

1 Q As far as the installation, does the brand
2 name make any difference in how you would chamfer it
3 or work with it to apply it?

4 A No, not at all.

5 Q When is the first time that you recall using
6 or working around brake lining material manufactured
7 or sold by Borg-Warner?

8 A I imagine early '60s.

9 Q Okay. And how long would you continue to
10 work around brake linings manufactured or sold by
11 Borg-Warner?

12 A Late '70s.

13 Q Can you estimate for the ladies and
14 gentlemen of the jury how many times you sanded or
15 chamfered or cut brake linings manufactured by Borg-
16 Warner?

17 A I wouldn't know how many times I done it.
18 Just about every time I installed brakes on a car.

19 Q How often would you come into contact --
20 over the time period from 1957 to the mid-1970s, how
21 often would you come into contact with brake lining