

1 their opinion, did you consider cost of developing
2 alternative materials to substitute out for asbestos in
3 making that determination?

4 A I didn't have to because there was no evidence
5 during the journey of the last 40 years that there was
6 a risk. So I didn't have to do that analysis.

7 Q Your analysis of reasonableness is based on
8 the conclusion that there is a risk?

9 A No, actually it was a, it was based on evidence
10 as time moved forward, that there was no risk and they
11 were moving to eliminate the asbestos anyway. The two
12 thoughts or the two processes in motion simultaneously
13 created reasonableness.

14 Q What level of risk of development of
15 mesothelioma would the epidemiology studies that are on
16 Exhibit 15 detect?

17 THE WITNESS: Can I hear that again, please?

18 (Record read.)

19 THE WITNESS: I don't know how to answer that.

20 BY MR. RUCKDESCHEL:

21 Q Would they detect a 1-in-10,000 risk?

22 A Oh, that's your question.

23 Q That is my question. We'll make that my
24 question. And then we can change the number.

25 A I can't see a 1-in-10,000 risk.