

1 BY MR. MCGOWAN:

2 Q Mr. Thomas, are opinions that you testified
3 to regarding asbestos in the 1940s and 1950s, were
4 they based upon any knowledge, specific knowledge that
5 you had about Kaylo?

6 A No.

7 Q So were they based on just general knowledge
8 of asbestos as a fiber?

9 A Right.

10 BY MR. SMITH:

11 Q Mr. Thomas, when you came back to Toledo in
12 the '60s, I understand you became involved in the
13 Kaylo replacement program?

14 A Yes, right.

15 Q What was your role in that program?

16 A I was the number 2 guy in the business, and
17 I was shocked by the fact that there was asbestos
18 fiber being blown around and --

19 BY MR. MCGOWAN:

20 Q Do you understand what I mean by the
21 asbestos replacement program?