Mr. Mallia received as a result of working with brakes, the proportion of Caterpillar exposure is vanishingly small or zero?

MR. LANKFORD: Objection, are you talking about occupational, nonoccupational, all?

BY MR. RUCKDESCHEL:

Q All.

A I wouldn't want to say on a percent basis compared to let's say brake wear debris from Ford, General Motors, if you're trying to say on a percent basis which one of the four possible exposures was most significant, I'm going to struggle with that, but I can say the exposures were very, very small as a result of working on Caterpillar equipment.

Q And when you say very, very small you mean in comparison to whatever dose Mr. Mallia received, the Caterpillar dose is a very, very small proportion?

A Well, they are all unimportant but I would say if you had to say relatively on a mass basis of brake wear debris for which there was potential exposure, I would say Chrysler and Caterpillar were awfully small.

Q Okay. Mr. Mallia in his lifetime wasn't just exposed to just brake wear debris, though? He was also exposed to dust from the manipulation of new brakes?

A Yes, and I think he even mentions clutches as