

1 years that you worked at Ford, and just, if you
2 can, tell me who was head of the legal
3 department during what years?

4 A It would be spotty. I never really
5 tracked the legal department, who was running
6 what.

7 Q Looking at No. 11, do you know what
8 trade organizations or associations that Ford
9 belonged to over the years? And I say over the
10 years. Let's just say since 1925.

11 A I know some of them probably related
12 to more of the health and safety areas. The
13 trade organizations probably would have been
14 everyone that exists because we had every skill
15 you could possibly imagine somewhere in Ford.

16 Q Let's limit it to the health and
17 safety ones. Which trade organizations did
18 they belong to that had to do with health and
19 safety issues?

20 A Well, people on the Society of
21 Toxicology, American Board of Toxicology,
22 American Board of Industrial Hygiene, AIHA,
23 American Industrial Hygiene Association,
24 Society of Safety Engineers. And there's a
25 couple subgroups of that, and there's some also