

1 THE COURT: Mr. Smith, good morning, sir.

2 MR. SMITH: Good morning. Thank you.

3 The Dr. Millette issue needs to be discussed
4 because he needs to get on a plane this afternoon, and
5 if there is a problem, we need to know.

6 THE COURT: All right.

7 You have reviewed the objection submitted by
8 Ford?

9 MR. SMITH: I have.

10 THE COURT: What is your response to the
11 objection stated by Ford?

12 MR. SMITH: Ford's position, essentially,
13 Your Honor, is that we should have tested the Ford
14 brakes in March of this year pretrial. And when we
15 received them, at least the disc brake pads we
16 received from another plaintiff's counsel.

17 Your Honor will recall that we had some
18 difficulty getting brakes from some of the other
19 defendants, and Ford represented to us and to you at
20 that time that they had no brakes. So once they made
21 that representation, we went out and tried to find