

1 they knew or what they should have known, and what
2 they did and what they didn't do as a result of that
3 knowledge.

4 That is why they are negligent. Because
5 this disease, these diseases are preventable.

6 If you can show the industrial hygiene
7 board, please.

8 (Whereupon, charts displayed to the jury.)

9 MR. IGNATOWSKI: Do you remember Dr.
10 Dement's testimony? Known since 1913. Throughout the
11 entire time.

12 Forty-three years before Mr. Grewe is
13 exposed, as Ms. Hines told you, many years before Mr.
14 Wood is exposed. Substitute, if available. Close
15 system, prevent escape of the dust.

16 Do you remember the dust Dr. Dement went
17 through about the precautions to be taken out? Same
18 concept, same principles.

19 Exhaust ventilation, protective clothing and
20 equipment, supervision, educate the worker so they
21 know the precaution so they can make the decision