

1 be the same. If you asked me about risk assessment the
2 risk assessment views would be the same. In this case,
3 of course, you have exposure to brake wear debris from
4 heavy equipment as well as autos. So that's a little
5 difference from Matos and Rizzi. It doesn't have any
6 significant impact on my views but it's a factual
7 difference. And, of course, the epidemiology hasn't
8 changed since last week so I would say that would be
9 the same as well.

10 Q Okay. I'd like to work through those each in
11 turn and again just get through the Reader's Digest
12 version of your opinions. So could you tell me,
13 Dr. Paustenbach, in summary fashion your opinions
14 regarding state of the art in this case?

15 A I guess I don't understand the question. The
16 state of the art in this case would be a one-hour
17 dialogue, and I would refer you to my 2004 paper. If
18 you want more than that, then I guess it's up to the
19 lawyers and the judge if you want me to give you a long
20 talk about state of the art.

21 Q I'm not -- if you can't give me a condensed
22 version of it, then that's okay. I'm just asking
23 whether you can.

24 A Sure, of course I can.

25 Q Can you give me a two-minute state of the art,