

3 This case is about knowledge. That is what
4 it comes down to.

First, with respect to Mr. Wood, it is

18 undisputed that Ford Motor Company manufactured
19 trucks, that Ford knew that those trucks that it
20 manufactured, that Mr. Wood worked around, contained
21 asbestos brakes, both at the time that it left the
1 factory originally and also during any replacement by
2 Ford Motor Company of any brakes.

3 Ford also knew that any replacement brakes
4 would contain asbestos, and that is so throughout the
5 1920s, the 1930s, the 1940s, the 1950s, the 1960s,
6 any replacement brakes whether they were Ford or any
7 other brakes contained asbestos.

8 Ford also knew from their -- Ford also had
9 what is called an instruction book -- and this is
10 blown up and it is in evidence for you -- that was
11 with the Model A cars and trucks.

12 And this case is only applicable to the
13 model trucks because that is the truck Mr. Wood worked
14 around, and this is a 1931 instruction booklet.

15 And in that booklet, we know that Ford Motor
16 Company recommended that when repairs or replacements
17 were necessary, it was important that you get, and
18 they recommended that you get, genuine Ford parts to
19 replace them, and that would include the Ford asbestos
20 parts that would go in this truck.

21 There were also -- if I can get Mr.
1 Hoffman's help with the overhead -- there was also
2 another instruction book that is in evidence, and that
3 is from a 1928 Model A instruction book, and within
4 that it also virtually says the same thing, that Ford
5 recommended that with respect to the Model A trucks
6 and cars that you use Ford replacement parts.

7 In the foreword of that instruction book, it
8 basically says the same thing, that Ford recommended
9 that when repairs are necessary, that you use genuine
10 Ford replacement parts.

11 The evidence also showed us not only did
12 Ford use and have instruction books, but they also had
13 what was called technical service manuals.

14 And those technical service manuals are put
15 out basically monthly, I believe Mr. Anderson told us,
16 and within that monthly service manual, Ford also
17 recommended that grinding be done, all linings should
18 be ground after assembling to show -- so as to secure
19 a uniform braking surface.

20 We know grinding was expected to be done
21 because they had a special grinder for Ford shoes.

1 This is the exhibit Mr. Anderson identified