

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SOLANO

---oOo---

MICHAEL McINNIS and ROBERT)
DITTMER,)
)
Plaintiffs,)
) Case No.
vs.) FCS033636
)

JEWEL HIRSCH, individually and)
doing business as FAIRFIELD)
CLEANERS; RONALD W. WASLOHN; TERRY)
A. DUREE, INC., a corporation;)
STEPHEN C. SPENCER; RICHARD RAGLE;)
GEORGE J. TOMASINI, JR., in his)
own right and as trustee of the)
George J. Tomasini Trust; MARY)
ALICE BEDINGFIELD in her own right)
and as trustee of the Mary Alice)
Bedingfield Revocable Trust;)
ATTIEH ASSAD; and MUNIRA ASSAD,)
)
Defendants.)

AND RELATED CROSS-CLAIMS.)
)

---oOo---

DEPOSITION OF SCOTT KEILHOLTZ

Thursday, November 3, 2011

Taken at the location of:

1107 Second Street, Suite 210
Sacramento, California 95814

---oOo---

Reported by Antonia Severson, CSR #3430

2

1 APPEARANCES
2
3 For the Plaintiff and Cross-Defendant ROBERT DITTMER:
4 LAW OFFICE OF ISOLA LAW GROUP
5 405 West Pine Street
6 Lodi, CA 95240
7 (209)367-7055
8 By: DOYLE GRAHAM, Attorney at Law

9 For the Defendant JEWEL HIRSCH:
10 LAW OFFICE OF HUNSUCKER, GOODSTEIN & NELSON
11 3717 Mt. Diablo Boulevard, Suite 200
12 Lafayette, CA 94549
13 (925)284-0840
14 By: ALLISON E. McADAM, Attorney at Law

15 For the Defendants RICHARD RAGLE and GEORGE JAY
16 TOMASINI, JR.:
17 LAW OFFICE OF LEWIS, BRISBOIS, BISGAARD & SMITH
18 1 Sansome Street, Suite 1400
19 San Francisco, CA 94104
20 (415)438-6683
21 By: ROBERT FARRELL, Attorney at Law

22 For the Defendants ATTIEH ASSAD and MUNIRA ASSAD:
23 (NOT PRESENT)
24 LAW OFFICE OF SHAMIYEH & SHAMIEH
25 112 West 25th Avenue, Suite 1
San Mateo, CA 94403
(650)627-8027
By: A. NICK SHAMIYEH and RAMI S. SHAMIEH,
Attorneys at Law

3

1 APPEARANCES
2 (Cont'd)
3
4 For Defendants TERRY A. DUREE, INC., STEPHEN C. SPENCER,
5 RONALD W. WASLOHN: (NOT PRESENT)
6 TERRY A. DUREE, Attorney at Law
7 A Professional Corporation
8 622 Jackson Street
9 Fairfield, CA 94533
10 (707)422-8933

11 For Cross-Defendant CATHERINE ESTER KIRK: (NOT PRESENT)
12 LAW OFFICE OF SEDGWICK, DETERT, MORAN & ARNOLD
13 333 Bush Street, 30th Floor
14 San Francisco, CA 94104-2834
15 (415)781-7900
16 By: EARL L. HAGSTROM and MATTHEW DUDLEY,
17 Attorneys at Law

18 For Cross-Defendants RICHARD A. CORDES and SUZANNE M.
19 CORDES: (NOT PRESENT)
20 LAW OFFICES OF JIM G. PRICE
21 6569 Brentwood Boulevard
22 Post Office Box 1417
23 Brentwood, CA 94513
24 (925)516-4686

25 For Cross-Defendants TEGTMEIER ASSOCIATES, INC., and
MOORE & TEGTMEIER:
LAW OFFICE OF NOSSAMAN
50 California Street, 34th Floor
San Francisco, CA 94111
(415)398-3600
By: JAMES A. NICKOVICH, Attorney at Law

4

1 APPEARANCES
2 (Cont'd)
3
4 For OBIE GOINS, LUCILLA HAZARD, JUDY LAWING and RAY L.
5 JOHNSON:
6 LAW OFFICE OF HUNT & JEPSON
7 2200B Douglas Boulevard, Suite 150
8 Roseville, CA 95661
9 (916)780-7008
10 By: JEREMY B. PRICE, Attorney at Law

11 For GERALD DUENSING and SANDRA DUENSING: (NOT PRESENT)
12 In Propria Persona
13 5861 Lupin Lane
14 Pollock Pines, CA 95688
15 (530)647-0562

16 For LAVERNE APPLEBY-STEWART: (NOT PRESENT)
17 In Propria Persona
18 612 Garnet Court
19 Vacaville, CA 95688
20 (707)480-2287

21 For KATHRYN PIRMAN, formerly known as KATHRYN BUTLER,
22 and WILLIAM L. BUTLER: (NOT PRESENT)
23 LAW OFFICE OF BUSTAMANTE, O'HARA & GAGLIASSO
24 333 West San Carlos Street, 8th Floor
25 San Jose, CA 95110
(408)977-1911
By: ROBERT M. GAGLIASSO and M. ELIZABETH CIRONE,
Attorneys at Law

5

1 APPEARANCES
2 (Cont'd)
3
4 For THOMAS TURIGLIATTO: (NOT PRESENT)
5 In Propria Persona
6 5074 Dry Creek Road
7 Napa, CA 94558

8 Other Persons Present:
9 SCOTT KEILHOLTZ, Deponent
10 Antonia Severson, Court Reporter

11 ---oOo---

6

1 I N D E X

2 Examination By Page

3 Mr. Graham 7

4 Ms. McAdam 134

5 Mr. Nickovich 139

6 Mr. Farrell 149

7 Mr. Graham 150

8

9 ---oOo---

10 E X H I B I T S

Number	Description	Page
11 1	12-page Deposition Subpoena For Personal Appearance and Production of Documents And Things	42
12 2	8-page 1961 City Directory	70
13 3	5-page Articles of Incorporation Of Solano Printers & Lithographers	73

14

15

16 ---oOo---

17

18

19

20

21

22

23

24

25

8

1 Q. Okay. Do you recall if you've ever been

2 designated as an expert in a state court?

3 A. I don't believe so.

4 Q. Okay. Do you recall if you've ever been

5 designated as an expert in a federal court?

6 A. No, I don't believe so.

7 Q. Have you ever submitted any report, expert

8 report, to any state or federal court?

9 A. No.

10 Q. Okay. And of these half dozen times that you

11 were deposed, could you tell me of those half dozen

12 times how many, if any, involved your operations of a

13 printing shop?

14 A. They all did.

15 Q. They all did.

16 And could you just briefly break down for me

17 just the main issues of these six times that you were

18 deposed, previously?

19 A. I -- I really couldn't go into the detail. It

20 goes back -- the last time I was deposed was probably

21 around '97, and at the end of the Cal Central Press

22 there was a lot of litigation going on.

23 Q. Litigation with?

24 A. Creditors.

25 Q. And of the remaining times that you've been

7

1 B E I T R E M E M B E R E D, that pursuant to notice, and

2 on Thursday, November 3, 2011, commencing at the hour of

3 10:04 a.m., at the location of 1107 Second Street, Suite

4 210, Sacramento, California, before me, ANTONIA

5 SEVERSON, a Shorthand Reporter in and for the State of

6 California, there personally appeared:

7 S C O T T K E I L H O L T Z,

8 Called as a witness herein, having been duly sworn to

9 tell the truth, the whole truth, and nothing but the

10 truth, testified as follows:

11 ---oOo---

12 E X A M I N A T I O N

13 BY MR. GRAHAM:

14 Q. Mr. Keilholtz, good morning. As I introduced

15 myself before, my name is Doyle Graham. I represent the

16 plaintiffs in this case.

17 I first want to ask you, have you ever had your

18 deposition taken before?

19 A. Yes, I have.

20 Q. On how many occasions?

21 A. Half a dozen at least.

22 Q. And of those half a dozen occasions where

23 you've given depositions, have you given any depositions

24 in capacity as an expert?

25 A. I don't recall.

9

1 previously deposed, have any of those issues revolved

2 around contamination?

3 A. No, never.

4 Q. Okay. Since it's been a little while since

5 your last deposition, I'll go over some of the kind of

6 basic ground rules for you.

7 Today is essentially a question-and-answer

8 session. I get to ask the questions first. Any of the

9 other counsel can ask questions.

10 Please wait till I'm done with my question. We

11 have a court reporter here taking down everything that

12 we say. Please wait till I'm done with my question

13 completely.

14 And by the same token, I'll wait for you to

15 completely answer your question before I pose the next

16 question.

17 Is that agreeable?

18 A. Uh-huh. Yes.

19 Q. Second thing, I do need verbal answers, a "yes"

20 and a "no," rather than an "uh-huh" or "huh-uh." If I

21 stop you and say, "Is that a 'yes,'" please don't think

22 I'm being rude.

23 A. I understand.

24 Q. I need to have a clean record.

25 A. I understand.

10

1 Q. Okay. If you don't understand any of the
 2 questions that I ask you or any of the phrases or terms
 3 that I use, please ask me to rephrase those, and I will.
 4 By the same token, if I don't understand one of
 5 your answers, I'm going to ask you to explain. Okay?
 6 A. Correct.
 7 Q. Again, as I told you before the deposition, if
 8 at any time you wish to take a break, at any time, let
 9 me know. We'll take a break to accommodate your
 10 schedule.
 11 I know you indicated you have family or
 12 relatives flying in, so if at any time you need to take
 13 a break, please let me know.
 14 A. (Witness nodded head.)
 15 Q. At the end of your deposition, a deposition
 16 transcript will be prepared by the court reporter.
 17 You'll have an opportunity to review that transcript,
 18 make any changes that you feel are necessary to that
 19 transcript.
 20 However, I must caution you, if you change any
 21 answers substantively, if you change a "yes" to a "no,"
 22 or a "no" to a "yes," I or any other counsel can later
 23 comment upon those changes, and it may affect your
 24 credibility later down the line.
 25 Do you understand?

11

1 A. Yes.
 2 Q. Mr. Keilholtz, are you under the influence of
 3 any medication, drugs or alcohol that would influence
 4 your ability to give your best testimony today?
 5 A. No, I'm not.
 6 Q. Okay. I noticed, you didn't bring any
 7 documents today, did you?
 8 A. No.
 9 Q. Okay. We'll get into that a little bit later.
 10 What I'd like to do then, I don't have a copy
 11 of your current resumé, so what I'd kind of like to do
 12 is just briefly break down some of the areas of your
 13 past experience, training, education.
 14 Where did you go to high school, Mr. Keilholtz?
 15 A. Lowell High School in San Francisco.
 16 Q. Walt?
 17 A. Lowell.
 18 Q. Lowell. L-o-w-e-l-l?
 19 A. Yes.
 20 Q. Okay. And what is the date of your birth,
 21 Mr. Keilholtz?
 22 A. January 1st, 1936.
 23 Q. And are you currently employed?
 24 A. I'm a consultant occasionally, but right now I
 25 don't have anything going on. I may have something

12

1 soon.
 2 Q. Do you have your own business?
 3 A. Yeah, it's a sole proprietorship as a
 4 consultant.
 5 Q. And that's the Rosenthal Group?
 6 A. Yes. I do business as the Rosenthal Group.
 7 Q. And what is your title with the Rosenthal
 8 Group?
 9 A. I don't have a formal title. There are only
 10 two people.
 11 Q. Okay. And that would be yourself and whom?
 12 A. Howard Rosenthal.
 13 Q. And what are your -- essentially your job
 14 duties or job responsibilities with respect to being a
 15 consultant for the Rosenthal Group?
 16 A. We do mergers and acquisitions. Everything is
 17 for the printing industry, specifically.
 18 So we do mergers and acquisitions; we give
 19 financial advice; we help develop strategies; we review
 20 print processes. The whole range or gamut of services
 21 that are required by the printing industry.
 22 Q. When you say "print processes," to what are you
 23 referring?
 24 A. The methods used in the production of
 25 materials, such as the books around this room.

13

1 Q. That would be -- so that would be books. Would
 2 that include ink?
 3 A. You can't print without ink --
 4 Q. Okay.
 5 A. -- or some form of some material --
 6 Q. Okay.
 7 A. -- that puts the image down on the sheet.
 8 Q. So your consulting services with the Rosenthal
 9 Group would consist of recommendations for what type of
 10 ink to use on substrate or --
 11 A. I would never get into that level of
 12 recommendation.
 13 Q. Okay.
 14 A. Those are usually based on favoritisms of
 15 people that supply materials.
 16 Q. Okay. Then that I'm trying to nail down from
 17 you, sir, is what specifically are your jobs with the
 18 respect to being a consultant for the Rosenthal Group
 19 with respect to printing processes.
 20 A. Well, people -- one of the issues today that
 21 would be -- people would be looking into whether they
 22 should go digitally or buy additional offset equipment,
 23 which is a type of manufacturing equipment for the
 24 printing industry.
 25 And so depending on the mix of work that a

14

1 company has, it might be better to go digital and buy a
 2 digital machine, or it might be better to buy an offset
 3 machine.
 4 That is the type of thing that I would be
 5 involved in.
 6 Q. Anything to do with management of chemicals or
 7 solvents for the printing industry?
 8 A. I've never been involved in that.
 9 Q. Okay. When were you first -- withdraw that.
 10 When did you begin as a consultant for the
 11 Rosenthal Group?
 12 A. I don't have the exact date. We -- after
 13 selling Cal Central, I did a number of consulting things
 14 and hooked up with Howard.
 15 And at some point in time, Howard and I started
 16 to work together as the Rosenthal Group, but I don't
 17 remember exactly when that took place.
 18 Q. Sometime after nineteen --
 19 A. After '96. Sometime after '98 probably, '99.
 20 Q. Mr. Keilholtz, again, let me finish my question
 21 before you --
 22 A. I'm sorry.
 23 Q. That's fine.
 24 And in what year did you sell Cal Central
 25 Press?

15

1 A. 1996.
 2 Q. And to whom did you sell it?
 3 A. American Lithographers.
 4 Q. And did you have any interest in American
 5 Lithographers at the time that Cal Central Press was
 6 sold to American Lithographers?
 7 A. No, I did not.
 8 Q. Okay. What year did you graduate high school?
 9 A. '54.
 10 Q. And then did you attend any colleges,
 11 Mr. Keilholtz?
 12 A. Yes, I did.
 13 Q. And what colleges would those be?
 14 A. I went to Stanford University.
 15 Q. And did you graduate from Stanford?
 16 A. Yes, I did.
 17 Q. In what year, sir?
 18 A. 1958.
 19 Q. And what was your degree in?
 20 A. History.
 21 Q. During the period of 1954 to 1958, did you have
 22 any employment?
 23 A. Yes.
 24 Q. And for whom -- or by whom were you employed?
 25 A. A cafeteria in Palo Alto that I can't remember

16

1 the name of, out of business; the public library in Palo
 2 Alto; and for Sacramento Lithograph here in Sacramento.
 3 Q. And what years were you employed by Sacramento
 4 Lithograph in Sacramento?
 5 A. It was summer work, and I don't know if I
 6 worked every summer or not.
 7 Q. So to your best recollection, it would be the
 8 summers between 1954 and 1955?
 9 That's a "yes"?
 10 A. No, between '54 and '57.
 11 Q. '57.
 12 And you graduated from Stanford, again, in what
 13 year?
 14 A. '58.
 15 Q. Okay. So you worked at Sacramento
 16 Lithographer -- or Lithograph, I beg your pardon.
 17 A. Sacramento Lithograph Company.
 18 Q. That would be the summers between '54 and
 19 '57 --
 20 A. Correct.
 21 Q. -- is that correct?
 22 A. Correct.
 23 Q. One thing I forgot to tell you at the
 24 beginning, Mr. Keilholtz, I know a lot of things
 25 happened a long time ago, and I don't expect you to have

17

1 specific dates for me.
 2 A. Right.
 3 Q. But I'm entitled to your best recollection and
 4 a best estimate.
 5 A. Right.
 6 Q. So if I try to narrow you down, again, don't
 7 think I'm being rude. I just need to narrow it down to
 8 get a clear record for myself.
 9 A. Okay.
 10 Q. Thank you.
 11 And what was your job title at Sacramento
 12 Lithograph?
 13 A. In the summers?
 14 Q. Yes, sir.
 15 A. I didn't have a job title.
 16 Q. What were your job responsibilities?
 17 A. Whatever people needed. I don't think I did
 18 the lithography. Probably some bindery work, odd-ball
 19 stuff. You know, what kids do in the summer.
 20 Q. Do you recall where Sacramento Lithograph was
 21 located?
 22 A. Certainly do. 220 S Street in Sacramento.
 23 Q. Are they still in operation?
 24 A. No.
 25 Q. And what kind of printing process -- strike

18

1 that.

2 What kind of printing processes were being

3 conducted at Sacramento Lithograph during the time that

4 you were employed during the summers between 1954 and

5 1957?

6 A. Lithography and letter press.

7 Q. And during your employment during the summers

8 for Sacramento Lithograph, did you ever have any

9 participation in any of the operations of the lithograph

10 machine?

11 A. No.

12 Q. How about the letter press machine?

13 A. No.

14 Q. During your summers working for Sacramento

15 Lithograph, were you ever educated or trained as to the

16 processes of the operation of the lithograph press?

17 A. Just by observation but no formal training.

18 Q. And same question with respect to the letter

19 press?

20 A. Same, observation, no training.

21 Q. Okay. In your summer employment with

22 Sacramento Lithograph, were you familiar with any of the

23 chemicals or solvents that were used in the lithograph

24 operations?

25 A. No.

19

1 Q. Were you aware that solvents and chemicals --

2 at the time that you were working during the summers for

3 Sacramento Lithograph, were you aware of the fact that

4 solvents and chemicals were used in the operations of

5 the lithograph press?

6 A. I didn't know what they were called, but I know

7 that we had substances that we put in the press. I

8 didn't know what a solvent was probably then.

9 Q. When you say "put in the press," what do you

10 mean?

11 A. In lithography, besides having ink that goes

12 into the machinery, you also have chemicals that go into

13 the machinery. And it's water, and at that time with

14 alcohol and some very small amount of -- I don't

15 remember what the heck the other thing was.

16 Q. Do you refer to those as fountain solutions?

17 A. Yeah.

18 Q. Okay.

19 A. Yes.

20 Q. Thank you.

21 How about with respect to cleaning any of the

22 lithograph machines at Sacramento Lithograph, were you

23 ever involved in that respect?

24 A. Not during the summers.

25 Q. Okay. And I presume at some point in time you

20

1 were later employed by Sacramento Lithograph?

2 A. Correct.

3 Q. Okay. And what year did you first become

4 employed by Sacramento Lithograph, other than the summer

5 work that we were previously speaking of?

6 A. 1961.

7 Q. Let me go back to your summer work at

8 Sacramento Lithograph.

9 Were you familiar with any of the cleaning of

10 any of the letter press machines during your summer work

11 at Sacramento Lithograph?

12 A. No.

13 Q. You were never involved in that at all?

14 A. No.

15 Q. Okay. So after you graduated from Stanford

16 University, did you attend any other college?

17 A. No.

18 Q. Did you attend any other -- strike that.

19 Did you attend any trade school after --

20 A. No.

21 Q. Let me finish my question, Mr. Keilholtz.

22 Did you attend any trade school after you

23 graduated from Stanford University?

24 A. No.

25 Q. So between 1957 and 1961, 1961 being the time

21

1 that you went to work for Sacramento Lithograph, did you

2 have any other employment?

3 A. I was in the military.

4 Q. And what branch of the military?

5 A. Army.

6 Q. And that would be for the four years from the

7 '57 to sixty --

8 A. '58 when I graduated, to '61.

9 Q. Thank you.

10 And just generally, what were your duties in

11 the Army during that time period?

12 A. I worked in the mental hygiene clinic. I was a

13 clinical psychology technician.

14 Q. Okay. And then you went to work for Sacramento

15 Lithograph in 1961; is that correct?

16 A. Correct.

17 Q. Okay. And what was your job title in 1961 when

18 you were hired by Sacramento Lithograph?

19 A. Really didn't have a job title.

20 Q. Were you hired as a full-time employee?

21 A. Yes.

22 Q. What were your responsibilities as a full-time

23 employee for Sacramento Lithograph when you were hired

24 by them in 1961?

25 A. I started off doing bindery work and doing hand

22

1 collation.
 2 Q. What is hand collation?
 3 A. When you didn't have inserting machines, you
 4 would take pieces of paper and put them together, marry
 5 one piece to the other.
 6 So if you had a twenty -- a document with 20
 7 signatures, you would put them together by hand.
 8 Q. And when you were first employed as a full-time
 9 employee by Sacramento Lithograph, did you have any
 10 responsibilities with printing with respect to the
 11 lithograph machine?
 12 A. Not initially, no.
 13 Q. When did that change?
 14 A. Probably after six months.
 15 Q. When you first started working for Sacramento
 16 Lithograph in 1961, did you have any responsibilities
 17 with respect to the operation with the letter press
 18 machine?
 19 A. No.
 20 Q. Okay. In 1961 when you first started working
 21 for Sacramento Lithograph, how many letter press
 22 machines were at that location?
 23 A. I have no idea now. It was -- that company did
 24 not do a lot of letter press. It was a lithography
 25 company, basically.

23

1 Q. And how many lithograph presses were at that
 2 location?
 3 A. Well, probably four or five.
 4 Q. And what were the main types of jobs that were
 5 conducted, for whom they were conducted by Sacramento
 6 Lithograph?
 7 And by that I mean, were you all printing
 8 newsprint, magazines?
 9 A. It was coated work -- well, it wasn't all
 10 coated. It was coated work, and so we did some
 11 magazines.
 12 We also did a lot of work for Aerojet, which
 13 was not coated at all; that was more simple stuff. That
 14 was all secured work. Probably 20, 30 percent was
 15 Aerojet.
 16 And the rest, a variety of coated stock
 17 material, advertising pieces, as well as magazines.
 18 Q. And the ads were printed on coated stock?
 19 A. The advertising pieces were usually coated
 20 stock or high grade stocks, not newsprint.
 21 Q. Okay. So six months after your employment with
 22 Sacramento Lithograph, tell me how your job duties
 23 changed with respect to operations of the lithograph
 24 presses.
 25 A. I started to run a small what was called a

24

1 Multilith, which is a variety of a small printing press,
 2 a small litho press.
 3 Q. You're going to have to spell that for me, sir.
 4 A. Multilith, M-u--l-t-i-l-i-t-h.
 5 Q. And specifically what were your
 6 responsibilities with respect to that?
 7 A. Well, when you run one, you turn out work, so I
 8 was putting jobs through the press.
 9 Q. Okay. So you worked in the press room?
 10 A. Correct.
 11 Q. Did you work in the prepress room during --
 12 A. Not during that period of time, later.
 13 Q. Later. Okay. We'll get to that.
 14 So six months after you became employed at
 15 Sacramento Lithograph, your duties changed in that you
 16 were now working in the press room with the lithograph
 17 press?
 18 A. Correct.
 19 Q. Okay. And for how long did you do that?
 20 A. Three months, six months.
 21 Q. Now, in your operations -- strike that.
 22 In your employment with Sacramento Lithograph
 23 with respect to operating the lithograph machine, were
 24 you also responsible for any cleaning of that machine?
 25 A. Yes. When you run a Multilith, you have to

25

1 clean it up afterwards.
 2 Q. And can you describe to me the processes
 3 involved with respect to cleaning up a Multilith?
 4 A. You put some -- you -- I'm not sure of the
 5 exact way in which we did it then because things have
 6 changed so much, but we would squirt some fluid onto the
 7 rollers where the ink was, and we would take a rag and
 8 clean that.
 9 Q. Was this a one-step process?
 10 A. Well, I don't know if you'd call it one step.
 11 There wasn't -- I mean, there were several other things
 12 you -- no, that was -- I guess you'd call it one step.
 13 I don't know how you'd categorize it.
 14 Q. Okay. Sure. And that's fair.
 15 I'll explain. What I'm trying to get at, is
 16 when you cleaned the rollers, when you put the fluid on
 17 the rollers, was that it, you did it with one fluid
 18 once, or did you back it up with a second fluid? Did
 19 you do it a second time, or did you do it as required?
 20 A. Well, it would be as required because you have
 21 to get rid of all the ink, and different inks had
 22 different tacks, or some would adhere more to the
 23 rollers than others.
 24 And so you just keep cleaning until you -- can
 25 I take a break? This is probably my brother-in-law.

26

1 MR. GRAHAM: We're off the record.
 2 (Off the record.)
 3 MR. GRAHAM: All right. Back on.
 4 Q. Okay. Before a short break, Mr. Keilholtz, we
 5 were talking about cleaning the rollers for the
 6 Multilith.
 7 Is that a Multilith machine?
 8 A. Uh-huh.
 9 Q. Okay.
 10 A. That was a brand.
 11 Q. A brand.
 12 A. I guess you'd call them duplicating press. A
 13 Multilith was actually a brand name of a particular
 14 duplicator.
 15 Q. Now, going back to cleaning the rollers on this
 16 Multilith -- is it Multilith press? I just want to use
 17 the appropriate --
 18 A. (Witness nodded head.)
 19 Q. Okay.
 20 -- on the Multilith press, you would put the
 21 fluid on the rollers and then clean it off with a rag?
 22 A. (Witness nodded head.)
 23 Q. "Yes"?
 24 A. Correct.
 25 Q. Okay.

27

1 A. I'm sorry.
 2 Q. No, that's fine.
 3 And then what was typically done with those
 4 rags?
 5 A. They were put into a metal container.
 6 Q. Okay. And cleaning the rollers, we were
 7 talking about, I mean, that would be roller wash that
 8 you would be using, correct?
 9 A. Correct.
 10 Q. Okay. Do you know what types of roller wash
 11 that you were using at Sacramento Lithograph?
 12 A. No. Brands I wouldn't know, and I don't even
 13 remember what the materials were particularly. I mean,
 14 I didn't pay attention.
 15 Q. Okay. Did you also use rubber coaters on those
 16 rollers?
 17 A. Never heard of a rubber coater.
 18 Q. Okay. Have you ever heard of a blanket wash?
 19 A. Yes.
 20 Q. What is a blanket wash?
 21 A. That's a material also that when you're running
 22 your press, the blanket will get dirty. And sometimes
 23 little bits and specks will adhere to the blanket, and
 24 you have to clean it up again with the rag.
 25 And on the rag you have some kind of a solvent

28

1 or cleaning material to clean up the blanket.
 2 Q. And when you worked at Sacramento Lithograph,
 3 were you familiar with what type of solvent was used for
 4 the blanket washes?
 5 A. No.
 6 Q. Okay. Have you since become familiar with what
 7 types of chemicals are used in blanket washes?
 8 A. Well, certainly now, but I -- you know, that's
 9 not part of what I've been working on, so I couldn't
 10 give you any information that I know about solvents.
 11 Q. Sure.
 12 A. Or what they're composed of or what the brands
 13 are.
 14 Q. But you said you've since become familiar with
 15 what types of chemicals are used in blanket washes.
 16 A. Well, I've become aware that the solvents --
 17 that solvents are used, and there has been some question
 18 about the -- and problems with solvents and what you do
 19 with them.
 20 Q. Do you know specifically what types of
 21 solvents?
 22 A. No.
 23 Q. Have you ever heard the term "PCE"?
 24 A. PCE?
 25 Q. Yes, sir.

29

1 A. Or PCB?
 2 Q. PCE, as in Edward.
 3 A. Yeah, I think I have.
 4 Q. Have you ever heard of the solvent TCE?
 5 A. No.
 6 Q. Have you ever heard of the solvent 111 TCA?
 7 A. I think I remember something called 111, but I
 8 don't remember TCA.
 9 Q. So going back to your time when you were
 10 working for Sacramento Lithograph, with respect to the
 11 operations of the Multilith press and the operations in
 12 the press room, was there any wastewater that was
 13 generated through those operations?
 14 A. I'm hesitating because I'm trying to
 15 remember -- they always have a water solution in the
 16 tray to mix with the ink. That's part of the offset
 17 process.
 18 And I'm trying to remember if we ever cleaned
 19 that -- I mean, we'd clean it, but I think it just kept
 20 adding water to it. So I don't think we ever really got
 21 rid of it.
 22 Q. And during the operation of the Multilith press
 23 that you're talking about at Sacramento Lithograph --
 24 strike that.
 25 During your operation of the Multilith press

30

1 during the time that you were employed by Sacramento
 2 Lithograph, did you ever clean the press itself?
 3 A. You mean the frame of the press?
 4 Q. Yes. To get ink off?
 5 A. No, I never did.
 6 Q. Okay. Did you ever clean the area around the
 7 Multilith press to remove ink or dirt?
 8 A. Well, you wouldn't have ink around it unless
 9 you were terribly sloppy. You might have dirt that
 10 comes from someplace else, but that would be cleaned by
 11 the janitors at night.
 12 Q. Okay. Would you describe the Multilith process
 13 as a sloppy process?
 14 A. No.
 15 Q. Okay.
 16 A. If you're sloppy, you're going to be a terrible
 17 pressman.
 18 Q. What about with respect to printing on a coated
 19 substrate, would you classify that process as a messy
 20 process?
 21 A. No, the same. A little more absorption of ink
 22 perhaps into an uncoated stock, but the coated -- the
 23 ink sits, but it still dries very similar.
 24 And, again, that can't be messy. You'd have
 25 streaking and everything else on your final product.

31

1 Q. Is the ink with the coated substrate process --
 2 or coated substrate, the ink that's used in that
 3 process, is that a less viscous ink?
 4 A. Than what?
 5 Q. Than the ink that is used, say, with a
 6 Multilith machine?
 7 A. No, the viscosity is pretty much similar in all
 8 offset processes.
 9 Q. In your operations at Sacramento Lithograph,
 10 specifically with the Multilith press, did you all make
 11 use of any sort of drying units?
 12 A. No.
 13 Q. Okay. That was not necessary for that process?
 14 A. No.
 15 Q. Okay. So we've been talking about the time
 16 that you worked for Sacramento Lithograph with respect
 17 to your operations of the Multilith press.
 18 And you indicated to me earlier that at some
 19 point in time that your duties changed, and I think you
 20 said that that was approximately three months; is that
 21 correct?
 22 A. Correct.
 23 Q. And then how did your job duties change after
 24 that three-month period of time?
 25 A. Then I became a feeder on a two-color press.

32

1 Q. What does a feeder on a two-color press do?
 2 A. The two-color press was a larger machine than
 3 the Multilith, so it turned out a larger sheet of paper.
 4 I believe the machine was turning out 23-by-35-inch
 5 stock or pieces of paper, one at a time.
 6 And the feeder helps keep -- it puts the paper
 7 in the back end of the press while the pressman takes it
 8 off the front and checks during the run to make sure
 9 that the color is consistent and it looks good.
 10 And the feeder kept making sure that the back
 11 end of the press is working properly because you're
 12 feeding at that time, probably you're doing four to
 13 5,000 sheets an hour.
 14 Q. Those were sheet-fed presses?
 15 A. Yes.
 16 Q. Okay. This Multilith press, was that a --
 17 A. Sheet-fed.
 18 Q. -- that was sheet-fed, also?
 19 A. (Witness nodded head.)
 20 Q. And for how long a period of time were you a
 21 feeder on this two-color press?
 22 A. Probably three months, six months.
 23 Q. Okay. And with respect to this two-color
 24 press, did you have any responsibilities with respect to
 25 cleaning the press in any way?

33

1 A. The same as with the Multilith, both the
 2 pressman and the feeder would go ahead and work together
 3 to clean up the rollers or -- again, the blanket cleanup
 4 would be by the pressman, but the roller cleanup at the
 5 end of the run would be by both feeder and pressman.
 6 Q. And then after that three- to six-month period,
 7 did your job duties change in any way at Sacramento
 8 Lithograph?
 9 A. Yes.
 10 Q. Okay. And how did they change?
 11 A. I went to prepress.
 12 Q. Okay. Did you have a specific job title?
 13 A. Well, at that point they call the people in
 14 prepress strippers.
 15 Q. Strippers?
 16 A. So I was a stripper.
 17 Q. All right. And for fear of a chuckle, tell me,
 18 sir, what does a stripper do?
 19 A. It changed completely with electronics, but in
 20 the old days we would take film from the camera, put it
 21 into a flat that was an orange material, and we would
 22 adhere the film to the flat.
 23 We'd cut out the excess material. Just all we
 24 wanted was the film to show through, and we would take
 25 that film or that layout and would put it on top of a

34

1 metal plate and would burn the plate.
 2 And that plate is what goes on the press in
 3 order to get the image transferred.
 4 Q. Let me back up just for a second to your
 5 operations with the Multilith press.
 6 In your operations of that press, did you have
 7 any responsibilities with respect to cleaning the
 8 plates?
 9 A. When you take the plates off, all you do is rub
 10 them down again with the material, and you put gum on
 11 top of it to save the plate for the future. They don't
 12 save plates anymore, but they used to.
 13 Then if there's a rerun, you take the old plate
 14 out and put it back on. Same would apply in the bigger
 15 presses.
 16 Q. And when you say "the bigger presses," you're
 17 speaking of --
 18 A. 23-by-35 size, like the one that -- the
 19 two-color that I worked on.
 20 Q. That's what I was trying to clarify.
 21 You said with the operations of the Multilith,
 22 you take them off and rub them down with material. What
 23 material? What are you --
 24 A. Well, I don't remember if it's the same
 25 material you used on the rollers. But it was a chemical

35

1 or something that was clearer, and you'd just wipe the
 2 press -- the plate down to get rid of the excess ink.
 3 And then you'd squirt this gum arabic on top of
 4 the plate and let it dry for a few seconds before
 5 storing.
 6 This is like history. This is old stuff.
 7 Q. I'm enjoying it.
 8 Your operations in the prepress at Sacramento
 9 Lithograph, other than your job title as a stripper and
 10 the job duties that you just described earlier, did you
 11 have any other additional duties?
 12 A. Well, my basic job during the period probably
 13 of about nine months was -- I mentioned the Aerojet work
 14 that we did, and it was a huge amount of work.
 15 And on a second shift, I would come in, and I
 16 would load the camera. And from the back end I'd put
 17 the film in the camera, and we had somebody up front
 18 putting the copies or the stuff we wanted to shoot in
 19 the holder outside.
 20 And then would push the button, and we would
 21 turn out -- we were turning out something like 60 films
 22 an hour, which was pretty good speed at that time,
 23 20/24.
 24 This is all simple black work, so that was
 25 really the basic thing I was doing. And at that time we

36

1 hand-developed the film so we didn't have developing
 2 machines.
 3 And so we'd put the film in a tray, and I would
 4 do that. And you'd rock the tray back and forth, take
 5 the film out, and then you'd hang it up to dry.
 6 Q. You said "pretty good speed at that time,
 7 20/24," what do you --
 8 A. 60 copies -- 60 pieces of 20 by 24 film. So
 9 we're doing one 20-by-24 piece of film, which would
 10 hold eight -- which would hold four pages of
 11 eight-and-a-half-by-11 material, and we're doing one
 12 every minute.
 13 Q. You became employed by Sacramento Lithograph in
 14 1961; is that correct?
 15 A. Correct.
 16 Q. Okay. And when did you end your employment
 17 with Sacramento Lithograph?
 18 A. Sacramento Lithograph became Cal Central Press
 19 in early 1962, due to a merger of two companies. So
 20 what I've been describing took place under Sacramento
 21 Lithograph as well as under Cal Central Press.
 22 MR. GRAHAM: Can we go off the record for just
 23 one second?
 24 (Off the record.)
 25 MR. GRAHAM: All right. Back on.

37

1 Q. So then after your job as a stripper in the
 2 prepress room for Sacramento Lithograph, did your job
 3 title change in any way after that?
 4 A. I have a kind of smile. We didn't really call
 5 things job titles, so no one ever thought much about
 6 that.
 7 But at some point in time after prepress, I
 8 became an estimator. No one really called me estimator.
 9 I always did whatever I had to do, and it would include
 10 other things, like talking to customers, and going back
 11 in the camera room, and going out to the bindery,
 12 delivering product.
 13 Q. Okay. So then is it fair to say that when
 14 you -- well, when your job duties changed, when you
 15 became an estimator, the job duties you've just
 16 described, is it fair to say that you no longer had any
 17 duties or responsibilities with respect to the press
 18 operations?
 19 A. Well, if they needed me out there, I'd go out
 20 there. I always had responsibility for everything that
 21 I'd done before.
 22 Q. Okay.
 23 A. So I'd get in and help.
 24 Q. Okay. So it wasn't the fact that you became an
 25 estimator and all of a sudden you were moved to an

10 (Pages 34 to 37)

38

1 office and you no longer hung out with the prepress
 2 guys?
 3 A. No, I hung out with everybody, but most of the
 4 time I would be up front when I was estimating.
 5 Q. And then you indicated that in 1962 that
 6 Sacramento Litho became Cal Central Press; is that
 7 correct?
 8 A. Correct.
 9 Q. And after I guess some sort of acquisition of
 10 Sacramento Litho by Cal Central Press, did Cal Central
 11 Press still operate at the 220 S Street location?
 12 A. For a short while.
 13 Q. For how long?
 14 A. Probably a year and a half.
 15 Q. And so then you became employed for Cal Central
 16 Press; is that correct?
 17 A. Correct.
 18 Q. Okay.
 19 A. Kept separate names, so I may have been getting
 20 checks from Sacramento Lithograph. Sacramento
 21 Lithograph continued as a company.
 22 Q. I got you.
 23 A. News Publishing and Sacramento Lithograph
 24 merged, created Cal Central as a selling agency.
 25 Sacramento Lithograph and News Publishing

39

1 Company merged, took on the name of Cal Central, which
 2 was a selling agency, and the two manufacturing
 3 companies, News Publishing and Sacramento Lithograph,
 4 continued, with people being employed by one, the other,
 5 or by Cal Central.
 6 And I believe I was still employed by
 7 Sacramento Lithograph. Probably received my checks from
 8 Sacramento Lithograph through the mid '60s.
 9 Q. Did you -- strike that.
 10 What year did -- withdraw.
 11 Did job responsibilities as an estimator
 12 for Sacramento Lithograph change in any respect after
 13 the acquisition by Cal Central Press?
 14 A. Well, no. I became an estimator after Cal
 15 Central existed.
 16 Q. And then at what point in time did those job
 17 duties change?
 18 A. You mean when I became an estimator?
 19 Q. Yes.
 20 A. Well, I'm guessing approximately two and a half
 21 years after I was employed.
 22 Q. After you were first employed by Sacramento?
 23 A. First employed by Sacramento Lithograph.
 24 Q. And then how did your job duties change as an
 25 estimator in that period of time?

40

1 A. Well, I was estimating, so when people wanted a
 2 job, we'd figure out what it was going to cost them.
 3 Q. Okay.
 4 A. That's that an estimator does.
 5 Q. I'm not familiar. That's why I'm asking you.
 6 And you remained an estimator for Sacramento
 7 Lithograph until what year?
 8 A. I don't know.
 9 Q. Can you give me a --
 10 A. I probably did it for about a year. And I'm
 11 not going to give years now because I'm going over
 12 periods, and I don't want to trap myself in getting my
 13 years and my periods mixed up.
 14 Q. Okay. Well, sir, I'm not going to trap you,
 15 and I'm entitled to your best estimate.
 16 A. And my best estimate is I worked as an
 17 estimator for about a year.
 18 Q. Okay. And then how did that change?
 19 A. Well, I'm not sure what was next because at
 20 that point I became more involved in the management.
 21 Sometime around '68 I started to run the plant
 22 as a production manager. And I remember that because
 23 that was 1968, that was the year I got married, so I
 24 always tie my being a plant manager with my marriage.
 25 Q. And you were -- you ran the plant as a

41

1 production manager for what company?
 2 A. For the whole company, Cal Central, News
 3 Publishing and Sac Litho.
 4 Q. Were you an owner of Cal Central Press?
 5 A. Not at that time.
 6 Q. Okay. And when did you become an owner of Cal
 7 Central Press?
 8 A. In I believe '70, myself and -- I bought out my
 9 father, and my father's partner, two sons bought him
 10 out, and we then -- the three of us owned Cal Central
 11 Press.
 12 Q. And what are the names of those individuals?
 13 A. John Clark, David Clark.
 14 Q. So John Clark and David Clark were your
 15 father's partners?
 16 A. No, John Clark, Sr., was my father's partner.
 17 David Clark and John Clark, Jr., were the sons of John
 18 Clark, Sr.
 19 Q. Gotcha.
 20 And what was your father's name?
 21 A. Roy Keilholtz. Actually, it was William Roy,
 22 but he always went by Roy.
 23 Q. So you bought those gentlemen out in
 24 approximately 1970; is that correct?
 25 A. Correct.

42

1 Q. Okay.

2 MR. GRAHAM: Let's go ahead and mark this as 1

3 to Mr. Keilholtz.

4 (Whereupon Exhibit No. 1 was then marked for

5 identification.)

6 BY MR. GRAHAM:

7 Q. Mr. Keilholtz, you've been handed what's been

8 marked as Exhibit 1 to your deposition here today.

9 Do you recognize this document?

10 A. Yes.

11 Q. And you recall receiving this document?

12 A. Yes.

13 Q. And in fact, this is what commanded your

14 appearance today at your deposition, correct?

15 A. Yes.

16 Q. Okay. And when you received this document, did

17 you review the document in its entirety?

18 A. Yes.

19 Q. Okay. I'd like to turn you to, at the bottom

20 of the right-hand corner of this document, it's marked

21 as page 3.

22 A. Yes.

23 Q. And it starts in the bold there,

24 "Please take further notice that the

25 following documents must be produced."

43

1 Do you see that?

2 A. Yes.

3 Q. Okay. When you received your deposition

4 subpoena, did you go through these categories of

5 documents? Did you read through them?

6 A. I read it.

7 Q. Okay. And what effort did you make on your

8 part to obtain documents that would be responsive to the

9 categories of documents that were subpoenaed here?

10 A. I made no effort because there are no records.

11 Q. How are you so sure that you have no records?

12 A. Because during various -- when Cal Central was

13 sold to Sacramento Litho -- excuse me -- when Cal

14 Central was bought by American Litho, we had a lot of

15 records, an assortment of things from various companies

16 that we had owned, in the back of the company.

17 And at one point, the people that took over the

18 company got rid of all those records, which concerned me

19 at the time because of tax issues, because there were

20 records that might have been needed had we had a tax

21 audit.

22 That never happened, fortunately, so it was

23 never a problem. But they took the stuff and shredded

24 it, including employee records, from the employees'

25 records from before they bought the company.

44

1 Q. When you say "they" took them and shredded

2 them --

3 A. American Litho. I'm sorry, I butted in.

4 Finish.

5 Q. When you say "they" took them and shredded

6 them, who is "they"?

7 A. The managers of American Litho.

8 And six months later that was purchased by

9 Jefferson Smurfit, S-m-u-r-f-i-t. And a year and a half

10 or two years later that was purchased by Consolidated

11 Graphics.

12 And during that process, things -- anything

13 that had been saved or would have been there, slowly, I

14 know would disappear. And I have no access to that

15 stuff anyway, even if it was still there.

16 Q. Could you give me the names of any of the

17 managers of American Lithograph that you believe were

18 involved with respect to these documents that we've been

19 speaking of?

20 A. No, I don't have any names.

21 Q. You don't --

22 A. In fact, I was irritated. I think they had a

23 human resource person they had brought into the company

24 who on her own decided to do that and called on the

25 people to have the stuff shredded.

45

1 And I thought that was an idiotic decision, but

2 I had nothing to say. I didn't own the company anymore.

3 Q. So you have no documents at all within your

4 possession regarding the purchase -- your purchase of

5 Solano Printers & Lithographers?

6 A. No.

7 Q. And you have no documents with respect to any

8 insurance policies that you would have taken out on any

9 of the businesses that you'd owned?

10 A. No. No. If I had every document we'd had 30

11 or 40 years ago, my God, I wouldn't have room in my

12 house to live.

13 Q. Have you ever maintained any off-site storage

14 areas for business documents?

15 A. No.

16 Q. And you don't have any documents in your

17 possession regarding any design or layout of any

18 buildings at 622 Jackson Street?

19 A. No.

20 Q. And you have no documents with respect to any

21 leases that occurred between you and any other person

22 with respect to 622 Jackson Street?

23 A. No.

24 Q. No photographs, no pictures of old presses,

25 nothing?

46

1 A. No.

2 Q. Mr. Keilholtz, prior to your deposition today,

3 did you speak with anyone with respect to your

4 deposition today?

5 A. You.

6 Q. Right.

7 A. And the attorney (indicating).

8 Q. And when you say "the attorney," you're

9 pointing to Mr. -- I'm --

10 A. I don't know your last --

11 MR. NICKOVICH: Nickovich.

12 THE WITNESS: Nickovich.

13 BY MR. GRAHAM:

14 Q. And when did you speak to Mr. Nickovich?

15 A. Approximately a week ago. Maybe a week and a

16 half.

17 Q. Did he call you or you call him?

18 A. He called me.

19 Q. And on his side of the line was there anyone

20 else on that conversation that you're aware of?

21 A. Not that I'm aware of.

22 Q. And on your side of the line was there anyone

23 else on that conversation?

24 A. Absolutely not.

25 Q. Okay. And for how long did you all talk?

47

1 A. Probably 20 minutes.

2 Q. Okay. And what all did you discuss?

3 A. He explained the nature of the litigation that

4 was taking place and why I was involved.

5 Q. Explained the nature of the litigation and

6 what?

7 A. And why I was involved.

8 Q. What did he tell you with respect to his

9 explanation of the nature of the litigation?

10 A. Essentially what you told me, was that there

11 was a question about contamination in the City of

12 Fairfield.

13 And he, like you, said they were looking for

14 the possible sources of that contamination other than

15 just your client. You both confirmed the same thing.

16 He probably gave me I suppose a bit more

17 detail, but it all blends together.

18 Q. And why do you believe he gave you more detail?

19 A. Because we talked longer.

20 Q. And what type of additional detail did

21 Mr. Nickovich provide to you?

22 A. Again, they blended -- the conversations

23 between you and him blended together.

24 Q. Did he tell you what type of contamination was

25 in the City of Fairfield that was the subject of this

48

1 litigation?

2 A. Yeah. He said PCBs, I thought. You said PCE

3 earlier, but I thought PCBs.

4 Q. Did he tell you anything else with respect to

5 the types of contamination that were the subject of this

6 litigation?

7 A. Well, I was aware that dry cleaners have

8 problems with PCBs and had guessed that this probably

9 was a dry cleaning problem, and so we talked about that.

10 Q. And what did you talk about with respect to the

11 dry cleaners' problems of PCBs?

12 A. Is that the right term? I don't know.

13 We talked about, yes, this is a common problem

14 with dry cleaners' business, and so far as I knew that

15 there was no problem that had ever come up in my

16 knowledge in the printing industry that involved PCBs.

17 Q. And -- but he didn't mention any other

18 contaminant that was the subject of this litigation

19 other than what you understood to be PCB?

20 A. No, he did not.

21 Q. Did he ask you about your operations at

22 622 Jackson?

23 A. I don't -- I know you did, but I don't know if

24 he did or not. I think he was aware of what was there,

25 so I'm not sure.

49

1 Q. Okay. Anything else that he explained to you

2 with respect to the nature of the litigation that you

3 haven't already told me?

4 A. No.

5 Q. And then you indicated that he also told you or

6 you also discussed why you were involved; is that

7 correct?

8 A. Right.

9 Q. Okay. And what was discussed with respect

10 to -- as to why you were involved?

11 A. Well, in a case like this, and this is going on

12 all over California, that everybody looks for deep

13 pockets to find someone who can afford to pay for this

14 cleanup.

15 Q. Is that what Mr. Nickovich told you? Or is

16 this something you discussed or --

17 A. Yes, that's what he told me.

18 Q. That's what he told you.

19 And did he tell you why anybody would be

20 looking at you for a deep pocket?

21 A. Because I owned the company that once occupied

22 the quarters.

23 I mean, that's -- I don't know if he told me

24 that, but it stands to reason that if this is true, and

25 I do know that it's a problem with dry cleaners and

50

1 they're going after dry cleaners all over the state.
 2 And I know that for a fact without ever having
 3 been involved in this particular deposition.
 4 Q. Are you also aware that they're going after
 5 printers up and down the state for contamination that
 6 resulted from historical printing operations?
 7 A. No, I am not.
 8 Q. And in your work as a consultant for the
 9 Rosenthal Group, you're not aware of any issues with
 10 respect to allegations by any regulatory agencies, say,
 11 the EPA, any other regulatory agency with respect to
 12 alleged contamination from the operations of printers?
 13 A. I'm on the board of directors of the Printing
 14 Industries of California, which is a group that does
 15 lobbying for the State and al- -- for the industry to
 16 the State, and also tracks things, like some of the
 17 problems that we've had with the afterburners and webs,
 18 and so on.
 19 And nothing has come up at all about
 20 contamination in the industry. And we have regular
 21 meetings, and I was just at a meeting a month ago.
 22 So I know of no problems that are arising at
 23 this time within our industry, specifically, about any
 24 contaminants other than traditional concerns.
 25 We used to worry about silver because that was

51

1 going down the drain, and then we had silver collections
 2 to get that out of there. That was from film, when we
 3 still used film.
 4 And everybody started to use more cleanup
 5 things, but that was more of a thing for the ozone
 6 issues that we have, so we started to use different
 7 chemicals in cleanup.
 8 But, again, with a -- under the regulations
 9 that we're trying to clean up the environment, the air
 10 quality.
 11 Q. And in that capacity that you just described,
 12 have you ever read, reviewed any information with
 13 respect to a regulatory agency, documents, information
 14 regarding toluene contamination at old historical
 15 printing sites?
 16 A. No.
 17 Q. Been going about an hour, Mr. Keilholtz. You
 18 want to take a break and --
 19 A. I'd rather get out of here as soon as possible.
 20 Q. Okay. Well, I'm going to do the best I can.
 21 We'll keep going.
 22 MR. GRAHAM: We'll leave it to the court
 23 reporter then. Would you like to take a break?
 24 THE REPORTER: If we can take a break at some
 25 point.

52

1 MS. McADAM: Maybe within half an hour, take a
 2 quick break.
 3 BY MR. GRAHAM:
 4 Q. Okay. So other than the deep-pocket
 5 conversation that you had with Mr. Nickovich --
 6 MR. NICKOVICH: Objection, mischaracterizes his
 7 testimony. Move to strike that comment.
 8 MR. GRAHAM: Well, it's not a comment yet. I'm
 9 working on my question, sir.
 10 Q. With respect to the conversation that you just
 11 described with -- regarding this deep-pocket
 12 conversation you had with Mr. Nickovich --
 13 MR. NICKOVICH: Objection, mischaracterizes his
 14 testimony.
 15 MR. GRAHAM: Sir, let me finish my question --
 16 MR. NICKOVICH: Move to strike that comment.
 17 MR. GRAHAM: -- first before you object,
 18 please.
 19 Q. With respect to the conversation that you just
 20 described with Mr. Nickovich regarding the deep-pocket
 21 issues, did Mr. Nickovich tell you any other reasons why
 22 you were involved in this litigation?
 23 MR. NICKOVICH: Objection, move to strike,
 24 mischaracterizes the testimony.
 25 BY MR. GRAHAM:

53

1 Q. You can answer now.
 2 A. I can?
 3 Q. Yeah.
 4 A. Well, I'm not sure what the question is now
 5 since you had the conflict.
 6 Q. One thing I probably forgot to tell you in the
 7 beginning is after I ask a question, any other counsel
 8 at this table can make objections.
 9 A. Right.
 10 Q. Okay. They're doing it merely to preserve
 11 their objections for the record so that at a later time
 12 they can take it to the Court and complain about the
 13 style of my question. Okay?
 14 Please don't let any of the attorneys'
 15 objections distract you, and focus on my question.
 16 Okay. No one will be instructing you not to answer, so
 17 you need to answer my questions.
 18 A. So what is the question?
 19 Q. I'm about to give it to you. Just one second.
 20 With respect to the conversation that you just
 21 described regarding the deep-pocket conversation that
 22 you had with Mr. Nickovich, did Mr. Nickovich provide to
 23 you any other information with respect to why you were
 24 involved in this case?
 25 MR. NICKOVICH: Objection, mischaracterizes the

54

1 testimony, move to strike.
 2 THE WITNESS: No.
 3 BY MR. GRAHAM:
 4 Q. Other than the conversation that you had with
 5 myself and the conversation that you had with
 6 Mr. Nickovich, did you speak to any other attorneys
 7 prior to your deposition here today?
 8 A. Yes.
 9 Q. Who?
 10 A. A woman named Judith Anshin.
 11 Q. Okay. Other than that person, did you speak to
 12 any other attorneys --
 13 A. No.
 14 Q. -- with respect to your deposition here today?
 15 A. No.
 16 Q. Did you review any documents in preparation for
 17 your deposition today?
 18 A. I have no documents except this (indicating).
 19 Q. Well, I mean, there are other possibilities. I
 20 just wanted to know if prior to your deposition today if
 21 you reviewed any documents to prepare yourself for your
 22 deposition.
 23 A. I looked up "PCB" on Google, if you consider
 24 that a document -- I guess that's a document.
 25 Q. And what did you learn with respect to your

55

1 research of PCB on the Internet prior to your deposition
 2 today?
 3 A. I was rather disappointed in the sparsity of
 4 information available on Google.
 5 Q. Did you do any other follow-up research with
 6 respect to PCBs -- just to be clear, you're saying P-C-B
 7 as in boy, correct?
 8 A. Correct.
 9 Q. Okay. Did you do any other research -- other
 10 than your Google search for PCB, did you do any other
 11 research whatsoever prior to your deposition today?
 12 A. Well, simultaneously, I did look up printing
 13 and contamination. Again, found very scant information.
 14 It really wasn't helpful.
 15 Q. Did you save any of those documents?
 16 A. No, but I just could call them up again. I
 17 could call them up again. Why would I save them?
 18 They're on the computer.
 19 Q. I'm just asking if you saved them.
 20 A. No.
 21 Q. Okay.
 22 A. I know how to find them again.
 23 Q. You didn't open up a file and --
 24 A. No.
 25 Q. Let me just finish my question, Mr. Keilholtz.

56

1 You didn't open up a file and then transfer
 2 those documents into the file?
 3 A. I did not.
 4 Q. Okay. Did you print any copies of those
 5 documents?
 6 A. I did not.
 7 Q. Do you recall any of the authors of the
 8 documents that you reviewed prior to your deposition
 9 today with respect to printing and contamination?
 10 A. No.
 11 Q. Do you recall generally any opinions or any
 12 facts that you read with respect to your research on
 13 printing and contamination in preparation for your
 14 deposition today?
 15 A. No, I felt there wasn't anything particularly
 16 relevant.
 17 Q. And why did you not feel that there was
 18 anything particularly relevant?
 19 A. I couldn't find any particular allusion or
 20 reference to the industry in terms of the kind of -- the
 21 kind of contamination that I understood was being
 22 investigated.
 23 Q. Okay. Have you read the Complaint in this
 24 case, sir?
 25 A. No.

57

1 Q. Has anybody ever provided to you a copy of the
 2 Complaint in this case?
 3 A. No.
 4 Q. All right. I want to move along to the
 5 property that is -- one of the properties that is the
 6 subject of this litigation, and that's property that we
 7 commonly have been referring to as the 622 through 630
 8 Jackson Street property. Okay?
 9 Let me ask you: Are you familiar with a
 10 company by the name of Solano Printers & Stationers?
 11 A. No.
 12 Q. Do you have any knowledge whatsoever with
 13 respect to any of the operations of Solano Printers &
 14 Stationers at the 622 through 630 Jackson Street
 15 property?
 16 A. No.
 17 Q. Do you have any knowledge with respect to any
 18 of the owners of Solano Printers & Stationers?
 19 A. No.
 20 Q. Do you know what type of business that was?
 21 A. Well, I know -- but I'm not really sure.
 22 Q. Okay. And, again, I don't want you to --
 23 A. I know the name. I'm not sure what they did.
 24 Q. Sure. And, Mr. Keilholtz, I don't want you to
 25 guess at anything here.

58

1 A. No, I don't want to speculate at anything.
 2 Q. Thank you. It's not a sin to tell me, "I don't
 3 know."
 4 A. Okay.
 5 Q. Okay. Let me ask you: Were you ever familiar
 6 that a company by the name of Solano Printers &
 7 Stationers operated at the location that we've been
 8 speaking of, the 622 through 630 Jackson Street?
 9 A. No.
 10 Q. Okay. This is news to you?
 11 A. Yeah. I guess -- well, I don't know if I want
 12 to speculate, but I'm assuming that that's the name of
 13 the company that we bought that became Solano Printers &
 14 Lithographers.
 15 Q. So at some point in time you purchased a
 16 company that later became Solano Printers &
 17 Lithographers; is that correct?
 18 A. Actually, my father and John Clark bought the
 19 company.
 20 Q. And your father again is Roy Keilholtz?
 21 A. Correct.
 22 Q. And John Clark, Sr., correct?
 23 A. Correct.
 24 Q. Okay. And they purchased Solano Printers &
 25 Stationers; is that correct?

59

1 A. Well, I'm not sure. As I said, I don't know
 2 what the name of the company was.
 3 Q. Okay. Well, let me ask you this: Was it your
 4 understanding that they had purchased a company that had
 5 operated at the 622 through 630 Jackson Street location?
 6 A. Yes.
 7 Q. Okay. But you had no knowledge as to what type
 8 of company that was?
 9 A. Well, I have a vague recollection as to what I
 10 thought the company did.
 11 Q. And what vague recollection as to what you
 12 thought the company did do you have?
 13 A. It did some letter press, and it was an old,
 14 what I call a job shop, that was kind of an additional,
 15 small little print shop.
 16 And I do believe it had a -- it sold standard
 17 forms and invitations, wedding announcements and things
 18 like that, that were actually purchased from other
 19 printers.
 20 So I think half of their business as I remember
 21 was kind of a -- other printed materials they didn't do,
 22 and the other half was just local letter press.
 23 Q. And do you know how many letter press machines
 24 operated at the 622/630 Jackson Street prior to Mr. --
 25 prior to your father and Mr. Clark's purchase of that

60

1 business?
 2 A. No.
 3 Q. Do you know in what year your father and
 4 Mr. Clark, Sr., purchased the business -- just for ease,
 5 we'll call it Solano Printers & Stationers, okay -- do
 6 you know what year that they purchased that business?
 7 A. No.
 8 Q. Okay. Do you have an estimation?
 9 A. I really am off. When I talked to you, I think
 10 maybe mid '60s.
 11 Q. And is it your understanding that your father
 12 and Mr. Clark, Sr., operated a letter press printing
 13 operation at 622 through 630 Jackson Street?
 14 A. Yes.
 15 Q. Do you know for how many years?
 16 A. My recollection, maybe a year and a half.
 17 Q. Do you know the names of any of the letter
 18 press operators that operated at Solano Printers &
 19 Stationers?
 20 A. No, I do not. It was really a small company.
 21 I doubt there were more than two people.
 22 Q. Is your father still alive?
 23 A. No.
 24 Q. Do you know if John Clark, Sr., is still alive?
 25 A. He is not alive.

61

1 Q. Okay. Well, let me ask you: Did your father
 2 have the knowledge and capability to run a letter press
 3 machine?
 4 A. Well, he was really a lithographer. But he
 5 could have run a letter press if he had to, but he never
 6 really did.
 7 Q. Okay. So to your knowledge he didn't operate
 8 the letter press machine during the operations of Solano
 9 Printers --
 10 A. No.
 11 Q. -- & Stationers at 622 Jackson?
 12 A. No.
 13 Q. During the time that Solano Printers &
 14 Stationers operated at the 622/630 Jackson location, did
 15 you ever go to that business?
 16 A. A few times.
 17 Q. Did you -- were you ever employed by Solano
 18 Printers & Stationers?
 19 A. No.
 20 Q. Okay. And the few times that you went there,
 21 what was the purpose of your visit?
 22 A. Probably to visit and see what was going on.
 23 Q. Now, are you aware that at that 622/630 Jackson
 24 Street location that there was a theater adjacent to the
 25 Solano Printers & Stationers?

62

1 A. Yes, I remember that.
 2 Q. So the Solano Printers & Stationers building,
 3 that was -- that abutted the theater?
 4 A. I thought there was a space in between.
 5 Q. Okay. Let me ask you: During the time that
 6 Solano Printers & Stationers operated at the -- what
 7 we've been calling the 622/630 Jackson Street, how many
 8 spaces were in that area?
 9 A. What do you mean "spaces"?
 10 Q. Tenants, quartered-off partitions for tenants?
 11 A. Well, I don't remember if we had the whole
 12 building or we only had half of it.
 13 Q. That's what I'm trying to determine.
 14 A. I don't remember.
 15 Q. Okay. Do you recall that the building that at
 16 which Solano Printers & Stationers was operating,
 17 whether that building was adjacent to an alley?
 18 A. Vague recollection. I'm not sure.
 19 Q. Do you recall a back door that opened up to an
 20 alley?
 21 A. No.
 22 Q. Do you recall a back door that opened up to the
 23 back part of the building, which would have been the
 24 west side of the building?
 25 A. No.

63

1 Q. Okay. Do you recall a door that opened up into
 2 a gated area which was in between the 622/630 Jackson
 3 property and the movie theater?
 4 A. No.
 5 Q. Do you recall any back access at that property
 6 during the time that Solano Printers & Stationers
 7 operated?
 8 A. No.
 9 Q. So it's your understanding that Solano Printers
 10 & Stationers operated at our 622/630 Jackson Street
 11 location for approximately one to one and a half years?
 12 A. Correct.
 13 Q. And then at that time, what happened with
 14 respect to Solano Printers & Stationers?
 15 A. It moved.
 16 Q. It moved?
 17 A. Uh-huh.
 18 Q. Where did it move to?
 19 A. Texas Street some place. I don't know the
 20 address, a small standalone building.
 21 Q. And is it -- well, let me ask you: Solano
 22 Printers & Stationers, that was purchased by what
 23 company?
 24 A. By John Clark -- well, I guess by Cal Central.
 25 Q. Okay. And at that time Cal Central changed the

64

1 name to Solano Printers & Lithographers?
 2 A. I'm just speculating about that. Based on our
 3 conversation, I think that's probably what happened,
 4 because I don't remember that name "Stationers" at all,
 5 and we never used that name.
 6 Q. In total, how many years would you estimate --
 7 strike that.
 8 In total, how many years would you estimate
 9 that Solano Printers & Stationers operated at the
 10 622/630 Jackson Street?
 11 A. A year and a half.
 12 Q. Okay. Up until what point in time?
 13 A. Well, again, it depends on when we bought it.
 14 I don't remember.
 15 Q. Okay. So let me ask you: When you say "when
 16 we bought it," when --
 17 A. I'm speaking collectively for the organization,
 18 my father and his partner. So, obviously, I identify
 19 with them.
 20 Q. Okay. But what I'm trying to do is distinguish
 21 between your father's ownership of Solano Printers &
 22 Stationers and your ownership of Solano Printers &
 23 Lithographers.
 24 A. To the best of my recollection, when John and
 25 my dad bought the company, they put it in my name and

65

1 Dave's name.
 2 And I don't even remember any discussion, but I
 3 assume it was one of those family things where they felt
 4 it was the right way to do it. Maybe they had tax
 5 advice. I don't know.
 6 Q. Okay. So then, to your knowledge, your father
 7 and Mr. Clark, Sr., never did in fact own Solano
 8 Printers & Stationers?
 9 A. Not in name, no. I don't think they ever had
 10 the name on anything.
 11 Q. Okay. And then Solano Printers & Stationers
 12 was purchased by Cal Central Press?
 13 A. No.
 14 Q. Okay. Where am I wrong on that?
 15 A. Because I think it was always -- oh, under the
 16 name, regardless of who owned it, it was under the name
 17 of myself and Dave, I believe.
 18 Q. Okay.
 19 A. And then when it moved to Texas Street, myself,
 20 Dave Clark and Ed Peabody built the building that it
 21 moved to.
 22 Q. So did you all ever operate Solano Printers &
 23 Lithographers at the 622/630 Jackson Street?
 24 A. Did -- I don't understand your question.
 25 Q. Sure. Well, let me ask you this: Did Solano

66

1 Printers & Lithographers ever operate at the
 2 622/630 Jackson Street?
 3 A. I believe so.
 4 Q. Okay. For how many years?
 5 A. A year and a half.
 6 Q. Okay. See, that's where I'm getting confused,
 7 because I thought in my questions before to you, I was
 8 speaking of Solano Printers & Stationers, and I thought
 9 that you had indicated to me that they operated there
 10 for a year and a year and a half.
 11 A. I don't know how long they operated. That's
 12 what I said earlier. I'm not aware of that name at all.
 13 So when you used it, I was talking specifically
 14 about Solano Printers & Lithographers, which I am
 15 assuming at this point since you've gone through the
 16 records is the company that we -- the name that we used
 17 once we bought that Stationers.
 18 But I'm not even sure that's true, but that's
 19 what I'm speculating based on what you're saying and
 20 asking.
 21 Q. Sure. And, Mr. Keilholtz, I don't want you to
 22 speculate or guess as to what I'm thinking or try to
 23 figure that out.
 24 A. That's what's causing the confusion over this
 25 year and a half thing.

67

1 Q. Okay. Okay. All's I'm trying to get from you
 2 is your best recollection of the operations --
 3 A. Right.
 4 Q. -- and who operated and the names they
 5 operated.
 6 A. And I did say that I have absolutely no
 7 recollection of that Stationer's company.
 8 Q. Okay. So then to your best recollection, your
 9 father and John Clark, Sr., were operating Solano
 10 Printers & Lithographers at the 622/630 Jackson Street?
 11 A. I -- I don't know what you mean by "operating."
 12 I mean, they certainly weren't running day-to-day
 13 operations.
 14 Q. They owned a business called Solano Printers &
 15 Lithographers -- and when I say "they," I mean your
 16 father and John Clark, Sr. -- that operated at the
 17 622/630 Jackson Street location, correct?
 18 A. Right.
 19 Q. Okay. And to your knowledge, they operated at
 20 that location for a year and a half; is that correct?
 21 A. Right.
 22 Q. Approximately a year and a year and a half.
 23 A. There are a whole group of companies that John
 24 and dad bought, and all of them were not -- I mean, they
 25 were all under Cal Central. And at that time I had a

68

1 key position at Cal Central, but my dad was still and
 2 John were still principals.
 3 So you have to understand this gets really
 4 muddled because we had at one point something like 11
 5 corporations. This was the smallest of all of them and
 6 the one that got the least attention.
 7 Most of the companies, once they were
 8 purchased, were run by the person we bought it from. In
 9 that case, of Solano Printers & Lithographers, whatever
 10 it was called before, we sent one of our employees, Jack
 11 Whalley, down to run it. And he was really responsible
 12 for the day-to-day operation.
 13 And you had his name because you mentioned it
 14 when I talked to you on the phone.
 15 Q. So to your knowledge, Jack Whalley went down
 16 and operated Solano Printers & Lithographers, correct?
 17 A. Correct.
 18 Q. Okay. And that was at the 622/630 Jackson
 19 Street?
 20 A. Correct.
 21 Q. Okay. Do you know approximately what year
 22 those operations started?
 23 A. I said I don't remember.
 24 Q. Okay. I thought when you said you didn't
 25 remember, we were speaking of Solano Printers &

69

1 Stationers.
 2 A. Yes, and remember, I said I don't know what
 3 that is.
 4 Q. I heard that later.
 5 A. Right.
 6 Q. Okay. After I went through a host of questions
 7 about Solano Printers & Stationers.
 8 A. So the year and a half applies, and I think I
 9 said earlier it may be around '65, but I'm guessing.
 10 Q. Okay. And Jack Whalley, is that how you
 11 pronounce it?
 12 A. Whalley.
 13 Q. Whalley.
 14 A. It's spelled like Whalley. I can see why you'd
 15 call it that, but it's Whalley. That's how he
 16 pronounced it.
 17 Q. Okay. And Jack Whalley, he was actually
 18 employed by Solano Printers & Lithographers, or was he
 19 employed by a different company?
 20 A. I don't know where he got his check from. It
 21 could have been coming from Cal Central and News
 22 Publishing.
 23 He was an employee of New Publishing, on their
 24 payroll, one of the three -- one of the two operating
 25 companies under Cal Central, and he went down to take

70

1 over that company in Fairfield.
 2 Whether or not he maintained or remained on the
 3 payroll of News Publishing, I do not know.
 4 Q. Okay.
 5 MR. GRAHAM: All right. I think this is a good
 6 time to take a break. Let's take about a 10-minute
 7 break, and we'll get back.
 8 (Recess taken.)
 9 MR. GRAHAM: Back on.
 10 Q. Mr. Keilholtz, I'll remind you, even though
 11 we've taken a break, you're still under oath.
 12 A. I understand.
 13 Q. Before we took the break, we were talking a
 14 little bit about the operations of Solano Printers &
 15 Lithographers and Solano Printers & Stationers at the
 16 622/630 Jackson Street property.
 17 You recall that?
 18 A. Yes.
 19 Q. Okay.
 20 MR. GRAHAM: What I'm going to do is mark the
 21 next.
 22 (Whereupon Exhibit No. 2 was then marked for
 23 identification.)
 24 BY MR. GRAHAM:
 25 Q. Mr. Keilholtz, I'll direct your attention to

71

1 what's been marked as Exhibit 2 to your declaration.
 2 Do you have that in front of you?
 3 A. Yes.
 4 Q. Okay. And just for the record, this is the
 5 1961 City Directory produced, and it's Bates JH 10113 to
 6 JH 10120. And the date of the directory is 1961.
 7 MR. NICKOVICH: Excuse me, did you say -- call
 8 this an exhibit to his declaration?
 9 MR. GRAHAM: I may have -- yeah, I did. Thank
 10 you, Counsel.
 11 Q. Exhibit 2 to your deposition.
 12 Mr. Keilholtz, do you have that in front of
 13 you?
 14 A. Yes.
 15 Q. Okay. What I'd like to -- if you look at the
 16 bottom right-hand corner, you'll see what we refer to as
 17 Bates stamps, and they start with "JH."
 18 A. Right.
 19 Q. If I could direct your attention to the page
 20 that's marked JH 10117.
 21 A. (Witness complied.) Okay.
 22 Q. Are you there?
 23 A. Yes.
 24 Q. Okay. I'd like to direct your attention to
 25 about a third down the page, under the title "Greeting

72

1 Cards."
 2 Do you see that?
 3 A. Yes.
 4 Q. States, "Solano Printers & Stationers."
 5 Do you see that?
 6 A. Right.
 7 Q. Again, this is a 1961 guide. Does this
 8 document in any way refresh your recollection that as of
 9 1961, or at least in 1961, that Solano Printers &
 10 Stationers was operating at the 622 Jackson Street
 11 location?
 12 A. It certainly shows it existed.
 13 MR. NICKOVICH: I'm going to object. It's been
 14 asked and answered.
 15 BY MR. GRAHAM:
 16 Q. Does this refresh your recollection, sir?
 17 A. Well, it doesn't refresh my recollection, but
 18 it shows that it existed.
 19 Q. Okay.
 20 A. And there's two entries here. There's one at
 21 the top under "Gift Shops."
 22 Q. Yes, sir.
 23 A. So it looks like they did greeting cards and
 24 gift shops.
 25 Q. If that doesn't help refresh your recollection,

73

1 that's all I have for you on that one.
 2 A. Okay.
 3 Q. Okay. Mr. Keilholtz, do you know what year
 4 that Solano Printers & Lithographers was incorporated?
 5 A. No.
 6 Q. Do you know what parties or what persons
 7 incorporated Solano Printers & Lithographers?
 8 A. Well, I am really at a loss because I thought
 9 the company was set up in the name of myself and Dave
 10 Clark, so I don't remember that it was incorporated.
 11 Q. Okay.
 12 A. So my facts seem unclear.
 13 Q. Okay.
 14 A. My memory is unclear.
 15 MR. GRAHAM: No. 3.
 16 (Whereupon Exhibit No. 3 was then marked for
 17 identification.)
 18 BY MR. GRAHAM:
 19 Q. All right. Mr. Keilholtz, I've handed to you
 20 what's been marked as Exhibit 3 to your deposition here
 21 today. You can take as much time to review this as you
 22 like, or as little time. I only have a few questions.
 23 Let me know when you're ready.
 24 A. (Witness complied.) Okay.
 25 Q. Mr. Keilholtz, have you ever seen this document

74

1 before?
 2 A. I certainly don't remember, but I probably
 3 have.
 4 Q. Okay. And for the record, this is the Articles
 5 of Incorporation of Solano Printers & Lithographers?
 6 A. Correct.
 7 Q. And I'd like to direct your attention to the
 8 page 4 of this document.
 9 And you see under the list there it states
 10 names, and there's the name of "Kathleen Baker."
 11 Do you see that?
 12 A. Yes.
 13 Q. Do you know who Kathleen Baker is?
 14 A. Absolutely no idea.
 15 Q. Same question, do you know who Donna Booth is?
 16 A. No.
 17 Q. Do you know how -- strike that.
 18 Do you know who Doris R. Munn is?
 19 A. No.
 20 Q. Do you know who Wilma Sharp is?
 21 A. No.
 22 Q. Do you know who Annette Verga is?
 23 A. No.
 24 Q. Okay. To your knowledge, does this appear to
 25 be the Articles of Incorporation of the company that you

75

1 were involved in, Solano Printers & Lithographers?
 2 A. It appears to be. And the date would tie into
 3 my '65 date, and the -- it looks reasonable to assume
 4 that.
 5 I don't know why these people are there, but I
 6 guess it was some kind of a routine you went through
 7 where you use a bank to set this thing up. I don't
 8 understand that.
 9 Makes me think that Cal Central was using
 10 Crocker Citizens at that time.
 11 Q. And Crocker Citizens is a bank?
 12 A. I'm assuming that because that's what it says.
 13 Q. After Citizens Bank Building; is that what
 14 you're referring to?
 15 A. Crocker Citizens Bank Building.
 16 Q. Okay.
 17 A. But I think that would be Crocker Citizens.
 18 And I have a vague recollection of that name.
 19 Q. How do you have a recollection of that name?
 20 A. Well, I've been in Sacramento a long time, so,
 21 you know, 500 -- I don't know.
 22 Q. I'm sorry?
 23 A. No, forget it. No, I'm assuming that's a bank.
 24 Q. And do you have a recollection of Solano
 25 Printers & Lithographers utilizing this 500 Crocker

76

1 Citizens Bank Building that we were speaking of?
 2 A. No.
 3 Q. Okay. Now, with respect to Solano Printers &
 4 Lithographers, were you an officer of that company?
 5 A. I don't know.
 6 Q. Do you know who were the officers of that
 7 company?
 8 A. No.
 9 Q. Were you a director of that company?
 10 A. I don't know. Again, I mentioned all these
 11 corporations, so we did each one a little bit
 12 differently.
 13 Q. Okay. And right now I'm only speaking with
 14 respect to Solano --
 15 A. I realize that. But, again, I -- it's 40 years
 16 ago.
 17 Q. That's fine. And, again, an "I don't know"
 18 answer is fine.
 19 Now, I think you indicated earlier, and tell me
 20 if I'm wrong, that the operation known as Solano
 21 Printers & Stationers, they used a letter press for
 22 their printing operations at 622 through 630 Jackson
 23 Street; is that correct?
 24 A. That's what I think.
 25 Q. Okay. And Solano Printers & Lithographers,

77

1 they eventually relocated to 622/630 Jackson Street, or
 2 began operations at that location; is that correct?
 3 A. Began operations.
 4 Q. Began operations there?
 5 And do you know for how many years that Solano
 6 Printers & Lithographers operated at the 622/630 Jackson
 7 Street?
 8 A. What I said, a year and a half.
 9 Q. A year and a half.
 10 Now, when the Solano Printers & Lithographers
 11 began operations at 622/630 Jackson Street, what types
 12 of presses did they use at that location?
 13 A. Well, they would have used whatever the prior
 14 company had, which I'm assuming is letter press.
 15 Q. Why do you believe that they would have used
 16 what the other company had?
 17 A. Well, because we took over that company. We
 18 bought it. We wouldn't bring in new equipment.
 19 Q. That's what I'm trying to figure out.
 20 A. Well, we wouldn't have done it.
 21 Q. Why not?
 22 A. We would have brought in new equipment later if
 23 we changed the nature of the business. And I'm sure we
 24 did.
 25 I think we tossed out all of the stationery

20 (Pages 74 to 77)

78

1 stuff and the gift stuff and whatever was -- tossed out
 2 all of the extraneous stuff and went to be strictly a
 3 printing company because that's what we knew.
 4 Q. So to your knowledge, when Solano Printers &
 5 Lithographers began operations at the 622/630 Jackson
 6 Street, they were using letter press printing?
 7 A. They were using equipment from the prior
 8 company.
 9 Q. And do you know what equipment that was?
 10 A. No, I do not.
 11 Q. Do you know how many letter presses that there
 12 were?
 13 A. I do not.
 14 Q. Do you know if there was any other associated
 15 printing equipment other than the letter presses that
 16 had been previously used at the 622/630 Jackson Street?
 17 A. That would have been a hot metal machine or
 18 two, a Linotype probably, L-i-n-e-o-t-y-p-e (sic), one
 19 word, and hot metal type setting cases.
 20 Q. Anything else?
 21 A. No.
 22 Q. Okay. But you know there was at least one
 23 letter press machine?
 24 A. I'm assuming there was one because I know I
 25 would buy it otherwise.

79

1 Q. Okay. So to your knowledge, Solano Printers &
 2 Lithographers, when they began operation at the
 3 622/630 Jackson Street, when they began operations
 4 there, they were using strictly the equipment that had
 5 been previously used there by Solano Printers &
 6 Stationers?
 7 A. That is my recollection to the best of my
 8 ability.
 9 Q. Okay. Now, at any point in time prior to the
 10 time that Solano Printers & Lithographers ceased
 11 operations at the 622/630 Jackson Street site, prior to
 12 that time, did Solano Printers & Lithographers purchase
 13 any new equipment or put any other press equipment at
 14 that location?
 15 A. I have no idea. I don't remember.
 16 Q. Do you know who would remember that?
 17 A. No, except maybe Jack Whalley.
 18 Q. Is there -- let me ask you: Is there someone
 19 from -- that was affiliated with Solano Printers &
 20 Lithographers that would have more knowledge on that
 21 subject than yourself?
 22 A. Because, remember, it's a small company, a few
 23 people. Jack Whalley would be the only guy that could
 24 probably remember that. I know he's dead.
 25 Q. Other than Mr. Whalley, were there any other

80

1 employees or persons that worked for Solano Printers &
 2 Lithographers at the 622/630 Jackson Street location?
 3 A. I have no idea. I mentioned to you Jim Liles,
 4 and I don't know when he joined the company, L-i-l-e-s.
 5 And I think he joined the company after we moved to the
 6 new location, but I'm not sure.
 7 Q. And that new location you're speaking of, that
 8 was --
 9 A. Some place on Texas.
 10 Q. Sure. Let me just finish so we get a clear
 11 record.
 12 So Mr. Whalley was a Linotype operator?
 13 A. Yes, he was.
 14 Q. Okay. What are hot metal cases?
 15 A. Did I say "hot metal cases"?
 16 Q. I think so. Or you said hot metal printing --
 17 A. I probably did, and I mixed the terms. The job
 18 cases are what you kept standard type in, so you'd go
 19 and you'd hand-pick the type, if you were doing
 20 something like an invitation or something short run.
 21 If you had a larger project like a law book,
 22 you would then use the Linotype machine, and that
 23 machine would cast the type and create what they call a
 24 pick, and that would have a whole group.
 25 So it's all kind of hot metal process, but the

81

1 job case -- and then we had what was called a California
 2 job case, had a particular arrangement of the letters so
 3 you knew where to pick them from.
 4 Q. Okay. During the time that Solano Printers &
 5 Lithographers operated at the 622/630 Jackson Street,
 6 are you aware of any repairs that needed to be done on
 7 any of the press equipment?
 8 A. You know, that kind of equipment didn't take
 9 much repairing. It just kept running, and people knew
 10 how to hold the stuff together, so I don't ever remember
 11 repairs on the letter press.
 12 I'm sure it happened, but it really wasn't a
 13 common thing. People held stuff together in those days
 14 by shoestrings.
 15 Q. Let me ask you: During the time that Solano
 16 Printers & Lithographers operated at the 622/630 Jackson
 17 Street, during that time period, how often would you say
 18 that you were actually present at that location?
 19 A. I think I said earlier, maybe a half a dozen or
 20 a dozen times. I don't know.
 21 Q. And I just want to be clear because I think
 22 there was a little confusion between us earlier with
 23 respect to Solano Printers & Stationers versus Solano
 24 Printers & Lithographers.
 25 So you did visit the Solano Printers &

82

1 Lithographers approximately a half a dozen times during
 2 the time period that it was in operation at the
 3 622/630 Jackson Street?
 4 A. Correct.
 5 Q. Okay. Did you ever operate any of the printing
 6 presses during the time that Solano Printers &
 7 Lithographers operated at the 622/630 Jackson Street?
 8 A. No.
 9 Q. Okay. Were you ever involved in any of the
 10 cleaning operations of any of the presses during the
 11 time that Solano Printers & Lithographers operated at
 12 the 622/630 Jackson Street?
 13 A. No.
 14 Q. Okay. Other than Jim Whalley, can you think of
 15 any other person that would be involved with respect to
 16 any of the cleaning of any of the presses, cleaning of
 17 any of the rollers, any of the cleaning of the equipment
 18 for Solano Printers & Lithographers during the time that
 19 they operated at the 622/630 Jackson Street location?
 20 A. No.
 21 Q. Did Solano Printers & Lithographers ever
 22 operate at a location on Bell Street?
 23 A. Not to my knowledge. I never heard of Bell
 24 Street.
 25 Q. Okay. And you're not familiar with any changes

83

1 in equipment or changes in the operational processes
 2 that were conducted by Solano Lithographers during their
 3 operations -- during the entirety of their operations at
 4 the 622/630 Jackson Street location?
 5 A. Yeah, I'm not aware of any.
 6 Q. Okay. And other than Jack Whalley, who else
 7 would have knowledge of that type of information?
 8 A. He would really be the only person that I know
 9 of that would really have the knowledge. My dad and
 10 John Clark might have, but they wouldn't even know the
 11 detail he would. And of course, all three of them gone.
 12 Q. What about Mr. --
 13 A. Liles I referred to. I'm not sure when he came
 14 into the picture. So if he came in after we had moved
 15 to the new location, he probably wasn't very aware of
 16 the configuration at the -- at the site that we're
 17 talking about.
 18 Q. Okay. And are you aware of the configuration
 19 at the site that we're speaking of?
 20 A. No, I can't remember what it looked like. You
 21 asked me about the doors. I have no recollection at
 22 this time after 45 years where our doors were.
 23 Q. That's fine. That's fine.
 24 A. I wonder how many people would.
 25 Q. Well, you'd be amazed.

84

1 A. Maybe not when they're 75.
 2 Q. You'd be amazed.
 3 A. Maybe I'm stupid.
 4 Q. I'm not implying that. Don't infer that.
 5 The operations at the 622/630 Jackson Street
 6 locations with respect to Solano Printers &
 7 Lithographers, during the time that Solano Printers &
 8 Lithographers was operating at that location, they did
 9 not own that property, did they?
 10 A. No.
 11 Q. Okay. Do you know during the time that Solano
 12 Printers & Lithographers operated at the 622/630
 13 location who owned that property?
 14 A. I do not.
 15 Q. And did Solano Printers & Lithographers enter
 16 into any type of lease or rental agreement with the
 17 landlords with respect to Solano Printers &
 18 Lithographers use of the 622/630 Jackson Street
 19 property?
 20 A. Well, I would assume that -- I would assume as
 21 a business practice there'd be some type of lease, but I
 22 have no idea what is or what it was.
 23 Q. Do you recall yourself entering into --
 24 A. No.
 25 Q. Let me finish my question.

85

1 A. I'm sorry.
 2 Q. Do you recall yourself entering into any lease
 3 with respect to Solano Printers & Lithographers'
 4 operations at the 622/630 Jackson Street property?
 5 A. No, and I doubt if I would have been involved.
 6 Q. Who would have?
 7 A. Probably my dad.
 8 Q. Anyone else that you can think of?
 9 A. No. He was really the manufacturing guy, and
 10 he's the one that knew the people that owned it.
 11 Q. When you say he was "the manufacturing guy,"
 12 what do you mean?
 13 A. Well, his partner was really in charge of
 14 sales, and Dad was always -- he had part- -- he was
 15 always the guy that ran the back plant thing. He was
 16 the operations guy.
 17 Q. Okay. And "his partner," that's Mr. Clark,
 18 Sr., correct?
 19 A. Correct.
 20 Q. All right. During the time that Solano
 21 Printers & Lithographers operated at the 622/630 Jackson
 22 Street location, what were their hours of operation at
 23 that location, do you recall?
 24 A. Probably 8:00 to 5:00.
 25 Q. Five days a week?

86

1 A. Five days a week. It was not a big operation,
 2 so -- in the printing industry there's usually some
 3 overtime, so once in awhile probably somebody worked
 4 late at night or came in on the weekend.
 5 But the regular hours would have been 8:00 to
 6 5:00 at the most, five days a week.
 7 Q. And with respect to -- well, let me ask you:
 8 Do you know precisely what the address was of the
 9 location of Solano Printers & Lithographers at the
 10 Jackson Street?
 11 A. Do I know?
 12 Q. Yeah.
 13 A. Well, we've been using it all the time,
 14 622/630.
 15 Q. Okay. Well, I guess what I'm asking you, more
 16 specifically, do you know if it was 622 --
 17 A. No.
 18 Q. -- 624, 630?
 19 A. I don't know.
 20 Q. Okay. And we'll just call it the Jackson
 21 Street location. Is that okay with you?
 22 A. Fine.
 23 Q. Okay. Solano Printers & Lithographers'
 24 operations at the Jackson Street location, was there a
 25 prepress room at that location?

87

1 MR. NICKOVICH: I'm going to object. I think
 2 because there's multiple Jackson Street locations in the
 3 litigation. We shouldn't be using that term.
 4 MR. GRAHAM: That's probably true. Okay. I'll
 5 go back to 622/630.
 6 Q. Let me give you my question again,
 7 Mr. Keilholtz.
 8 (Whereupon the reporter read back the following
 9 testimony:
 10 "Q. Okay. Solano Printers &
 11 Lithographers' operations at the Jackson
 12 Street location, was there a prepress
 13 room at that location?")
 14 BY MR. GRAHAM:
 15 Q. And by "that location," I'm referring to the
 16 622/630 Jackson Street location to which we've been
 17 referring to earlier.
 18 A. I do not believe there was.
 19 Q. Okay. Okay. So there was a press room,
 20 correct?
 21 A. Correct.
 22 Q. Okay. And were there offices at that location,
 23 also?
 24 A. There was a little walk-in area where a
 25 customer could come and stand. And if I remember, there

88

1 was a wall between the back plant and the front, but I'm
 2 not even sure of that.
 3 Q. Okay. Do you know whether Mr. Whalley had an
 4 office at the 622/630 Jackson Street location?
 5 A. He wouldn't have had an office. He's working
 6 out back. We'd sit in the front, you know, when
 7 customers walk in. Probably had a desk there.
 8 Q. Okay. Do you know of anyone else who had an
 9 office at that 622/630 location, the Jackson location,
 10 during the time that Solano Printers & Lithographers
 11 operated?
 12 A. No.
 13 Q. Do you know during the time that Solano
 14 Printers & Lithographers operated at the 622/630 Jackson
 15 location, who was in charge of ordering supplies?
 16 A. Jack Whalley.
 17 Q. Jack Whalley?
 18 What about ordering cleaners?
 19 A. Jack Whalley.
 20 Q. And solvents?
 21 A. Jack Whalley.
 22 Q. Okay. During the time that Solano Printers &
 23 Lithographers operated at the 622/630 Jackson Street
 24 location, do you recall that Mr. Clark, Jr., had any
 25 role in the operations or running of Solano Printers &

89

1 Lithographers?
 2 A. Same as myself, none.
 3 Q. None.
 4 Same question with respect to Mr. David Clark?
 5 A. None.
 6 Q. None.
 7 A. John Clark wasn't even working for the company
 8 I don't think when we bought it.
 9 Q. I'm sorry?
 10 A. John Clark, Jr. You mentioned John Clark.
 11 John Clark, Jr., came to work somewhere around '67, '68
 12 for Cal Central Press.
 13 Q. Okay. So did you have any roles or duties with
 14 respect to the operations of Solano Printers &
 15 Lithographers at the 622/630 Jackson Street location?
 16 A. No.
 17 Q. Not at all?
 18 A. Not at all.
 19 Q. No, you didn't directly supervise any
 20 employees?
 21 A. No.
 22 Q. Who was Mr. Whalley's supervisor?
 23 A. You know, we didn't have a formal chain of
 24 command. I guess he would take directions from either
 25 John or dad.

90

1 Q. Okay. Was there a foreman at that location?
 2 A. It would have been Jack Whalley.
 3 Q. Okay.
 4 A. It was probably a two- or three-man operation.
 5 Q. Okay. And why do you say that?
 6 A. It was really small. I think when he got it,
 7 it was doing less than 100,000 a year volume.
 8 Q. Okay.
 9 A. Half of the 100,000 was the front stuff, the
 10 greeting cards and invitations and so on that weren't
 11 done in the plant.
 12 Q. Okay. 100,000 a year volume, you mean with
 13 respect to dollars?
 14 A. Dollars.
 15 Q. Okay. And do you know what types of jobs that
 16 Solano Printers & Lithographers conducted with respect
 17 to printing operations at the 622/630 Jackson Street
 18 location?
 19 A. I really don't -- I can't say for sure, but
 20 knowing the equipment and the nature of the time, it
 21 would have just been local walk-in stuff where somebody
 22 did a little form for their business or a short run,
 23 maybe a little letter, a newsletter for a local
 24 organization.
 25 I mean, it really would have been very, very

91

1 short run printing, and not particularly quality
 2 looking. And it would have all been black.
 3 Q. No color?
 4 A. No color.
 5 Q. Do you remember any of the clients of Solano
 6 Printers & Lithographers when they operated at the
 7 622/630 Jackson Street?
 8 A. Not at all.
 9 Q. How about Wells Fargo, were they a client
 10 during the time that Solano Printers & Lithographers
 11 first operated at 622/630 Jackson Street?
 12 A. I think the bank's -- excuse me.
 13 MR. GRAHAM: That's fine. Let's go off the
 14 record.
 15 (Interruption off the record.)
 16 (Whereupon the reporter read back the following
 17 testimony:
 18 "Q. How about Wells Fargo, were
 19 they a client during the time that
 20 Solano Printers & Lithographers first
 21 operated at 622/630 Jackson Street?")
 22 THE WITNESS: We started to do some bank checks.
 23 And I don't really remember it being Wells Fargo; I
 24 thought it was Bank of California. But I don't know
 25 whether we started that check program after we had moved

92

1 or not.
 2 But I'm certainly aware the check was a big
 3 business. It was big -- it was bigger than what they had
 4 at Fairfield when we took over.
 5 BY MR. GRAHAM:
 6 Q. Okay. Do you recall any of the different types
 7 of papers that were used to print on at the -- strike
 8 that.
 9 In the operations of Solano Printers &
 10 Lithographers at the 622/630 Jackson Street location, do
 11 you recall whether or not that they did any of the
 12 printing jobs on glossed paper?
 13 A. I'm almost sure they didn't.
 14 Q. Okay. Why are you sure that they didn't?
 15 A. Because it wasn't the kind of product what I
 16 described was typically a product that was done on
 17 uncoated stock because that's what letter press was not.
 18 Letter press didn't suit itself to the glossier
 19 stocks. It didn't have the fine -- it just didn't have
 20 the characteristics.
 21 Q. When you say it "didn't have the
 22 characteristics," what do you mean?
 23 A. Letter press was not a quality -- I mean, think
 24 of the Gutenberg Bible, that was letter press, but, you
 25 know, it never did really beautiful stuff.

93

1 When lithography came around, it was able to
 2 print a much better picture and do a better color job.
 3 So in the mid-'50s most of our printing in
 4 America switched from letter press to offset or
 5 lithography.
 6 Q. And the letter press that was -- strike that.
 7 In the operations of Solano Printers &
 8 Lithographers at the 622/630 Jackson Street, the letter
 9 presses that they were utilizing, were those sheet-fed
 10 or web-fed?
 11 A. Oh, sheet-fed.
 12 Q. Sheet-fed?
 13 Do you recall how many impressions per hour
 14 that the letter press would do over at the
 15 622/630 Jackson Street location?
 16 A. No, but I'd be -- they'd be lucky if they get
 17 1200 to 2,000.
 18 Q. Why is that?
 19 A. Because they're slow. They're slow presses.
 20 Q. Do you recall what type of press it was?
 21 A. No.
 22 Q. The make or model?
 23 A. No.
 24 Q. Do you know if it was the Heidelberg press?
 25 A. Could have been a Heidelberg.

94

1 Q. Why do you say it "could have been a
 2 Heidelberg"?

3 A. Well, there were a number of brands or
 4 manufacturers of letter press equipment, one of which
 5 was Heidelberg.

6 Q. Sure.

7 And what makes you believe that the Heidelberg
 8 letter press was actually at the location --

9 A. I didn't say I did believe it. I said it could
 10 have been a Heidelberg.

11 Q. Sure. And just give me one second to let me
 12 finish my question. I'll try to get you out of here as
 13 soon as I can, sir, but I gotta finish my question.

14 I understand there were a number of brands, but
 15 do you specifically recall that there was a Heidelberg
 16 press located at the 622/630 Jackson Street during the
 17 operations of Solano Printers & Lithographers?

18 A. And I said it could have been.

19 Q. Okay. And then I think I asked you why do you
 20 think it could have been.

21 A. Because that was a very common brand.

22 Q. Other than the fact that it was a very common
 23 brand, is there anything else that leads you to believe
 24 that there was a Heidelberg press operated by Solano
 25 Printers & Lithographers at the 622/630 Jackson Street

95

1 location?

2 A. No.

3 Q. Do you recall if it was a Chandler & Price?

4 A. That's going back. That's pretty old
 5 equipment. So, again, I'd speculate, it probably wasn't
 6 that either, or that it wasn't that at all because of
 7 the fact that's a really old -- I think they were
 8 probably bankrupt by the time I was alive.

9 Q. Okay. Since we're talking about the press,
 10 let's -- let me ask you: The letter presses that you
 11 believed were located at the 622/630 Jackson Street
 12 location during the operations of Solano Printers &
 13 Lithographers, were those hand presses?

14 A. Again, I really don't know.

15 Q. Okay. So you couldn't tell me whether that was
 16 a hand press, a table top --

17 A. My speculation would be we had one hand press
 18 over there and probably had an automated --
 19 automatically fed letter press. That would be my
 20 speculation knowing the time and the nature of job shops
 21 in that period of time.

22 Q. Okay. So based upon the information that you
 23 know, you believe that there was a hand press at that
 24 location during the operations of Solano Printers &
 25 Lithographers, and also an automatic feed press?

96

1 A. Right.

2 Q. Okay. Now, do you know -- you said the
 3 impressions per hour would be somewhere between 1200 and
 4 2,000. For each of those --

5 A. No, it would be slower for hand feed. The hand
 6 feed, probably five or 600.

7 Q. Okay. That's what I'm -- and then for the
 8 automatic we're looking at the 1200 to 2,000?

9 A. Correct.

10 Q. I'm sorry?

11 A. Yes, correct.

12 Q. Do you know if this hand press -- that's a
 13 manually-operated press, right?

14 A. Correct.

15 Q. And that's manually cleaned?

16 A. Well, yeah, by the operator.

17 Q. As opposed to an automatic clean?

18 A. Yeah.

19 Q. Okay.

20 A. None of these presses had automatic clean at
 21 that time. Automatic fade wouldn't have had an
 22 automatic clean. The guy still has to clean it up.

23 Q. When did the automatic clean -- approximately
 24 what year did those come into being?

25 A. Automatic cleaning on offset started probably

97

1 in the '80s.

2 Q. Oh, okay. Okay. I beg your pardon. Bear with
 3 me, Mr. Keilholtz. I'm not a press operator.

4 A. I know.

5 Q. Okay. You ascertained that.

6 Were these heat set presses that were used by
 7 Solano Printers & Lithographers at the 622/630 Jackson
 8 Street location?

9 A. No. And to clarify, heat set wasn't -- that
 10 also was something that came later.

11 Q. Okay. So then those presses were referred to
 12 as blanket-to-blanket presses?

13 A. No.

14 Q. "No"?

15 A. You never use that term in letter press.

16 Q. Okay. What is that term used for?

17 A. Blanket-to-blanket is a term for lithography or
 18 offset.

19 Q. Gotcha.

20 A. And, in fact, that's really a term for web
 21 presses -- well, you don't want the detail.

22 Q. Sure, I do.

23 A. Well, if you're running a web press, you're
 24 putting ink on both sides of the paper. And the sheet
 25 is going through -- you've got a roll of paper at the

98

1 end, and you're putting the sheet through.
 2 And you've got a blanket here, and a blanket
 3 here (indicating), and the sheet is going between the
 4 blanket. And the image is being transferred on the top
 5 of the sheet and on the bottom of the sheet
 6 simultaneously, with the two rollers causing the
 7 pressure that lets the impression take place -- lets the
 8 image be transferred or take place.
 9 And then it comes out the other end, either
 10 folded in the product, depending if there's a folder in
 11 line, or it comes out sheeted.
 12 And sometimes those presses have heat set like
 13 you talked about, and sometimes they don't. But you're
 14 using really terms that don't have anything to do with
 15 sheet-fed letter press or litho.
 16 Q. Okay. Great, thank you. Thank you.
 17 Now, the presses that we've been discussing,
 18 the hand press and the automatic feed press that's
 19 located at the 622/630 Jackson Street during the
 20 operations of Solano Printers & Lithographers, do you
 21 have any information with respect to how often, say, the
 22 hand press would need to be cleaned?
 23 A. Well, it would depend on how often they used
 24 it, but probably -- the nature of letter press was such
 25 that they probably cleaned the things up about once a

99

1 week, not like offset or lithography.
 2 Q. Okay. And how is offset different with respect
 3 to the cleaning?
 4 A. Because you've got the rubber blanket involved
 5 in offset. You've got to clean the situation -- you've
 6 got to clean it up because the ink's dry, the stuff
 7 solidifies, you've got to get it off your blanket, and
 8 you've got to get it out of your ink tray.
 9 So you need regular cleanup, and you clean up
 10 at the end of every day or before changing colors on
 11 your press.
 12 In the case of letter press, it can sit there.
 13 The ink doesn't really -- it's a little bit different.
 14 The ink really doesn't -- you can let it sit. It's a
 15 little different ink, you can let it sit.
 16 Q. For a day to two days?
 17 A. Uh-huh, people usually did.
 18 Q. Do you have any knowledge, Mr. Keilholtz, with
 19 respect to any chemicals or washes that were used in the
 20 operations of Solano Printers & Lithographers at the
 21 622/630 Jackson Street?
 22 A. No.
 23 Q. You don't recall any brand names?
 24 A. No.
 25 Q. Okay. Let's talk about the building over at

100

1 the 622/630 Jackson Street location.
 2 When Solano Printers & Lithographers first
 3 started operating at that location, was that a two-story
 4 building?
 5 A. No, I don't think so. I'm surprised you even
 6 asked. I thought it was one store.
 7 Q. Let me ask you: Did it have a mezzanine that
 8 went up?
 9 A. I don't remember that.
 10 Q. How high would you estimate the ceiling was?
 11 A. 14-foot to 18-foot.
 12 Q. During the time that Solano Printers &
 13 Lithographers operated at the 622/630 Jackson Street
 14 location, are you aware of any of the names of any of
 15 the tenants that occupied the buildings adjacent to
 16 Solano Printers & Lithographers?
 17 A. Not at all.
 18 Q. Okay. Do you know how many shifts there were
 19 during the operations of Solano Printers & Lithographers
 20 at the 622/630 Jackson location?
 21 A. One.
 22 Q. One. And that's the 8:00-to-5:00 shift,
 23 correct?
 24 A. Uh-huh.
 25 Q. Okay. Did that change over a period of time

101

1 during the time that Solano Printers & Lithographers
 2 operated? Did it change seasonally, anything of that
 3 nature?
 4 A. No, it was probably always one shift.
 5 Q. Okay. During the time that Solano Printers &
 6 Lithographers first began to operate at the
 7 622/630 Jackson Street location, what type of flooring
 8 was in that building? Cement floor?
 9 A. I think cement, if you want me to guess. But
 10 I'm guessing. I would say I think it's cement.
 11 Q. Why do you think it was cement?
 12 A. Cement is typically what I see in print shops,
 13 and it gives a solid bed to put equipment on. When
 14 you've got heavy duty equipment that's rocking and
 15 rolling, you need a pretty solid foundation.
 16 Q. Let me ask you: Was any of the equipment that
 17 Solano Printers & Lithographers utilized in their
 18 operations at the 622/630 Jackson Street location, was
 19 any of that equipment bolted to the floor?
 20 A. No.
 21 Q. Okay. Was there a bathroom within the building
 22 that Solano Printers & Lithographers occupied?
 23 A. I'm sure there was, but I don't remember it.
 24 Q. Do you remember if there was more than one?
 25 A. I doubt it.

102

1 Q. Was it the case that Solano Printers &
 2 Lithographers employed janitorial services to keep up
 3 with the housekeeping duties at the 622/630 Jackson
 4 Street location, or is it the case that those duties
 5 would be taken care of by an employee?
 6 A. It's just such a small building, probably the
 7 employee took care of it.
 8 Q. Okay. And do you recall within the building in
 9 which Solano Printers & Lithographers operated at the
 10 622/630 Jackson Street, whether there was a floor drain
 11 in that building?
 12 A. I have no idea.
 13 Q. Okay. And you indicated, I believe, before
 14 that there was no prepress room?
 15 A. No.
 16 Q. And do you know where the locations of the
 17 dumpsters were at the time that Solano Printers &
 18 Lithographers operated at the 622/630 Jackson Street?
 19 A. No.
 20 Q. Okay. You don't recall them being in the back?
 21 A. No.
 22 Q. Do you recall them being in the front?
 23 A. No. I don't think they'd be in the front.
 24 They'd be on the sidewalk.
 25 Q. That's what I thought, too.

103

1 Do you know who took away the trash for Solano
 2 Printers & Lithographers when they were operating at the
 3 622/630 location?
 4 A. I assume the Fairfield or Solano County garbage
 5 people:
 6 Q. Let me ask you: To your knowledge, was any
 7 private vendor ever hired by Solano Printers &
 8 Lithographers, or any other party or person, to dispose
 9 of any waste from the operations of Solano Printers &
 10 Lithographers at the 622/630 Jackson Street location?
 11 A. I really don't know, but I doubt it.
 12 Q. Why do you doubt it?
 13 A. That was a time -- I mean, we didn't have much
 14 waste. You didn't have a lot of paper waste. You had a
 15 few cans. You just give it to the garbage people.
 16 Q. Any other type of waste you can think of?
 17 A. No.
 18 Q. Ink waste?
 19 A. Well, I mentioned ink stays in the can, and at
 20 that point in time we didn't have the concerns with the
 21 environment, so people just threw the can with the waste
 22 into the garbage.
 23 Q. Okay. What about solvent waste, do you know
 24 how that was dealt with?
 25 A. I mentioned the rags, and those rags were

104

1 cleaned up, and at some point they were recycled. We
 2 had professional cleaners come and take them back.
 3 And, frankly, I think that may have been going
 4 on when I first came into the industry in '61.
 5 Q. Do you recall any names of any vendors or
 6 recyclers that were utilized by Solano Printers &
 7 Lithographers during their operations at 622/630 Jackson
 8 Street for the purposes of recycling rags?
 9 A. No.
 10 Q. Okay. Do you know of any dry cleaners as to
 11 where those -- strike that.
 12 Are you aware of any dry cleaners that were
 13 utilized for purposes of dry cleaning those rags for
 14 Solano Printers & Lithographers when they were operating
 15 at the 622/630 Jackson Street location?
 16 A. No. We wouldn't have sent the rags to a dry
 17 cleaning place. It would have been too expensive.
 18 Q. All right. You said at some point in time that
 19 there was a vendor that would take away these rags and
 20 recycle them; is that correct?
 21 A. Yes.
 22 Q. Okay. Was that always the case during the time
 23 that Solano Printers & Lithographers operated at the
 24 622/630 location?
 25 A. I mentioned I believe they were doing that when

105

1 I came to work in '61, which would be before the period
 2 we're talking about.
 3 So by that time I think it would be pretty
 4 established that you'd rotate your rags, and
 5 professional cleaners would come get them and take care
 6 of them.
 7 Q. Okay. Setting that aside, do you have any
 8 other basis for your opinion that Solano Printers &
 9 Lithographers utilized a recycling company for the use
 10 of their rags during the operations at 622/630 Jackson
 11 Street?
 12 A. Setting aside my assumption, I have none.
 13 Q. Okay. Do you have any knowledge with respect
 14 to the steps, the processes that were taken to clean the
 15 hand press during the time that Solano Printers &
 16 Lithographers operated at the 622/630 Jackson Street
 17 location?
 18 A. Hand press --
 19 Q. Yes.
 20 A. -- strictly?
 21 You scoop out the ink, put it into the can,
 22 that's the can they came in. You'd try to save it
 23 because you could use it again for a little bit if it
 24 wasn't skimmed over at the top.
 25 And then you would take a chemical of some

106

1 kind, a clear liquid. If I remember, it was kind of
 2 alcohol-based, had kind of a strong odor.
 3 And you'd take a rag, and you would wash the
 4 roller train that carried all the ink onto the platen,
 5 which is where the paper goes that gets the impression
 6 put on it.
 7 And you'd clean up the platen, again, with the
 8 same rag and the same solution. And, you know, you'd
 9 take as long as it took to make sure it was clean and
 10 everything looked fine, and then you're done.
 11 Q. And then was there any residue liquid left
 12 after you were done cleaning that hand press?
 13 A. The liquid -- you know, I'm sure buckets of
 14 liquid would go into the rag and be absorbed. It wasn't
 15 that heavy of a liquid or that much of the liquid.
 16 So, no, that would probably be absorbed.
 17 Q. Do you have any method in place -- strike that.
 18 Did Solano Printers & Lithographers have any
 19 method in place during their operations at
 20 622/630 Jackson Street to ring out the rags for purposes
 21 of recycling?
 22 A. No.
 23 Q. Okay.
 24 A. It would be messy. I mean, they -- that -- you
 25 just wouldn't do that.

107

1 Q. You've never heard of that process?
 2 A. No. Taking a ringer -- he's talking about the
 3 old-fashioned ringer like you used to have in the
 4 washing machines, like my grandmother had. That would
 5 just smash all the materials down into the rag. That
 6 wouldn't clean it up.
 7 Q. In order to get the solvent out to recycle the
 8 solvent, have you ever heard of that -- some sort of
 9 process where you ring out the rags, sometimes they had
 10 machines, sometimes they had operators that did that?
 11 A. I never heard of that.
 12 Q. You've never heard of that?
 13 During the operations of Solano Printers &
 14 Lithographers at the 622/630 Jackson Street, did they
 15 ever recycle ink at that location?
 16 A. No.
 17 Q. Okay. With respect to the automatic feed press
 18 that was located at the 622/630 Jackson Street during
 19 the Solano Printers & Lithographers' operations, could
 20 you explain to me the processes involved in cleaning
 21 that press?
 22 A. Really would be the same. You scoop the ink
 23 out, put it in a can, take material or solvent, and
 24 clean up the rollers.
 25 There's no platen in the case. There's a

108

1 flatbed that the -- that the form sits in that you're
 2 going to be printing, and so it just sits on that, and
 3 you've got ink applied.
 4 So all you really have is the ink train that's
 5 putting the ink down in place, and you've got to clean
 6 all those rollers up with the rag.
 7 Q. Okay. Do you also have to scrape the ink off
 8 of the press?
 9 A. Well, in the ink fountain you'd be scraping
 10 because you want to get all the residue out, but you
 11 don't scrape the rollers because the rollers are a
 12 rubber based material, and you'd destroy them. So you
 13 just use the rag on the rollers.
 14 Q. And how would you change the ink in that ink
 15 fountain? Are you familiar with --
 16 A. Well, you take it out with the scraper that I'm
 17 talking about and put another ink in, again, using a
 18 scraper, and you just manually put it in.
 19 Q. And with respect to the hand press that was
 20 utilized by Solano Printers & Lithographers in their
 21 operations at 622/630 Jackson Street, would you also --
 22 was there any reason that you would clean any of the
 23 plates on that machine?
 24 A. There were no plates on those machines.
 25 Q. That's what I wanted to find out.

109

1 What about with respect to the automatic feed
 2 press?
 3 A. No plates.
 4 Q. Okay.
 5 A. Plates only have to do with offset and
 6 lithography.
 7 Q. Okay. Thank you.
 8 Do you know what methods were utilized by
 9 Solano Printers & Lithographers during their operations
 10 at 622/630 Jackson Street in order to remove ink from
 11 the floor?
 12 A. Well, as I mentioned before, you don't really
 13 get ink on the floor. If you do, you're doing something
 14 wrong. I guess you'd take a scraper, but you're not
 15 going to have ink thrown all over the place.
 16 Q. Okay. And I --
 17 A. I've never seen a printing company with ink on
 18 the floor unless it's so miserably awful that it's -- I
 19 just don't do business with people like that.
 20 Q. Sure. Let me ask you: You've never heard of
 21 operations, cleaning operations whereby people would
 22 have to remove ink from the floor that either was from a
 23 messy operation, from a spill, from somebody knocking
 24 over anything that resulted in ink on the floor? You
 25 never heard of --

110

1 A. No. If you knock over a can, the ink isn't so
 2 viscous that it flows. It's just going to stay in the
 3 can and it's going to not go anywhere.
 4 And the stuff doesn't fly out of the press. If
 5 it's flying out of the press, you're going to have just
 6 crappy printing.
 7 Q. Now, the ink that you described, would that be
 8 true also with ink that was used for newspaper printing?
 9 A. Yeah.
 10 Q. Would that also be true for ink that was used
 11 on coated substrate?
 12 A. Yes.
 13 Q. It would be that viscous?
 14 A. That it would stay. It doesn't move around a
 15 lot. If you get into flexo printing, you have a very
 16 liquidy type of material, but that's not used in letter
 17 press or in litho. F-I-e-x-o, flexography.
 18 Q. So, to your knowledge, as you sit here today,
 19 there -- you can't recall of an instance where any ink
 20 was spilled on the floor during the operations of Solano
 21 Printers & Lithographers at the 622/630 Jackson Street
 22 location?
 23 A. No.
 24 Q. Is that something you would have been informed
 25 of in your capacity with Solano Printers &

111

1 Lithographers?
 2 A. No one would want to tell me if they were
 3 stupid enough to get ink on the floor because I think
 4 that's a bad practice.
 5 There would be ink occasionally on a press, but
 6 that's more of the operator being a little sloppy when
 7 he's putting ink up into the fountain.
 8 Q. Sure. And for --
 9 A. But no one's going to come and tell an owner
 10 that they've got ink all over the place.
 11 Q. Right. So do you know what methods were
 12 employed by anyone, Mr. Whalley or anyone else, at
 13 Solano Printers & Lithographers during their operations
 14 at 622/630 Jackson Street to remove ink from either the
 15 hand press or the automatic feed press? Do you know how
 16 they do that?
 17 A. Well, didn't I just explain how it's done?
 18 Q. No, I don't think so.
 19 A. Well, you asked me how you clean them up. That
 20 would be exactly the same way in which Mr. Whalley would
 21 have cleaned up the press.
 22 Q. Okay. So the operations that you --
 23 A. I described a knife into the fountain, get rid
 24 of the ink, solution onto the rollers to clean up the
 25 rollers, and in the case of a hand press, clean up the

112

1 platen.
 2 Q. Okay. Mr. Keilholtz, you're going to have to
 3 let me finish my question. You're going to drive this
 4 lady insane.
 5 A. I'm sorry. I'll apologize to you more than to
 6 him. You're the hard-working person here.
 7 Q. Now, setting aside the cleaning processes that
 8 we described for the presses, would you ever -- was
 9 there ever an occasion where they would clean the
 10 exterior of the press?
 11 A. Yeah.
 12 Q. Okay. And how was that done during the
 13 operations of Solano Printers & Lithographers during the
 14 time that they operated at 622/630 Jackson Street?
 15 A. With a rag and some solution on that, or
 16 solvent (indicating).
 17 Q. Okay.
 18 A. And I'm going through the motion. You can't
 19 see that on the record.
 20 Q. During the time that Solano Printers &
 21 Lithographers operated at 622/630 Jackson Street where
 22 were cleaning rags located?
 23 A. I have no idea.
 24 Q. Okay. Where were solvents stored?
 25 A. Well, it would have been in containers, but I

113

1 don't know -- on shelves.
 2 Q. Okay. And how big of containers were they in?
 3 A. Well, you know, small gallon size or -- the
 4 biggest, or maybe pint size, depending on the material.
 5 Q. And approximately where in the building were
 6 those gallon or pint size --
 7 A. Containers?
 8 Q. -- containers of solvent stored?
 9 A. I have no idea.
 10 Q. Okay. Do you know where any mops or cleaning
 11 materials were stored at 622/630 Jackson Street location
 12 during the time that Solano Printers & Lithographers
 13 operated at that location?
 14 A. Absolutely not.
 15 Q. And do you have any information with respect to
 16 any of the types of blanket washes, solvents, cleaners
 17 that were used at 622/630 Jackson Street during the time
 18 that Solano Printers & Lithographers operated there?
 19 A. No.
 20 Q. Do you know whether any product called Type
 21 Wash was ever used at the 622/630 Jackson Street
 22 location during the time that Solano Printers &
 23 Lithographers operated there?
 24 A. Type Wash was part of the entire letter press,
 25 hot metal process.

114

1 Q. Okay. And I'm not sure that -- and that was
 2 utilized during -- by Solano Printers & Lithographers at
 3 the 622/630 Jackson Street?
 4 A. It would have been.
 5 Q. Okay. And do you know if Solano Printers &
 6 Lithographers during the operations at the
 7 622/630 Jackson Street location used any Safety-Kleen
 8 parts washers?
 9 A. I don't know.
 10 Q. Are you familiar with a product called
 11 Safety-Kleen parts washer 105?
 12 A. No, I'm not familiar with that.
 13 Q. Are you familiar with any Safety-Kleen parts
 14 washers?
 15 A. I'm vaguely aware that Safety-Kleens exist.
 16 Q. How so?
 17 A. What do you mean "how so"?
 18 Q. How are you aware of it?
 19 A. I've seen them in different plants, I think.
 20 Q. Okay. Have you ever used any of those
 21 products?
 22 A. Perhaps my employees have, but I haven't.
 23 Q. Have you ever -- strike that.
 24 Do you know -- did you ever have any
 25 conversations with Mr. Whalley, with respect to his

115

1 operations for Solano Printers & Lithographers at the
 2 622/630 Jackson Street, did you ever have any
 3 conversations with him with respect to how he would
 4 remove ink, say from his clothes, that he inadvertently
 5 got on him during the printing processes?
 6 A. No.
 7 Q. Okay. Let me ask you: During the time that
 8 Solano Printers & Lithographers operated at the
 9 622/630 Jackson Street location, could you smoke in that
 10 place?
 11 A. Yeah.
 12 Q. Okay.
 13 A. In that day and age.
 14 Q. Right.
 15 A. I hope we can't be crucified for that.
 16 Everyone smoked then.
 17 Q. I smoke myself, sir. And I'm not -- that's not
 18 what I'm trying to get at. What I'm trying to get at is
 19 if Mr. Whalley wanted to light up a cigarette while he
 20 was --
 21 A. We --
 22 Q. Please let me finish.
 23 If Mr. Whalley wanted to light up a cigarette
 24 while he was working at the 622/630 Jackson Street
 25 location, he could?

116

1 A. Absolutely. We followed the standard practice
 2 of the time.
 3 Q. No safety concerns with respect to any of the
 4 chemicals, with respect to any cigarettes --
 5 A. None.
 6 Q. -- in the building?
 7 Do you have any knowledge as to how often
 8 chemicals were delivered to the 622/630 Jackson Street
 9 location during the time that Solano Printers &
 10 Lithographers operated at that location?
 11 A. No.
 12 Q. To the best of your knowledge, who would know
 13 that?
 14 A. Nobody that's alive. Whalley if he were alive.
 15 Q. Do you know of any of the suppliers that
 16 supplied any chemicals to Solano Printers &
 17 Lithographers during their operations at the
 18 622/630 Jackson Street location?
 19 A. I don't know.
 20 Q. Do you know if Van Waters & Rogers ever
 21 supplied any chemicals to Solano Printers &
 22 Lithographers during the time they operated at the
 23 622/630 Jackson Street?
 24 A. They're kind of a high priced product. I don't
 25 think they would have used that but --

117

1 Q. Same question with respect to Goss-Jewett?
 2 A. Goss?
 3 Q. Jewett?
 4 A. Jewett? That's web stuff, I think. I don't --
 5 we never used that.
 6 Q. And did Mr. Whalley, was it his responsibility
 7 to order those products?
 8 A. Yes.
 9 Q. Okay. Anyone else's?
 10 A. No.
 11 Q. Did he report to anyone with respect to
 12 invoices of those products or types of products he
 13 should -- well, strike that. Let me break them up.
 14 Did Mr. Whalley ever report to anyone to your
 15 knowledge with respect to invoices for chemicals that
 16 were used during Solano Printers & Lithographers'
 17 operations at 622 Jackson?
 18 A. The bills were paid by Cal Central Press, so
 19 any bill or invoice that looked unreasonable would be
 20 questioned by our Accounting Department.
 21 Q. Did you have any involvement in that --
 22 A. No.
 23 Q. -- questioning invoices?
 24 A. No, but I knew what was going on. We had
 25 limits as to how much somebody could buy, but that was

118

1 just a small business. It never reached the limits.
 2 Q. Do you have any knowledge as to how any
 3 solvents or cleaning products were delivered to Solano
 4 Lithographers during their operations at the
 5 622/630 Jackson Street property?
 6 A. By truck.
 7 Q. Okay. How do you know that?
 8 A. How else were they going to deliver it?
 9 Q. I don't know. That's why I'm asking you, sir.
 10 A. Well, I'm telling you, by truck.
 11 Q. Okay. And I'm asking you, how do you know
 12 that?
 13 A. Because there's no other way unless we -- the
 14 guy picked it up in his car.
 15 Q. That would be one way.
 16 A. And Whalley wouldn't have done that.
 17 Q. Okay. Why not?
 18 A. Because the suppliers, in the first place,
 19 would have either been in the Bay Area or here in
 20 Sacramento. So he would have had to have driven to pick
 21 them up and put them in his car.
 22 Q. And what suppliers are you referring to, within
 23 the Bay Area and Sacramento, that would supply products
 24 for use by Solano Printers & Lithographers during their
 25 operations at 622/630 Jackson Street?

119

1 A. Well, one of them was Cal Ink. There's a
 2 couple -- there's so many of them that have come and
 3 gone, and I can't remember any others than Cal Ink right
 4 now.
 5 Q. And that was located in the Bay Area or in
 6 Sacramento?
 7 A. Yeah, Bay Area. He had quarters in Berkeley.
 8 Q. Any other ones you recall in the Bay Area?
 9 A. No. I have to think about it. Smart Supply.
 10 They had a branch here. I don't know where their
 11 headquarters were.
 12 Q. Any others?
 13 A. No.
 14 Q. I'm sorry?
 15 A. No, I'd have to stop and think, and it would
 16 probably be -- I'd probably be able to recall after a
 17 while, but I'd have to give that some thought.
 18 Q. And if by the end of the day or by the end of
 19 our time together, if you recall any, if you'd give me
 20 that information, I'd appreciate it.
 21 A. Okay.
 22 Q. Do you recall any in Sacramento?
 23 A. Well, Cal Ink and the other one I mentioned
 24 both had branches here.
 25 Q. The Smart Supply?

120

1 A. Smart Supply.
 2 Q. Thank you.
 3 When this truck would come up to deliver
 4 chemicals for use by Solano Printers & Lithographers
 5 during their operations at the 622/630 Jackson Street
 6 property, did they drive up into the back, or did they
 7 drive up to the front, do you know?
 8 A. I have no idea.
 9 Q. Were any chemicals or supplies ever delivered
 10 to Solano Printers & Lithographers during their
 11 operations at 622/630 Jackson Street, were they ever
 12 delivered in 55-gallon drums?
 13 A. Boy, that would be a lot for them. I really
 14 doubt it, but I don't know.
 15 Q. Okay. You have no knowledge one way or the
 16 other?
 17 A. I have no direct knowledge.
 18 Q. We talked about rags that were utilized by
 19 Solano Printers & Lithographers in their operations of
 20 cleaning the presses at the 622/630 Jackson Street.
 21 Are you familiar with any other types of wipes
 22 that they would use at that location?
 23 A. There are wipes that I've seen in the industry,
 24 but they're for -- but they're not as good a cleanup
 25 method, and so we've never used them in any of our

121

1 operations.
 2 Q. Okay. Let me ask you: To your knowledge, the
 3 two presses that we've been talking about utilized by
 4 Solano Printers & Lithographers during their operations
 5 at the 622/630 Jackson Street property, did you only
 6 need one solvent to clean both of those presses, or did
 7 both of those presses -- sorry -- or did each of those
 8 presses require a different type of solvent for
 9 cleaning?
 10 A. I'm not sure. My speculation is it's the same.
 11 I mean, the process is the same. I can't imagine why
 12 we'd use different from my knowledge of the industry.
 13 But I really don't know what we did there.
 14 Q. Okay. Do you have any knowledge,
 15 Mr. Keilholtz, with respect to how ink was delivered to
 16 Solano Printers & Lithographers during their operations
 17 at 622/630 Jackson Street?
 18 A. By the same vendors as I mentioned before, and
 19 by truck.
 20 Q. Okay. And that would be Cal Ink and Smart
 21 Supply?
 22 A. Right.
 23 Q. Okay. And --
 24 A. And who else, I can't -- I mean, you know, I've
 25 dealt with dozens of these companies, and many of them

122

1 have gone out of business.
 2 Q. I understand.
 3 And the ink, that would be delivered, what, in
 4 55-gallon drums?
 5 A. No, no. Again, that would be an awful lot of
 6 ink. They probably got small containers of five to 10
 7 pounds.
 8 Q. And do you know -- and forgive me if I asked
 9 you this -- do you know where that was stored --
 10 A. I have no idea.
 11 Q. One second.
 12 Do you know where that was stored during Solano
 13 Printers & Lithographers' operations at the
 14 622/630 Jackson?
 15 A. No.
 16 Q. Okay. During Solano Printers & Lithographers'
 17 operations at the 622/630 Jackson, were you ever made
 18 aware of any solvent spills?
 19 A. No.
 20 Q. Were -- same question with respect to ink
 21 spills?
 22 A. No.
 23 Q. Okay. Have you ever heard the phrase "dipping
 24 ink out of a fountain"?
 25 A. Well, I haven't really heard it since you said

123

1 it, but I know exactly what it is.
 2 Q. What is it?
 3 A. Well, it's taking that spatula, whatever, that
 4 metal knife, and pulling it out, and that's part of the
 5 cleanup process, or maybe getting ready for another
 6 color to go in there.
 7 Q. Okay.
 8 A. But that's what I would interpret the comment.
 9 Q. And do you know if -- or strike that.
 10 When -- in the operations of Solano Printers &
 11 Lithographers at the 622/630 Jackson Street, when they
 12 dipped out the ink fountains, do you know how they
 13 disposed of that?
 14 A. That's what I mentioned, that you put into the
 15 old ink can, and if it's still usable and hasn't gotten
 16 too scummy, you might reuse it or you take the can and
 17 put it in the garbage.
 18 Q. Okay. That's what I -- thank you.
 19 Do you have any idea, Mr. Keilholtz, as to how
 20 much ink was used by Solano Printers & Lithographers
 21 during their operations at the 622/630 Jackson Street
 22 property?
 23 A. Well, I don't know if it would help, a revenue
 24 figure, but the ink runs in our industry a couple of
 25 percent of total revenues. And at the most, that

124

1 company did a 150 to 200,000 at its peak when it was
 2 down on Texas Street.
 3 So that would have been two to \$4,000 worth of
 4 ink a year. That's a pretty minimal amount.
 5 Q. Same question with respect to solvents?
 6 A. I'm not as aware of the solvent cost as I am --
 7 it gets buried and not reported in our ratio studies,
 8 nor in our financial statements. But I would say it's
 9 probably like a half of a percent.
 10 Q. Do you know if during their operations at
 11 622/630 Jackson Street whether Solano Printers &
 12 Lithographers ever did any film developing at that
 13 location?
 14 A. We don't think so. I don't -- remember, I said
 15 there's no prepress, and you can't do film developing
 16 unless you did prepress.
 17 Q. Right. I wanted to clarify that with you.
 18 A. And so it depends a little bit when we got into
 19 this check business. But I think that was after, again,
 20 after we moved.
 21 Q. How would it depend on when you got into the
 22 check business?
 23 A. Because we used a different process. We
 24 started to use a Multilith to print the checks, to
 25 encode the checks. We printed the masters in

125

1 Sacramento, the master form, and then would cut it down
 2 and send it down there, and would imprint for people
 3 like Wells Fargo, though as I remember, our major
 4 customer was really the Bank of California.
 5 I guess we did, we did Wells Fargo, we did one
 6 or two branches in Sacramento, and that's all. But we
 7 got a substantial block of business from the Bank of
 8 California, and that's one of the reasons we moved
 9 because we were anticipating getting that business.
 10 And I remember that, again, because that was
 11 the business we were trying to break into, so it was a
 12 major thrust.
 13 Q. The checking coding process or what -- is that
 14 what that is?
 15 A. Yeah, because that's when you first started to
 16 have the little number down there at the bottom.
 17 Q. Right.
 18 A. And it would be, you had to use a magnetic ink,
 19 a special ink, and that way it could be read when it
 20 went through the teller's -- the bank's machines.
 21 And that started at about the period in time
 22 when we moved. That was just getting going in the '60s
 23 to '70s, and it became a standard. Of course, it became
 24 more sophisticated now.
 25 But you got the code number always, and that

126

1 started at that period of time, and we were fairly early
 2 on in introducing that.
 3 Q. So as you sit here today, you don't have
 4 knowledge one way or the other whether Solano Printers &
 5 Lithographers conducted those types of operations at the
 6 622/630 Jackson Street property?
 7 A. I do not know for sure. I don't believe we
 8 did, but I have no way of verifying that.
 9 Q. Now, these mag- -- strike that.
 10 This encoding process for the bank checks that
 11 we've just been discussing, was it necessary to utilize
 12 a different printing press for those types of
 13 operations?
 14 A. We did it on like a Multilith that I learned to
 15 print on. A little small duplicator.
 16 Q. Okay. So if, in fact, those check encoding
 17 processes -- just assume for a second that they were
 18 occurring at the 622/630 Jackson Street property during
 19 Solano Printers & Lithographers' operations over there.
 20 They would have had to have an additional
 21 machine to conduct those processes; is that correct?
 22 A. Correct.
 23 Q. Okay. Other than the hand press and the
 24 automatic feed --
 25 A. Right.

127

1 Q. -- that you previously described?
 2 A. Yes.
 3 MR. NICKOVICH: Objection, assumes facts not in
 4 evidence.
 5 BY MR. GRAHAM:
 6 Q. Are you familiar with a company called
 7 Fairfield Printing Company?
 8 A. No.
 9 Q. "No"?
 10 What about Fairfield Printers?
 11 A. I have vague recollection of a Fairfield
 12 Printers & Lithographers, which I think we talked about
 13 when I was on the phone with you. And I was confused
 14 about the names of the two companies, Solano and
 15 Fairfield.
 16 Q. Now, to your knowledge, did Fairfield Printers
 17 & Lithographers, did they operate within Fairfield?
 18 A. I don't know.
 19 Q. Have you ever had any affiliation whatsoever
 20 with Fairfield Printers & Lithographers?
 21 A. I don't believe so.
 22 Q. Do you know if Cal Central Press ever had any
 23 affiliation whatsoever with Fairfield Printers &
 24 Lithographers?
 25 A. I don't believe so. We sold Fairfield Printers

128

1 & Lithographers -- Solano Printers & Lithographers, we
 2 sold it to Safeguard, which was a major corporation at
 3 the time, and at that time we got out of and closed the
 4 business.
 5 Q. And approximately what year was that?
 6 A. Sometime in the early '70s or late '60s, '68,
 7 to '71, '2.
 8 Q. So you're not -- let me ask you: Are you
 9 familiar with any other printing company that operated
 10 at this 622/630 Jackson location subsequent to the
 11 operations of Solano Printers & Lithographers?
 12 A. No, I'm not.
 13 Q. Okay. All right. When you all moved out of
 14 the 622/630 Jackson Street location, when Solano
 15 Printers & Lithographers moved out of there, where did
 16 those machines go?
 17 A. They would have moved to the new location.
 18 Q. At the Texas Street location?
 19 A. Yeah.
 20 Q. Okay. Do you specifically recall all of the
 21 machines moving to that location?
 22 A. I have no idea what we moved.
 23 Q. You couldn't sit here --
 24 A. I couldn't sit here and tell you.
 25 Q. Were you involved in any way in moving any of

129

1 the machines or supplies?
 2 A. No.
 3 Q. Do you know who was?
 4 A. No.
 5 Q. You don't have any names?
 6 A. No.
 7 Q. Inside the building at the 622/630 Jackson
 8 Street location, during the time that Solano Printers &
 9 Lithographers operated there, are you familiar with any
 10 cracks in the cement floors there?
 11 A. No.
 12 Q. Okay. Nothing stands out?
 13 A. Well, back up. I've never seen a cement floor
 14 that doesn't have a crack.
 15 Q. That's a better answer.
 16 Do you recall any specific places within the
 17 building that had cracks within the cement?
 18 A. No.
 19 Q. Okay. You recall that ever being a problem
 20 between Solano Printers & Lithographers and the
 21 landlord?
 22 A. No.
 23 MR. NICKOVICH: Objection, assumes facts not in
 24 evidence.
 25 MR. GRAHAM: I think our court reporter needs

130

1 to take a break. Let's take a break for about 10
 2 minutes. I have -- let's go off the record.
 3 (Recess taken.)
 4 BY MR. GRAHAM:
 5 Q. All right. We're back on.
 6 Mr. Keilholtz, you understand you're still
 7 under oath?
 8 A. I understand.
 9 Q. Okay. Let me ask you: During the operations
 10 of Solano Printers & Lithographers at the
 11 622/630 Jackson location, do you recall if there was
 12 ever a machinist employed to take care of those presses?
 13 A. No.
 14 Q. You don't recall or there was not one?
 15 A. Well, I don't recall, but a business that size
 16 would be crazy to hire a machinist.
 17 Q. Is it your belief that Mr. Whalley had the
 18 capability to perform the duties of a machinist with
 19 respect to the presses that were located at the
 20 622/630 Jackson Street location?
 21 A. That equipment -- the traditional equipment
 22 seldom broke down, and we did have a guy on staff at Cal
 23 Central that could have been available had we needed him
 24 to go to Fairfield.
 25 Q. Let me ask you, Mr. Keilholtz: Are you aware

131

1 as you sit here today whether or not there were ever any
 2 dry cleaning operations that took place at the
 3 622/630 Jackson Street property?
 4 A. Certainly not aware of any there, no.
 5 Q. And I mean within any time period?
 6 A. Within any time period. There would be no
 7 reason for me to know that.
 8 Q. Do you have any knowledge with respect to a
 9 business called Gillespie Cleaners?
 10 A. No.
 11 Q. Did you ever know a Mr. Bernard Gillespie?
 12 A. No.
 13 Q. Did you ever know Marcie Gillespie?
 14 A. No.
 15 Q. Macie Gillespie?
 16 A. No.
 17 Q. Do you know a man by the name of Russell
 18 Hoover?
 19 A. No.
 20 Q. Were you ever made aware of the fact that at
 21 some point in time there was an older building that was
 22 located behind the main building at the 622/630 Jackson
 23 Street location?
 24 MR. NICKOVICH: Objection, assumes facts not in
 25 evidence.

132

1 THE WITNESS: I don't remember what was back
 2 there.
 3 BY MR. GRAHAM:
 4 Q. Had you ever heard of an old building being
 5 torn down that was back behind the 622/630 Jackson
 6 Street property?
 7 A. Never heard of it.
 8 Q. Okay. Had you ever heard of a boiler explosion
 9 that took place over at the old Gillespie Cleaners that
 10 was located at the 622 through 630 Jackson Street
 11 location?
 12 A. Never.
 13 Q. Okay. It was big news in Fairfield. That's
 14 why I just --
 15 MR. NICKOVICH: I need to object. That assumes
 16 facts not in evidence.
 17 BY MR. GRAHAM:
 18 Q. Let me ask you, Mr. Keilholtz: Did you live in
 19 Fairfield at any point in time?
 20 A. No.
 21 Q. Okay. Did you ever subscribe to any Fairfield
 22 newspapers?
 23 A. No.
 24 Q. Do you know a Mr. Gerald Duensing?
 25 A. Joe Duensing? No.

133

1 Q. Gerald.
 2 A. Gerald Duensing?
 3 Q. Duensing.
 4 A. No.
 5 Q. Gerry Duensing?
 6 A. No.
 7 Q. Tom Turigliatto?
 8 A. No.
 9 Q. Do you know a man by the name of Ed Peabody?
 10 A. Yes.
 11 Q. And who is Ed Peabody?
 12 A. He was the fellow that I mentioned earlier that
 13 when we bought the building that the printing company
 14 moved to, he was a partner with Dave and I.
 15 Q. The printing -- the building that the printing
 16 company moved to, you're referring to --
 17 A. At Texas.
 18 Q. Okay. Thank you.
 19 MR. GRAHAM: With that, Mr. Keilholtz, I'm
 20 going to pass the baton. I might have some more
 21 follow-up questions based upon what other attorneys ask
 22 you; I may not.
 23 I'll review my notes, see what I have. If I
 24 have anything, it'll be minimal. And thank you for
 25 showing up today. I appreciate it.

134

1 THE WITNESS: Sure.
 2 MR. PRICE: No questions at this time.
 3 MS. McADAM: You want to go next or me?
 4 MR. NICKOVICH: No, go ahead.
 5 MS. McADAM: Okay.
 6 EXAMINATION
 7 BY MS. McADAM:
 8 Q. Hi, Mr. Keilholtz. I'm Allison McAdam, and I
 9 represent Jewel Hirsch in this matter. I just have a
 10 couple of questions for you. Several are follow-up, and
 11 several might be new subject matter.
 12 I just wanted to find out, first: Do you have
 13 any personal knowledge of any dry cleaning operations in
 14 downtown Fairfield?
 15 A. No.
 16 Q. Would Cal Central have maintained insurance
 17 policies that may have covered the operations of Solano
 18 Printing & lithography?
 19 A. Yes, we would have had insurance.
 20 Q. During the time it operated at the 622 --
 21 A. Right.
 22 Q. -- 630 property, Jackson Street property?
 23 A. We always insured everything.
 24 Q. Where would those policies have been
 25 maintained?

135

1 A. Well, probably a copy with the insurer, the
 2 insurance company, and probably we had copies in the
 3 main plant.
 4 Q. Is there someone who may still have those
 5 copies?
 6 A. No. You're talking 45 years ago.
 7 Q. I understand. Sometimes insurance policies
 8 have a way of showing up years later, so I'm just
 9 wondering if there's anywhere that those policies may
 10 still be stored.
 11 A. I'm sure that in the transition that I
 12 mentioned earlier, all materials relevant to the history
 13 of the company got taken -- dumped.
 14 And the people that probably carried the
 15 insurance, they're out of business, so I doubt they have
 16 the records.
 17 Q. That was going to be my next question.
 18 Is there an employee from Cal Central that
 19 would know which insurers those policies may have been
 20 placed with? Or do you recall which insurers?
 21 A. No, it would have been -- can't think of her
 22 first name -- Abrew was the person that was
 23 responsible -- Abrew, A-b-r-e-w, can't think of the
 24 first name, it'll come back to me, and she's dead.
 25 Q. Abrew was an employee of Cal Central?

136

1 A. Yeah, she was our office manager. And she
 2 would have seen records and kept records, and she kept
 3 everything in a pile some place. She was always one of
 4 those miracle workers that would go, "Here it is."
 5 Q. Did Abrew have an assistant or a subordinate?
 6 A. We had a staff, so she was the one in charge of
 7 the staff of about three people.
 8 Q. Do you recall any of the other staff names?
 9 A. No. Dorothy Adams, and she's dead.
 10 Q. Anyone else?
 11 A. (Witness shook head.)
 12 Q. And none of the insurance companies' names jump
 13 to mind as someone that you routinely placed insurance
 14 with at Cal Central?
 15 A. Sacramento Valley Insurance Company I believe
 16 was the company, and that's what I was trying to think.
 17 And we knew the two principals, and I can't think of
 18 their name, but they did the insurance stuff.
 19 Q. And you think that would have been during the
 20 time period we've been discussing, the mid 1960s when
 21 Solano --
 22 A. Yeah, I suspect --
 23 Q. -- Solano Printing & Lithography was in
 24 operation at the 622/630 Jackson Street property?
 25 A. Right. That would -- I'm sure would be the

137

1 people that would have had the insurance.
 2 Q. And I may have missed your response --
 3 A. Pauline Abrew, by the way, was the name of the
 4 woman that was my office manager.
 5 Q. I'm sorry?
 6 A. Pauline Abrew.
 7 Q. Pauline? And you understand she's deceased?
 8 A. Well, you know, she might still be alive
 9 somewhere, but she's pretty old if she is.
 10 Q. Do you recall where Ms. Abrew resided?
 11 A. The last place she was living was in
 12 La Riviera, there's some condos that she lived in. But
 13 I haven't seen her for probably 15 or 20 years.
 14 Q. Is that in Sacramento?
 15 A. That's in Sacramento, excuse me, yes, yes.
 16 La Riviera is in Sacramento. That's where she lived.
 17 Q. And I may have missed your response, but who
 18 owned the 622/630 Jackson Street property at the time
 19 that you were operating --
 20 A. Yeah, I don't know --
 21 Q. -- the business there?
 22 You don't recall?
 23 A. I don't recall.
 24 Q. Do you recall if Mr. Whalley had any family
 25 members, relatives work with him at the printing shop on

138

1 622/630 Jackson Street?
 2 A. No, but we kind of talked about that. I have a
 3 vague recollection that after we sold the company to
 4 Safeguard, that Whalley and his son got involved in a
 5 print shop that might have been that Fairfield thing
 6 that came up earlier.
 7 Q. Does the name Robert Whalley ring a bell?
 8 A. There were two Whalleys. Robert I think was
 9 the one son that might have been doing printing with
 10 him. The other son was working here in Sacramento as an
 11 electrician and had a really good job. I'm sure he
 12 never did, but I can't think of his first name.
 13 But Robert does ring a bell. They could have
 14 for a brief period of time run a printing business.
 15 Q. Do you recall Robert ever working at Solano
 16 Printing & Lithography at the time?
 17 A. No, I don't. I'm almost sure he didn't.
 18 Q. And then just to clarify, you do recall that
 19 solvents were used during the operations at
 20 622/630 Jackson Street during the time Solano Printers &
 21 Lithography operated there; is that correct?
 22 A. That's right.
 23 MR. FARRELL: Objection, that's a leading
 24 question, that assumes facts not in evidence, misstates
 25 prior testimony.

139

1 BY MS. McADAM:
 2 Q. Okay. Well, let's go back.
 3 Do you recall whether solvents were used during
 4 the operations of Solano Printing & Lithography during
 5 the operations at the 622/630 Jackson Street property?
 6 A. And I'll phrase it this way. I don't really
 7 recall if they were used, but it would be impossible to
 8 run a print shop without using some.
 9 Q. Based on your understanding --
 10 A. Of the printing industry.
 11 Q. -- and your years of experience in the printing
 12 industry, it's your understanding that solvents would
 13 have been used --
 14 A. Correct.
 15 Q. -- during the operations of Solano Printing --
 16 Printers & Lithography at the 622/630 Jackson Street
 17 property?
 18 A. Correct.
 19 MS. McADAM: All right. Thank you very much,
 20 Mr. Keilholtz.
 21 MR. NICKOVICH: Bob, do you want to go, or do
 22 you want me to go?
 23 MR. FARRELL: Go ahead.
 24 - - -
 25 EXAMINATION

140

1 BY MR. NICKOVICH:
 2 Q. Hi, Mr. Keilholtz. I just have a few more
 3 questions for you.
 4 We've been talking about the 622/630 property.
 5 And you recall that there was a movie theater in part of
 6 that property, correct?
 7 A. Yes.
 8 Q. Do you recall if that was considered
 9 630 Jackson Street?
 10 A. I have no idea what the address was. I just
 11 know it faced on Texas Street.
 12 Q. Okay. Thank you.
 13 Now, you recall that you believe a letter press
 14 and an automatic press were used at 622 Jackson Street,
 15 Solano Printers & Lithographers.
 16 You base that assumption, I believe, on the
 17 fact that you wouldn't have bought the print shop if it
 18 didn't have those --
 19 A. Right.
 20 Q. -- equipment, correct?
 21 Do you have firsthand knowledge that those
 22 pieces of equipment existed there?
 23 A. No.
 24 Q. Okay. Thank you.
 25 Now, I want to zero in on the amount of time

141

1 that Solano Printers & Lithographers operated at
 2 622 Jackson Street.
 3 It's my understanding, based on your testimony,
 4 and please correct me if I'm wrong, that Solano Printers
 5 & Lithographers operated at 620 Jackson Street for a
 6 maximum of one and a half years; is that correct?
 7 A. That's my recollection.
 8 Q. And it could have been as little as 12 months;
 9 is that correct?
 10 A. Could have been.
 11 Q. Okay. Thank you.
 12 MR. GRAHAM: Counsel, you said "620 Jackson."
 13 MR. NICKOVICH: I meant 622. Thank you.
 14 Q. I want to talk about the size of Solano
 15 Printers & Lithographers that operated at 622 Jackson
 16 Street for one year to one and a half years.
 17 Do you know precisely how many employees
 18 operated at that facility during that time period?
 19 A. Best of my recollection, between two and three
 20 people.
 21 Q. Okay.
 22 A. Including Whalley.
 23 Q. Could it have been less?
 24 A. It could have been less.
 25 Q. Could it have been one person?

142

1 A. It could have been one person.
 2 Q. Okay. So for that entire one-year to
 3 one-and-a-half-year time period that Solano Printers &
 4 Lithographers operated at 622 Jackson Street, is it
 5 possible that it was just a one-person print shop?
 6 A. It is possible.
 7 Q. Thank you.
 8 Now, I want to talk about an answer you gave to
 9 one of Mr. Graham's questions regarding the fact that
 10 Type Wash could have been used at Solano Printers &
 11 Lithographers.
 12 Do you have any firsthand knowledge that Type
 13 Wash was used at Solano Printers & Lithographers?
 14 A. No.
 15 Q. Okay. Thank you.
 16 Now, Mr. Graham asked you about the amount of
 17 ink used every year at Solano Printers & Lithographers,
 18 which operated at 622 Jackson Street, and he also asked
 19 you about the amount of solvents. I'm going to take ink
 20 first.
 21 I believe you speculated based on a calculation
 22 that ink was 1 percent to 2 percent of revenue that at
 23 its peak it could have been two to \$4,000 a year in ink;
 24 is that correct?
 25 A. Correct.

143

1 Q. What's the minimum amount conceivably that
 2 could have been spent on ink at that facility during the
 3 year to year and a half that Solano Printers &
 4 Lithographers operated at 622 Jackson Street?
 5 A. \$500.
 6 Q. Thank you.
 7 And you made a similar calculation regarding
 8 the amount of money that would have been spent on
 9 solvents for Solano Printers & Lithographers' operations
 10 at the 622 Jackson Street for one to one and a half
 11 years.
 12 And if I recall, that was based on an
 13 assumption that was at least half or less of a percent
 14 of the amount spent on ink; is that correct?
 15 A. Right.
 16 Q. Okay. What is the minimum amount that could
 17 have been spent on an annual basis on solvents for
 18 Solano Printers & Lithographers at 622 Jackson Street?
 19 MR. GRAHAM: Objection, vague and ambiguous,
 20 calls for speculation.
 21 MR. NICKOVICH: Let me ask again.
 22 THE WITNESS: We -- we could have used as
 23 little as 500 in ink, we probably would have used
 24 somewhere around 50 in solvents, \$50. Would be very
 25 minimal.

144

1 BY MR. NICKOVICH:
 2 Q. That's on an annual basis?
 3 A. Yes.
 4 Q. Okay. So based on your testimony that Solano
 5 Printers & Lithographers may have operated for as little
 6 as one year at 622 Jackson Street, it's possible that
 7 the grand total of dollars and cents spent on solvents
 8 for that facility was \$50?
 9 MR. GRAHAM: Objection, vague and ambiguous,
 10 misstates testimony, incomplete hypothetical, and lacks
 11 foundation.
 12 THE WITNESS: Yes, it's possible.
 13 BY MR. NICKOVICH:
 14 Q. What is the least amount of money possible that
 15 Solano Printers & Lithographers spent on solvents during
 16 the time it operated at 622 Jackson Street?
 17 MR. GRAHAM: Objection, vague and ambiguous,
 18 calls for speculation.
 19 THE WITNESS: Well, speculation, if they didn't
 20 clean things up, they could have gotten by with spending
 21 nothing.
 22 BY MR. NICKOVICH:
 23 Q. So it's possible that they didn't spend any
 24 money on solvents; is that correct?
 25 A. It's possible, on solvents.

145

1 Q. Thank you.
 2 And you yourself have no personal knowledge
 3 about any of the solvents that were used at 622 Jackson
 4 Street --
 5 MR. GRAHAM: Vague and ambiguous.
 6 BY MR. NICKOVICH:
 7 Q. -- during Solano Printers & Lithographers'
 8 operations; is that correct?
 9 MR. GRAHAM: Same objection.
 10 THE WITNESS: Correct.
 11 BY MR. NICKOVICH:
 12 Q. Okay. Thank you.
 13 I'm going to shift for one second to the
 14 question about, when Solano Printers & Lithographers
 15 moved to Texas Street, do you know how long they
 16 operated at Texas Street?
 17 A. I don't really remember that. I've got a
 18 really poor recollection, but I suppose three to four
 19 years.
 20 Q. Okay. So is it fair to say at least twice as
 21 long as they operated at 622 Jackson Street?
 22 A. That's fair.
 23 Q. Okay. So it's fair to say that Solano Printers
 24 & Lithographers operated at least twice as long on Texas
 25 Street as they operated at 622 Jackson Street; is that

146

1 correct?
 2 A. Yes.
 3 Q. Thank you.
 4 I just want to follow up with a few more
 5 questions, and this will probably be all I have.
 6 Again, your testimony is that you have no
 7 knowledge that Solano Printers & Lithographers ever used
 8 any solvents when they operated at 622 Sol- -- Jackson
 9 Street; is that correct?
 10 MR. GRAHAM: Objection, vague and ambiguous,
 11 calls for speculation.
 12 BY MR. NICKOVICH:
 13 Q. And you have no knowledge that Solano Printers
 14 & Lithographers ever used any chlorinated solvents when
 15 they operated at 622 Jackson Street; is that correct?
 16 A. Right.
 17 MR. GRAHAM: Objection, vague and ambiguous,
 18 calls for speculation.
 19 Mr. Keilholtz, if you'd give me one second to
 20 get my objections on record, sir.
 21 THE REPORTER: And I did not get an answer to
 22 the one before --
 23 MR. NICKOVICH: Okay. We'll do it again.
 24 THE REPORTER: -- because I realize you went on
 25 to another question, so --

147

1 MR. NICKOVICH: Okay.
 2 THE REPORTER: He said it, but he didn't say it
 3 to me, and I was trying to get everybody. Do you want
 4 me to tell you which one?
 5 MR. NICKOVICH: Yeah, let's -- let's start
 6 where --
 7 THE REPORTER: I just want to be fair because I
 8 didn't lose it, I just didn't hear him. Hold on.
 9 (Whereupon the reporter read back the following
 10 testimony:
 11 "Q. Again, your testimony is that
 12 you have no knowledge that Solano
 13 Printers & Lithographers ever used any
 14 solvents when they operated at
 15 622 Sol- -- Jackson Street; is that
 16 correct?
 17 "MR. GRAHAM: Objection, vague and
 18 ambiguous, calls for speculation.")
 19 THE REPORTER: But he may have answered
 20 something because you went on to a new question.
 21 MR. NICKOVICH: Okay.
 22 THE WITNESS: And my answer was "correct."
 23 THE REPORTER: I didn't hear it. Thanks.
 24 MR. NICKOVICH: Let me start from the
 25 beginning.

148

1 THE REPORTER: Just ask that one again.
 2 Thanks.
 3 BY MR. NICKOVICH:
 4 Q. Do you recall from your firsthand knowledge
 5 whether or not any solvents were used by Solano Printers
 6 & Lithographers when they separated at 622 Jackson
 7 Street?
 8 MR. GRAHAM: Objection, vague and ambiguous,
 9 calls for speculation.
 10 THE WITNESS: And I don't recall.
 11 BY MR. NICKOVICH:
 12 Q. Thank you.
 13 Do you recall if any chlorinated solvents were
 14 used by Solano Printers & Lithographers when they
 15 operated at 622 Jackson Street?
 16 MR. GRAHAM: Vague and ambiguous.
 17 THE WITNESS: And I don't recall.
 18 BY MR. NICKOVICH:
 19 Q. Do you recall if perchloroethylene was ever
 20 used by Solano Printers & Lithographers when they
 21 separated at 622 Jackson Street?
 22 MR. GRAHAM: Vague and ambiguous.
 23 THE WITNESS: And I don't recall.
 24 BY MR. NICKOVICH:
 25 Q. Do you recall if tetrachloroethylene was ever

149

1 used by Solano Printers & Lithographers when they
 2 separated at 622 Jackson Street?
 3 MR. GRAHAM: Vague and ambiguous.
 4 THE WITNESS: I don't recall.
 5 BY MR. NICKOVICH:
 6 Q. Okay. Do you recall if trichloroethylene was
 7 ever used by Solano Printers & Lithographers when they
 8 operated at 622 Jackson Street?
 9 MR. GRAHAM: Vague and ambiguous.
 10 THE WITNESS: And I don't recall.
 11 MR. NICKOVICH: Thank you. That's all I
 12 have.
 13 EXAMINATION
 14 BY MR. FARRELL:
 15 Q. Mr. Keilholtz, very quickly, Robert Farrell. I
 16 represent the Ragle and Tomasini defendants.
 17 Do you know Mr. Richard Ragle? Did you ever
 18 meet him?
 19 A. No.
 20 Q. What about George Tomasini?
 21 A. No.
 22 Q. Are you familiar at all with a dry cleaner that
 23 was formerly operated at 712 Madison Street in downtown
 24 Fairfield?
 25 A. No.

150

1 Q. Do you ever recall visiting a dry cleaner at
 2 that location?
 3 A. No.
 4 MR. FARRELL: Thank you, sir. That's all I
 5 have.
 6 FURTHER EXAMINATION
 7 BY MR. GRAHAM:
 8 Q. Mr. Keilholtz, a couple more questions.
 9 In your experience with printing shop
 10 operations, are you familiar with any printing shop that
 11 conducted letter press printing for the time period of a
 12 year to year and a half where they spent no money on
 13 solvents?
 14 MR. NICKOVICH: Objection, calls for
 15 speculation, asked and answered.
 16 THE WITNESS: If --
 17 BY MR. GRAHAM:
 18 Q. Can you give me one example?
 19 A. Well, I can't name a company, but if somebody
 20 were really messy and dirty or they had very little
 21 work, they could really be in business and not use any
 22 solvents.
 23 I wouldn't recommend that as a company I'd
 24 would want to do business with because they wouldn't be
 25 doing good printing, but people sometimes do strange

151

1 things.
 2 Q. Sure.
 3 And would you make that -- such a
 4 recommendation to anyone that operated Solano Printers &
 5 Lithographers during the time that you were involved in
 6 with that company?
 7 A. I wouldn't recommend it, but on the other hand,
 8 it's the kind of thing that would have fallen beneath my
 9 sights, and I probably wouldn't have realized what they
 10 were doing.
 11 Q. So you have no knowledge one way or another how
 12 much money was spent on solvents during the operations
 13 of Solano Printers & Lithographers at the
 14 622/630 Jackson Street?
 15 A. No.
 16 MR. NICKOVICH: Objection, asked and
 17 answered.
 18 BY MR. GRAHAM:
 19 Q. And so when you're saying it's possible that no
 20 money was spent on solvents, you're just speculating as
 21 to that, correct?
 22 MR. NICKOVICH: Objection, asked and
 23 answered.
 24 THE WITNESS: I am speculating.
 25 MR. GRAHAM: Okay. That's all I have for you,

152

1 sir.
 2 THE WITNESS: Okay. Am I done?
 3 MR. GRAHAM: I think you are, unless these
 4 folks have more.
 5 (The deposition was concluded at 1:31 p.m.)
 6 --o0o--
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

153

1 Pursuant to Section 2025 (q) (1) of the code of
 2 Civil Procedure of the State of California, I hereby
 3 certify that I have read my deposition transcript, pages
 4 7 - 152, made those changes and corrections that I deem
 5 necessary, and approve the same as now true and correct.
 6
 7 Dated this _____ day of _____, 2011.
 8
 9
 10
 11
 12
 13 _____
 14 SCOTT KEILHOLTZ
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 I, ANTONIA SEVERSON, a licensed Certified
 2 Shorthand Reporter, duly qualified and certified as such
 3 by the State of California, do hereby certify: That
 4 prior to being examined, the witness named in the
 5 foregoing deposition was by me duly sworn to testify to
 6 the truth, the whole truth, and nothing but the truth;

7 That the said deposition was by me recorded
 8 stenographically at the time and place herein mentioned,
 9 and the foregoing pages constitute a full, true, complete
 10 and correct record of the testimony given by the said
 11 witness;

12 That I am a disinterested person, not being in
 13 any way interested in the outcome of said action, nor
 14 connected with, nor related to any of the parties in said
 15 action, or to their counsel, in any manner whatsoever.

16
 17 Dated this 9th day of November, 2011.

18
 19
 20
 21 _____
 ANTONIA SEVERSON, CSR NO. 3430
 CERTIFIED SHORTHAND REPORTER

22
 23
 24
 25

1 Delta Deposition Reporting
 P.O. Box 7312
 2 Stockton, California 95267
 Phone: (209) 477-0837 (888) 477-0856
 3 Fax: (209) 477-0856

4
 5
 6 Case Name: MICHAEL McINNIS and ROBERT DITTMER vs.
 JEWEL HIRSCH, etc., et al.
 7 Case No: FCS033636
 Date of Deposition: NOVEMBER 3, 2011
 8 Deponent: SCOTT KEILHOLTZ

9
 10 The Original transcript of this deposition was
 available in this office during business hours on
 11 business days for a period of 40 calendar days, and that
 all counsel and deponent were given written notice, in
 12 which the following occurred:

13
 14 The witness and parties waived examination
 and reading of the deposition.

15
 16 The witness corrected, approved or refused
 to approve the deposition by letter to
 17 this office, hereunto attached.

18
 19 The witness appeared in this office,
 corrected and signed the deposition
 as indicated herein.

20
 21 The witness refused to sign the
 deposition.

22
 23 The witness failed to appear at this
 office.

24
 25 Date: _____

1 November 9, 2011
 2
 3 SCOTT KEILHOLTZ
 427 Anchor Lane, #102
 West Sacramento, CA 95605

4
 5 Re: MICHAEL McINNIS and ROBERT DITTMER vs.
 JEWEL HIRSCH, etc., et al.
 6 Case No. FCS033636

7 Dear Mr. Keilholtz,

8
 9 The transcript of your deposition taken on
 Thursday, November 3, 2011, is now available at this
 10 office for your review, correction (if necessary) and
 signature. A copy of your deposition has been forwarded
 to counsel.

11 If you have any questions about reading or
 signing your deposition, you may wish to discuss with
 12 counsel whether it is desirable for you to review,
 correct, and sign the transcript before it is filed with
 13 the court.

14 You have thirty days from the date of this
 letter within which to review the transcript. If you so
 wish to review it, please call this office to arrange
 15 for an appointment.

16
 17
 18 Very truly yours,
 19
 20 Casie Takhar-Hidalgo
 Office Manager
 Delta Deposition

21 cc - all counsel
 22
 23
 24
 25

A				
ability 11:4 79:8	agency 38:24 39:2 50:11 51:13	Anshin 54:10	87:24 118:19,23 119:5,7,8	attorney 2:6,11,17 3:5,24 4:7 46:7,8
able 93:1 119:16	ago 16:25 45:11 46:15 50:21 76:16	answer 9:15 53:1 53:16,17 76:18	areas 11:12 45:14	attorneys 2:24 3:13 4:23 53:14 54:6 54:12 133:21
Abrew 135:22,23 135:25 136:5 137:3,6,10	agreeable 9:17	answered 72:14 147:19 150:15 151:17,23	arising 50:22	audit 43:21
absolutely 46:24 67:6 74:14 113:14 116:1	agreement 84:16	answers 9:19 10:5 10:21	Army 21:5,11	authors 56:7
absorbed 106:14 106:16	ahead 33:2 42:2 134:4 139:23	anticipating 125:9	ARNOLD 3:10	automated 95:18
absorption 30:21	air 51:9	Antonia 1:25 5:9 7:4 154:1,21	arrange 155:14	automatic 95:25 96:8,17,20,21,22 96:23,25 98:18 107:17 109:1 111:15 126:24 140:14
abutted 62:3	al 50:15 155:5 156:6	anybody 49:19 57:1	arrangement 81:2	automatically 95:19
access 44:14 63:5	alcohol 11:3 19:14	anymore 34:12 45:2	Articles 6:15 74:4 74:25	available 55:4 130:23 155:9 156:10
accommodate 10:9	alcohol-based 106:2	anyway 44:15	ascertained 97:5	Avenue 2:22
Accounting 117:20	Alice 1:11,12	apologize 112:5	aside 105:7,12 112:7	aware 19:1,3 28:16 46:20,21 48:7,24 50:4,9 61:23 66:12 81:6 83:5 83:15,18 92:2 100:14 104:12 114:15,18 122:18 124:6 130:25 131:4,20
acquisition 38:9 39:13	alive 60:22,24,25 95:8 116:14,14 137:8	appear 74:24 156:23	asked 72:14 83:21 94:19 100:6 111:19 122:8 142:16,18 150:15 151:16,22	awful 109:18 122:5
acquisitions 12:16 12:18	allegations 50:10	appearance 6:12 42:14	asking 40:5 55:19 66:20 86:15 118:9 118:11	awhile 86:3
action 154:13,15	alleged 50:12	appeared 7:6 156:18	ASSAD 1:13,13 2:20,20	A-b-r-e-w 135:23
Adams 136:9	alley 62:17,20	appears 75:2	assistant 136:5	a.m 7:3
adding 29:20	Allison 2:11 134:8	APPLEBY-STE... 4:14	associated 78:14	
additional 13:22 35:11 47:20 59:14 126:20	allusion 56:19	APPLY 34:14	ASSOCIATES 3:21	
address 63:20 86:8 140:10	All's 67:1	appointment 155:15	assortment 43:15	
adhere 25:22 27:23 33:22	Alto 15:25 16:2	appreciate 119:20 133:25	assume 65:3 75:3 84:20,20 103:4 126:17	
adjacent 61:24 62:17 100:15	amazed 83:25 84:2	appropriate 26:17	assumes 127:3 129:23 131:24 132:15 138:24	
ads 23:18	ambiguous 143:19 144:9,17 145:5 146:10,17 147:18 148:8,16,22 149:3 149:9	approve 153:5 156:16	assuming 58:12 66:15 75:12,23 77:14 78:24	
advertising 23:17 23:19	America 93:4	approved 156:16	assumption 105:12 140:16 143:13	
advice 12:19 65:5	American 15:3,4,6 43:14 44:3,7,17	approximately 31:20 39:20 41:24 46:15 63:11 67:22 68:21 82:1 96:23 113:5 128:5	attached 156:17	
Aerojet 23:12,15 35:13	amount 19:14 35:14 124:4 140:25 142:16,19 143:1,8,14,16 144:14	arabic 35:3	attend 15:10 20:16 20:18,19,22	
affect 10:23	Anchor 155:3	area 30:6 62:8 63:2	attention 27:14 68:6 70:25 71:19 71:24 74:7	
affiliated 79:19	Annette 74:22		ATTIEH 1:13 2:20	
affiliation 127:19 127:23	announcements 59:17			
afford 49:13	annual 143:17 144:2			
afterburners 50:17				
age 115:13				
agencies 50:10				

B

B 4:7 6:9
back 8:20 20:7
25:18 26:3,15
29:9 32:7,10 34:4
34:14 35:16 36:4
36:25 37:10 43:16
62:19,22,23 63:5
70:7,9 85:15 87:5
87:8 88:1,6 91:16
95:4 102:20 104:2
120:6 129:13

<p>130:5 132:1,5 135:24 139:2 147:9 bad 111:4 Baker 74:10,13 bank 75:7,11,13,15 75:23 76:1 91:22 91:24 125:4,7 126:10 bankrupt 95:8 bank's 91:12 125:20 base 140:16 based 13:14 64:2 66:19 95:22 108:12 133:21 139:9 141:3 142:21 143:12 144:4 basic 9:6 35:12,25 basically 22:25 basis 105:8 143:17 144:2 Bates 71:5,17 bathroom 101:21 baton 133:20 Bay 118:19,23 119:5,7,8 Bear 97:2 beautiful 92:25 bed 101:13 Bedingfield 1:11 1:12 beg 16:16 97:2 began 77:2,3,4,11 78:5 79:2,3 101:6 beginning 16:24 53:7 147:25 belief 130:17 believe 8:3,6 32:4 39:6 41:8 44:17 47:18 59:16 65:17 66:3 77:15 87:18 94:7,9,23 95:23 102:13 104:25 126:7 127:21,25</p>	<p>136:15 140:13,16 142:21 believed 95:11 bell 82:22,23 138:7 138:13 beneath 151:8 Berkeley 119:7 Bernard 131:11 best 11:4 16:7 17:3 17:4 40:15,16 51:20 64:24 67:2 67:8 79:7 116:12 141:19 better 14:1,2 93:2,2 129:15 Bible 92:24 big 86:1 92:2,3 113:2 132:13 bigger 34:14,16 92:3 biggest 113:4 bill 117:19 bills 117:18 bindery 17:18 21:25 37:11 birth 11:20 BISGAARD 2:15 bit 11:9 47:16 70:14 76:11 99:13 105:23 124:18 bits 27:23 black 35:24 91:2 blanket 27:18,20 27:22,23 28:1,4,7 28:15 33:3 98:2,2 98:4 99:4,7 113:16 blanket-to-blanket 97:12,17 blended 47:22,23 blends 47:17 block 125:7 board 50:13 Bob 139:21 boiler 132:8 bold 42:23</p>	<p>bolted 101:19 book 80:21 books 12:25 13:1 Booth 74:15 bottom 42:19 71:16 98:5 125:16 bought 41:8,9,23 43:14,25 58:13,18 64:13,16,25 66:17 67:24 68:8 77:18 89:8 133:13 140:17 Boulevard 2:10 3:17 4:5 Box 3:18 156:1 boy 55:7 120:13 branch 21:4 119:10 branches 119:24 125:6 brand 26:10,11,13 94:21,23 99:23 brands 27:12 28:12 94:3,14 break 8:16 10:8,9 10:13 11:12 25:25 26:4 51:18,23,24 52:2 70:6,7,11,13 117:13 125:11 130:1,1 Brentwood 3:17,18 brief 138:14 briefly 8:16 11:12 bring 11:6 77:18 BRISBOIS 2:15 broke 130:22 brother-in-law 25:25 brought 44:23 77:22 buckets 106:13 building 62:2,12,15 62:17,23,24 63:20 65:20 75:13,15 76:1 99:25 100:4 101:8,21 102:6,8 102:11 113:5</p>	<p>116:6 129:7,17 131:21,22 132:4 133:13,15 buildings 45:18 100:15 built 65:20 buried 124:7 burn 34:1 Bush 3:11 business 1:8 12:2,6 16:1 45:14 48:14 57:20 59:20 60:1 60:4,6 61:15 67:14 77:23 84:21 90:22 92:3 109:19 118:1 122:1 124:19,22 125:7,9 125:11 128:4 130:15 131:9 135:15 137:21 138:14 150:21,24 156:10,11 businesses 45:9 BUSTAMANTE 4:21 BUTLER 4:19,20 butted 44:3 button 35:20 buy 13:22 14:1,2 78:25 117:25</p>	<p>69:21,25 75:9 89:12 117:18 119:1,3,23 121:20 127:22 130:22 134:16 135:18,25 136:14 calculation 142:21 143:7 calendar 156:11 California 1:1,23 3:23 7:4,6 49:12 50:14 81:1 91:24 125:4,8 153:2 154:3 156:2 call 25:10,12 26:12 33:13 37:4 46:17 46:17 55:16,17 59:14 60:5 69:15 71:7 80:23 86:20 155:14 called 7:8 19:6 23:25 29:7 37:8 44:24 46:18 67:14 68:10 81:1 113:20 114:10 127:6 131:9 calling 62:7 calls 143:20 144:18 146:11,18 147:18 148:9 150:14 camera 33:20 35:16,17 37:11 cans 103:15 capability 61:2 130:18 capacity 7:24 51:11 110:25 car 118:14,21 cards 72:1,23 90:10 care 102:5,7 105:5 130:12 Carlos 4:21 carried 106:4 135:14 case 1:6 7:16 49:11 53:24 56:24 57:2</p>
--	--	---	---	--

<p>68:9 81:1,2 99:12 102:1,4 104:22 107:25 111:25 155:6 156:6,7 cases 78:19 80:14 80:15,18 Casie 155:20 cast 80:23 categories 43:4,9 categorize 25:13 CATHERINE 3:9 causing 66:24 98:6 caution 10:20 cc 155:22 ceased 79:10 ceiling 100:10 cement 101:8,9,10 101:11,12 129:10 129:13,17 Central 8:21 14:13 14:24 15:5 36:18 36:21 38:6,10,10 38:15,24 39:1,5 39:13,15 41:2,4,7 41:10 43:12,14 63:24,25 65:12 67:25 68:1 69:21 69:25 75:9 89:12 117:18 127:22 130:23 134:16 135:18,25 136:14 cents 144:7 certainly 17:22 28:8 67:12 72:12 74:2 92:2 131:4 certified 154:1,2,21 certify 153:3 154:3 chain 89:23 Chandler 95:3 change 10:20,21 22:13 31:23 33:7 33:10 37:3 39:12 39:17,24 40:18 100:25 101:2 108:14 changed 23:23</p>	<p>24:15 25:6 31:19 33:19 37:14 63:25 77:23 changes 10:18,23 82:25 83:1 153:4 changing 99:10 characteristics 92:20,22 charge 85:13 88:15 136:6 check 69:20 91:25 92:2 124:19,22 126:16 checking 125:13 checks 32:8 38:20 39:7 91:22 124:24 124:25 126:10 chemical 34:25 105:25 chemicals 14:6 18:23 19:1,4,12 28:7,15 51:7 99:19 116:4,8,16 116:21 117:15 120:4,9 chlorinated 146:14 148:13 chuckle 33:17 cigarette 115:19,23 cigarettes 116:4 CIRONE 4:23 Citizens 75:10,11 75:13,15,17 76:1 City 6:14 47:11,25 71:5 Civil 153:2 clarify 34:20 97:9 124:17 138:18 Clark 41:13,13,14 41:14,16,17,17,18 58:18,22 60:4,12 60:24 63:24 65:7 65:20 67:9,16 73:10 83:10 85:17 88:24 89:4,7,10 89:10,11</p>	<p>Clark's 59:25 classify 30:19 clean 9:24 25:1,8 26:21 27:24 28:1 29:19 30:2,6 33:3 51:9 96:17,20,22 96:22,23 99:5,6,9 105:14 106:7,9 107:6,24 108:5,22 111:19,24,25 112:9 121:6 144:20 cleaned 25:16 29:18 30:10 96:15 98:22,25 104:1 111:21 cleaner 149:22 150:1 cleaners 1:8 48:7 48:11,14 49:25 50:1 88:18 104:2 104:10,12 105:5 113:16 131:9 132:9 cleaning 19:21 20:9 24:24 25:3,24 26:5,15 27:6 28:1 32:25 34:7 48:9 82:10,16,16,17 96:25 99:3 104:13 104:17 106:12 107:20 109:21 112:7,22 113:10 118:3 120:20 121:9 131:2 134:13 cleanup 33:3,4 49:14 51:4,7 99:9 120:24 123:5 clear 17:8 55:6 80:10 81:21 106:1 clearer 35:1 client 47:15 91:9,19 clients 91:5 clinic 21:12 clinical 21:13</p>	<p>closed 128:3 clothes 115:4 coated 23:9,10,10 23:13,16,18,19 30:18,22 31:1,2 110:11 coater 27:17 coaters 27:15 code 125:25 153:1 coding 125:13 collation 22:1,2 collections 51:1 collectively 64:17 college 20:16 colleges 15:10,13 color 32:9 91:3,4 93:2 123:6 colors 99:10 come 35:15 48:15 50:19 87:25 96:24 104:2 105:5 111:9 119:2 120:3 135:24 comes 30:10 98:9 98:11 coming 69:21 command 89:24 commanded 42:13 commencing 7:2 comment 10:23 52:7,8,16 123:8 common 48:13 81:13 94:21,22 commonly 57:7 companies 36:19 39:3 43:15 67:23 68:7 69:25 121:25 127:14 136:12 company 14:1 16:17 22:23,25 38:21 39:1 41:1,2 43:16,18,25 44:23 45:2 49:21 57:10 58:6,13,16,19 59:2,4,8,10,12 60:20 63:23 64:25</p>	<p>66:16 67:7 69:19 70:1 73:9 74:25 76:4,7,9 77:14,16 77:17 78:3,8 79:22 80:4,5 89:7 105:9 109:17 124:1 127:6,7 128:9 133:13,16 135:2,13 136:15 136:16 138:3 150:19,23 151:6 complain 53:12 Complaint 56:23 57:2 complete 154:9 completely 9:13,15 33:19 complied 71:21 73:24 composed 28:12 computer 55:18 conceivably 143:1 concerned 43:18 concerns 50:24 103:20 116:3 concluded 152:5 condos 137:12 conduct 126:21 conducted 18:3 23:5,5 83:2 90:16 126:5 150:11 configuration 83:16,18 confirmed 47:15 conflict 53:5 confused 66:6 127:13 confusion 66:24 81:22 connected 154:14 consider 54:23 considered 140:8 consist 13:9 consistent 32:9 Consolidated 44:10 constitute 154:9</p>
---	--	--	--	--

<p>consultant 11:24 12:4,15 13:18 14:10 50:8 consulting 13:8 14:13 container 27:5 containers 112:25 113:2,7,8 122:6 contaminant 48:18 contaminants 50:24 contamination 9:2 47:11,14,24 48:5 50:5,12,20 51:14 55:13 56:9,13,21 continued 38:21 39:4 Cont'd 3:1 4:1 5:1 conversation 46:20 46:23 52:5,10,12 52:19 53:20,21 54:4,5 64:3 conversations 47:22 114:25 115:3 copies 35:18 36:8 56:4 135:2,5 copy 11:10 57:1 135:1 155:10 CORDES 3:15,16 corner 42:20 71:16 corporation 1:9 3:5 128:2 corporations 68:5 76:11 correct 10:6 16:20 16:21,22 20:2 21:15,16 24:10,18 26:24 27:8,9 31:21,22 36:14,15 38:7,8,16,17 41:24,25 42:14 49:7 55:7,8 58:17 58:21,22,23,25 63:12 67:17,20 68:16,17,20 74:6</p>	<p>76:23 77:2 82:4 85:18,19 87:20,21 96:9,11,14 100:23 104:20 126:21,22 138:21 139:14,18 140:6,20 141:4,6 141:9 142:24,25 143:14 144:24 145:8,10 146:1,9 146:15 147:16,22 151:21 153:5 154:10 155:12 corrected 156:16 156:19 correction 155:9 corrections 153:4 cost 40:2 124:6 counsel 9:9 10:22 53:7 71:10 141:12 154:15 155:10,12 155:22 156:11 County 1:2 103:4 couple 119:2 123:24 134:10 150:8 course 83:11 125:23 court 1:1 4:16 5:9 8:2,5,8 9:11 10:16 51:22 53:12 129:25 155:13 covered 134:17 crack 129:14 cracks 129:10,17 crappy 110:6 crazy 130:16 create 80:23 created 38:24 credibility 10:24 Creditors 8:24 Creek 5:5 Crocker 75:10,11 75:15,17,25 CROSS-CLAIMS 1:15 Cross-Defendant</p>	<p>2:3 3:9 Cross-Defendants 3:15,21 crucified 115:15 CSR 1:25 154:21 current 11:11 currently 11:23 customer 87:25 125:4 customers 37:10 88:7 cut 33:23 125:1</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 6:1 dad 64:25 67:24 68:1 83:9 85:7,14 89:25 date 11:20 14:12 71:6 75:2,3 155:13 156:7,25 Dated 153:7 154:17 dates 17:1 Dave 65:17,20 73:9 133:14 Dave's 65:1 David 41:13,14,17 89:4 day 99:10,16 115:13 119:18 153:7 154:17 days 33:20 81:13 85:25 86:1,6 99:16 155:13 156:11,11 day-to-day 67:12 68:12 dead 79:24 135:24 136:9 dealt 103:24 121:25 Dear 155:7 deceased 137:7 decided 44:24 decision 45:1 declaration 71:1,8 deem 153:4</p>	<p>deep 49:12,20 deep-pocket 52:4 52:11,20 53:21 Defendant 2:8 defendants 1:14 2:14,20 3:3 149:16 degree 15:19 deliver 118:8 120:3 delivered 116:8 118:3 120:9,12 121:15 122:3 delivering 37:12 Delta 155:21 156:1 Department 117:20 depend 98:23 124:21 depending 13:25 98:10 113:4 depends 64:13 124:18 deponent 5:8 156:8 156:11 deposed 8:11,18,20 9:1 deposition 1:19 6:11 7:18 9:5 10:7,15,15 42:8 42:14 43:3 46:2,4 50:3 54:7,14,17 54:20,22 55:1,11 56:8,14 71:11 73:20 152:5 153:3 154:5,7 155:8,10 155:11,21 156:1,7 156:10,14,16,19 156:21 depositions 7:23,23 describe 25:2 30:12 described 35:10 37:16 51:11 52:11 52:20 53:21 92:16 110:7 111:23 112:8 127:1 describing 36:20 Description 6:10</p>	<p>design 45:17 designated 8:2,5 desirable 155:12 desk 88:7 destroy 108:12 detail 8:19 47:17 47:18,20 83:11 97:21 determine 62:13 DETERT 3:10 develop 12:19 developing 36:1 124:12,15 Diablo 2:10 different 25:21,22 51:6 69:19 92:6 99:2,13,15 114:19 121:8,12 124:23 126:12 differently 76:12 digital 14:1,2 digitally 13:22 dipped 123:12 dipping 122:23 direct 70:25 71:19 71:24 74:7 120:17 directions 89:24 directly 89:19 director 76:9 directors 50:13 directory 6:14 71:5 71:6 dirt 30:7,9 dirty 27:22 150:20 disappear 44:14 disappointed 55:3 discuss 47:2 155:11 discussed 49:6,9,16 discussing 98:17 126:11 136:20 discussion 65:2 disinterested 154:12 dispose 103:8 disposed 123:13 distinguish 64:20</p>
--	--	--	---	---

<p>distract 53:15 DITTMER 1:4 2:3 155:5 156:6 document 22:6 42:9,11,16,17,20 45:10 54:24,24 72:8 73:25 74:8 documents 6:12 11:7 42:25 43:5,8 43:9 44:18 45:3,7 45:14,16,20 51:13 54:16,18,21 55:15 56:2,5,8 doing 1:8 21:25,25 32:12 35:25 36:9 36:11 53:10 80:19 90:7 104:25 109:13 138:9 150:25 151:10 dollars 90:13,14 144:7 Donna 74:15 door 62:19,22 63:1 doors 83:21,22 Doris 74:18 Dorothy 136:9 doubt 60:21 85:5 101:25 103:11,12 120:14 135:15 Douglas 4:5 downtown 134:14 149:23 Doyle 2:6 7:15 dozen 7:21,22 8:10 8:11 81:19,20 82:1 dozens 121:25 drain 51:1 102:10 dries 30:23 drive 112:3 120:6,7 driven 118:20 drugs 11:3 drums 120:12 122:4 dry 5:5 35:4 36:5 48:7,9,11,14</p>	<p>49:25 50:1 99:6 104:10,12,13,16 131:2 134:13 149:22 150:1 drying 31:11 DUDLEY 3:12 due 36:19 Duensing 4:9,9 132:24,25 133:2,3 133:5 duly 7:8 154:2,5 dumped 135:13 dumpsters 102:17 duplicating 26:12 duplicator 26:14 126:15 DUREE 1:9 3:3,5 duties 12:14 21:10 23:22 24:15 31:19 31:23 33:7 35:10 35:11 37:14,15,17 39:17,24 89:13 102:3,4 130:18 duty 101:14</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 2:1,1,11 3:1,1 4:1 4:1 5:1,1 6:1,9 EARL 3:12 earlier 31:18 35:10 48:3 66:12 69:9 76:19 81:19,22 87:17 133:12 135:12 138:6 early 36:19 126:1 128:6 ease 60:4 Ed 65:20 133:9,11 educated 18:15 education 11:13 Edward 29:2 effort 43:7,10 eight 36:10 eight-and-a-half... 36:11 either 89:24 95:6</p>	<p>98:9 109:22 111:14 118:19 electrician 138:11 electronics 33:19 ELIZABETH 4:23 else's 117:9 employed 11:23 15:24 16:3 18:4 20:1,4 22:8 24:14 30:1 36:13 38:15 39:4,6,21,22,23 61:17 69:18,19 102:2 111:12 130:12 employee 21:20,23 22:9 43:24 69:23 102:5,7 135:18,25 employees 43:24 68:10 80:1 89:20 114:22 141:17 employment 15:22 18:7,21 21:2 23:21 24:22 36:16 encode 124:25 encoding 126:10,16 enjoying 35:7 enter 84:15 entering 84:23 85:2 entire 113:24 142:2 entirety 42:17 83:3 entitled 17:3 40:15 entries 72:20 environment 51:9 103:21 EPA 50:11 equipment 13:22 13:23 77:18,22 78:7,9,15 79:4,13 79:13 81:7,8 82:17 83:1 90:20 94:4 95:5 101:13 101:14,16,19 130:21,21 140:20 140:22 essentially 9:7 12:13 47:10</p>	<p>established 105:4 ESTER 3:9 estimate 17:4 40:15 40:16 64:6,8 100:10 estimating 38:4 40:1 estimation 60:8 estimator 37:8,8,15 37:25 39:11,14,18 39:25 40:4,6,17 et 155:5 156:6 eventually 77:1 everybody 38:3 49:12 51:4 147:3 evidence 127:4 129:24 131:25 132:16 138:24 exact 14:12 25:5 exactly 14:17 111:20 123:1 examination 6:2 7:12 134:6 139:25 149:13 150:6 156:14 examined 154:4 example 150:18 excess 33:23 35:2 excuse 43:13 71:7 91:12 137:15 exhibit 42:4,8 70:22 71:1,8,11 73:16,20 exist 114:15 existed 39:15 72:12 72:18 140:22 expect 16:25 expensive 104:17 experience 11:13 139:11 150:9 expert 7:24 8:2,5,7 explain 10:5 25:15 107:20 111:17 explained 47:3,5 49:1 explanation 47:9</p>	<p>explosion 132:8 exterior 112:10 extraneous 78:2</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>faced 140:11 facility 141:18 143:2 144:8 fact 19:3 37:24 42:13 44:22 50:2 65:7 94:22 95:7 97:20 126:16 131:20 140:17 142:9 facts 56:12 73:12 127:3 129:23 131:24 132:16 138:24 fade 96:21 failed 156:23 fair 25:14 37:13,16 145:20,22,23 147:7 Fairfield 1:8 3:6 47:12,25 70:1 92:4 103:4 127:7 127:10,11,15,16 127:17,20,23,25 130:24 132:13,19 132:21 134:14 138:5 149:24 fairly 126:1 fallen 151:8 familiar 18:22 20:9 28:3,6,14 40:5 57:9 58:5 82:25 108:15 114:10,12 114:13 120:21 127:6 128:9 129:9 149:22 150:10 family 10:11 65:3 137:24 far 48:14 Fargo 91:9,18,23 125:3,5 Farrell 2:17 6:4</p>
---	--	--	--	--

138:23 139:23 149:14,15 150:4 father 41:9 58:18 58:20 59:25 60:3 60:11,22 61:1 64:18 65:6 67:9 67:16 father's 41:9,15,16 41:20 64:21 favoritisms 13:14 Fax 156:3 FCS033636 1:6 155:6 156:7 fear 33:17 fed 95:19 federal 8:5,8 feed 95:25 96:5,6 98:18 107:17 109:1 111:15 126:24 feeder 31:25 32:1,6 32:10,21 33:2,5 feeding 32:12 feel 10:18 56:17 fellow 133:12 felt 56:15 65:3 figure 40:2 66:23 77:19 123:24 file 55:23 56:1,2 filed 155:12 film 33:20,22,24,25 35:17 36:1,3,5,8,9 51:2,3 124:12,15 films 35:21 final 30:25 financial 12:19 124:8 find 49:13 55:22 56:19 108:25 134:12 fine 14:23 27:2 76:17,18 83:23,23 86:22 91:13 92:19 106:10 finish 14:20 20:21 44:4 52:15 55:25	80:10 84:25 94:12 94:13 112:3 115:22 first 7:17 9:8 14:9 20:3 22:8,15,20 39:22,23 52:17 91:11,20 100:2 101:6 104:4 118:18 125:15 134:12 135:22,24 138:12 142:20 firsthand 140:21 142:12 148:4 five 23:3 85:25 86:1 86:6 96:6 122:6 flat 33:21,22 flatbed 108:1 flexo 110:15 flexography 110:17 floor 3:11,23 4:21 101:8,19 102:10 109:11,13,18,22 109:24 110:20 111:3 129:13 flooring 101:7 floors 129:10 flows 110:2 fluid 25:6,16,17,18 26:21 fly 110:4 flying 10:12 110:5 focus 53:15 folded 98:10 folder 98:10 folks 152:4 follow 146:4 followed 116:1 following 42:25 87:8 91:16 147:9 156:12 follows 7:10 follow-up 55:5 133:21 134:10 foregoing 154:5,9 foreman 90:1 forget 75:23	forgive 122:8 forgot 16:23 53:6 form 13:5 90:22 108:1 125:1 formal 12:9 18:17 89:23 formerly 4:19 149:23 forms 59:17 forth 36:4 fortunately 43:22 forwarded 155:10 found 55:13 foundation 101:15 144:11 fountain 19:16 108:9,15 111:7,23 122:24 fountains 123:12 four 21:6 23:3 32:12 36:10 145:18 frame 30:3 Francisco 2:16 3:11,23 11:15 frankly 104:3 front 32:8 35:17 38:4 71:2,12 88:1 88:6 90:9 102:22 102:23 120:7 full 154:9 full-time 21:20,22 22:8 further 42:24 150:6 future 34:11 F-I-e-x-o 110:17	gated 63:2 generally 21:10 56:11 generated 29:13 gentlemen 41:23 George 1:10,11 2:14 149:20 Gerald 4:9 132:24 133:1,2 Gerry 133:5 getting 38:19 40:12 66:6 123:5 125:9 125:22 gift 72:21,24 78:1 Gillespie 131:9,11 131:13,15 132:9 give 11:4 12:18 28:10 40:9,11 44:16 53:19 87:6 94:11 103:15 119:17,19 146:19 150:18 given 7:23,23 154:10 156:11 gives 101:13 glossed 92:12 glossier 92:18 go 8:19 9:5 11:14 13:22 14:1 19:12 20:7 33:2 36:22 37:19 42:2 43:4 61:15 80:18 87:5 91:13 106:14 110:3 123:6 128:16 130:2,24 134:3,4 136:4 139:2,21,22,23 God 45:11 goes 8:20 19:11 34:2 106:5 going 8:22 10:5 11:25 24:3 26:15 29:9 30:16 37:10 37:11 40:2,11,11 40:14 49:11 50:1 50:4 51:1,17,20	51:21 61:22 70:20 72:13 87:1 95:4 97:25 98:3 104:3 108:2 109:15 110:2,3,5 111:9 112:2,3,18 117:24 118:8 125:22 133:20 135:17 142:19 145:13 GOINS 4:3 good 7:14 32:9 35:22 36:6 70:5 120:24 138:11 150:25 GOODSTEIN 2:9 Google 54:23 55:4 55:10 Goss 117:2 Goss-Jewett 117:1 Gotcha 41:19 97:19 gotta 94:13 gotten 123:15 144:20 grade 23:20 graduate 15:8,15 graduated 16:12 20:15,23 21:8 Graham 2:6 6:3,5 7:13,15 26:1,3 36:22,25 42:2,6 46:13 51:22 52:3 52:8,15,17,25 54:3 70:5,9,20,24 71:9 72:15 73:15 73:18 87:4,14 91:13 92:5 127:5 129:25 130:4 132:3,17 133:19 141:12 142:16 143:19 144:9,17 145:5,9 146:10,17 147:17 148:8,16 148:22 149:3,9 150:7,17 151:18 151:25 152:3 Graham's 142:9
--	---	--	--	--

grand 144:7	106:12 108:19	103:7	identify 64:18	ink 13:2,3,10 19:11
grandmother 107:4	111:15,25 126:23	Hirsch 1:7 2:8	idiotic 45:1	25:7,21 29:16
Graphics 44:11	151:7	134:9 155:5 156:6	image 13:7 34:3	30:4,7,8,21,23
Great 98:16	handed 42:7 73:19	historical 50:6	98:4,8	31:1,2,3,5 35:2
greeting 71:25	hand-developed	51:14	imagine 121:11	97:24 99:8,13,14
72:23 90:10	36:1	history 15:20 35:6	implying 84:4	99:15 103:18,19
ground 9:6	hand-pick 80:19	135:12	impossible 139:7	105:21 106:4
group 2:4 12:5,6,8	hang 36:5	hold 36:10,10	impression 98:7	107:15,22 108:3,4
12:15 13:9,18	happened 16:25	81:10 147:8	106:5	108:5,7,9,14,14
14:11,16 50:9,14	43:22 63:13 64:3	holder 35:19	impressions 93:13	108:17 109:10,13
67:23 80:24	81:12	hooked 14:14	96:3	109:15,17,22,24
guess 25:12 26:12	hard-working	Hoover 131:18	imprint 125:2	110:1,7,8,10,19
38:9 54:24 57:25	112:6	hope 115:15	inadvertently	111:3,5,7,10,14
58:11 63:24 66:22	HAZARD 4:3	host 69:6	115:4	111:24 115:4
75:6 86:15 89:24	head 10:14 26:18	hot 78:17,19 80:14	include 13:2 37:9	119:1,3,23 121:15
101:9 109:14	26:22 32:19	80:15,16,25	including 43:24	121:20 122:3,6,20
125:5	136:11	113:25	141:22	122:24 123:12,15
guessed 48:8	headquarters	hour 7:2 32:13	incomplete 144:10	123:20,24 124:4
guessing 39:20 69:9	119:11	35:22 51:17 52:1	incorporated 73:4	125:18,19 142:17
101:10	hear 147:8,23	93:13 96:3	73:7,10	142:19,22,23
guide 72:7	heard 27:17,18	hours 85:22 86:5	Incorporation 6:15	143:2,14,23
gum 34:10 35:3	28:23 29:4,6 69:4	156:10	74:5,25	inks 25:21
Gutenberg 92:24	82:23 107:1,8,11	house 45:12	indicated 10:11	ink's 99:6
guy 79:23 85:9,11	107:12 109:20,25	housekeeping	31:18 38:5 49:5	insane 112:4
85:15,16 96:22	122:23,25 132:4,7	102:3	66:9 76:19 102:13	inserting 22:3
118:14 130:22	132:8	Howard 12:12	156:19	Inside 129:7
guys 38:2	heat 97:6,9 98:12	14:14,15	indicating 46:7	instance 110:19
	heavy 101:14	huge 35:14	54:18 98:3 112:16	instructing 53:16
	106:15	huh-uh 9:20	individually 1:7	insurance 45:8
H	heck 19:15	human 44:23	individuals 41:12	134:16,19 135:2,7
H 6:9	Heidelberg 93:24	hung 38:1,3	Industries 50:14	135:15 136:12,13
HAGSTROM 3:12	93:25 94:2,5,7,10	HUNSUCKER 2:9	industry 12:17,21	136:15,18 137:1
half 7:21,22 8:10	94:15,24	HUNT 4:5	13:24 14:7 48:16	insured 134:23
8:11 38:14 39:20	held 81:13	hygiene 21:12	50:15,20,23 56:20	insurer 135:1
44:9 46:16 52:1	help 12:19 37:23	hypothetical	86:2 104:4 120:23	insurers 135:19,20
59:20,22 60:16	72:25 123:23	144:10	121:12 123:24	interest 15:4
62:12 63:11 64:11	helpful 55:14		139:10,12	interested 154:13
66:5,10,25 67:20	helps 32:6	I	infer 84:4	Internet 55:1
67:22 69:8 77:8,9	hereunto 156:17	idea 22:23 74:14	influence 11:2,3	interpret 123:8
81:19 82:1 90:9	hesitating 29:14	79:15 80:3 84:22	information 28:10	Interruption 91:15
124:9 141:6,16	Hi 134:8 140:2	102:12 112:23	51:12,13 53:23	introduced 7:14
143:3,10,13	high 11:14,15 15:8	113:9 120:8	55:4,13 83:7	introducing 126:2
150:12	23:20 100:10	122:10 123:19	95:22 98:21	investigated 56:22
hand 21:25 22:2,7	116:24	128:22 140:10	113:15 119:20	invitation 80:20
95:13,16,17,23	hire 130:16	identification 42:5	informed 110:24	invitations 59:17
96:5,5,12 98:18	hired 21:18,20,23	70:23 73:17	initially 22:12	90:10
98:22 105:15,18				

<p>invoice 117:19 invoices 117:12,15 117:23 involved 8:12 14:5 14:8 19:23 20:13 25:3 40:20 44:18 47:4,7 48:16 49:6 49:10 50:3 52:22 53:24 75:1 82:9 82:15 85:5 99:4 107:20 128:25 138:4 151:5 involvement 117:21 irritated 44:22 ISOLA 2:4 issues 8:17 9:1 13:20 43:19 50:9 51:6 52:21 it'll 133:24 135:24</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p>J 1:10,11 Jack 68:10,15 69:10,17 79:17,23 83:6 88:16,17,19 88:21 90:2 Jackson 3:6 45:18 45:22 48:22 57:8 57:14 58:8 59:5 59:24 60:13 61:11 61:14,23 62:7 63:2,10 64:10 65:23 66:2 67:10 67:17 68:18 70:16 72:10 76:22 77:1 77:6,11 78:5,16 79:3,11 80:2 81:5 81:16 82:3,7,12 82:19 83:4 84:5 84:18 85:4,21 86:10,20,24 87:2 87:11,16 88:4,9 88:14,23 89:15 90:17 91:7,11,21 92:10 93:8,15</p>	<p>94:16,25 95:11 97:7 98:19 99:21 100:1,13,20 101:7 101:18 102:3,10 102:18 103:10 104:7,15 105:10 105:16 106:20 107:14,18 108:21 109:10 110:21 111:14 112:14,21 113:11,17,21 114:3,7 115:2,9 115:24 116:8,18 116:23 117:17 118:5,25 120:5,11 120:20 121:5,17 122:14,17 123:11 123:21 124:11 126:6,18 128:10 128:14 129:7 130:11,20 131:3 131:22 132:5,10 134:22 136:24 137:18 138:1,20 139:5,16 140:9,14 141:2,5,12,15 142:4,18 143:4,10 143:18 144:6,16 145:3,21,25 146:8 146:15 147:15 148:6,15,21 149:2 149:8 151:14 JAMES 3:24 janitorial 102:2 janitors 30:11 January 11:22 JAY 2:14 Jefferson 44:9 JEPPSON 4:5 JEREMY 4:7 Jewel 1:7 2:8 134:9 155:5 156:6 Jewett 117:3,4 JH 71:5,6,17,20 Jim 3:17 80:3 82:14</p>	<p>job 12:13,14 17:11 17:15,16 21:17,19 23:22 31:23 33:7 33:12 35:9,10,12 37:1,2,5,14,15 39:11,16,24 40:2 59:14 80:17 81:1 81:2 93:2 95:20 138:11 jobs 13:17 23:4 24:8 90:15 92:12 Joe 132:25 John 41:13,14,16 41:17,17 58:18,22 60:24 63:24 64:24 67:9,16,23 68:2 83:10 89:7,10,10 89:11,25 JOHNSON 4:4 joined 80:4,5 Jose 4:22 Jr 1:10 2:14 41:17 88:24 89:10,11 Judith 54:10 JUDY 4:3 jump 136:12</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p>Kathleen 74:10,13 KATHRYN 4:19 4:19 keep 25:24 32:6 51:21 102:2 Keilholtz 1:19 5:8 7:7,14 11:2,14,21 14:20 15:11 16:24 20:21 26:4 41:21 42:3,7 46:2 51:17 55:25 57:24 58:20 66:21 70:10,25 71:12 73:3,19,25 87:7 97:3 99:18 112:2 121:15 123:19 130:6,25 132:18 133:19 134:8 139:20</p>	<p>140:2 146:19 149:15 150:8 153:12 155:2,7 156:8 kept 29:19 32:10 38:19 80:18 81:9 136:2,2 key 68:1 kids 17:19 kind 9:5 11:11 17:25 18:2 27:25 37:4 56:20,21 59:14,21 75:6 80:25 81:8 92:15 106:1,1,2 116:24 138:2 151:8 KIRK 3:9 knew 48:14 78:3 81:3,9 85:10 117:24 136:17 knife 111:23 123:4 knock 110:1 knocking 109:23 know 10:9,11,13 16:5,24 17:19 19:6,6,8 25:10,13 27:10,12 28:8,10 28:20 40:8 44:14 46:10 48:12,23,23 49:23,25 50:2,22 54:20 55:22 57:20 57:21,23 58:3,11 59:1,23 60:3,6,15 60:17,24 63:19 65:5 66:11 67:11 68:21 69:2,20 70:3 73:3,6,23 74:13,15,17,18,20 74:22 75:5,21,21 76:5,6,10,17 77:5 78:9,11,14,22,24 79:16,24 80:4 81:8,20 83:8,10 84:11 86:8,11,16 86:19 88:3,6,8,13 89:23 90:15 91:24</p>	<p>92:25 93:24 95:14 95:23 96:2,12 97:4 100:18 102:16 103:1,11 103:23 104:10 106:8,13 109:8 111:11,15 113:1,3 113:10,20 114:5,9 114:24 116:12,15 116:19,20 118:7,9 118:11 119:10 120:7,14 121:13 121:24 122:8,9,12 123:1,9,12,23 124:10 126:7 127:18,22 129:3 131:7,11,13,17 132:24 133:9 135:19 137:8,20 140:11 141:17 145:15 149:17 knowing 90:20 95:20 knowledge 48:16 57:12,17 59:7 61:2,7 65:6 67:19 68:15 74:24 78:4 79:1,20 82:23 83:7,9 99:18 103:6 105:13 110:18 116:7,12 117:15 118:2 120:15,17 121:2 121:12,14 126:4 127:16 131:8 134:13 140:21 142:12 145:2 146:7,13 147:12 148:4 151:11 known 4:19 76:20</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>L 3:12 4:3,20 La 137:12,16 lacks 144:10 lady 112:4</p>
--	--	--	---	--

<p>Lafayette 2:10 landlord 129:21 landlords 84:17 Lane 4:11 155:3 larger 32:2,3 80:21 late 86:4 128:6 LAVERNE 4:14 law 2:4,4,6,9,11,15 2:17,21,24 3:5,10 3:13,17,22,24 4:5 4:7,21,23 80:21 LAWING 4:3 layout 33:25 45:17 leading 138:23 leads 94:23 learn 54:25 learned 126:14 lease 84:16,21 85:2 leases 45:21 leave 51:22 left 106:11 letter 18:6,12,18 20:10 22:17,21,24 59:13,22,23 60:12 60:17 61:2,5,8 76:21 77:14 78:6 78:11,15,23 81:11 90:23 92:17,18,23 92:24 93:4,6,8,14 94:4,8 95:10,19 97:15 98:15,24 99:12 110:16 113:24 140:13 150:11 155:14 156:16 letters 81:2 let's 42:2 70:6 91:13 95:10 99:25 130:1,2 139:2 147:5,5 level 13:11 LEWIS 2:15 library 16:1 licensed 154:1 light 115:19,23 Liles 80:3 83:13</p>	<p>limits 117:25 118:1 line 10:24 46:19,22 98:11 Linotype 78:18 80:12,22 liquid 106:1,11,13 106:14,15,15 liquidy 110:16 list 74:9 litho 24:2 38:6,10 41:3 43:13,14 44:3,7 98:15 110:17 lithograph 16:2,4 16:16,17 17:12,20 18:3,8,9,15,16,22 18:23 19:3,5,22 19:22 20:1,4,8,11 21:1,15,18,23 22:9,11,16,21 23:1,6,22,23 24:15,16,22,23 27:11 28:2 29:10 29:23 30:2 31:9 31:16 33:8 35:9 36:13,17,18,21 37:2 38:20,21,23 38:25 39:3,7,8,12 39:23 40:7 44:17 lithographer 16:16 61:4 Lithographers 6:15 15:3,5,6 45:5 58:14,17 64:1,23 65:23 66:1,14 67:10,15 68:9,16 69:18 70:15 73:4 73:7 74:5 75:1,25 76:4,25 77:6,10 78:5 79:2,10,12 79:20 80:2 81:5 81:16,24 82:1,7 82:11,18,21 83:2 84:7,8,12,15,18 85:3,21 86:9,23 87:11 88:10,14,23</p>	<p>89:1,15 90:16 91:6,10,20 92:10 93:8 94:17,25 95:13,25 97:7 98:20 99:20 100:2 100:13,16,19 101:1,6,17,22 102:2,9,18 103:2 103:8,10 104:7,14 104:23 105:9,16 106:18 107:14,19 108:20 109:9 110:21 111:1,13 112:13,21 113:12 113:18,23 114:2,6 115:1,8 116:10,17 116:22 117:16 118:4,24 120:4,10 120:19 121:4,16 122:13,16 123:11 123:20 124:12 126:5,19 127:12 127:17,20,24 128:1,1,11,15 129:9,20 130:10 140:15 141:1,5,15 142:4,11,13,17 143:4,9,18 144:5 144:15 145:7,14 145:24 146:7,14 147:13 148:6,14 148:20 149:1,7 151:5,13 lithography 17:18 18:6 19:11 22:24 93:1,5 97:17 99:1 109:6 134:18 136:23 138:16,21 139:4,16 litigation 8:22,23 47:3,5,9 48:1,6,18 49:2 52:22 57:6 87:3 little 9:4 11:9 27:23 30:21 59:15 70:14 73:22 76:11 81:22</p>	<p>87:24 90:22,23 99:13,15 105:23 111:6 124:18 125:16 126:15 141:8 143:23 144:5 150:20 live 45:12 132:18 lived 137:12,16 living 137:11 load 35:16 lobbying 50:15 local 59:22 90:21 90:23 located 17:21 94:16 95:11 98:19 107:18 112:22 119:5 130:19 131:22 132:10 location 1:21 7:3 22:22 23:2 38:11 58:7 59:5 61:14 61:24 63:11 67:17 67:20 72:11 77:2 77:12 79:14 80:2 80:6,7 81:18 82:19,22 83:4,15 84:8,13 85:22,23 86:9,21,24,25 87:12,13,15,16,22 88:4,9,9,15,24 89:15 90:1,18 92:10 93:15 94:8 95:1,12,24 97:8 100:1,3,14,20 101:7,18 102:4 103:3,10 104:15 104:24 105:17 107:15 110:22 113:11,13,22 114:7 115:9,25 116:9,10,18 120:22 124:13 128:10,14,17,18 128:21 129:8 130:11,20 131:23 132:11 150:2</p>	<p>locations 84:6 87:2 102:16 Lodi 2:5 long 16:25 24:19 32:20 38:13 46:25 66:11 75:20 106:9 145:15,21,24 longer 37:16 38:1 47:19 look 55:12 71:15 looked 54:23 83:20 106:10 117:19 looking 13:21 47:13 49:20 91:2 96:8 looks 32:9 49:12 72:23 75:3 lose 147:8 loss 73:8 lot 8:22 16:24 22:24 23:12 43:14 103:14 110:15 120:13 122:5 Lowell 11:15,17,18 LUCILLA 4:3 lucky 93:16 Lupin 4:11 L-i-l-e-s 80:4 L-i-n-e-o-t-y-p-e 78:18 L-o-w-e-l-l 11:18 l-t-i-l-i-t-h 24:4</p> <hr/> <p style="text-align: center;">M</p> <p>M 3:15 4:23,23 machine 14:2,3 18:10,12 22:11,18 24:23,24 26:7 31:6 32:2,4 61:3,8 78:17,23 80:22,23 108:23 126:21 machinery 19:12 19:13 machines 19:22 20:10 22:3,22 36:2 59:23 107:4</p>
---	--	---	--	--

<p>107:10 108:24 125:20 128:16,21 129:1 machinist 130:12 130:16,18 Macie 131:15 Madison 149:23 mag 126:9 magazines 23:8,11 23:17 magnetic 125:18 main 8:17 23:4 131:22 135:3 maintained 45:13 70:2 134:16,25 major 125:3,12 128:2 making 32:10 man 131:17 133:9 management 14:6 40:20 manager 40:22,24 41:1 136:1 137:4 155:20 managers 44:7,17 manner 154:15 manually 96:15 108:18 manually-operated 96:13 manufacturers 94:4 manufacturing 13:23 39:2 85:9 85:11 Marcie 131:13 mark 42:2 70:20 marked 42:4,8,20 70:22 71:1,20 73:16,20 marriage 40:24 married 40:23 marry 22:4 Mary 1:11,12 master 125:1 masters 124:25</p>	<p>Mateo 2:22 material 13:5 23:17 27:21 28:1 33:21 33:23 34:10,22,23 34:25 36:11 107:23 108:12 110:16 113:4 materials 12:25 13:15 27:13 59:21 107:5 113:11 135:12 matter 134:9,11 MATTHEW 3:12 maximum 141:6 McADAM 2:11 6:3 52:1 134:3,5,7,8 139:1,19 McINNIS 1:4 155:5 156:6 mean 19:10 23:7 25:11 27:7,13 29:19 30:3 39:18 49:23 54:19 62:9 67:11,12,15,24 85:12 90:12,25 92:22,23 103:13 106:24 114:17 121:11,24 131:5 meant 141:13 medication 11:3 meet 149:18 meeting 50:21 meetings 50:21 members 137:25 memory 73:14 mental 21:12 mention 48:17 mentioned 35:13 68:13 76:10 80:3 89:10 103:19,25 104:25 109:12 119:23 121:18 123:14 133:12 135:12 154:8 merely 53:10 merged 38:24 39:1</p>	<p>merger 36:19 mergers 12:16,18 messy 30:19,24 106:24 109:23 150:20 metal 27:5 34:1 78:17,19 80:14,15 80:16,25 113:25 123:4 method 106:17,19 120:25 methods 12:24 109:8 111:11 mezzanine 100:7 MICHAEL 1:4 155:5 156:6 mid 39:8 60:10 93:3 136:20 military 21:3,4 mind 136:13 minimal 124:4 133:24 143:25 minimum 143:1,16 minute 36:12 minutes 47:1 130:2 miracle 136:4 mischaracterizes 52:6,13,24 53:25 miserably 109:18 missed 137:2,17 misstates 138:24 144:10 mix 13:25 29:16 mixed 40:13 80:17 model 93:22 money 143:8 144:14,24 150:12 151:12,20 month 50:21 months 22:14 23:21 24:14,20,20 31:20 32:22,22 35:13 44:8 141:8 MOORE 3:21 mops 113:10 MORAN 3:10</p>	<p>morning 7:14 motion 112:18 move 52:7,16,23 54:1 57:4 63:18 110:14 moved 37:25 63:15 63:16 65:19,21 80:5 83:14 91:25 124:20 125:8,22 128:13,15,17,22 133:14,16 145:15 movie 63:3 140:5 moving 128:21,25 Mt 2:10 muddled 68:4 Multilith 24:1,4,25 25:3 26:6,7,13,16 26:16,20 29:11,22 29:25 30:7,12 31:6,10,17 32:3 32:16 33:1 34:5 34:21 124:24 126:14 multiple 87:2 MUNIRA 1:13 2:20 Munn 74:18 M-u 24:4</p> <hr/> <p style="text-align: center;">N</p> <p>N 2:1 3:1 4:1 5:1 6:1 nailed 13:16 name 7:15 16:1 26:13 39:1 41:20 57:10,23 58:6,12 59:2 64:1,4,5,25 65:1,9,10,16,16 66:12,16 68:13 73:9 74:10 75:18 75:19 131:17 133:9 135:22,24 136:18 137:3 138:7,12 150:19 156:6 named 54:10 154:4</p>	<p>names 38:19 41:12 44:16,20 60:17 67:4 74:10 99:23 100:14 104:5 127:14 129:5 136:8,12 Napa 5:5 narrow 17:6,7 nature 47:3,5,9 49:2 77:23 90:20 95:20 98:24 101:3 necessary 10:18 31:13 126:11 153:5 155:9 need 9:19,24 10:12 17:7 53:17 98:22 99:9 101:15 121:6 132:15 needed 17:17 37:19 43:20 81:6 130:23 needs 129:25 NELSON 2:9 never 9:3 13:11 14:8 20:13 27:17 30:5 43:22,23 61:5 64:5 65:7 82:23 92:25 97:15 107:1,11,12 109:17,20,25 117:5 118:1 120:25 129:13 132:7,12 138:12 new 69:23 77:18,22 79:13 80:6,7 83:15 128:17 134:11 147:20 news 38:23,25 39:3 41:2 58:10 69:21 70:3 132:13 newsletter 90:23 newspaper 110:8 newspapers 132:22 newsprint 23:8,20 NICK 2:23 Nickovich 3:24 6:4 46:11,11,12,14</p>
---	---	---	--	---

<p>47:21 49:15 52:5 52:6,12,13,16,20 52:21,23 53:22,22 53:25 54:6 71:7 72:13 87:1 127:3 129:23 131:24 132:15 134:4 139:21 140:1 141:13 143:21 144:1,13,22 145:6 145:11 146:12,23 147:1,5,21,24 148:3,11,18,24 149:5,11 150:14 151:16,22 night 30:11 86:4 nine 35:13 nineteen 14:18 nodded 10:14 26:18,22 32:19 NOSSAMAN 3:22 notes 133:23 notice 7:1 42:24 156:11 noticed 11:6 November 1:20 7:2 154:17 155:1,9 156:7 number 6:10 14:13 94:3,14 125:16,25</p> <hr/> <p style="text-align: center;">O</p> <p>oath 70:11 130:7 OBIE 4:3 object 52:17 72:13 87:1 132:15 objection 52:6,13 52:23 53:25 127:3 129:23 131:24 138:23 143:19 144:9,17 145:9 146:10,17 147:17 148:8 150:14 151:16,22 objections 53:8,11 53:15 146:20</p>	<p>observation 18:17 18:20 obtain 43:8 obviously 64:18 occasion 112:9 occasionally 11:24 111:5 occasions 7:20,22 occupied 49:21 100:15 101:22 occurred 45:21 156:12 occurring 126:18 odd-ball 17:18 odor 106:2 office 2:4,9,15,21 3:10,18,22 4:5,21 38:1 88:4,5,9 136:1 137:4 155:9 155:14,20 156:10 156:17,18,23 officer 76:4 officers 76:6 offices 3:17 87:22 offset 13:22 14:2 29:16 31:8 93:4 96:25 97:18 99:1 99:2,5 109:5 off-site 45:13 oh 65:15 93:11 97:2 okay 8:1,4,10 9:4 10:1,5 11:6,9,20 12:11 13:4,6,13 13:16 14:9 15:8 16:15 17:9 18:21 19:18,25 20:3,15 21:14,17 22:20 23:21 24:9,13,19 25:14 26:4,9,19 26:25 27:6,10,15 27:18 28:6 30:6 30:12,15 31:13,15 32:16,23 33:10,12 36:16 37:13,22,24 38:18 40:3,14,18 41:6 42:1,16,19</p>	<p>43:3,7 46:25 47:2 49:1,9 51:20 52:4 53:10,13,16 54:11 55:9,21 56:4,23 57:8,22 58:4,5,10 58:24 59:3,7 60:5 60:8 61:1,7,20 62:5,15 63:1,25 64:12,15,20 65:6 65:11,14,18 66:4 66:6 67:1,1,8,19 68:18,21,24 69:6 69:10,17 70:4,19 71:4,15,21,24 72:19 73:2,3,11 73:13,24 74:4,24 75:16 76:3,13,25 78:22 79:1,9 80:14 81:4 82:5,9 82:14,25 83:6,18 84:11 85:17 86:15 86:20,21,23 87:4 87:10,19,19,22 88:3,8,22 89:13 90:1,3,5,8,12,15 92:6,14 94:19 95:9,15,22 96:2,7 96:19 97:2,2,5,11 97:16 98:16 99:2 99:25 100:18,25 101:5,21 102:8,13 102:20 103:23 104:10,22 105:7 105:13 106:23 107:17 108:7 109:4,7,16 111:22 112:2,12,17,24 113:2,10 114:1,5 114:20 115:7,12 117:9 118:7,11,17 119:21 120:15 121:2,14,20,23 122:16,23 123:7 123:18 126:16,23 128:13,20 129:12 129:19 130:9</p>	<p>132:8,13,21 133:18 134:5 139:2 140:12,24 141:11,21 142:2 142:15 143:16 144:4 145:12,20 145:23 146:23 147:1,21 149:6 151:25 152:2 old 33:20 34:13 35:6 45:24 51:14 59:13 95:4,7 123:15 132:4,9 137:9 older 131:21 old-fashioned 107:3 once 25:18 49:21 66:17 68:7 86:3 98:25 ones 119:8 one's 111:9 one-and-a-half-y... 142:3 one-person 142:5 one-step 25:9 one-year 142:2 oOo 1:3,17,24 5:11 6:7,18 7:11 open 55:23 56:1 opened 62:19,22 63:1 operate 38:11 61:7 65:22 66:1 82:5 82:22 101:6 127:17 operated 58:7 59:5 59:24 60:12,18 61:14 62:6 63:7 63:10 64:9 66:9 66:11 67:4,5,16 67:19 68:16 77:6 81:5,16 82:7,11 82:19 84:12 85:21 88:11,14,23 91:6 91:11,21 94:24</p>	<p>100:13 101:2 102:9,18 104:23 105:16 112:14,21 113:13,18,23 115:8 116:10,22 128:9 129:9 134:20 138:21 141:1,5,15,18 142:4,18 143:4 144:5,16 145:16 145:21,24,25 146:8,15 147:14 148:15 149:8,23 151:4 operating 24:23 62:16 67:9,11 69:24 72:10 84:8 100:3 103:2 104:14 137:19 operation 17:23 18:16 22:17 29:22 29:25 60:13 68:12 76:20 79:2 82:2 85:22 86:1 90:4 109:23 136:24 operational 83:1 operations 8:12 18:9,24 19:4 23:23 24:21 29:11 29:11,13 31:9,17 34:5,6,21 35:8 37:18 48:21 50:6 50:12 57:13 61:8 67:2,13 68:22 70:14 76:22 77:2 77:3,4,11 78:5 79:3,11 82:10 83:3,3 84:5 85:4 85:16 86:24 87:11 88:25 89:14 90:17 92:9 93:7 94:17 95:12,24 98:20 99:20 100:19 101:18 103:9 104:7 105:10 106:19 107:13,19</p>
---	--	---	---	--

<p>108:21 109:9,21 109:21 110:20 111:13,22 112:13 114:6 115:1 116:17 117:17 118:4,25 120:5,11 120:19 121:1,4,16 122:13,17 123:10 123:21 124:10 126:5,13,19 128:11 130:9 131:2 134:13,17 138:19 139:4,5,15 143:9 145:8 150:10 151:12 operator 80:12 96:16 97:3 111:6 operators 60:18 107:10 opinion 105:8 opinions 56:11 opportunity 10:17 opposed 96:17 orange 33:21 order 34:3 107:7 109:10 117:7 ordering 88:15,18 organization 64:17 90:24 Original 156:10 outcome 154:13 outside 35:19 overtime 86:3 owned 41:10 43:16 45:9 49:21 65:16 67:14 84:13 85:10 137:18 owner 41:4,6 111:9 owners 57:18 ownership 64:21 64:22 ozone 51:5 O'HARA 4:21 o0o 152:6</p> <hr/> <p style="text-align: center;">P</p>	<p>P 2:1,1 3:1,1 4:1,1 5:1,1 page 6:2,10 42:21 71:19,25 74:8 pages 36:10 153:3 154:9 paid 117:18 Palo 15:25 16:1 paper 22:4 32:3,5,6 92:12 97:24,25 103:14 106:5 papers 92:7 pardon 16:16 97:2 part 28:9 29:16 43:8 62:23 85:14 113:24 123:4 140:5 participation 18:9 particular 26:13 50:3 56:19 81:2 particularly 27:13 56:15,18 91:1 parties 73:6 154:14 156:14 partitions 62:10 partner 41:9,16 64:18 85:13,17 133:14 partners 41:15 parts 114:8,11,13 party 103:8 pass 133:20 Pauline 137:3,6,7 pay 27:14 49:13 payroll 69:24 70:3 PCB 29:1 48:19 54:23 55:1,10 PCBs 48:2,3,8,11 48:16 55:6 PCE 28:23,24 29:2 48:2 Peabody 65:20 133:9,11 peak 124:1 142:23 people 12:10 13:15 13:20,21 17:17</p>	<p>33:13 39:4 40:1 43:17 44:25 60:21 75:5 79:23 81:9 81:13 83:24 85:10 99:17 103:5,15,21 109:19,21 125:2 135:14 136:7 137:1 141:20 150:25 percent 23:14 123:25 124:9 142:22,22 143:13 perchloroethylene 148:19 perform 130:18 period 15:21 21:11 24:12 31:24 32:20 33:6 35:12 39:25 81:17 82:2 95:21 100:25 105:1 125:21 126:1 131:5,6 136:20 138:14 141:18 142:3 150:11 156:11 periods 40:12,13 person 44:23 45:21 54:11 68:8 82:15 83:8 103:8 112:6 135:22 141:25 142:1 154:12 Persona 4:10,15 5:4 personal 6:12 134:13 145:2 personally 7:6 persons 5:8 73:6 80:1 phone 68:14 127:13 156:2 photographs 45:24 phrase 122:23 139:6 phrases 10:2 pick 80:24 81:3 118:20</p>	<p>picked 118:14 picture 83:14 93:2 pictures 45:24 piece 22:5 36:9 pieces 22:4 23:17 23:19 32:5 36:8 140:22 pile 136:3 Pine 2:4 Pines 4:11 pint 113:4,6 PIRMAN 4:19 place 14:17 36:20 47:4 63:19 80:9 98:7,8 104:17 106:17,19 108:5 109:15 111:10 115:10 118:18 131:2 132:9 136:3 137:11 154:8 placed 135:20 136:13 places 129:16 Plaintiff 2:3 plaintiffs 1:5 7:16 plant 40:21,24,25 85:15 88:1 90:11 135:3 plants 114:19 plate 34:1,1,2,11,13 35:2,4 platen 106:4,7 107:25 112:1 plates 34:8,9,12 108:23,24 109:3,5 please 9:10,12,21 10:3,13 42:24 52:18 53:14 115:22 141:4 155:14 pocket 49:20 pockets 49:13 point 14:15 19:25 31:19 33:13 37:7 39:16 40:20 43:17 51:25 58:15 64:12</p>	<p>66:15 68:4 79:9 103:20 104:1,18 131:21 132:19 pointing 46:9 policies 45:8 134:17,24 135:7,9 135:19 Pollock 4:11 poor 145:18 pose 9:15 position 68:1 possession 45:4,17 possibilities 54:19 possible 47:14 51:19 142:5,6 144:6,12,14,23,25 151:19 Post 3:18 pounds 122:7 practice 84:21 111:4 116:1 precisely 86:8 141:17 preparation 54:16 56:13 prepare 54:21 prepared 10:16 prepress 24:11 33:11,14 35:8 37:2,7 38:1 86:25 87:12 102:14 124:15,16 present 2:20 3:4,9 3:16 4:9,14,20 5:3 5:8 81:18 preserve 53:10 press 8:21 14:25 15:5 18:6,12,16 18:19 19:5,7,9 20:10 22:17,21,24 24:1,2,8,9,16,17 26:12,16,20 27:22 29:11,12,22,25 30:2,3,7 31:10,17 31:25 32:1,2,7,11 32:16,21,24,25</p>
---	---	---	--	---

34:2,5,6 35:2 36:18,21 37:17 38:6,10,11,16 39:13 41:4,7,11 59:13,22,23 60:12 60:18 61:2,5,8 65:12 76:21 77:14 78:6,23 79:13 81:7,11 87:19 89:12 92:17,18,23 92:24 93:4,6,14 93:20,24 94:4,8 94:16,24 95:9,16 95:17,19,23,25 96:12,13 97:3,15 97:23 98:15,18,18 98:22,24 99:11,12 105:15,18 106:12 107:17,21 108:8 108:19 109:2 110:4,5,17 111:5 111:15,15,21,25 112:10 113:24 117:18 126:12,23 127:22 140:13,14 150:11 presses 23:1,24 32:14 34:15,16 45:24 77:12 78:11 78:15 82:6,10,16 93:9,19 95:10,13 96:20 97:6,11,12 97:21 98:12,17 112:8 120:20 121:3,6,7,8 130:12,19 pressman 30:17 32:7 33:2,4,5 pressure 98:7 presume 19:25 pretty 31:7 35:22 36:6 95:4 101:15 105:3 124:4 137:9 previously 8:18 9:1 20:5 78:16 79:5 127:1	Price 3:17 4:7 95:3 134:2 priced 116:24 principals 68:2 136:17 print 12:20,22 13:3 56:4 59:15 92:7 93:2 101:12 124:24 126:15 138:5 139:8 140:17 142:5 printed 23:18 59:21 124:25 printers 6:15 45:5 50:5,12 57:10,13 57:18 58:6,13,16 58:24 59:19 60:5 60:18 61:9,13,18 61:25 62:2,6,16 63:6,9,14,22 64:1 64:9,21,22 65:8 65:11,22 66:1,8 66:14 67:10,14 68:9,16,25 69:7 69:18 70:14,15 72:4,9 73:4,7 74:5 75:1,25 76:3,21 76:25 77:6,10 78:4 79:1,5,10,12 79:19 80:1 81:4 81:16,23,24,25 82:6,11,18,21 84:6,7,12,15,17 85:3,21 86:9,23 87:10 88:10,14,22 88:25 89:14 90:16 91:6,10,20 92:9 93:7 94:17,25 95:12,24 97:7 98:20 99:20 100:2 100:12,16,19 101:1,5,17,22 102:1,9,17 103:2 103:7,9 104:6,14 104:23 105:8,15 106:18 107:13,19	108:20 109:9 110:21,25 111:13 112:13,20 113:12 113:18,22 114:2,5 115:1,8 116:9,16 116:21 117:16 118:24 120:4,10 120:19 121:4,16 122:13,16 123:10 123:20 124:11 126:4,19 127:10 127:12,16,20,23 127:25 128:1,11 128:15 129:8,20 130:10 138:20 139:16 140:15 141:1,4,15 142:3 142:10,13,17 143:3,9,18 144:5 144:15 145:7,14 145:23 146:7,13 147:13 148:5,14 148:20 149:1,7 151:4,13 printing 8:13 12:17 12:21 13:19,24 14:7 17:25 18:2 22:10 23:7 24:1 30:18 48:16 50:6 50:13 51:15 55:12 56:9,13 60:12 76:22 78:3,6,15 80:16 82:5 86:2 90:17 91:1 92:12 93:3 108:2 109:17 110:6,8,15 115:5 126:12 127:7 128:9 133:13,15 133:15 134:18 136:23 137:25 138:9,14,16 139:4 139:10,11,15 150:9,10,11,25 prior 46:2 54:7,20 55:1,11 56:8 59:24,25 77:13	78:7 79:9,11 138:25 154:4 private 103:7 probably 8:20 14:19 17:18 19:8 22:14 23:3,14 25:25 32:12,22 35:12 38:14 39:7 40:10 47:1,16 48:8 53:6 61:22 64:3 74:2 78:18 79:24 80:17 83:15 85:7,24 86:3 87:4 88:7 90:4 95:5,8 95:18 96:6,25 98:24,25 101:4 102:6 106:16 119:16,16 122:6 124:9 135:1,2,14 137:13 143:23 146:5 151:9 problem 43:23 48:9 48:13,15 49:25 129:19 problems 28:18 48:8,11 50:17,22 Procedure 153:2 process 17:25 25:9 29:17 30:12,13,19 30:20 31:1,3,13 44:12 80:25 107:1 107:9 113:25 121:11 123:5 124:23 125:13 126:10 processes 12:20,22 13:19 18:2,16 25:2 31:8 83:1 105:14 107:20 112:7 115:5 126:17,21 produced 42:25 71:5 product 30:25 37:12 92:15,16 98:10 113:20	114:10 116:24 production 6:12 12:24 40:22 41:1 products 114:21 117:7,12,12 118:3 118:23 professional 3:5 104:2 105:5 program 91:25 project 80:21 pronounce 69:11 pronounced 69:16 properly 32:11 properties 57:5 property 57:5,6,8 57:15 63:3,5 70:16 84:9,13,19 85:4 118:5 120:6 121:5 123:22 126:6,18 131:3 132:6 134:22,22 136:24 137:18 139:5,17 140:4,6 Propria 4:10,15 5:4 proprietorship 12:3 provide 47:21 53:22 provided 57:1 psychology 21:13 public 16:1 Publishing 38:23 38:25 39:3 41:3 69:22,23 70:3 pulling 123:4 purchase 45:4,4 59:25 79:12 purchased 44:8,10 58:15,24 59:4,18 60:4,6 63:22 65:12 68:8 purpose 61:21 purposes 104:8,13 106:20 pursuant 7:1 153:1 push 35:20
---	--	--	---	---

<p>put 19:7,9 22:4,7 25:4,16 26:20 27:5 33:20,25 34:10,14 35:16 36:3 64:25 79:13 101:13 105:21 106:6 107:23 108:17,18 118:21 123:14,17 puts 13:7 32:6 putting 24:8 35:18 97:24 98:1 108:5 111:7 P-C-B 55:6 p.m 152:5 P.O 156:1</p> <hr/> <p style="text-align: center;">Q</p> <p>qualified 154:2 quality 51:10 91:1 92:23 quartered-off 62:10 quarters 49:22 119:7 question 9:10,12,15 9:16 14:20 18:18 20:21 28:17 47:11 52:9,15 53:4,7,13 53:15,18 55:25 65:24 74:15 84:25 87:6 89:4 94:12 94:13 112:3 117:1 122:20 124:5 135:17 138:24 145:14 146:25 147:20 questioned 117:20 questioning 117:23 questions 9:8,9 10:2 53:17 66:7 69:6 73:22 133:21 134:2,10 140:3 142:9 146:5 150:8 155:11 question-and-ans...</p>	<p>9:7 quick 52:2 quickly 149:15</p> <hr/> <p style="text-align: center;">R</p> <p>R 2:1 3:1 4:1 5:1 74:18 rag 25:7 26:21 27:24,25 106:3,8 106:14 107:5 108:6,13 112:15 Ragle 1:9 2:14 149:16,17 rags 27:4 103:25,25 104:8,13,16,19 105:4,10 106:20 107:9 112:22 120:18 RAMI 2:23 ran 40:25 85:15 range 12:20 ratio 124:7 RAY 4:3 reached 118:1 read 43:5,6 51:12 56:12,23 87:8 91:16 125:19 147:9 153:3 reading 155:11 156:14 ready 73:23 123:5 realize 76:15 146:24 realized 151:9 really 8:19 21:19 29:20 35:25 37:4 37:8 55:14 57:21 60:9,20 61:4,6 68:3,11 73:8 81:12 83:8,9 85:9 85:13 90:6,19,25 91:23 92:25 95:7 95:14 97:20 98:14 99:13,14 103:11 107:22 108:4 109:12 120:13</p>	<p>121:13 122:25 125:4 138:11 139:6 145:17,18 150:20,21 reason 49:24 108:22 131:7 reasonable 75:3 reasons 52:21 125:8 recall 7:25 8:1,4 17:20 42:11 56:7 56:11 62:15,19,22 63:1,5 70:17 84:23 85:2,23 88:24 92:6,11 93:13,20 94:15 95:3 99:23 102:8 102:20,22 104:5 110:19 119:8,16 119:19,22 128:20 129:16,19 130:11 130:14,15 135:20 136:8 137:10,22 137:23,24 138:15 138:18 139:3,7 140:5,8,13 143:12 148:4,10,13,17,19 148:23,25 149:4,6 149:10 150:1 received 39:7 42:16 43:3 receiving 42:11 Recess 70:8 130:3 recognize 42:9 recollection 16:7 17:3 59:9,11 60:16 62:18 64:24 67:2,7,8 72:8,16 72:17,25 75:18,19 75:24 79:7 83:21 127:11 138:3 141:7,19 145:18 recommend 150:23 151:7 recommendation 13:12 151:4</p>	<p>recommendations 13:9 record 9:24 17:8 26:1,2 36:22,24 53:11 71:4 74:4 80:11 91:14,15 112:19 130:2 146:20 154:10 recorded 154:7 records 43:10,11 43:15,18,20,24,25 66:16 135:16 136:2,2 recycle 104:20 107:7,15 recycled 104:1 recyclers 104:6 recycling 104:8 105:9 106:21 refer 19:16 71:16 reference 56:20 referred 83:13 97:11 referring 12:23 57:7 75:14 87:15 87:17 118:22 133:16 refresh 72:8,16,17 72:25 refused 156:16,21 regarding 45:4,17 51:14 52:11,20 53:21 142:9 143:7 regardless 65:16 regular 50:20 86:5 99:9 regulations 51:8 regulatory 50:10 50:11 51:13 related 1:15 154:14 relatives 10:12 137:25 relevant 56:16,18 135:12 relocated 77:1 remained 40:6 70:2</p>	<p>remaining 8:25 remember 14:17 15:25 19:15 27:13 29:7,8,15,18 34:24 40:22 59:20 62:1,11,14 64:4 64:14 65:2 68:23 68:25 69:2 73:10 74:2 79:15,16,22 79:24 81:10 83:20 87:25 91:5,23 100:9 101:23,24 106:1 119:3 124:14 125:3,10 132:1 145:17 REMEMBERED 7:1 remind 70:10 remove 30:7 109:10,22 111:14 115:4 rental 84:16 repairing 81:9 repairs 81:6,11 rephrase 10:3 report 8:7,8 117:11 117:14 reported 1:25 124:7 reporter 5:9 7:5 9:11 10:16 51:23 51:24 87:8 91:16 129:25 146:21,24 147:2,7,9,19,23 148:1 154:2,21 Reporting 156:1 represent 7:15 134:9 149:16 require 121:8 required 12:21 25:19,20 rerun 34:13 research 55:1,5,9 55:11 56:12 resided 137:10 residue 106:11</p>
---	--	--	--	--

<p>108:10 resource 44:23 respect 12:14 13:18 13:19 18:18 19:21 19:23 22:10,17 23:23 24:6,23 25:3 29:10 30:18 31:16 32:23,24 34:7 37:17 39:12 44:18 45:7,20,22 46:3 47:8 48:4,10 49:2,9 50:10,11 51:13 52:10,19 53:20,23 54:14,25 55:6 56:9,12 57:13,17 63:14 76:3,14 81:23 82:15 84:6,17 85:3 86:7 89:4,14 90:13,16 98:21 99:2,19 105:13 107:17 108:19 109:1 113:15 114:25 115:3 116:3,4 117:1,11 117:15 121:15 122:20 124:5 130:19 131:8 response 137:2,17 responsibilities 12:14 17:16 21:22 22:10,16 24:6 32:24 34:7 37:17 39:11 responsibility 37:20 117:6 responsible 24:24 68:11 135:23 responsive 43:8 rest 23:16 resulted 50:6 109:24 resumé 11:11 reuse 123:16 revenue 123:23 142:22</p>	<p>revenues 123:25 review 10:17 12:19 42:17 54:16 73:21 133:23 155:9,12 155:14,14 reviewed 51:12 54:21 56:8 Revocable 1:12 revolved 9:1 Richard 1:9 2:14 3:15 149:17 rid 25:21 29:21 35:2 43:18 111:23 right 1:10,11 11:24 17:2,5 26:3 33:17 36:25 46:6 48:12 49:8 53:9 57:4 65:4 67:3,18,21 69:5 70:5 71:18 72:6 73:19 76:13 85:20 96:1,13 104:18 111:11 115:14 119:3 121:22 124:17 125:17 126:25 128:13 130:5 134:21 136:25 138:22 139:19 140:19 143:15 146:16 right-hand 42:20 71:16 ring 106:20 107:9 138:7,13 ringer 107:2,3 Riviera 137:12,16 Road 5:5 Robert 1:4 2:3,17 4:23 138:7,8,13 138:15 149:15 155:5 156:6 rock 36:4 rocking 101:14 Rogers 116:20 role 88:25 roles 89:13</p>	<p>roll 97:25 roller 27:7,10 33:4 106:4 rollers 25:7,16,17 25:23 26:5,15,21 27:6,16 33:3 34:25 82:17 98:6 107:24 108:6,11 108:11,13 111:24 111:25 rolling 101:15 RONALD 1:8 3:4 room 12:25 24:9,11 24:16 29:12 37:2 37:11 45:11 86:25 87:13,19 102:14 Rosenthal 12:5,6,7 12:12,15 13:8,18 14:11,16 50:9 Roseville 4:6 rotate 105:4 routine 75:6 routinely 136:13 Roy 41:21,21,22 58:20 rub 34:9,22 rubber 27:15,17 99:4 108:12 rude 9:22 17:7 rules 9:6 run 23:25 24:7,25 32:8 33:5 40:21 61:2,5 68:8,11 80:20 90:22 91:1 138:14 139:8 running 27:21 67:12 81:9 88:25 97:23 runs 123:24 Russell 131:17</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 2:1,23 3:1 4:1 5:1 6:9 17:22 38:11 Sac 41:3 Sacramento 1:23</p>	<p>7:4 16:2,2,3,4,15 16:17 17:11,20,22 18:3,8,14,22 19:3 19:22 20:1,4,8,11 21:1,14,18,23 22:9,15,21 23:5 23:22 24:15,22 27:11 28:2 29:10 29:23 30:1 31:9 31:16 33:7 35:8 36:13,17,18,20 37:2 38:6,10,20 38:20,23,25 39:3 39:7,8,12,22,23 40:6 43:13 75:20 118:20,23 119:6 119:22 125:1,6 136:15 137:14,15 137:16 138:10 155:3 Safeguard 128:2 138:4 safety 116:3 Safety-Kleen 114:7 114:11,13 Safety-Kleens 114:15 sales 85:14 San 2:16,22 3:11,23 4:21,22 11:15 SANDRA 4:9 Sansome 2:16 save 34:11,12 55:15 55:17 105:22 saved 44:13 55:19 saying 55:6 66:19 151:19 says 75:12 scant 55:13 schedule 10:10 school 11:14,15 15:8 20:19,22 scoop 105:21 107:22 SCOTT 1:19 5:8 7:7 153:12 155:2</p>	<p>156:8 scrape 108:7,11 scraper 108:16,18 109:14 scrapping 108:9 scummy 123:16 search 55:10 seasonally 101:2 second 1:22 7:3 9:19 25:18,19 34:4 35:15 36:23 53:19 94:11 122:11 126:17 145:13 146:19 seconds 35:4 Section 153:1 secured 23:14 SEDGWICK 3:10 see 43:1 61:22 66:6 69:14 71:16 72:2 72:5 74:9,11 101:12 112:19 133:23 seen 73:25 109:17 114:19 120:23 129:13 136:2 137:13 seldom 130:22 sell 14:24 15:2 selling 14:13 38:24 39:2 send 125:2 sent 68:10 104:16 separate 38:19 separated 148:6,21 149:2 services 12:20 13:8 102:2 session 9:8 set 73:9 75:7 97:6,9 98:12 setting 78:19 105:7 105:12 112:7 Severson 1:25 5:9 7:5 154:1,21 SHAMIEH 2:21,23</p>
--	--	--	--	--

<p>SHAMIYEH 2:21 2:23 Sharp 74:20 sheet 13:7 32:3 97:24 98:1,3,5,5 sheeted 98:11 sheets 32:13 sheet-fed 32:14,17 32:18 93:9,11,12 98:15 shelves 113:1 shift 35:15 100:22 101:4 145:13 shifts 100:18 shoestrings 81:14 shook 136:11 shoot 35:18 shop 8:13 59:14,15 137:25 138:5 139:8 140:17 142:5 150:9,10 shops 72:21,24 95:20 101:12 short 26:4 38:12 80:20 90:22 91:1 Shorthand 7:5 154:2,21 show 33:24 showing 133:25 135:8 shows 72:12,18 shredded 43:23 44:1,5,25 sic 78:18 side 46:19,22 62:24 sides 97:24 sidewalk 102:24 sights 151:9 sign 155:12 156:21 signature 155:10 signatures 22:7 signed 156:19 signing 155:11 silver 50:25 51:1 similar 30:23 31:7 143:7</p>	<p>simple 23:13 35:24 simultaneously 55:12 98:6 sin 58:2 sir 13:17 15:17 17:14 24:3 28:25 33:18 40:14 52:9 52:15 56:24 72:16 72:22 94:13 115:17 118:9 146:20 150:4 152:1 sit 88:6 99:12,14,15 110:18 126:3 128:23,24 131:1 site 79:11 83:16,19 sites 51:15 sits 30:23 108:1,2 situation 99:5 six 8:17 22:14 23:21 24:14,20 32:22 44:8 sixty 21:7 six-month 33:6 size 34:18 113:3,4,6 130:15 141:14 skimmed 105:24 sloppy 30:9,13,16 111:6 slow 93:19,19 slower 96:5 slowly 44:13 small 19:14 23:25 24:1,2 59:15 60:20 63:20 79:22 90:6 102:6 113:3 118:1 122:6 126:15 smallest 68:5 Smart 119:9,25 120:1 121:20 smash 107:5 smile 37:4 SMITH 2:15 smoke 115:9,17 smoked 115:16</p>	<p>Smurfit 44:9 Sol 146:8 147:15 Solano 1:2 6:15 45:5 57:10,13,18 58:6,13,16,24 60:5,18 61:8,13 61:17,25 62:2,6 62:16 63:6,9,14 63:21 64:1,9,21 64:22 65:7,11,22 65:25 66:8,14 67:9,14 68:9,16 68:25 69:7,18 70:14,15 72:4,9 73:4,7 74:5 75:1 75:24 76:3,14,20 76:25 77:5,10 78:4 79:1,5,10,12 79:19 80:1 81:4 81:15,23,23,25 82:6,11,18,21 83:2 84:6,7,11,15 84:17 85:3,20 86:9,23 87:10 88:10,13,22,25 89:14 90:16 91:5 91:10,20 92:9 93:7 94:17,24 95:12,24 97:7 98:20 99:20 100:2 100:12,16,19 101:1,5,17,22 102:1,9,17 103:1 103:4,7,9 104:6 104:14,23 105:8 105:15 106:18 107:13,19 108:20 109:9 110:20,25 111:13 112:13,20 113:12,18,22 114:2,5 115:1,8 116:9,16,21 117:16 118:3,24 120:4,10,19 121:4 121:16 122:12,16 123:10,20 124:11</p>	<p>126:4,19 127:14 128:1,11,14 129:8 129:20 130:10 134:17 136:21,23 138:15,20 139:4 139:15 140:15 141:1,4,14 142:3 142:10,13,17 143:3,9,18 144:4 144:15 145:7,14 145:23 146:7,13 147:12 148:5,14 148:20 149:1,7 151:4,13 sold 15:6 43:13 59:16 127:25 128:2 138:3 sole 12:3 solid 101:13,15 solidifies 99:7 solution 29:15 106:8 111:24 112:15 solutions 19:16 solvent 19:8 27:25 28:3 29:4,6 103:23 107:7,8,23 112:16 113:8 121:6,8 122:18 124:6 solvents 14:7 18:23 19:1,4 28:10,16 28:17,18,21 88:20 112:24 113:16 118:3 124:5 138:19 139:3,12 142:19 143:9,17 143:24 144:7,15 144:24,25 145:3 146:8,14 147:14 148:5,13 150:13 150:22 151:12,20 somebody 35:17 86:3 90:21 109:23 117:25 150:19 someplace 30:10</p>	<p>son 138:4,9,10 sons 41:9,17 soon 12:1 51:19 94:13 sophisticated 125:24 sorry 14:22 27:1 44:3 75:22 85:1 89:9 96:10 112:5 119:14 121:7 137:5 sort 31:11 38:9 107:8 sources 47:14 space 62:4 spaces 62:8,9 sparsity 55:3 spatula 123:3 speak 46:3,14 54:6 54:11 speaking 20:5 34:17 44:19 58:8 64:17 66:8 68:25 76:1,13 80:7 83:19 special 125:19 specific 17:1 33:12 129:16 specifically 12:17 13:17 24:5 28:20 31:10 50:23 66:13 86:16 94:15 128:20 specks 27:23 speculate 58:1,12 66:22 95:5 speculated 142:21 speculating 64:2 66:19 151:20,24 speculation 95:17 95:20 121:10 143:20 144:18,19 146:11,18 147:18 148:9 150:15 speed 35:22 36:6 spell 24:3</p>
--	--	---	---	--

<p>spelled 69:14 SPENCER 1:9 3:3 spend 144:23 spending 144:20 spent 143:2,8,14,17 144:7,15 150:12 151:12,20 spill 109:23 spilled 110:20 spills 122:18,21 squirt 25:6 35:3 Sr 41:16,18 58:22 60:4,12,24 65:7 67:9,16 85:18 staff 130:22 136:6 136:7,8 stamps 71:17 stand 87:25 standalone 63:20 standard 59:16 80:18 116:1 125:23 stands 49:24 129:12 Stanford 15:14,15 16:12 20:15,23 start 71:17 147:5 147:24 started 14:15 21:25 22:15,20 23:25 40:21 51:4,6 68:22 91:22,25 96:25 100:3 124:24 125:15,21 126:1 starts 42:23 state 1:1 7:5 8:2,8 50:1,5,15,16 153:2 154:3 statements 124:8 states 72:4 74:9 Stationers 57:10,14 57:18 58:7,25 60:5,19 61:11,14 61:18,25 62:2,6 62:16 63:6,10,14</p>	<p>63:22 64:4,9,22 65:8,11 66:8,17 69:1,7 70:15 72:4 72:10 76:21 79:6 81:23 stationery 77:25 Stationer's 67:7 stay 110:2,14 stays 103:19 stenographically 154:8 step 25:10,12 STEPHEN 1:9 3:3 steps 105:14 stock 23:16,18,20 30:22 32:5 92:17 stocks 23:20 92:19 Stockton 156:2 stop 9:21 119:15 storage 45:13 store 100:6 stored 112:24 113:8,11 122:9,12 135:10 storing 35:5 strange 150:25 strategies 12:19 streaking 30:25 Street 1:22 2:4,16 3:6,11,23 4:21 7:3 17:22 38:11 45:18 45:22 57:8,14 58:8 59:5,24 60:13 61:24 62:7 63:10,19 64:10 65:19,23 66:2 67:10,17 68:19 70:16 72:10 76:23 77:1,7,11 78:6,16 79:3,11 80:2 81:5 81:17 82:3,7,12 82:19,22,24 83:4 84:5,18 85:4,22 86:10,21,24 87:2 87:12,16 88:4,23 89:15 90:17 91:7</p>	<p>91:11,21 92:10 93:8,15 94:16,25 95:11 97:8 98:19 99:21 100:1,13 101:7,18 102:4,10 102:18 103:10 104:8,15 105:11 105:16 106:20 107:14,18 108:21 109:10 110:21 111:14 112:14,21 113:11,17,21 114:3,7 115:2,9 115:24 116:8,18 116:23 118:5,25 120:5,11,20 121:5 121:17 123:11,21 124:2,11 126:6,18 128:14,18 129:8 130:20 131:3,23 132:6,10 134:22 136:24 137:18 138:1,20 139:5,16 140:9,11,14 141:2 141:5,16 142:4,18 143:4,10,18 144:6 144:16 145:4,15 145:16,21,25,25 146:9,15 147:15 148:7,15,21 149:2 149:8,23 151:14 strictly 78:2 79:4 105:20 strike 17:25 20:18 24:21 29:24 39:9 52:7,16,23 54:1 64:7 74:17 92:7 93:6 104:11 106:17 114:23 117:13 123:9 126:9 stripper 33:16,18 35:9 37:1 strippers 33:14,15 strong 106:2 studies 124:7</p>	<p>stuff 17:19 23:13 35:6,18 43:23 44:15,25 78:1,1,2 81:10,13 90:9,21 92:25 99:6 110:4 117:4 136:18 stupid 84:3 111:3 style 53:13 subject 47:25 48:5 48:18 57:6 79:21 134:11 submitted 8:7 subordinate 136:5 subpoena 6:11 43:4 subpoenaed 43:9 subscribe 132:21 subsequent 128:10 substances 19:7 substantial 125:7 substantively 10:21 substrate 13:10 30:19 31:1,2 110:11 sudden 37:25 suit 92:18 Suite 1:22 2:10,16 2:22 4:5 7:3 summer 16:5,6 17:19 18:21 20:4 20:7,10 summers 16:8,18 17:13 18:4,7,14 19:2,24 SUPERIOR 1:1 supervise 89:19 supervisor 89:22 supplied 116:16,21 suppliers 116:15 118:18,22 supplies 88:15 120:9 129:1 supply 13:15 118:23 119:9,25 120:1 121:21 suppose 47:16 145:18</p>	<p>sure 25:4,14 28:11 32:8,10 40:19 43:11 48:25 53:4 57:21,23,24 59:1 62:18 65:25 66:18 66:21 77:23 80:6 80:10 81:12 83:13 88:2 90:19 92:13 92:14 94:6,11 97:22 101:23 106:9,13 109:20 111:8 114:1 121:10 126:7 134:1 135:11 136:25 138:11,17 151:2 surprised 100:5 suspect 136:22 SUZANNE 3:15 switched 93:4 sworn 7:8 154:5 S-m-u-r-f-i-t 44:9</p> <hr/> <p style="text-align: center;">T</p> <p>T 6:9 table 53:8 95:16 tacks 25:22 take 10:8,9,12 22:4 25:7,25 33:20,24 34:9,13,22 36:4 42:24 51:18,23,24 52:1 53:12 69:25 70:6,6 73:21 81:8 89:24 98:7,8 104:2,19 105:5,25 106:3,9 107:23 108:16 109:14 123:16 130:1,1,12 142:19 taken 1:21 7:18 45:8 70:8,11 102:5 105:14 130:3 135:13 155:8 takes 32:7 Takhar-Hidalgo</p>
---	---	--	---	--

<p>155:20 talk 46:25 48:10 99:25 141:14 142:8 talked 47:19 48:9 48:13 60:9 68:14 98:13 120:18 127:12 138:2 talking 26:5 27:7 29:23 31:15 37:10 66:13 70:13 83:17 95:9 105:2 107:2 108:17 121:3 135:6 140:4 tax 43:19,20 65:4 TCA 29:6,8 TCE 29:4 technician 21:13 TEGTMEIER 3:21,21 tell 7:9 8:11 16:23 23:22 33:17 47:8 47:24 48:4 49:19 52:21 53:6 58:2 76:19 95:15 111:2 111:9 128:24 147:4 teller's 125:20 telling 118:10 tenants 62:10,10 100:15 term 28:23 48:12 87:3 97:15,16,17 97:20 terms 10:2 56:20 80:17 98:14 terrible 30:16 terribly 30:9 TERRY 1:8 3:3,5 testified 7:10 testify 154:5 testimony 11:4 52:7,14,24 54:1 87:9 91:17 138:25 141:3 144:4,10 146:6 147:10,11</p>	<p>154:10 tetrachloroethyle... 148:25 Texas 63:19 65:19 80:9 124:2 128:18 133:17 140:11 145:15,16,24 thank 17:10 19:20 21:9 58:2 71:9 98:16,16 109:7 120:2 123:18 133:18,24 139:19 140:12,24 141:11 141:13 142:7,15 143:6 145:1,12 146:3 148:12 149:11 150:4 Thanks 147:23 148:2 theater 61:24 62:3 63:3 140:5 they'd 93:16 102:23,24 thing 9:19 14:4 16:23 19:15 35:25 47:15 51:5 53:6 66:25 75:7 81:13 85:15 138:5 151:8 things 6:13 14:13 16:24 25:5,11 37:5,10 43:15 44:12 50:16 51:5 59:17 65:3 98:25 144:20 151:1 think 9:21 17:7,17 29:3,7,19,20 31:19 44:22 48:24 59:20 60:9 64:3 65:9,15 69:8 70:5 75:9,17 76:19,24 77:25 80:5,16 81:19,21 82:14 85:8 87:1 89:8 90:6 91:12 92:23 94:19,20 95:7 100:5 101:9,10,11</p>	<p>102:23 103:16 104:3 105:3 111:3 111:18 114:19 116:25 117:4 119:9,15 124:14 124:19 127:12 129:25 135:21,23 136:16,17,19 138:8,12 152:3 thinking 66:22 third 71:25 thirty 155:13 THOMAS 5:3 thought 37:5 45:1 48:2,3 59:10,12 62:4 66:7,8 68:24 73:8 91:24 100:6 102:25 119:17 three 24:20 31:20 32:22 33:6 41:10 69:24 83:11 136:7 141:19 145:18 three-man 90:4 three-month 31:24 threw 103:21 thrown 109:15 thrust 125:12 Thursday 1:20 7:2 155:9 tie 40:24 75:2 till 9:10,12 time 8:20 10:8,8,12 14:15 15:5 16:25 18:3 19:2,13,25 20:25 21:11 24:12 25:19 29:9 30:1 31:15,19,24 32:5 32:12,20 35:22,25 36:6 37:7 38:4 39:16,25 41:5 43:19 50:23 53:11 58:15 61:13 62:5 63:6,13,25 64:12 67:25 70:6 73:21 73:22 75:10,20 79:9,10,12 81:4</p>	<p>81:15,17 82:2,6 82:11,18 83:22 84:7,11 85:20 86:13 88:10,13,22 90:20 91:10,19 95:8,20,21 96:21 100:12,25 101:1,5 102:17 103:13,20 104:18,22 105:3 105:15 112:14,20 113:12,17,22 115:7 116:2,9,22 119:19 125:21 126:1 128:3,3 129:8 131:5,6,21 132:19 134:2,20 136:20 137:18 138:14,16,20 140:25 141:18 142:3 144:16 150:11 151:5 154:8 times 8:10,12,17,25 61:16,20 81:20 82:1 title 12:7,9 17:11 17:15 21:17,19 33:12 35:9 37:3 71:25 titles 37:5 today 9:7 11:4,7 13:20 42:8,14 46:2,4 54:7,14,17 54:20 55:2,11 56:9,14 73:21 110:18 126:3 131:1 133:25 token 9:14 10:4 told 10:7 47:10 49:3,5,15,17,18 49:23 toluene 51:14 Tom 133:7 Tomasini 1:10,11 2:14 149:16,20 top 33:25 34:11</p>	<p>35:3 72:21 95:16 98:4 105:24 torn 132:5 tossed 77:25 78:1 total 64:6,8 123:25 144:7 tracks 50:16 trade 20:19,22 traditional 50:24 130:21 train 106:4 108:4 trained 18:15 training 11:13 18:17,20 transcript 10:16,17 10:19 153:3 155:8 155:12,14 156:10 transfer 56:1 transferred 34:3 98:4,8 transition 135:11 trap 40:12,14 trash 103:1 tray 29:16 36:3,4 99:8 trichloroethylene 149:6 truck 118:6,10 120:3 121:19 true 49:24 66:18 87:4 110:8,10 153:5 154:9 truly 155:18 Trust 1:11,12 trustee 1:10,12 truth 7:9,9,10 154:6,6,6 try 17:6 66:22 94:12 105:22 trying 13:16 25:15 29:14,18 34:20 51:9 62:13 64:20 67:1 77:19 115:18 115:18 125:11 136:16 147:3 Turigliatto 5:3</p>
---	---	---	---	---

<p>turn 24:7 35:21 42:19 turned 32:3 turning 32:4 35:21 twenty 22:6 twice 145:20,24 two 12:10 36:19 39:2,20 41:9 44:10 60:21 69:24 72:20 78:18 90:4 98:6 99:16 121:3 124:3 125:6 127:14 136:17 138:8 141:19 142:23 two-color 31:25 32:1,2,21,23 34:19 two-story 100:3 type 13:9,23 14:4 28:3 47:20,24 57:20 59:7 78:19 80:18,19,23 83:7 84:16,21 93:20 101:7 103:16 110:16 113:20,24 121:8 142:10,12 types 23:4 27:10 28:7,15,20 48:5 77:11 90:15 92:6 113:16 117:12 120:21 126:5,12 typically 27:3 92:16 101:12</p> <hr/> <p style="text-align: center;">U</p> <p>uh-huh 9:18,20 26:8 63:17 99:17 100:24 unclear 73:12,14 uncoated 30:22 92:17 understand 9:23,25 10:1,4,25 65:24 68:3 70:12 75:8 94:14 122:2 130:6</p>	<p>130:8 135:7 137:7 understanding 59:4 60:11 63:9 139:9,12 141:3 understood 48:19 56:21 units 31:11 University 15:14 20:16,23 unreasonable 117:19 usable 123:15 use 10:3 13:10 26:16 27:15 31:11 51:4,6 75:7 77:12 80:22 84:18 97:15 105:9,23 108:13 118:24 120:4,22 121:12 124:24 125:18 150:21 usually 13:14 23:19 86:2 99:17 utilize 126:11 utilized 101:17 104:6,13 105:9 108:20 109:8 114:2 120:18 121:3 utilizing 75:25 93:9</p> <hr/> <p style="text-align: center;">V</p> <p>Vacaville 4:16 vague 59:9,11 62:18 75:18 127:11 138:3 143:19 144:9,17 145:5 146:10,17 147:17 148:8,16 148:22 149:3,9 vaguely 114:15 Valley 136:15 Van 116:20 variety 23:16 24:1 various 43:12,15 vendor 103:7 104:19</p>	<p>vendors 104:5 121:18 verbal 9:19 Verga 74:22 verifying 126:8 versus 81:23 viscosity 31:7 viscous 31:3 110:2 110:13 visit 61:21,22 81:25 visiting 150:1 volume 90:7,12 vs 1:6 155:5 156:6</p> <hr/> <p style="text-align: center;">W</p> <p>W 1:8 3:4 wait 9:10,12,14 waived 156:14 walk 88:7 walk-in 87:24 90:21 wall 88:1 Walt 11:16 want 7:17 26:16 40:12 51:18 57:4 57:22,24 58:1,11 66:21 81:21 97:21 101:9 108:10 111:2 134:3 139:21,22 140:25 141:14 142:8 146:4 147:3,7 150:24 wanted 33:24 35:18 40:1 54:20 108:25 115:19,23 124:17 134:12 wash 27:7,10,18,20 106:3 113:21,24 142:10,13 washer 114:11 washers 114:8,14 washes 28:4,7,15 99:19 113:16 washing 107:4 WASLOHN 1:8</p>	<p>3:4 wasn't 23:9 25:11 37:24 55:14 56:15 81:12 83:15 89:7 92:15 95:5,6 97:9 105:24 106:14 waste 103:9,14,14 103:16,18,21,23 wastewater 29:12 water 19:13 29:15 29:20 Waters 116:20 way 25:5 32:25 33:7 37:3 65:4 72:8 111:20 118:13,15 120:15 125:19 126:4,8 128:25 135:8 137:3 139:6 151:11 154:13 web 97:20,23 117:4 webs 50:17 web-fed 93:10 wedding 59:17 week 46:15,15 85:25 86:1,6 99:1 weekend 86:4 Wells 91:9,18,23 125:3,5 went 15:14 21:1,14 33:11 41:22 61:20 68:15 69:6,25 75:6 78:2 100:8 125:20 146:24 147:20 weren't 67:12 90:10 west 2:4,22 4:21 62:24 155:3 we'll 10:9 11:9 24:13 51:21,22 60:5 70:7 86:20 146:23 we're 26:1 36:9,11 51:9 83:16,19 95:9 96:8 105:2</p>	<p>130:5 we've 31:15 44:18 50:17 58:7 62:7 70:11 86:13 87:16 98:17 120:25 121:3 126:11 136:20 140:4 Whalley 68:11,15 69:10,12,13,14,15 69:17 79:17,23,25 80:12 82:14 83:6 88:3,16,17,19,21 90:2 111:12,20 114:25 115:19,23 116:14 117:6,14 118:16 130:17 137:24 138:4,7 141:22 Whalleys 138:8 Whalley's 89:22 whatsoever 55:11 57:12 127:19,23 154:15 William 4:20 41:21 Wilma 74:20 wipe 35:1 wipes 120:21,23 wish 10:8 155:11 155:14 withdraw 14:9 39:10 witness 7:8 10:14 26:18,22 32:19 46:12 54:2 71:21 73:24 91:22 132:1 134:1 136:11 143:22 144:12,19 145:10 147:22 148:10,17,23 149:4,10 150:16 151:24 152:2 154:4,11 156:14 156:16,18,21,23 woman 54:10 137:4 wonder 83:24 wondering 135:9</p>
--	--	--	---	--

word 78:19	16:13 20:3 38:14	105 114:11	154:17 155:1,9	143:23
work 13:25 14:16	39:10 40:7,10,17	11 68:4	156:7	5074 5:5
16:5 17:18 20:5,7	40:23 44:9 60:3,6	1107 1:22 7:3	2025 153:1	530)647-0562 4:12
20:10 21:1,14,25	60:16 64:11 66:5	111 29:6,7	209 156:2,3	54 15:9 16:10,18
23:9,10,12,14	66:10,10,25 67:20	112 2:22	209)367-7055 2:5	55-gallon 120:12
24:7,11 33:2	67:22,22 68:21	12 141:8	210 1:22 7:4	122:4
35:13,14,24 50:8	69:8 73:3 77:8,9	12-page 6:11	220 17:22 38:11	57 16:10,11,19 21:7
89:11 105:1	90:7,12 96:24	1200 93:17 96:3,8	2200B 4:5	58 16:14 21:8
137:25 150:21	124:4 128:5	134 6:3	23-by-35 34:18	5861 4:11
worked 16:6,15	141:16 142:17,23	139 6:4	23-by-35-inch 32:4	
21:12 24:9 28:2	143:3,3 144:6	14-foot 100:11	24 36:8	6
31:16 34:19 40:16	150:12,12	1400 2:16	25th 2:22	60 35:21 36:8,8
80:1 86:3	years 16:3 21:6	1417 3:18		60s 39:8 60:10
workers 136:4	39:21 40:11,13	149 6:4	3	125:22 128:6
working 18:14 19:2	44:10 45:11 60:15	15 137:13	3 1:20 6:15 7:2	600 96:6
22:15,20 24:16	63:11 64:6,8 66:4	150 4:5 6:5 124:1	42:21 73:15,16,20	61 21:8 104:4 105:1
28:9 29:10 32:11	76:15 77:5 83:22	152 153:4	155:9 156:7	612 4:16
52:9 88:5 89:7	135:6,8 137:13	18-foot 100:11	30 23:14 45:10	620 141:5,12
115:24 138:10,15	139:11 141:6,16	1936 11:22	30th 3:11	622 3:6 45:18,22
worry 50:25	143:11 145:19	1954 15:21 16:8	333 3:11 4:21	48:22 57:7,14
worth 124:3		18:4	34th 3:23	58:8 59:5 60:13
wouldn't 27:12	Z	1955 16:8	3430 154:21	61:11 72:10 76:22
30:8 45:11 77:18	zero 140:25	1957 18:5 20:25	3717 2:10	86:16 117:17
77:20 83:10 88:5		1958 15:18,21		132:10 134:20
96:21 104:16	S	1960s 136:20	4	140:14 141:2,13
106:25 107:6	\$4,000 124:3	1961 6:14 20:6,25	4 74:8	141:15 142:4,18
118:16 140:17	142:23	20:25 21:15,17,24	40 45:11 76:15	143:4,10,18 144:6
150:23,24 151:7,9	\$50 143:24 144:8	22:16,20 36:14	156:11	144:16 145:3,21
written 156:11	\$500 143:5	71:5,6 72:7,9,9	405 2:4	145:25 146:8,15
wrong 65:14 76:20		1962 36:19 38:5	408)977-1911 4:22	147:15 148:6,15
109:14 141:4	#	1968 40:23	415)398-3600 3:24	148:21 149:2,8
	#102 155:3	1970 41:24	415)438-6683 2:17	622/630 59:24
	#3430 1:25	1996 15:1	415)781-7900 3:12	61:14,23 62:7
X			42 6:13	63:2,10 64:10
X 6:1,9	1	2	427 155:3	65:23 66:2 67:10
	1 2:16,22 6:11 42:2	2 6:14 70:22 71:1	45 83:22 135:6	67:17 68:18 70:16
Y	42:4,8 142:22	71:11 128:7	477-0837 156:2	77:1,6,11 78:5,16
yeah 12:3 19:17	153:1	142:22	477-0856 156:2,3	79:3,11 80:2 81:5
29:3 48:2 53:3	1st 11:22	2,000 93:17 96:4,8		81:16 82:3,7,12
58:11 71:9 83:5	1:31 152:5	20 22:6 23:14 36:8	5	82:19 83:4 84:5
86:12 96:16,18	10 122:6 130:1	47:1 137:13	5,000 32:13	84:12,18 85:4,21
110:9 112:11	10-minute 70:6	20-by-24 36:9	5-page 6:15	86:14 87:5,16
115:11 119:7	10:04 7:3	20/24 35:23 36:7	5:00 85:24 86:6	88:4,9,14,23
125:15 128:19	100,000 90:7,9,12	200 2:10	50 3:23 143:24	89:15 90:17 91:7
136:1,22 137:20	10113 71:5	200,000 124:1	50s 93:3	91:11,21 92:10
147:5	10117 71:20	2011 1:20 7:2 153:7	500 75:21,25	93:8,15 94:16,25
year 14:24 15:8,17	10120 71:6			

95:11 97:7 98:19	8		
99:21 100:1,13,20	8th 4:21		
101:7,18 102:3,10	8-page 6:14		
102:18 103:3,10	8:00 85:24 86:5		
104:7,15,24	8:00-to-5:00 100:22		
105:10,16 106:20	80s 97:1		
107:14,18 108:21	888 156:2		
109:10 110:21			
111:14 112:14,21	9		
113:11,17,21	9 155:1		
114:3,7 115:2,9	9th 154:17		
115:24 116:8,18	916)780-7008 4:6		
116:23 118:5,25	925)284-0840 2:11		
120:5,11,20 121:5	925)516-4686 3:19		
121:17 122:14,17	94104 2:16		
123:11,21 124:11	94104-2834 3:11		
126:6,18 128:10	94111 3:23		
128:14 129:7	94403 2:22		
130:11,20 131:3	94513 3:18		
131:22 132:5	94533 3:6		
136:24 137:18	94549 2:10		
138:1,20 139:5,16	94558 5:5		
140:4 151:14	95110 4:22		
624 86:18	95240 2:5		
630 57:7,14 58:8	95267 156:2		
59:5 60:13 76:22	95605 155:3		
86:18 132:10	95661 4:6		
134:22 140:9	95688 4:11,16		
65 69:9 75:3	95814 1:23		
650)627-8027 2:23	96 14:19		
6569 3:17	97 8:21		
67 89:11	98 14:19		
68 40:21 89:11	99 14:19		
128:6			
7			
7 6:3 153:4			
70 6:14 41:8			
70s 125:23 128:6			
707)422-8933 3:7			
707)480-2287 4:17			
71 128:7			
712 149:23			
73 6:15			
7312 156:1			
75 84:1			

