

11:22:24:24 asbestos brakes. When you left the Institute in
11:22:32:13 1989, was it your position that anyone who was
11:22:37:15 working with asbestos brakes needed protection?

11:22:42:28 A Yes.

11:22:42:28 Q Protection from breathing in asbestos
11:22:48:03 fibers?

11:22:49:18 A Yes.

11:22:49:18 Q And was that your position because you
11:22:57:21 knew and understood that both the installation and
11:23:03:12 removal of asbestos brakes could present an
11:23:08:12 exposure?

11:23:10:15 A Yes.

11:23:10:15 Q And those exposures could be harmful?

11:23:14:24 A Yes.

11:23:14:24 Q And that harm would include cancer?

11:23:20:03 A One of the harms could be cancer.

11:23:25:13 Q Another harm could be asbestosis?

11:23:29:22 A Yes.

11:23:29:22 Q And you knew that asbestosis was also a
11:23:34:07 potentially fatal disease?

11:23:35:24 A Could be a forerunner of cancer.

11:23:38:00 Q I have a number of documents that I would
11:23:45:09 like to show you and ask you about as it relates
11:23:49:00 to exposure, and then we will talk about perhaps a