

1 exposures to asbestos in a systematic fashion?

2 A I think the inferences from the various studies
3 I summarize in my paper should not be much different
4 from Joe Mallia.

5 Q Those inferences relate to groups of
6 individuals who all will have different work practices?

7 A That's right.

8 Q And there has been no study of individuals
9 with work practices specifically like Joe who filed,
10 blew out, cleaned up in the way he did and worked with
11 cars and trucks?

12 A Oh, you'd be I think incorrect about that. As
13 I said, before, I have no problem using that historical
14 database to predict the risk to Mr. Mallia because
15 those studies were conducted in earlier years when the
16 exposures were higher, when grinding or occurred and
17 blow-out was prevalent. And there was no warnings. I
18 mean you got warnings in his era as well.

19 So the fact that he's got warnings and you're
20 comparing him against a cohort that was more exposed is
21 why I can believe that there is no relationship between
22 his disease and his work as a brake mechanic.

23 Q Which of the studies in your 2003 paper
24 occurred during times when there was substantial
25 grinding in your opinion?