

1 Was there ever any testing that was -- that
2 you are aware of that was done in the 1930s or the
3 1940s concerning grinding of brakes?

4 A Tests?

5 Q By Ford concerning grinding?

6 A Not that I am aware of, no.

7 Q Are you aware of that Ford knew in the 1930s
8 and the 1940s that it was necessary to grind brakes
9 back then?

10 A Very frankly, I don't know much about the
11 1930s as far as brake system. Virtually all of the
12 documentation from that time period was done when I
13 started work.

14 Q You are not aware of any documentation
15 concerning grinding back in the 1930s and '40s?

16 A The Detroit historical library has some old
17 documents which I have looked at now and then, but
18 those are the only ones I am aware of, rather than
19 specific Ford documents.

20 Q Are you -- you are aware of Ford having
21 service bulletins; is that correct?