

1 Q Late 1980s.

2 A No, I don't think so. Not -- there wasn't set --
3 I mean, the question had come up in those -- in that time
4 period, had only come up in a couple or handful of cases
5 that I'd seen.

6 Q Okay. So prior to then, prior to the early -- the
7 late 1980s, would it have been prudent for a manufacturer of
8 asbestos-containing friction products to have warned of the
9 potential dangers?

10 MR. BISHOP: Objection to form.

11 MR. MCGEARY: Beyond the scope of proper report.

12 Ted, can we have the agreement that one objection
13 by one is an objection by all?

14 MR. GIANARIS: Sure.

15 A I think one could make that argument.

16 Q Well, how do you feel about that?

17 MR. BISHOP: Same objection.

18 A It's -- it's difficult -- it's difficult to
19 answer.

20 I mean, one way you can look at it is that at that
21 point in time, in the '80s, asbestos is asbestos is
22 asbestos. And that any asbestos product, no matter what
23 type it was, no matter how well encapsulated it was, should
24 have had a warning on it.

25 And the other way to look at it is, well, that's