

1 witness said he would not rely upon it.

2 So it was my impression that the work product
3 privilege and all of that stuff, the witness said he
4 would not rely upon it, he didn't consider it to be a
5 valid study at this point, then I would see no reason to
6 question him about it.

7 MR. LANKFORD: Thank you, Your Honor.

8 JUDGE KLINE: Fellows, it's been a pleasure.
9 I'm getting off and if you need me you can reach me at
10 one of these phones. You got the numbers, right?

11 MR. RUCKDESCHEL: Yes.

12 (Brief recess.)

13 THE VIDEOGRAPHER: Back on the record. Here
14 begins Tape 3. The time is 2:21.

15 (Plaintiffs' Exhibit 11 was marked for
16 identification by the court reporter.)

17 BY MR. RUCKDESCHEL:

18 Q Dr. Paustenbach, I just handed across to
19 counsel for Ford and General Motors what I've marked as
20 Exhibit 11. Would you identify that document for the
21 record, please, sir?

22 A It's a list of depositions or trial testimony
23 that I gave between August 18th, 2003 and 1990.

24 Q To the best of your knowledge is that
25 document, was that document complete and accurate at