

1 I want to take you a little bit further back
2 and just ask you, would you agree that, ever since
3 friction products were produced as far back as when
4 Ford made a vehicle in 1906, I believe, that asbestos
5 was the material in the brake linings and the friction
6 parts?

7 A Very frankly, that is before my time, and I
8 would presume that the linings would at that time have
9 contained chrysotile asbestos, but I believe some of
10 the very early linings that Ford used on external
11 contracting brakes used other fibers such as lumen and
12 cotton fibers as well.

13 Q But would you agree with me that asbestos
14 has been around in terms of being in brake lining
15 materials for the last 90 years?

16 A Yes, 90 years, that is about right.

17 Q So as far back as when Ford first began
18 manufacturing vehicles, asbestos was the material that
19 was used in brake linings?

20 A Chrysotile asbestos.

21 Q Chrysotile asbestos, okay.