

1 The answer is, "One -- testimony you are
2 talking?

3 "QUESTION: Deposition.

4 "ANSWER: Deposition testimony, might have
5 been two, perhaps three at the most."

6 Did I read that correctly?

7 A That is correct.

8 Q Also, sir, is it not true that you have
9 testified on behalf of General Motors in trial in a
10 brake mechanic case alleging mesothelioma?

11 A Yes, that was either late last year or the
12 beginning of this year when I did not agree to -- I
13 didn't realize I was to be an expert for General
14 Motors.

15 Q Well, I take it you did appear on their
16 behalf in trial on February 1, 1996 in Ohio to testify
17 for General Motors?

18 A Yes.

19 Q Now, you mentioned earlier that you were a
20 mechanic for a few years in the 1950s.

21 Is it fair to say that during that time as a