: Fine.

14 MR. GLICKFELD: As far as Bedford Enos' medical bills
15 are concerned, we're putting those together, and I'll produce
16 those. I'm sorry I don't have those here today.

17 There's also going to be some medical type bills for
18 Dora Enos which we're claiming are things which were made
19 necessary because of the death of Mr. Enos. And again,
20 that's something we're putting together, and I'll provide
21 that.

22 The next item would be wage loss information. Again, I
23 will give you that. I'm not sure at this time exactly what
24 form it will be in. It may be that it will be W-2 forms or
25 something, and I would be willing to produce those without
26 waiving the privilege as to the rest of the income tax
27 information.

28 I believe that an accountant has that information, and

1 this is not the best time of year to ask them to stop doing
2 what they're doing and get that for us. So those are other
3 things that we'll give you.

4 The last thing is, as far as this witness is concerned,
5 as you'll find out, he has worked at Mare Island for 20 years.
6 And I have shown him the pictures from the Bible deposition,
7 and he's picked out the ones that he recalls, or there's
8 something familiar about it, or whatever. And I'm producing
9 those. You can ask him whatever you want.

10 MS. MEYER: Okay. So we have a set of documents here
11 that are xerox copies of photographs, I presume.

12 MR. GLICKFELD: That's correct.

13 MS. MEYER: Why don't we attach this as an exhibit to
14 this deposition.

15 MR. GLICKFELD: Okay. And I guess the other thing,
16 they can all testify for you as to, I suppose, ballpark
17 figures on wage loss and medical bills and things like that,
18 and we'll give you the exact information later. Okay?

19 MS. MEYER: Fine.

20 (Document marked Defendants'
21 Exhibit 1 for Identification.)

22 MS. MEYER: I presume it's Thomas who is also here
23 present today?

24 MR. GLICKFELD: That's correct.

25 MS. MEYER: His deposition was noticed for later, and
26 he will be testifying later.

27 And I guess the record should reflect that Betty --

28 MS. CADWALLADER: It's Elizabeth.

1 MS. MEYER: -- Elizabeth Cadwallader is also present,
2 and her deposition will be taken later this morning.

3 Did Thomas Enos also review the photographs?

4 MR. GLICKFELD: I'll represent that he was present at
5 the time. But we primarily did it with Robert Enos.

6 MS. MEYER: Okay.

7 MR. GLICKFELD: You're welcome to ask him questions
8 about those, if you want.

9 MS. MEYER: And there are no other documents that are
10 to be produced at this time, right?

11 MR. GLICKFELD: No.

12 MS. MEYER: Q. Okay, Mr. Enos, would you give us an
13 address, please?

14 A. I live at 520 Raymond Drive, in Benicia,
15 California.

16 Q. Okay. Mr. Enos, have you ever had your deposition
17 taken before?

18 A. No, ma'am.

19 Q. Okay. I presume Mr. Glickfeld has explained to
20 you the procedure that we're going to be following this
21 morning, has he not?

22 A. Yes, he has, ma'am.

23 Q. Okay. Just briefly to review with you, I'm going
24 to be asking some questions, and then all the other attorneys
25 will get a chance to ask some questions.

26 You are under oath. This is in an informal setting,
27 however, I want to make sure that you understand that your
28 testimony is being taken down by this woman who's seated next

1 to you. And your testimony can be used at a later date.

2 She will be producing a transcript of your testimony
3 which will come out in a booklet form. You'll get a chance
4 to review that transcript and make whatever corrections you
5 care to make in the transcript. But I'd like to warn you
6 that if you do make corrections, we would, at a later date,
7 have an opportunity to comment on those corrections.

8 So we'd appreciate it if you'd try to make your answers
9 as accurate as possible. Okay?

10 A. Okay.

11 Q. Do you understand what I've just told you?

12 A. Yes, I do.

13 Q. Okay. Now I'd also like to ask you not to talk
14 while I'm talking, and I'll try not to talk while you're
15 talking, okay?

16 A. Okay.

17 Q. And I'd also like to ask you to make sure you
18 understand the question, because if you don't understand the
19 question, I need to know that you don't understand, and I can
20 try to clarify it for you, okay?

21 A. Okey-doke.

22 Q. All right. Do you have any questions before we
23 get started?

24 A. No, ma'am.

25 Q. What is your relationship to Bedford Enos?

26 A. Bedford was my dad.

27 Q. Okay. And what is your date of birth?

28 A. 8-28-45.

1 Q. And you have two brothers, is that correct?

2 A. Yes, ma'am.

3 Q. And were there any other children that your father
4 had?

5 A. No, ma'am.

6 Q. Mrs. Cadwallader is here today. She is related to
7 you, is she not?

8 A. Yes, she is, ma'am.

9 Q. What is her relationship to you?

10 A. Cousin.

11 Q. And Bedford Enos was her uncle; is that correct?

12 A. Yes, ma'am.

13 Q. Okay. And what was your mother's name?

14 A. Dora Faye Enos.

15 Q. And she passed away recently, is that right?

16 A. Yes, ma'am.

17 Q. And when was her death?

18 A. December the --

19 MR. T. ENOS: 29th.

20 THE WITNESS: -- 29th.

21 MS. MEYER: Try to give us your answer, as best as
22 possible.

23 THE WITNESS: Okay. I'm sorry.

24 MS. MEYER: We'll get a turn with the other people
25 later, okay?

26 Q. When did your father pass away?

27 A. December the 19th, '84.

28 Q. Okay. And who was his doctor at the time?

1 A. That I could not tell you. I -- his name is there,
2 but I cannot -- it's -- I couldn't say.

3 Q. All right. And were you aware of what the doctor
4 said was the cause of death?

5 A. Yes, I was.

6 Q. And what were you told, by the doctor, if the
7 doctor told you?

8 A. Well, the doctor didn't tell me about what he died
9 of.

10 Q. Okay.

11 A. I didn't --

12 Q. Okay, who told you?

13 A. Well, when I realized what it was, was the death
14 certificate. It had it on the death certificate.

15 Q. Okay. Did you ever discuss your father's
16 condition with his physician?

17 A. No, I didn't.

18 Q. Did you discuss it with your mother?

19 A. No, I didn't.

20 Q. Okay. What is your current employment, Mr. Enos?

21 A. I am a pipefitter at Mare Island.

22 Q. Okay. And how long have you been a pipefitter at
23 Mare Island?

24 A. 20 years.

25 Q. So you would have started in 1965?

26 A. Yes, ma'am.

27 Q. And have you been continuously employed at Mare
28 Island since 1965?

1 Q. Okay. And prior to becoming employed at Mare
2 Island, were you employed?

3 A. Yes, ma'am.

4 Q. Okay. What was your job just before you went to
5 work at Mare Island?

6 A. As soon as I got out of school, I went to work for
7 Yuba Manufacturing, in Industrial Park in Benicia.

8 Q. And what was the general nature of their business?

9 A. I was just a helper. That was just, you know,
10 helping people do this and do that.

11 Q. What kinds of things did they manufacture?

12 A. They were making gold dredges for up in Oregon and
13 Washington and up in there.

14 Q. And you were helping people manufacture gold
15 dredges, right?

16 A. Yes, ma'am.

17 Q. How long did you do that?

18 A. About six months.

19 Q. Okay. And then you went to work for Mare Island?

20 A. Yes, ma'am.

21 Q. Now, while you were employed at Mare Island, what
22 was your father's employment?

23 A. He was working at Mare Island as a shipfitter.

24 Q. Okay. And what period of time did he continue to
25 work at Mare Island until? What was his last date of
26 employment there, as far as you know?

27 A. His last date of employment, I'm not too sure
28 about. But it was '83. Or -- yes, '83.

1 Q. Okay. And while he was a shipfitter and you were
2 a pipefitter, were your shifts the same shifts?

3 A. I worked for three years on the same shift that he
4 did.

5 Q. And what three years was that?

6 A. '73, '74, and '75.

7 Q. And was that continuously on the same shift for
8 that three-year period?

9 A. Yes, ma'am.

10 Q. '73 to '75?

11 A. Yes, ma'am.

12 Q. Okay. And did you work at the same locations,
13 alongside your father, during those three years?

14 A. During the three years that I worked with him on
15 graveyard, it was -- I'd work maybe a week, you know, then go
16 someplace else. And then I'd come back.

17 See, we work on the submarines, and in my job as test
18 mechanic, I had various jobs on different boats. And I'd
19 work all the way through, say if I had one job, I'd go to one
20 job on a boat, I'd go to another job on another boat, and it
21 was basically just bouncing back and forth.

22 Q. Okay. And during that three-year period, you were
23 working on the same submarines that your father was also
24 working on?

25 A. Yes, I was.

26 Q. And were you working alongside him?

27 A. No.

28 Q. The shipfitters and the pipefitters had different

1 jobs at the same time?

2 A. Yes, ma'am.

3 Q. And they were working really on different parts of
4 the ship, right?

5 A. In the same area. Not back to back, as you say.

6 Q. Okay. So then let me see if I understand. You
7 wouldn't be working alongside your father such that you would
8 be aware of what he was doing at any point in time,
9 specifically?

10 A. Oh, yeah, I knew what he was doing.

11 Q. Okay. So you knew exactly what job he was
12 performing at a particular time?

13 A. Yes. Yes, ma'am.

14 Q. Okay. And this would have been during the period
15 from 1973 to '75, right?

16 A. Yes, ma'am.

17 Q. Okay. You said graveyard. What are the hours of
18 that shift?

19 A. That's from midnight to 8:00 in the morning.

20 Q. And some weeks you would be working on the same
21 sub as your father was, and some weeks you wouldn't be?

22 A. Uh-huh.

23 Q. Could you give us an estimate of about how many
24 weeks you'd be working on the same sub at the same time?

25 A. I'd say out of the three years, I probably got
26 about two years.

27 Q. Okay. So about two-thirds of the time?

28 A. Yes, ma'am.

1 Q. Now were you, yourself, handling any products
2 which you believed to contain asbestos --

3 A. Yes, ma'am.

4 Q. -- during that three-year period -- let me finish.
5 -- During the three-year period of 1973 to 1975?

6 A. Yes, ma'am.

7 Q. Okay. What products were those?

8 A. We were using Johns-Manville pipe insulation, we
9 were using --

10 MR. GLICKFELD: Excuse me, do you want manufacturers'
11 names, or just types of products?

12 MS. MEYER: Just types of products at this point.

13 THE WITNESS: Okay, we were using pipe covering,
14 asbestos hanger liners, and sheet -- sheets of asbestos.

15 MR. GLICKFELD: Also, just so I'm clear that he
16 understands the question, are you asking him products that he
17 personally handled, or products that he worked around?

18 MS. MEYER: Well, I started by asking the products that
19 you were personally handling.

20 MR. GLICKFELD: Okay.

21 MS. MEYER: Q. And I'm assuming these three products,
22 pipe covering, hanger liners, and sheets, were the products
23 that you personally were handling, right?

24 A. Yes, ma'am. Yes, ma'am.

25 Q. Okay. Now just a minute ago, you said it was
26 Johns-Manville pipe?

27 A. Yes, ma'am.

28 Q. And that was the pipe cover that you were using,

1 right?

2 A. And sheets.

3 Q. Okay. And do you know the manufacturer of the
4 hanger liner that you used?

5 A. They had different names. That I recollect right
6 now, the ones that we were using were a Kaylon (phonetic).

7 Q. Okay. Anything else that you remember?

8 A. That's the only thing I can remember on the hanger
9 liners.

10 Q. Okay. On the pipe cover, in addition to
11 Johns-Manville, do you remember any other manufacturer?

12 A. Oh, there were -- I just -- I'm drawing a blank.
13 I don't know.

14 Q. Okay. On the sheets, you mentioned it was
15 Johns-Manville sheets, right?

16 A. No. The sheets, they were like Eagle products, we
17 used an Eagle 66. And it was the cement that they used, the
18 quick-dry cement that Eagle 66 used. GAF had some sheets.

19 Q. Anything else?

20 A. And that's -- that's all I can remember. I
21 just --

22 Q. Okay. Now, do you know if, during 1973 to 1975
23 when you were working on the same subs that your father was
24 working on, he was working with any products that you
25 believed to contain asbestos?

26 A. Yes. Well, working in Shop 11, they have to
27 remove a lot of the lagging to get down to the bulkheads that
28 they were working on, and the foundations. And they had to

1 remove a lot of it.

2 And then when he was restoring the ship back to normal,
3 the ladders were working alongside of him. As they were
4 foundationing the blocks and stuff that they were using, the
5 ladders were there.

6 Q. Okay. He wasn't doing that work, himself; ladders
7 were doing it, is that correct?

8 A. Yes, ma'am.

9 Q. Okay. But he was near where the ladders were
10 doing this job?

11 A. Yes, ma'am.

12 Q. Okay. Do you know what the block was that the
13 ladders were using?

14 A. Most of the stuff that I can remember, because of
15 the big boxes they brought them down in, well, they had
16 Johns-Manville -- I can recall that, because we used a lot of
17 that. And then they had a Kraylon, or a Kaylon, or whatever
18 it is.

19 And then they had Eagle 66. And there was some
20 Raybestos. And that's really all I can recall. Because that
21 was the most that we used.

22 Q. Okay. Now you said you worked at Mare Island
23 starting in 1965 as a boilermaker.

24 A. Yes, ma'am.

25 Q. And that was for about one year, correct?

26 A. Yes, ma'am.

27 Q. Okay. During that one-year period, just give me a
28 general, brief description of what your job was.

1 A. Okay, when I started as a boilermaker, I was a
2- boilermaker helper. And we were repairing surface craft
3 boilers. We'd go in, tear out the brick, redo the tubes,
4 replace the tubes, and rebrick the furnaces in the surface
5 craft.

6 Q. And that was what you were doing?

7 A. Yes, ma'am.

8 Q. During that period, do you remember what kind of
9 boilers you were working on?

10 A. B&W's. Excuse me, Babcock & Wilcox.

11 Q. Okay. Any others?

12 A. That's the only ones they had.

13 Q. Okay. And were those the only asbestos-containing
14 products that you believe you came in contact with during the
15 time you were a boilermaker?

16 A. Yes. I had Eagle 66, we used that as an insulator.
17 And it would come in the block form and the powder form and
18 the cement form.

19 Q. Okay. Anything else?

20 A. That's all in the boiler shop.

21 Q. Okay, after you left the boiler shop, that would
22 have been about 1966, is that right?

23 A. Yes. It was about a year's time between '65 and
24 '66. It was --

25 Q. Okay. Give us a brief description of your job as
26 a pipefitter?

27 A. As a pipefitter?

28 Q. Yes.

1 A. Right now I'm working for Ocean Engineering as a
2 test mechanic supervisor. I supervise 11 people, and we are
3 testing ocean engineering products on the submarine. And
4 that's all I can tell you, because it's secret.

5 Q. Okay, fine. Let me go back to what I had thought
6 I was asking.

7 In 1966, you went over and became a pipefitter. And
8 between 1966 and some date, you continued as a pipefitter.
9 What was the last --

10 A. Oh, I misunderstood.

11 Q. Let me finish the question.

12 What was the last date you worked as a pipefitter?

13 A. The last date I worked as a pipefitter was April
14 the 1st of this year.

15 Q. Okay. Now, just tell us briefly what you did
16 while you were a pipefitter.

17 A. Now, the question you're asking -- you want me to
18 go back to when I became a pipefitter, up to now?

19 Q. Right. I just want a general description of the
20 job of a pipefitter, that's all.

21 A. Okay. See, the reasoning -- because there's about
22 three different types of pipefitters, okay? I originally
23 started out as a pipefitter. You're down fabricating,
24 bending, welding, and mechanical make-ups of pipes.

25 Q. Okay.

26 A. Okay.

27 Q. Then what did you do next?

28 A. Then I'm in the test branch right now. There you

1 would test everything that's in a system to a certain
2 pressure for submergence pressure, and to test the strength
3 to categorize the pipe.

4 Q. Okay. During your employment as a pipefitter from
5 1965 through to 1973, if you can divide it up that way in
6 your mind.

7 A. Uh-huh.

8 Q. Do you believe you came into contact, yourself,
9 with any asbestos-containing products?

10 A. Yes, ma'am.

11 Q. Which products?

12 A. The ones that I mentioned before. In new
13 construction, during the time up to about '72, during new
14 construction on the submarines, it was -- it was just laying
15 all over.

16 Q. Okay. And you, yourself, used the kind of
17 products you've previously described?

18 A. Yes, ma'am.

19 Q. Okay. After 1975, did you come into contact with
20 any asbestos-containing products, yourself, that you used?

21 A. The only product that I come in contact with after
22 '75 was Flexitallic gaskets. And they're -- what they are,
23 they're called -- they're gaskets. They're not Flex's, but
24 they're just a regular flat gasket.

25 Q. And do you know the manufacturer of the flat
26 gasket?

27 A. No, I could not tell you who the manufacturer was,
28 because when we got them, they were in cellophane wrappers

1 with a stock number on them.

2 Q. And no other labeling on the container?

3 A. No.

4 Q. Okay. Now during the period of time that you were
5 working as a pipefitter starting in 1966, and continuing
6 through to about 1972, were you working in the vicinity of
7 other trades that were using products that you believed to
8 contain asbestos?

9 A. Yes, ma'am.

10 Q. And what kinds of workers were those?

11 A. They're called ladders. They're Shop 64 on Mare
12 Island.

13 Q. Okay. And what kind of products were the ladders
14 using?

15 A. Well, they were using the pipe covering with the
16 sheets, the Eagle 66, powder type. The cement.

17 Shop 38, which is the machinists, they used the
18 Raybestos wicking, and the asbestos-lined brake shoes that
19 they have on the pumps. They used the Raybestos packing
20 gland material. And we've -- you know, I've handled that
21 helping them and assisting them with pipe make-ups to pumps.

22 Q. Okay. Anything else that you remember?

23 A. I really can't recall.

24 Q. Now, during the last five years of your father's
25 life, about how many times a week did you see him?

26 A. About every day.

27 Q. Okay.

28 MS. LYONS: I'm sorry, I didn't hear the question.

1 (Record read).

2 MS. MEYER: Q. And where was he living?

3 A. He was living at 520 Raymond Drive, Benicia.

4 Q. And you were living at the same location, is that
5 correct?

6 A. No, ma'am.

7 Q. Where were you living?

8 A. I was living at 1334 West Dale, Benicia,
9 California.

10 Q. And when did you move back to the Raymond Drive
11 address?

12 A. At the -- after the death of my mom. I'm in the
13 process of buying the home.

14 Q. I see. Okay.

15 (Brief discussion off the record).

16 THE WITNESS: Oh, yes, I did. After my dad died, I
17 moved back in the home to care for my mom.

18 Q. Okay. About when was that?

19 A. September -- September '84.

20 MS. MEYER: Q. Okay. And are you married, Mr. Enos?

21 A. Yes, I am, ma'am.

22 Q. What's your wife's name?

23 A. Phyllis Ann Enos.

24 Q. Okay. And is she employed outside the home?

25 A. Yes, she is, ma'am.

26 Q. Okay. What is her employment?

27 A. She's a retail clerk for Safeway, in Benicia.

28 Q. And has she been employed as a retail clerk for

1 Safeway for the past couple of years?

2 A. Yes, ma'am.

3 Q. And do you have any children?

4 A. Yes, ma'am.

5 Q. How many?

6 A. Two.

7 Q. Okay. How old are they?

8 A. I have one 20, and the other one is 17.

9 Q. Have they been living with you in the past couple
10 of years?

11 A. Yes, ma'am.

12 Q. Okay. Are they still living with you?

13 A. My daughter is. My boy has moved away.

14 Q. Okay. What's your daughter's name?

15 A. Stephanie Ann.

16 Q. And so that I'm clear, was it yourself, your wife,
17 and Stephanie that moved back into your parents' home after
18 your father died?

19 A. Yes, ma'am.

20 Q. Okay. And who cared for your mother while you
21 were working?

22 A. My wife cared for her during the daytime, because
23 she works nights. And then, you know, the days off that she
24 was there, she cared for her. But it was mostly me in the
25 evening, she in the day and evening.

26 Q. Okay. And did Stephanie help, too?

27 A. Oh, yes.

28 Q. Okay. And what was your mother's illness?

1 A. Emphysema.

2 Q. All right. Now did you provide support for your
3 mother prior to moving back into the house on Raymond Drive?

4 A. No, ma'am.

5 Q. Okay. Did she work outside the home, your mother,
6 during her lifetime?

7 A. Yes, she did.

8 Q. Okay. How long?

9 A. She worked at Mare Island during the war. And
10 then she was a waitress for a lot of years that I know of.

11 Q. Okay. And when did she stop working?

12 A. I don't know.

13 Q. Did she have a pension from Mare Island?

14 A. No, ma'am.

15 Q. From any other employment?

16 A. Social Security.

17 Q. Okay. She just had the Social Security, but that
18 she was entitled to from her employment as a waitress?

19 A. Yes, ma'am.

20 Q. Okay. Did your father have a pension?

21 A. Yes, ma'am.

22 Q. And what pension was that?

23 A. Retirement from Mare Island.

24 Q. Okay. When did he retire?

25 A. September of '83, I think.

26 Q. Okay. And do you know the reason for his
27 retirement?

28 A. At the time, no.

1 Q. Have you subsequently learned the reason for his
2 retirement?

3 A. Yes, ma'am.

4 Q. How did you learn that?

5 A. At the time of retirement, I was asked by my
6 father to get and collect his retirement papers, because he
7 worked graveyard, and he couldn't get there. So I would go
8 and get his retirement papers, which I thought was pretty
9 nice.

10 So he come up, and he asked me to find out the
11 disability clause that they have, or the regular retirement.

12 So I found out all the information, both the disability
13 and the regular retirement.

14 And he told me that the disability wouldn't be fast
15 enough, that he had, you know, he had to get going and get on
16 his retirement right now.

17 So I -- you know, we just talked to him, and I said,
18 "Well, I'm glad you're retiring, and we'll have to go to the
19 regular retirement. Because then you'd probably get a check
20 in a couple months.

21 Q. So he took a regular retirement?

22 A. Yes, ma'am.

23 Q. Okay. And --

24 MR. GLICKFELD: Were you finished?

25 THE WITNESS: No, I wasn't.

26 MS. MEYER: I'm sorry. Go ahead.

27 THE WITNESS: Oh. So I got all his paperwork for his
28 regular retirement. And at the time he retired, about three

1 weeks after he, you know, was through working, we find out
2 that he has to go in for surgery. But he wouldn't tell us
3 what it was for.

4 He said he had a problem with his lung, and there was
5 nothing to be worried about, and stuff like that.

6 So he went in for his operation, and then that's when
7 we found out about the -- the problem he had.

8 MS. MEYER: Q. Okay. Do you know how much his regular
9 retirement was on a regular basis?

10 A. I'd say around 1500 to 1700 a month.

11 Q. Okay. And do you know what your mother's Social
12 Security monthly income was?

13 A. I have no idea.

14 Q. Okay. Did your father have any other kind of
15 pension or retirement benefits?

16 A. No, ma'am.

17 Q. Did he have Social Security?

18 A. No, ma'am.

19 Q. Okay. Did he have any other income that was
20 coming in on a regular basis?

21 A. No, ma'am.

22 Q. Okay. How about your mother, did she have any
23 other income that was coming in on a regular basis?

24 A. No, ma'am.

25 Q. Okay. Did you help out your mother and father
26 from time to time, financially?

27 A. No, ma'am.

28 Q. Okay. Did they help you out?

1 A. Yes, ma'am.

2 Q. Okay. In the last, let's say, three years of your
3 father's life, did he help you out, financially?

4 A. Yes.

5 Q. Okay. Was that on a regular basis?

6 A. No, ma'am.

7 Q. Then it was on a sporadic basis, is that right?

8 A. Yes, ma'am.

9 Q. And can you tell us approximately what the amount
10 of that help was?

11 A. Oh, it was -- I was buying a pickup, and he helped
12 me with the down payment on that.

13 And then we needed to get a house, and he helped me
14 with a little bit of money on that. And it's, you know,
15 stuff like that.

16 Q. Okay. So you would ask him for specific
17 assistance to purchase specific items; is that right?

18 A. Yeah, if I couldn't get the money.

19 Q. Okay. Now did you have to hire anyone to assist
20 with the care of your mother after your father died?

21 A. Yes, ma'am.

22 Q. Okay. Who did you hire?

23 A. We had a nurse come in and -- to see to her needs.

24 Q. Okay. And what was the cost of that service?

25 A. I have no idea, ma'am.

26 Q. Okay. Who paid for it?

27 A. My mom's -- my mom's -- I guess her money that my
28 mom had for Social Security.

1 Q. I see. Who was administering the funds during
2 that period of time?

3 A. Betty Cadwallader.

4 Q. And do you know who the beneficiaries of your
5 father's estate are?

6 A. The beneficiaries of my father's estate?

7 Q. Yes.

8 A. My mother.

9 Q. Anyone else?

10 A. Not that I know of.

11 Q. Okay. Is there a will that you know of?

12 A. There was a will from my mom.

13 Q. But your father didn't have one?

14 A. He had one, but it was to my mother.

15 Q. Okay. And you haven't been involved in handling
16 the probate, the legal matters, with respect to that will; is
17 that right?

18 A. No, ma'am. That's right.

19 Q. Who is?

20 A. Betty.

21 Q. Did your father smoke?

22 A. Yes, he did.

23 Q. Okay. Did he smoke his whole life, as far as you
24 know?

25 A. As far as I can remember.

26 Q. Okay. And can you give us an estimate of how much
27 he smoked, on a daily basis?

28 A. I'd say probably no more than two packs a day.

1 Q. Okay. And he smoked about two packs a day for as
2 long as you can remember; is that right?

3 A. No. That's the last time I seen him, you know.
4 Before his operation, he was up to about two packs.

5 Q. Okay. And he continued smoking through until his
6 operation, is that right?

7 A. Up to his operation. Then he quit.

8 Q. Okay. And do you know when he began to smoke
9 about two packs a day?

10 A. No, ma'am.

11 Q. Did your mother smoke?

12 A. Earlier in her life she did. She quit.

13 Q. How much did she smoke, to your knowledge?

14 A. Oh, I have no idea.

15 Q. When was this earlier-in-her-life period?

16 A. Maybe 15 years ago.

17 Q. Okay. And do you smoke, yourself?

18 A. Yes, ma'am.

19 Q. And how long have you been smoking?

20 A. For about 12, 15 years.

21 Q. Okay. Now where is your brother, Larry?

22 A. He lives in New Jersey.

23 Q. Okay. And how old is he?

24 A. 37.

25 Q. And your brother Thomas, how old is he?

26 A. 26.

27 Q. And where does Thomas live?

28 A. He lives in Vacaville.

1 MS. MEYER: I have no further questions at this time.
2 Thank you.

3 MS. LYONS: Can we have five minutes, please?

4 MR. GLICKFELD: Sure.

5 (Brief recess taken).

6 MS. MEYER: Q. I just have one or two questions.

7 You told us when your father stopped working at Mare
8 Island. Do you know when he started working there?

9 A. When he started working there?

10 Q. Right.

11 A. 1942, I think.

12 Q. To your knowledge, did he continuously work from
13 1942 until 1983 at Mare Island?

14 A. No, ma'am, he didn't.

15 Q. Can you give us an estimate of approximately how
16 many years, to your knowledge, he worked there?

17 A. He had a total of 43 years and some odd months at
18 Mare Island.

19 Q. Okay. Was he employed as a shipfitter in any
20 other location?

21 A. No, ma'am.

22 Q. Okay. To your knowledge, did he have any exposure
23 to any products containing asbestos in any other kind of
24 employment?

25 A. I have no idea.

26 Q. Do you know where else he worked, other than Mare
27 Island?

28 A. Yes, ma'am.

1 Q. Can you just give us a list of those places?

2 A. The only place that I know that he worked other
3 than Mare Island is Cordac (phonetic) -- yeah, Cordac
4 Manufacturers, in Woodland, California.

5 Q. And do you know when he had that employment?

6 A. '58, '57.

7 Q. Is that in about 1958 or about 1957?

8 A. Yes, ma'am.

9 Q. Okay. And was that for about a year?

10 A. Yes, ma'am.

11 Q. And do you know what he did for that company?

12 A. He was a repair maintenance man on the machinery.

13 MS. MEYER: Okay. Thank you, I have nothing else.

14 MS. JACKSON: I have no questions.

15 EXAMINATION BY MS. LYONS

16 MS. LYONS: Q. Mr. Enos, do you recall working with
17 gaskets made by Garlock during the time you've been at Mare
18 Island?

19 A. That's sheet gasket, ma'am.

20 Q. All right. Is that those flat gaskets you
21 couldn't recall the name of earlier?

22 A. Yes, ma'am.

23 Q. How do you know that Garlock made them?

24 A. They were embossed on the sheets that it came in.
25 It was rolled up.

26 MS. LYONS: Thank you.

27 EXAMINATION BY MS. GAMBINO

28 MS. GAMBINO: Mr. Enos, my name is Mary Ellen Gambino.

1 Q. How is your health?

2 A. How is my health, today?

3 Q. Yes. Yes.

4 A. I've got a little bit of a cold, but other than
5 that, I'm good.

6 Q. Do you have any respiratory problems?

7 A. Not that I know of.

8 Q. Other than your mother and your father, do you
9 have any history of cancer in your family?

10 A. No.

11 Q. Any history of respiratory problems, that you know
12 of?

13 A. No, that I'm --

14 Q. Now you told us about a three-year period of time
15 that you worked closely with your father.

16 Was that the only time, between '73, and '75, that
17 you've worked with your father?

18 A. No, ma'am.

19 Q. Did you see him periodically over the entire 20
20 years that you were working at Mare Island?

21 A. Yes, ma'am.

22 Q. Was that the longest period of time that you can
23 remember working fairly closely, that three-year period that
24 you've told us about?

25 A. Yes. I was on graveyard at the time, ma'am.

26 Q. Yes. During that period, '73 to '75, had they
27 already initiated any safety procedures regarding working
28 around asbestos at Mare Island?

1 A. No, ma'am.

2 Q. Did you go to any safety meetings where asbestos
3 problems were discussed?

4 MR. GLICKFELD: During that time period?

5 MS. GAMBINO: During that time period.

6 THE WITNESS: No, ma'am.

7 MS. GAMBINO: Q. At any time period?

8 A. Yes, ma'am.

9 Q. And when did that start?

10 A. '75. The latter part of '75.

11 Q. When you were working with your father, did you
12 ever see him wearing a mask or a respirator of any type?

13 A. A dust respirator for grinding.

14 Q. And can you describe that to me? What material
15 was it made of?

16 A. It was rubber.

17 Q. Was it air-fed?

18 A. Yes, ma'am.

19 Q. And when did you see your father wearing that?

20 A. When we were in the nuclear program.

21 Q. Can you give me a year?

22 A. It was between the three years that I was on
23 graveyard with him.

24 Q. Did you see him wearing it more than once?

25 A. I can't recall. It could have been.

26 Q. Now what was the nuclear program, that was just
27 when you were working on nuclear submarines?

28 A. No, we were working in the reactor. You have to

1 wear an air-fed mask when you grind in the reactor.

2 Q. Did your father have to wear any type of a badge?

3 A. We all did.

4 Q. When were you married to Phyllis Ann?

5 A. In 1965.

6 Q. Were you living at home at the time, or were you
7 living with your parents at the time?

8 A. Yes, ma'am.

9 Q. Other than the period when you moved in with your
10 mother recently, when was the last time that you lived with
11 your father and your mother?

12 A. In '78, I come back from Tennessee, and we lived
13 there until we could find a house.

14 Q. And prior to that, when was the last time?

15 A. '65.

16 Q. In 1978, how long did you live with your parents?

17 A. Three weeks.

18 Q. What does your brother Larry do, if you know?

19 A. I have no idea what he does right now.

20 Q. Has anyone told you, or do you know the state of
21 his health?

22 A. Of his health?

23 Q. Yes.

24 A. He had a slight heart attack in '79, I think,
25 or '80.

26 Q. Do you know if he's disabled now?

27 A. No, he's not, ma'am.

28 Q. Was he married?

1 A. Yes, ma'am.

2 Q. And what is the name of his wife?

3 A. Barbara.

4 Q. Do they have any children?

5 A. Yes, they do, ma'am.

6 Q. And how many?

7 A. Two.

8 Q. How old are they, if you know?

9 A. 16, and 15, I think.

10 Q. Does Larry come out to visit very often?

11 A. About once every two years.

12 Q. Do you know when was the last time he saw his
13 father?

14 A. Christmas. Last -- Christmas of '82.

15 MS. GAMBINO: That's all the questions I have. Thank
16 you.

17 MR. LAVE: No questions.

18 MS. RENNERT: No questions.

19 MR. CLARK: No questions.

20 MR. MAJESKI: No questions.

21 MR. BALCHER: No questions.

22 MS. ADAMS: Mr. Enos, I just have a couple.

23 EXAMINATION BY MS. ADAMS

24 MS. ADAMS: Q. Were all the people that you worked
25 with at Mare Island government employees, to the best of your
26 knowledge?

27 A. All the people at Mare Island?

28 Q. That you worked with.

1 A. No, they're not.

2 Q. Who are not government employees?

3 A. They have contractors who come in.

4 Q. Do you know if all your father's work was done
5 aboard ship?

6 A. No, it wasn't, ma'am.

7 Q. When he was not working aboard ship, where did he
8 work at Mare Island?

9 A. In the shop.

10 Q. Which shop?

11 A. Shop 11.

12 Q. Okay. Is that in a particular building?

13 A. Yes, ma'am.

14 Q. Do you know the name of the building?

15 A. 690.

16 Q. Do you know how much of his time he spent in the
17 shop, as opposed to the time spent aboard ship?

18 A. Towards his latter part of his years, I'd say the
19 last six years of his time was spent in the shop.

20 Q. Exclusively in the shop?

21 A. Yes, ma'am.

22 Q. Prior to that, how much of his time was spent in
23 the shop, as opposed to the ship?

24 A. I would say --

25 MR. GLICKFELD: Well, I'm going to object. That calls
26 for speculation. There's no foundation that other than the
27 time period when they worked together, that he has any
28 specific knowledge of that type of work he did for time

1 periods back in the '40s or '50s or '60s.

2 If he can answer the question, he can.

3 MS. ADAMS: If he doesn't know, he can say he doesn't
4 know. But if you have a rough idea.

5 MR. GLICKFELD: I object to it, too.

6 Go ahead and answer, if you can.

7 THE WITNESS: I don't know. It's hard to say.

8 MS. ADAMS: Q. Do you think he spent more time on ship
9 than he did in the shop?

10 MR. GLICKFELD: Well, I'm going to object. That calls
11 for speculation.

12 You can answer it, if you can.

13 MS. ADAMS: Q. Do you know if he worked anyplace other
14 than Building 690, and aboard ship, at Mare Island?

15 A. Yeah.

16 Q. Do you know where else?

17 A. They had what they call slabs. It's where they
18 welded -- the welders would weld up what he has made for a
19 foundation. They take it to the slab. And that's just maybe
20 50 feet from the boat.

21 Q. Is there any other place he worked at Mare Island,
22 that you're aware of?

23 A. No.

24 MS. ADAMS: I have no further questions at this time.

25 MR. SIMMONS: Nothing.

26 MS. PIERCE: No.

27

28

SIGNATURE OF WITNESS

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
26
27
28

STATE OF CALIFORNIA)
) ss.
COUNTY OF ALAMEDA)

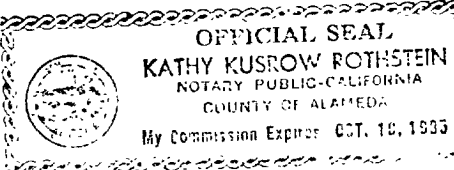
I, KATHY KUSROW ROTHSTEIN, a Notary Public in and for the County of Alameda, State of California, do hereby certify:

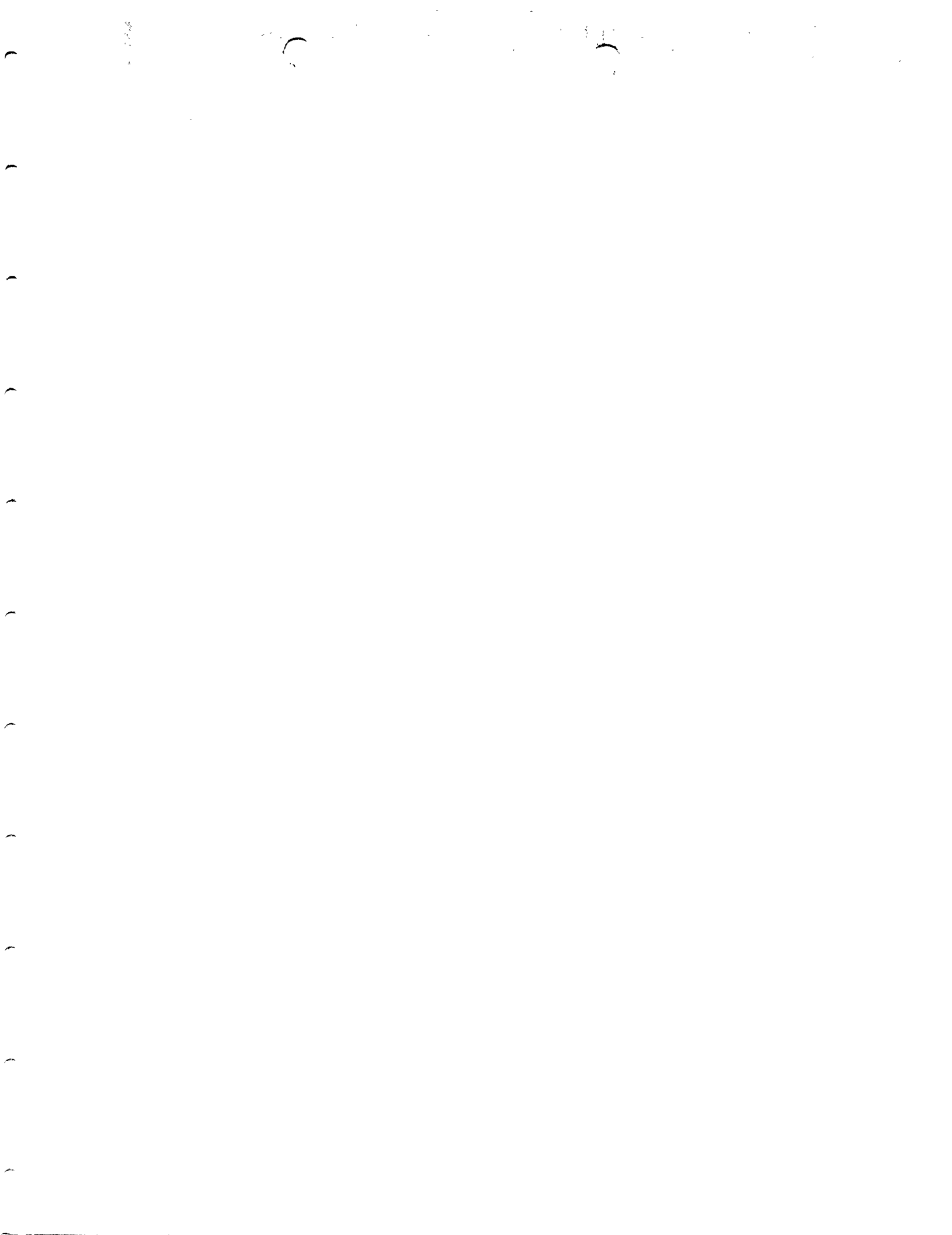
That ROBERT ENOS, in the foregoing deposition named, was present and by me sworn as a witness in the above-entitled action at the time and place therein specified;

That said deposition was taken before me as a Notary Public at said time and place, and was taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and was thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said deposition and of the proceedings which took place;

That I am a disinterested person to the said action.

IN WITNESS WHEREOF, I have hereunder subscribed my hand and affixed my official seal this 25th day of April, 1985.

 *Kathy Kusrow Rothstein*
KATHY KUSROW ROTHSTEIN, CSR NO. 3919
In and for the County of Alameda
State of California



SUMMARY OF EXHIBITS TO DEPOSITION OF ROBERT ENOS
PRESENTED ON APRIL 10, 1985

Exhibit A

Copies of photographs from the Bible deposition which Robert Enos picked out as familiar:

- (1) Armstrong label, Excelon Tile, Vinyl Plastic Asbestos;
- (2) Armstrong label, Heavy-Duty FRJ;
- (3) Armstrong label, Custom Excelon Tile, Vinyl Asbestos;
- (4) box with Atlas asbestos label, Newtherm;
- (5) picture of two bags; bag no. 1: Atlas Asbestos label, Atlas New-Mix No. 18 insulating cement; bag no. 2: Atlas Asbestos Co. Ltd. Montreal, Que. No. 660 Asbestos Finishing Cement;
- (6) cylinder with Atlas Asbestos label, Stove & Furnace Cement;
- (7) Detric Griptex Block Insulation;
- (8) Ruberoid label, Calselite Insulation;
- (9) Eagle Picher, "43" Finishing Cement;
- (10) Eagle Picher, Super "66" Insulating Cement;
- (11) Eagle Picher, 50 lb. bag of One-Cote Cement;
- (12) Eagle Picher, 50 lb. bag of Fireproofing Cement;
- (13) Eagle Picher, Drum of Stalastic;
- (14) Eagle-Picher, Insulseal;
- (15) Eagle Picher, Hylo;
- (16) Eagle Picher, 50 lb. bag of Hylo Cement;
- (17) Flintkote, Vinyl Asbestos Floor Tile;
- (18) 5 bags or containers of PABCO products (two of which are illegible. Bag. No. 3: Precision Molded CALTEMP Pipe Insulation, bag No. 4: Precision

Molded CALTEMP Block Insultation, bag No. 5:
Precision Molded Super CALTEMP Insulation;

(19) Webers 48, High Temperature Insulating Block;

(20) Appears to be 4 products in a row (one is illegible). Ruberoid, Calsilite insulation; Epitherm 1200; Johns-Manville, THERMOBESTOS Pipe Insulation;

(21) GAF Vinyl Asbestos Floor Tile;

(22) GAF Vinyl Asbestos Floor Tile 12x12, 3/32 GA., 45 PCS. 45 sq. ft.;

(23) Johns-Manville Thermobestos Pipe Insulation;

(24) Johns-Manville 85 Magnesia Block Insulation;

(25) Johns-Manville 100 lb. bag of No. 352;

(26) K&M (Keasbey & Mattison), Zebra;

(27) (OWENS CORNING (?), KAYLO Insultation (for temperatures to 1200 F.;

(28) OWENS CORNING FIBERGLAS, Kaylo-10 1200 F;

(29) Pittsburgh Corning, UNIBESTOS Insulation;

(30) SEPCO;

(31) SEPCO, Packing material Asbestos TFE 3/8" square;

(32) Johns-Manville Sheet Packing;

(33) Celotex, 5 gal. of Fibrous Adhesive;

(34) Johns-Manville Sheet Packing Style No. ?;

(35) Garlock Label;

(36) Two pictures: Pic. 1: John Crane, Style SS6-AM Packing Spool Form 5 lb.; Pic. 2: John Crane boxes on shelves (illegible);

(37) Flexitallic Handhole and Manhole Gaskets;

(38) Garlock label;

(39) Two labels: Label 1: GAF, Asbestos Base Felt 2 Squares;

Label 2: GAF, Ruberoid Asbestos
Millboard, 42"x48".

- (40) Two pictures: Picture No. 1: Johns-Manville, Role of Asbestos Paper. Picture No. 2: Johns-Manville, Thermo-Pac Style 1000 Asbestos Rope.
- (41) Two pictures: No. 1: illegible
No. 2: Johns-Manville, No. 1192 Asbestos Cord.
- (42) Two pictures: No. 1: Johns-Manville, Asbestogard Adhesive. No. 2: Johns-Manville Ventsulation, Asbestos Base Felt Mineral-Surfaced One Square.
- (43) Box with KEEN label on it.
- (44) American Asbestos Textile Corporation.
- (45) Three pictures (two are illegible).
Picture No. 3: (Tape?) with Raybestos label on it.
- (46) Two pictures with Raybestos Manhattan Inc. labels on them.
- (47) Label illegible, Pointing and Finishing Cement.

end

DEPOSITION SUMMARY OF ROBERT ENOS

ENOS v. JOHNS MANVILLE

April 10, 1985

Page

- 6, 1-10 Witnesses name is Robert Enos.
- 6, 11-7, 9 Document production: (1) have not yet compiled Bedford Enos' medical bills, (2) have not yet compiled the medical type bills for Dora Enos which were due to the death of Mr. Enos, (3) wage loss information (unsure of what form it will appear in, W-2 forms?), willing to produce those without waiving the privilege as to the rest of the income tax information, (4) pictures from Bible depo which witness has picked out as ones he recalls, or there is something familiar about them (he worked at Mare Island for 20 years).
- 7, 10-21 Documents attached as exhibits. Witnesses will testify to ballpark figures on wage loss and medical bills and other things; exact info will be given later. *
- 7, 22-8,11 Both Thomas Enos and Elizabeth Cadwallader were present and their depositions will be taken later on the same date. Thomas Enos was present when reviewing the photos (Robert primarily did it). No other docs to be produced.
- 8, 12-15 Lives at 520 Raymond Dr., Benicia, CA.
- 8, 16-9, 24 Counsel explains nature of a depo.
- 9, 25-10, 5 Bedford was witness' father. Witness' date of birth, 8-28-45. He has 2 brothers, his father had no other children.
- 10, 6-12 Mrs. Cadwallader is his cousin. Bedford was her uncle.
- 10, 13-25 Mother was Dora Faye Enos, died recently, 12/29.
- 10, 26-11, 19 Father passed away, 12/19/84. Does not know who is doctor was at the time. He was aware of what the doctor said was the cause of death, but the doctor did not tell him (he saw it on the death certificate). He never discussed his father's condition with his physician or his mother.

- 11, 20-12, 7 Has been a pipefitter at Mare Island for 20 years. Started in 1965 and has been continuously employed there all but 8 months (6/78 - 2/79).
- 12, 8-28 When he was first hired on Mare Island he was a boilermaker for 1 year. When he first started out in the general employment of being a pipefitter, his title was a pipefitter worker. In 1968, he became a journeyman.
- 13, 1-20 Prior to employment at Mare Island: right out of school he went to work for Yuba Manufacturing in Industrial Park, in Benicia. He helped manufacture gold dredges for 6 mos. Then he went to Mare Island.
- 13, 21-15, 16 While he was employed at Mare Island, his father was working at Mare Island as a shipfitter until 1983. From 1973 to 1975 they were continuously on the same shift (the graveyard). During this 3 year period, in his job as a test mechanic, he had various jobs on different boats. Sometimes he worked with his father, he bounced back and forth. During the 3 year span, he worked on the same submarines that his father was working on, but not alongside him. Shipfitters and pipefitters had different jobs at the same time. They worked in the same area, but not back to back. At a particular time he knew exactly what job his father was performing.
- 15, 17-28 Graveyard = midnight to 8 A.M. 2/3rds of the time he would be working on the same sub at the same time as his father, during this 3 year span.
- 16, 1-24 During this 3 year period (1973-75), he was handling products which he believed contained asbestos: pipe covering, asbestos hanger liners, sheets of asbestos.
- 16, 25-17, 21 Names of products he handled: Johns-Manville Pipe (Cover?), Kaylor (phonetic) hangerliner, Eagle 66 quick dry cement, GAF asbestos sheets, (Eagle products asbestos sheets?). That's all he can remember.
- 17, 22-18, 11 Believes that during 1973 to 1975, while he was working with his father on the same subs, his father was working with products that witness believed contained asbestos. In shop

- 11 they had to remove a lot of the lagging to get down to the bulkheads and foundations. And when he was restoring the ship back to normal, the lagers were working alongside him.
- 18, 12-21 Block that the lagers were using: Johns-Manville, Kraylon or Kaylon, Eagle 66, Raybestos.
- 18, 22-19, 20 In 1965, he worked at Mare Island starting as a boilermaker's helper for 1 year repairing surface craft boilers - they'd go in, tear out the brick, redo the tubs, replace the tubs, and rebrick the furnaces in the surface craft. The boilers they were working on - Babcock & Wilcox. Other asbestos-containing products you came into contact with during boilermaker time - Eagle 66 insulator, block form, power block form and cement form.
- 19, 21-20, 6 He left the boiler shop in about 1966. Right now he works for Ocean Engineering as a test mechanic supervisor: supervises 11 people, testing ocean engineering products on submarine.
- 20, 7-21, 3 He has been a pipefitter from 1966 to April 1, 1985. There are 3 different type of pipefitters. He started out down fabricating, bending, welding, and mechanical make-ups of the pipes. Now, in the test branch, he tests everything that's in a system to a certain pressure for submergence pressure, and to test the strength to categorize the pipe.
- 21, 4-18 During his employment as a pipefitter from 1965 to 1973, he believes he came into contact with asbestos products: the ones mentioned before. Up until about 1972 during the new construction of submarines, it was laying all over.
- 21, 19-22, 3 After 1975, the only asbestos-containing product he contacted was Flexitallic gaskets. He got them in cellophane wrappers.
- 22, 4-23 During the time he was working as a pipefitter, 1966-1972, he was working in the vicinity of other trades that were using products that he believed contained asbestos: lagers Shop 64, using pipe covering with the sheets, Eagle 66, power type. The machinists, shop 38, used Raybestos wicking, asbestos lined brake shoes, Raybestos packing gland material. (He handled that when assisting them with pipe make-ups).

- 22, 24-23, 19 During the last 5 years of his father's life witness saw him about every day. Father was living in Benicia at 1334 West Dale. He moved back to Raymond Dr. after the death of his mom, he is in the process of buying a home. Change of testimony - he moved back into the home to care for his mom after his dad died, around Sept. of 1984.
- 23, 20-24, 2 Married Phyllis Ann Enos. She has been a Retail Clerk for Safeway for the past couple of years.
- 24, 3-15 He has 2 children (20 and 17), have been living with him in the past couple of years. Daughter Stephanie Ann is still living with him.
- 24, 16-25,11 He, his wife, and Stephanie moved back to his parent's home after his father died. His wife cared for his mother during the days and he cared for her during the nights. Stephanie helped as well. Mother's illness: Emphysema.
- 25, 2-19 He did not provide support for his mother prior to moving back to Raymond Dr. His mother worked at Mare Island during the war, she was a waitress for many years. Does not know when she stopped working. She did not have a pension from Mare Island; she had Social Security from her employment as a waitress.
- 25, 20-27, 24 Father had retirement pension from Mare Island (retired in Sept. 1983). At the time witness did not know the reason for his retirement. Witness picked up father's retirement papers, checked on disability clause and regular retirement. Disability would take too long so he took reg. retirement. 3 weeks after retiring father went in for surgery (problem with lung). That's when witness found out about the problem his father had. Father's reg. retirement around \$1500 or \$1700 per month. Has no idea what mother's S.S. monthly income was. Father had no other kind of pension or retirement benefits (no S.S.); neither Mother nor father had any other income that was coming in on a regular basis.
- 27, 25-28, 18 Did not help out mother and father financially but they helped him. Within the last 3 years of father's life, father helped him out on a sporadic basis - helped put downpayment on pickup, helped with purchase of the house.

- 28, 19-29, 3 He hired a nurse to assist with the care of his mother after his father died. He does not know the cost of the service; mother's S.S. paid for it (Betty Cadwallader administered the funds).
- 29, 4-20 His mother was the beneficiary of his father's estate. There was a will from his mother. The will from his father was to his mother. Betty has been involved in handling the probate, legal matters, with respect to that will.
- 29, 21-30, 10 His father smoked as long as the witness can remember (before father's operation, father was up to about 2 packs per day). After operation, he quit. Witness does not know when father began to smoke about 2 packs a day.
- 30, 11-16 Mother smoked earlier in her life, maybe 15 yrs. ago, then she quit. Has no idea how much she smoked.
- 30, 17-20
30, 21-28 Witness has been smoking for about 12 to 15 yrs. Brothers: Larry, 37, lives in N.J.; Thomas, 26, lives in Vacaville.
- 31, 7-18 Witness thinks that his father started working at Mare Island in 1942 - did not work continuously from 1942 to 1983. Father had a total of 43 years and some odd months at Mare Island.
- 31, 19-32, 12 Father was not employed as a shipfitter in any other location. Witness has no idea if father had any exposure to any products containing asbestos in any other kind of employment. The only place that witness knows his father worked at other than Mare Island is Cordac (phonetic) Manufacturers in Woodland, CA. in 1957 or 1958 for about a year. He was a repair maintenance man on the machinery for about a year.
- 32, 15-26 Exam. by Ms. Lyons. He recalls working with sheet gaskets made by Garlock during the time he was at Mare Island (those flat gaskets he couldn't recall the name of earlier). He knows Garlock made them because they were embossed on the sheets that it came in.
- 32, 27-33, 13 Exam by Ms. Gambino. Today witness has a bit of a cold, other than that he is fine. He has no respiratory problems that he knows of. Other than his mother and his father he

has no history of cancer or respiratory problems in his family that he knows of.

- 33, 14-34, 10 He saw his father periodically over the entire 20 yrs. that he was working at Mare Island, but the longest period of time that he remembers working fairly closely to his father was that 3-year period (1973-75). During that period, 1973 to 1975, they had not initiated any safety features regarding working around asbestos at Mare Island. During that time, he did not go to any safety meetings where asbestos problems were discussed - that started in the latter part of 1975.
- 34, 11-35, 3 When he was working with his father in the Nuclear program (between the 3 yrs. that he was on the graveyard with him) he saw his father wear a rubber air-fed dust respirator for grinding. He can't recall if he saw him wearing it more than once. They were working in the reactor, not on Nuclear submarines. You have to wear an air-fed mask when you grind in the reactor. Everybody had to wear a badge.
- 35, 4-17 When he was married to Phyllis Ann in 1965, he was living with his parents. Other than the period when he moved in with his mother recently, the last time he lived with his father and mother was in 1978 when he returned from Tennessee. They lived there for 3 weeks until they could find a house. Prior to 1978, the last time he lived at home was in 1965.
- 35, 18-36, 14 He has no idea what his brother Larry does right now. Larry had a slight heart attack in 1979 1980 but is not disabled now. Larry is married to Barbara and they have 2 children (he thinks 16 and 15). Larry comes out to visit once every two years; the last time he saw his father was Christmas of 1982.
- 36, 23-37, 3 Exam. by Ms. Adams. Not all of the people that he worked with at Mare were government employees- they have contractors that come in.
- 37, 4-38, 23 Not all of father's work was done aboard ship - he worked in shop 11, Bldg. 690 for the last six years of his time. Prior to that witness does not know how much time his father spent in his shop as opposed to the ship. Other than

Bldg. 690, and aboard ship, his father also worked where they had what they call slabs, where the welders would weld up what he has made for a foundation (maybe 50 feet from the boat). There is no other place that father worked at at Mare Island that witness is aware of.



IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SAN FRANCISCO

---o0o---

DORA ENOS

Plaintiff,

vs.

JOHNS-MANVILLE CORP.,
et al.

Defendant.

No. 788265

EXHIBITS TO THE DEPOSITION OF

ROBERT ENOS

Taken: 4-10-85

Aiken & Welch, Inc.

Certified Shorthand Reporters

1404 Franklin Street, Suite 505
Oakland, California 94612
(415) 451-1580

98



TV

HIGH TEMPERATURE BONDING
POINTING AND FINISHING
CEMENT

MANUFACTURED BY
HYDRON INDUSTRIES, INC.
DALLAS, TEXAS 75223

HYDRON INDUSTRIES



HYDRON INDUSTRIES