

1 THE VIDEOGRAPHER: Off the record. The time is
2 9:27.

3 (Discussion off the record.)

4 THE VIDEOGRAPHER: Back on the record the time
5 is 9:28.

6 BY MR. RUCKDESCHEL:

7 Q No. 17, Dr. Paustenbach, requests you produce
8 documents that relate to any draft or outlines or
9 preliminary version or precursors to the brake
10 articles. Have you brought any such documents?

11 A There are none.

12 Q Are there any retainer agreements, this is No.
13 18, confidentiality agreements or other contractual
14 agreements between Ford, General Motors or Chrysler or
15 their attorneys relating to the brake articles you
16 brought?

17 A Not that I'm aware. If they existed they would
18 have been in the hands of Exponent.

19 Q And for No. 19, any documents?

20 A I read that as the same as 18. Is there a
21 difference?

22 Q It's simply between ChemRisk as opposed to
23 between you.

24 A The articles were written before, and published
25 I think before ChemRisk was operating.