

1 measures should be urgently instituted.

2 Do you recall that phrase?

3 A I don't remember that specifically, but
4 something to that effect, yes.

5 Q That is fine. And Rohl said as rapidly as
6 possible?

7 A Very well could have been said, yes.

8 Q You would agree, would you not, that Ford
9 did not put any warnings on any of their after-market
10 asbestos-containing brake products immediately after
11 those studies?

12 A Right, we didn't agree with what they said.

13 Q In fact, we have read to the jury here -- or
14 are you aware that we read to the jury here -- that
15 Ford in their sworn interrogatory answers say that the
16 first time they put caution statements on their brake
17 packages was in 1980?

18 A That sounds like approximately correct.

19 Q Even if we go back to the Hackish and Knight
20 paper that you also relied upon in your direct
21 examination, is it not true that they also urged