

1 did you look at any Ford manuals or conduct any brake
2 service operations?

3 A No, I did not.

4 Q Did you look at any other brake manual,
5 brake service manuals by other suppliers and
6 manufacturers?

7 A No, I don't believe so. Other than the EPA
8 documents which discuss some of the activities.

9 Q Okay. Are you aware that various manuals
10 are put out by companies, including Ford, to tell
11 people how to conduct brake service operations?

12 A I would assume so.

13 Q All right. Can you tell me what a semi-
14 metallic brake pad is, Doctor?

15 A Well, that would be a brake pad that has
16 some metal in it.

17 Q Do you have an understanding as to whether
18 that would be an asbestos-free part?

19 Or do you know?

20 A I don't know.

21 Q Okay. Now, as I understand it, you