

1 being forwarded, did any of them indicate that Mr.
2 Wood might have been exposed to products other than
3 brake and clutches?

4 A Yes. There was one of the medical reports
5 that indicated that the physician writing the report,
6 at least thought that it was possible that Mr. Wood
7 might have been exposed to debris from construction
8 work.

9 Q Okay. Thank you.

10 A Sure.

11 Q One of the things that industrial hygienists
12 attempt to do is to quantify lifetime exposure?

13 A When we can, yes, sir.

14 Q I think you told me at your deposition that
15 given the number of years that have passed and the
16 lack of specific details, you are unable to do that in
17 this case; is that right?

18 A Yes, sir.

19 Q You would need additional specific facts; is
20 that right?

21 A Yes, sir.